

Final Supplemental Environmental Impact Report 3 for

METRO GOLD LINE

Evaluating Relocation of the
San Dimas Station
Parking Facility

FOOTHILL EXTENSION

Azusa to Montclair (SCH No. 2010121069)

July 2022

APPENDIX E: RESPONSE TO COMMENTS



Foothill Gold Line

Metro Gold Line Foothill Extension Construction Authority

RESPONSE TO COMMENTS

The Draft SEIR 3 was distributed for public review on February 18, 2022 through April 4, 2022, pursuant to CEQA Guidelines Section 15105. A total of 9 comment letters and e-mails were received. According to CEQA Guidelines Section 15088(a), “the lead agency shall evaluate comments on environmental issues received from persons who reviewed the Draft SEIR and shall prepare a written response.” This section provides response to written environmental comments received during the public comment period. Written responses are presented for all comment letters received during the public review period, and are organized chronologically.

Each letter has been assigned a number code, and individual comments in each letter have also been coded to facilitate responses. For example, the letter from State of California Department of Transportation (Caltrans) is identified at Comment Letter 4, with comments noted as 4-1, 4-2, etc. Copies of each comment letter are provided prior to each response. Comments that present opinions about the project or that raise issues not directly related to the substance of the environmental analysis in the Draft SEIR 3 are noted but, in accordance with CEQA, are not required to receive a detailed response. In response to some of the comments received, the text of the Final SEIR 3 has been revised.

Responses to Written Comments Received that Address Environmental Issues Raised in the Draft SEIR 3

Table 1 List of Comment Letters on the Draft SEIR

Letter No.	Agency/Organization/Individual	Date of Letter	Page # of Response
1	Hartney, Aaron	March 10, 2022	3
2	Saldana, Gil & Martha	March 14, 2022	6
3	Witt, Brenda	March 22, 2022	11
4	Edmonson, Miya LDR/CEQA Branch Chief, California Department of Transportation (District 7)	March 25, 2022	19
5	Chris Constantin, City Manager Jeff Malawy, City Attorney City of San Dimas	April 1, 2022	40
6	Morris, Curtis W.	April 2, 2022	72
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8	Looney, Paul	April 3, 2022	81
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From: [Lisa Levy Buch](#)
To: [Hertz, Robert](#); [Koon, Jessica](#); [Chris Burner](#); [Mitch Purcell](#)
Cc: [Laura Langford](#); [Chris Lowe](#)
Subject: [EXTERNAL] DRAFT SEIR COMMENT: Relocation of Gold Line parking
Date: Thursday, March 10, 2022 1:55:54 PM

From: Aaron Hartney <ahartney54@gmail.com>
Sent: Thursday, March 10, 2022 5:37 AM
To: Lisa Levy Buch <LLevyBuch@foothillgoldline.org>
Subject: Relocation of Gold Line parking

Dear Lisa,

Please accept this message as representation of strong opposition and generalized neighborhood concern with the new plan to transition the park and ride to good line parking.

1-1

As has been previously submitted to the city in writing, we continue to be concerned about the safety of residents given increased traffic. In recent months, we have had one child hit and at least two other known near misses. The residential streets of Monte Vista, Commercial and W. Railway have seen a significant increase in traffic with the route modifications that have already been made. Transitioning the park and ride will escalate the situation further.

1-2

Many residents including myself and my family have made life decisions to buy homes in the area, based on trust that the existing Gold Line plans would be adhered to. We question both the integrity of the Gold Line and integrity of our City officials who are seemingly pushing a problem to local residents instead of owning the problem that should have been planned for years ago (relocation of the city yard). This was a budget item and project that was clearly mishandled, and the scramble to come up with a cheaper solution while knowingly creating problems in a primarily residential neighborhood and putting our children at risk (including those who use our streets to access Pioneer park and skate park), calls the city's competence into question.

1-3

If the decision to relocate the Gold Line parking to the existing park and ride is already final, then we strongly challenge the concept to utilize the residential streets as entrance and exit pathways for the parking lot. Doing so would be intentional by the Gold Line and City, and future vehicle vs pedestrian accidents as a result should be considered.

1-4

Please reach out with any questions.

Thank you,

Aaron Hartney
224 W Railway St.
San Dimas, CA 91773

Comment Letter 1: Hartney, Aaron (Resident)

Comment Response 1-1

Opposition of the Project Modifications is noted and will be considered by the Construction Authority.

Comment Response 1-2

CEQA Guidelines no longer require analysis of intersection level of service and instead consider vehicle miles traveled (VMT) as the primary measure of traffic impact. 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).

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 on Commercial Street and Monte Vista Avenue as warranted to reduce potential automobile and pedestrian/bicycle conflicts.

Comment Response 1-3

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 from the currently approved location. The parking lot relocation from the approved location is subject to CEQA review.

Relocating and reconfiguring the San Dimas parking facility from the Approved Project would result in less construction and time to construct. 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.

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 Draft SEIR.

Comment Response 1-4

The reconfiguration of the Park and Ride facility requires additional access to Commercial Street in order to provide adequate access for Park and Ride, Kiss and Ride, and Transit facilities. Supplemental traffic analysis was conducted and found no substantial changes in traffic operations due to the Project Modifications.

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. Additionally, the Construction Authority has committed to work with the City of San Dimas to identify and fund traffic control on Commercial Street and Monte Vista Avenue as warranted to reduce potential automobile and pedestrian/bicycle conflicts.

Koon, Jessica

From: Lisa Levy Buch <LLevyBuch@foothillgoldline.org>
Sent: Monday, March 14, 2022 3:50 PM
To: Chris Burner; Hertz, Robert; Koon, Jessica
Cc: Chris Lowe; Laura Langford
Subject: [EXTERNAL] DRAFT SEIR Comment: Goldline Parking lot

-----Original Message-----

From: g and m sal (null) <gmsaldana1@yahoo.com>
Sent: Monday, March 14, 2022 1:51 PM
To: public affairs <publicaffairs@foothillgoldline.org>
Subject: Goldline Parking lot

We live on 245 West Railway Street in San Dimas, Ca. 19773. We want the Goldline to know that we do not want the parking lot at the Park and Ride location because it would cause multiple problems for the residents of our street. Traffic problems, danger to our children and grandchildren, pedestrian traffic, and more homeless encampments. We would desire that the City of San Dimas would comply with their first proposal and build the lot on Walnut Street. Our home is especially being affected because we are right on the corner of Railway and Cataract and will have a hard time leaving our driveway on Cataract as it is, because of the Goldline overpass behind our house. Please consider the overall problems this will cause for all the residents and hold the City of San Dimas accountable to their original proposal. Thank you, Gil and Martha Saldana

2-1
2-2

Comment Letter 2: Saldana, Gil & Martha (Resident)

Comment Response 2-1

Opposition of the Project Modifications is noted and will be considered by the Construction Authority.

As discussed in Section 3.2.6, a supplemental traffic analysis was conducted and found no substantial changes in traffic operations due to the Project Modifications.

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 long-term 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.

Comment Response 2-2

The proposed Project Modifications do not include any changes to project features in the vicinity of the Railway and Cataract intersection, therefore no changes in access are anticipated as a result of the Project Modifications.

CEQA Guidelines no longer require analysis of intersection level of service and instead consider vehicle miles traveled (VMT) as the primary measure of traffic impact. However, a supplemental traffic analysis was conducted and found no substantial changes in traffic operations due to the Project Modifications. The traffic analysis found an increase in delay of 7.7 seconds at San Dimas Ave/ Railway St and 4.5 seconds at San Dimas Ave/ Commercial Street, however, both intersections will remain at a traffic level of service A or B (the lowest levels of traffic delay).

From: Brenda Dalton <gymnasticcoach@hotmail.com>
Sent: Tuesday, March 22, 2022 10:37 AM
To: Lisa Levy Buch <LLevyBuch@foothillgoldline.org>; Brenda Dalton <gymnasticcoach@hotmail.com>
Subject: SEIR Report

Dear Lisa Levy Buch and Foothill Goldline,

I oppose the moving of the proposed Gold Line Parking Facility!

3-1

Railway Street is frequented by families with strollers, skate boarders, children, families riding their bikes and people walking their dogs.

3-2

The added traffic, trash and added parking issues on Railway Street by moving the Gold Line parking to the Park and Ride will ruin our hometown, tranquil feeling of living on Railway Street in San Dimas. Undoubtedly, this will impact my mental health and wellness.

I am a single, retired female fearing that the increased traffic, both pedestrian and auto will also impact my personal safety. There have already been encounters with homeless people yelling at me and tormenting my dog as I am on my front porch with my friends. My home has been broken into.

3-3

In addition, the approved location at the current City Yard Site is in a commercial-industrial area that is more suitable for expansion than the Park and Ride that is in a residential area.

3-4

I purchased my home (new construction) on Railway Street February 1 of 2007. At that time, I was aware that the Gold line would be built over the north wall in my backyard. Since I was aware of that at that time, then certainly the City of San Dimas was aware of that as well. The proposed parking lot for the Gold Line was already planned to be near the San Dimas Sheriff's station. Now, 15 years later, the City is claiming to want to move the Gold line parking lot to save them money. Knowing what the City knew 15 years ago, they should have been planning to address the movement of their City yard lot to a new location. Because they have failed to

3-5

budget and move their lot, now their solution is to modify the Park and Ride to make it the Gold line parking lot without any consideration to the families that live on and around Railway Street. They are also proposing to keep the entrance and exit onto Railway Street!
15 years ago, I invested in my home based on the existing plan of the parking facility being by the Sheriff's station. If I had wanted to buy a home that constantly had automobile traffic, I would have bought a home on Bonita Avenue. I paid a premium price to purchase a newly built home on Railway Street, not Bonita Avenue.

3-5
(Cont.)

I have since retired and am unable to afford to buy a new home somewhere else. This was to be my forever home.

3-6

Since the beginning of construction at Cataract and Bonita, there has been a documented increase in the traffic on Railway Street. Many of the cars and motorcycles are travelling at a high rate of speed. Sitting on my front porch, talking to the neighbors walking by and enjoying my home in San Dimas, was once a peaceful place to be. Now, many times, as I am trying to relax on my porch, I feel agitated due to the amount of traffic that we have. By making the Park and Ride the Gold line parking lot, all of the traffic, both by cars and pedestrians will increase my stress and anxiety which will be detrimental to my well-being.

3-7

My neighbors and I are concerned about the safety of our children and grandchildren playing in the front yard. We already have numerous homeless people walking up and down the sidewalk and in the street. With the Gold Line parking relocating to the Park and Ride, this will greatly increase the number of homeless people walking up and down Railway Street and will also increase trash that will be thrown on our street and in our yards.

3-8

These problems cannot be mitigated by policing and speed humps.

3-9

As a single female, I fear that this increased pedestrian traffic will result in a threat to my personal safety. Movement of the parking facility undoubtedly would negatively impact my home and quality of life.

3-10

In contrast, leaving the Gold Line parking lot close to the Sherriff's department, in an area that is already an industrial area and with closer access to the Gold Line station would bring the Railway neighborhood back to being the neighborhood where we all chose to live. This proposal should not be considered for a residential neighborhood when there is a commercial-industrial area that had already been approved many years ago (before I purchased my home).

3-11

During the Gold Line Virtual Public Scoping Meeting, the majority of callers wanted the City to stick with the original location, one caller went on to call it "a betrayal by our city."

3-12

Please do not move the Gold Line parking to the Park and Ride. The City needs to move the City yard, and stick with the original approved parking facility. This was NOT on the Cities radar when many of us made the choice to purchase a home on Railway Street.

3-13

We cannot move our homes! Please save our neighborhood and preserve our quality of life.

3-14

Sincerely,
Brenda Witt
221 West Railway Street
San Dimas, CA 91773

Comment Letter 3: Witt, Brenda (Resident)

Comment Response 3-1

Opposition of the Project Modifications is noted and will be considered by the Construction Authority.

Comment Response 3-2

CEQA Guidelines no longer require analysis of intersection level of service and instead consider vehicle miles traveled (VMT) as the primary measure of traffic impact. 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).

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 will work with the City of San Dimas to identify and fund traffic control on Commercial Street and Monte Vista Avenue as warranted to reduce potential automobile and pedestrian/bicycle conflicts.

The supplementary traffic analysis conducted does not anticipate significant changes in traffic volumes on Railway St that would result in safety impacts. Traditional traffic demand assignment dictates that drivers will use higher-classification streets (such as San Dimas Avenue) over minor access road (such as Railway and Monte Vista) when LOS operations are acceptable and can facilitate the demand without major delays. The traffic analysis results indicates that the LOS on San Dimas will be acceptable, which indicates 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.

Comment Response 3-3

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. With the incorporation of mitigation measures SS-3 through SS-10, long-term impacts of the Project Modifications would be no greater than those identified by the 2013 FEIR and subsequent environmental actions. No new or more severe significant impacts would occur. 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.

Comment Response 3-4

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. The Project Modifications would be constructed on the existing parking lot and the western portion of Freedom Park which is zoned as “Creative Growth”, as compared to the previously approved site which consists of industrial land use. The Project Modifications would be consistent with existing and planned land uses and development of the reconfigured parking facility would not prevent future re-development that could include additional features permitted in the Creative Growth zoning designation. Additionally, the Project Modifications would not physically divide an established community; therefore, impacts would be less than significant.

Comment Response 3-5

The Project Modifications are proposed in a location already utilized as a park and ride facility and will be designed in accordance with Metro design criteria to include elements of landscaping and fencing as appropriate along the perimeter of the property. The Construction Authority will also work with the City of San Dimas to identify and fund traffic control measures to increase safety on surrounding streets. The City of San Dimas also has the authority to prohibit traffic on Railway St between Cataract and Monte Vista if desired.

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.

The supplementary traffic analysis conducted does not anticipate significant changes in traffic volumes on Railway St that would result in safety impacts. Traditional traffic demand assignment dictates that drivers will use higher-classification streets (such as San Dimas Avenue) over minor access road (such as Railway and Monte Vista) when LOS operations are acceptable and can facilitate the demand without major delays. The traffic analysis results indicates that the LOS on San Dimas will be acceptable, which indicates 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.

Comment Response 3-6

The Project Modifications would not displace existing housing units to construct the reconfigured San Dimas Station parking facility. No new or more severe significant impacts would occur. Refer to Comment Response 3-5.

Comment Response 3-7

Existing mitigation measures CTR-1 through CTR-3 as identified in the 2013 FEIR and subsequent environmental actions address short-term construction impacts related to traffic and remain applicable to the proposed Project Modifications. The City of San Dimas also has the authority to prohibit traffic on Railway St between Cataract and Monte Vista if desired.

CEQA Guidelines no longer require analysis of intersection level of service and instead consider vehicle miles traveled (VMT) as the primary measure of traffic impact. 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).

The supplementary traffic analysis conducted does not anticipate significant changes in traffic volumes on Railway St that would result in safety impacts. Traditional traffic demand assignment dictates that drivers will use higher-classification streets (such as San Dimas Avenue) over minor access road (such as Railway and Monte Vista) when LOS operations are acceptable and can facilitate the demand without major delays. The traffic analysis results indicates that the LOS on San Dimas will be acceptable, which indicates 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.

Comment Response 3-8

Consistent with the 2013 FEIR and subsequent environmental actions, CPTED features would be incorporated in the Project Modifications to provide a safe, secure, and comfortable transit system. 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. Implementation of the mitigation measures identified in the 2013 FEIR and subsequent environmental actions would reduce long-term impacts associated with the Project Modifications to less than significant (SS-3 through SS-10).

Comment Response 3-9

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 long-term impacts associated with the Project Modifications to less than significant.

Comment Response 3-10

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 will work with the City of San Dimas to identify and fund traffic control on Commercial Street and Monte Vista Avenue as warranted to reduce potential automobile and pedestrian/bicycle conflicts.

Please refer to response 3-8 for additional information related to CPTED design principals that will be incorporated into the Project Modifications to address safety and security.

Comment Response 3-11

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 4.11.3.4, 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. Furthermore, building a parking facility adjacent to the existing Project ROW is consistent with the San Dimas General Plan.

Comment Response 3-12

Preference for the Approved Parking Facility as included in Draft SEIR 2 has been noted and will be considered by the Construction Authority.

Comment Response 3-13

Opposition of the Project Modifications and preference for the Approved Parking Facility as included in Draft SEIR 2 has been noted and will be considered by the Construction Authority.

Comment Response 3-14

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.

DEPARTMENT OF TRANSPORTATION

DISTRICT 7
 100 S. MAIN STREET, MS 16
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*Making Conservation
 a California Way of Life*

March 25, 2022

Lisa Levy Bunch, CCO
 Metro Gold Line Foothill
 Extension Construction Authority
 406 E. Huntington Drive, Suite 202
 Monrovia, CA 91016

RE: Metro Gold Line Foothill Extension
 Phase 2B - Azusa to Montclair
 Draft Supplemental Environmental
 Impact Report (EIR)
 SCH # 2010121069
 Vic. LA-Multiple
 GTS # 07-LA-2018-03868

Dear Lisa Levy Bunch:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced Draft Supplemental EIR. The Project Modifications include relocation of the proposed parking facility at the San Dimas Station from the previously approved location to a new location south of the project right-of-way between Monte Vista Avenue and San Dimas Avenue. The Project Modifications are proposed as a result of coordination conducted between the City of San Dimas and the Construction Authority. The Metro Gold Line Foothill Extension Construction Authority is the Lead Agency under the California Environmental Quality Act (CEQA).

4-1

The proposed project is located approximately a mile away from State Route 57 (SR-57) and Interstate 210 (I-210). It is also located approximately 2.5 miles from the State Route 66 (SR-66) and 5 miles from the SR-57 and Interstate 10 (I-10) interchange.

4-2

After further review of the Draft Supplemental EIR, Caltrans has the following comments:

- The reconfiguration and relocation of the San Dimas Parking Facility from the currently approved location to south of the right of way between Monte Vista Avenue and San Dimas Avenue did not reveal any significant safety impact to the SR-57, which is the closest State Facility.

4-3

- The new traffic signals should be synchronized with the railroad crossing. However, Caltrans would like to be informed of any additional impacts to our facilities should it occur during construction or after rail service commences.

4-4

The following information is included for your consideration.

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Senate Bill 743 (2013) has codified into CEQA law and mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. You may reference the Governor's Office of Planning and Research (OPR) for more information:

4-5

<http://opr.ca.gov/ceqa/updates/guidelines/>

The proposed project may conduct its own analysis to determine significant traffic safety impact. If potential safety impacts are identified, the following preferred traffic safety impact mitigation may be recommended as mitigation:

- Transportation demand management programs to reduce the traffic safety impacts, which may include increased transit access, commute trip reductions such as rideshare programs, shared mobility facilities (bicycle or vehicular), increased bicycle and pedestrian infrastructure.
- Investments to existing active transportation infrastructure, or transit system amenities (or expansion) to reduce the project's traffic safety impacts; and/or
- Potential changes to the ramp terminal operations including, but not limited to lane reassignment, traffic signalization, signal phasing or timing modifications, turn lane extensions to mitigate safety impacts from project traffic.

4-6

As a reminder, VMT is the standard transportation analysis metric in CEQA for land use projects after July 1, 2020, which is the statewide implementation date.

4-7

For this project, we encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements. For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). This reference is available online at:

4-8

<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

You can also refer to the 2010 *Quantifying Greenhouse Gas Mitigation Measures* report by the California Air Pollution Control Officers Association (CAPCOA), which is available online at:

<http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

4-9

Please be reminded that any work performed within the State right-of-way will require an Encroachment Permit from Caltrans. Any modifications to State facilities must meet all mandatory design standard and specifications.

4-10

Any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.

4-11

If you have any questions, please feel free to contact Karen Herrera, the project coordinator, at Karen.Herrera@dot.ca.gov and refer to GTS # 07-LA-2018-03868.

4-12

Sincerely,

Miya Edmonson

MIYA EDMONSON
LDR/CEQA Branch Chief

cc: State Clearinghouse

**Comment Letter 4: Edmonson, Miya
(LDR/CEQA Branch Chief, California Department of Transportation [District 7])**

Comment Response 4-1

Comment includes introductory remarks. No environmental concerns or issues are described, therefore, no response is needed.

Comment Response 4-2

Comment is describing the location of the Project Modifications and nearby freeway interchanges. No environmental concerns or issues are described, therefore, no response is needed.

Comment Response 4-3

Comment confirms no safety impacts to SR-57 would occur as a result of the Project Modifications. No environmental concerns are discussed, therefore, no additional response is needed.

Comment Response 4-4

Traffic signals will be synchronized with the railroad crossings, and Caltrans will be informed of any additional impacts to their facilities.

Comment Response 4-5

Reference to SB 743 is discussed in Section 3.1.1. Impacts related to VMT resulting from the Project Modifications is described in Section 3.1.2.3, confirming the proposed new parking facility would be reconfigured to accommodate the same number of parking spaces as in the currently approved parking location east of the San Dimas Station platform. Therefore, no change in parking demand or ridership levels are anticipated due to the Project Modifications. In turn, VMT would not be impacted due to the Project Modifications.

Comment Response 4-6

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 will work with the City of San Dimas to identify and fund traffic control on Commercial Street and Monte Vista Avenue as warranted to reduce potential automobile and pedestrian/bicycle conflicts. The proposed parking lot relocation would not change any Caltrans ramp operations.

Comment Response 4-7

Reference to SB 743 is discussed in Section 3.1.1. Impacts related to VMT resulting from the Project Modifications is described in Section 3.1.2.3, confirming the proposed new parking facility would be reconfigured to accommodate the same number of parking spaces as in the currently approved parking location east of the San Dimas Station platform. Therefore, no change in parking demand or ridership levels are anticipated due to the Project Modifications. In turn, VMT would not be impacted due to the Project Modifications.

Comment Response 4-8

The Construction Authority and Metro will continue to incorporate ITS and TDM strategies into all transit projects in accordance with the Federal Highway Administration's (FHWA) Integrating Demand Management. Note that the proposed parking lot relocation would not change the Park & Ride patron demand at this station compared to the previously approved project and, therefore, would not trigger the need to revise these strategies.

Comment Response 4-9

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. Additionally, 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 been 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. As such, the Project Modifications would not cause significant long-term impacts related to GHG emissions and no additional mitigation is required.

Comment Response 4-10

The Project Modifications would meet all state mandatory design standards and specifications. The Project Modifications do not include work within State right-of-way.

Comment Response 4-11

The Project would acquire all necessary permits, as needed. Timing for specific construction activities would be developed in accordance with all existing mitigation measures.

Comment Response 4-12

Comment provides contact information. No environmental concerns or issues are described, therefore, no response is needed.

City Council

Emmett Badar, Mayor
Eric Weber, Mayor Pro Tem
Denis Bertone
John Ebner
Ryan A. Vienna

City Manager

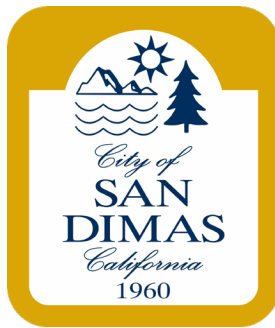
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April 1, 2022

Lisa Levy Buch, Chief Communications Officer
Metro Gold Line Foothill Extension Construction Authority
406 E. Huntington Drive, Suite 202
Monrovia, CA 91016-3633

Subject: Comments on Draft Supplemental EIR (DSEIR) Metro Gold Line Extension Phase 2B – Evaluating Relocation of the San Dimas Parking Facility

Dear Ms. Buch:

Please allow this letter to serve as the City of San Dimas' comments on the above-referenced Draft Supplemental Environmental Impact Report 3 ("Draft SEIR 3") for the relocation of the San Dimas parking facility. This letter follows a letter previously submitted to Metro Gold Line Foothill Extension Construction Authority (the "Authority") on November 17, 2021 regarding the Notice of Preparation of the Draft SEIR 3, which raised significant concerns about the relocation of the parking facility from the City Yard to the proposed Park and Ride location on the City and its community.

5-1

Despite our efforts to work with Metro Gold Line to address the impacts on the City and the surrounding community, the Draft SEIR 3 does not adequately address our concerns, as detailed below.

5-2

Project Description

1. The Draft SEIR 3 does not accurately describe the proposed Project Modifications. The Project Description states the "Project Modifications also include roadway improvements to accommodate vehicles accessing the parking facility along Commercial street". However, no specific information regarding these improvements is provided. Further, there is no mention of the modifications to Freedom Park that are proposed. The Project Modifications would result in a portion of the existing Freedom Park site to be improved with an access road. Additionally, the Kiss and Ride Drop Area appears to further encroach into Freedom Park, which is not disclosed in the Project Description. Additionally, throughout the Draft SEIR 3, reference is made only to the existing Park & Ride lot when discussing the Project Modifications. As a result, it is unclear if the Draft SEIR 3 adequately assesses impacts as they relate to the proposed improvements and

5-3

the conversion of a portion of Freedom Park to an access road.

5-3
(Cont.)

2. Draft SEIR 3, Page 3-20, Traffic Circulation, incorrectly states the primary entrance for Park & Ride and Kiss & Ride access will shift from Walnut Avenue to San Dimas Avenue. Entrances to the parking lot relocation are located on Commercial Street and Monte Vista Avenue which are residential streets.

5-4

3. Draft SEIR 3, Page 4, Project Modifications, incorrectly states that “Access will occur only from the western side (San Dimas Avenue) of the station platform. No access to the San Dimas station will be provided from the eastern (Walnut Avenue) side of the platform as a result of the station parking facility”. Pedestrian access from Walnut Avenue was not directly connected to the Park and Ride located at the Maintenance Yard. In fact, the only direct access to the station for Park and Ride patrons under that proposal design layout was via a subterranean pedestrian tunnel (under the Metro Line track) that connected directly to the center platform at the station.

5-5

While the project modification does not incorporate First/Last Mile Plan around the relocated station parking, the City feels strongly that the Authority should reinstate the pedestrian connection to the station from Walnut Avenue as originally planned because the previous layout was independent of the station parking. In addition, this connectivity to Walnut Avenue is within the Authority’s construction work areas and should be constructed as part of the project because it provides access for residents living on the east side of the station.

4. Figure 1-3 fails to identify the correct parking lot footprint as it does not depict the location of the proposed access road or exit for the Kiss and Ride Area. In reviewing an EIR, a paramount consideration is the right of the public to be informed in a manner that enables it to intelligently weigh the environmental consequences of any contemplated action and have an appropriate voice in the formulation of any decision. An accurate, stable and finite project description is required for an informative and legally sufficient EIR. Because of the importance of the project description, when the project changes significantly, the failure to prepare a subsequent or supplemental EIR deprives the public, who relied on the EIR, of information and meaningful participation. (*City of San Jose v. Great Oaks Water Co.* (1987) 192 Cal.App.3d 1005, 1017.) The Draft SEIR 3 fails to meet these requirements.

5-6

In addition, the Draft SEIR 3 fails to include in its review the two parcels located at the intersection of Bonita and Cataract, Assessor Parcel Numbers 8390-021-915 and 916. As indicated by the Letter of Intent between the Authority and the City, these parcels are included in the new parcels to be acquired and likewise subject to the requirement that the Authority secure all CEQA approvals necessary for the use of the parcels. The requirements of CEQA cannot be avoided by piecemeal review, which results from chopping a large project into many little ones, which cumulatively may have substantial impact and perhaps disastrous consequences. (*Rio Vista Farm Bureau Center v. County of Solano* (1992) 5 Cal.App.4th 351, 370; *Environmental Prot. Info. Ctr. v. Cal. Dept. of Forestry and Fire Prot.* (2008) 44 Cal. 4th 459, 503.)

5-7

Moreover, failure to purchase and utilize those two parcels for station parking/access is a violation of the Letter of Intent, as the Letter of Intent requires the parties to “work together in good faith toward execution of a mutually agreeable purchase and sale agreement” for those two parcels.

5-8

By failing to include the two parcels on Bonita and Cataract, the Authority is piecemealing its environmental review of the proposed modification without the legally required environmental review of the project's impacts. An inaccurate or incomplete project description undermines CEQA's purposes because it thwarts a full analysis of project impacts, thus minimizing the project's effects. (*City of Santee v. County of San Diego* (1989) 214 Cal.App.3d 1438, 1454; *San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 656.) Thus, when an EIR gives "conflicting signals to decision-makers and the public about the nature and scope of the activity being proposed," the courts have found it "fundamentally inadequate and misleading." (*San Joaquin Raptor Rescue Center*, 149 Cal.App.4th at 655-56.) The Draft SEIR 3 has the type of truncated project review that CEQA prohibits and creates uncertainty about the project's impacts.

5-9

Transportation and Parking

In our prior letter, we expressed our significant concern regarding the reduction in the number of parking spaces in the proposed relocated parking facility, as well as concerns regarding pedestrian routes and the impact on traffic in the residential neighborhoods in the vicinity of the proposed parking facility. The Draft SEIR 3 fails to adequately analyze and mitigate these concerns.

5-10

Meaningful analysis of impacts effectuates one of CEQA's fundamental purposes: To "inform the public and responsible officials of the environmental consequences of their decisions before they are made." (*Laurel Heights Improvement Ass'n v. Regents of the Univ. of Cal.* (1993) 6 Cal.4th 1112, 1123.) To accomplish this purpose, an EIR must contain facts and analysis, not just an agency's bare conclusions. (*Citizens of Goleta Valley v. Bd. of Supers.* (1990) 52 Cal. 3d 553, 568.) An EIR's conclusions must be supported by substantial evidence. (*Laurel Heights Improvement Ass'n*, 47 Cal.3d at 409.) The Draft SEIR 3 is vague and lacks supporting documentation to adequately assess Transportation impacts. The items detailed in the City's response below address concerns, but the City cannot fully evaluate the Draft SEIR 3 without additional studies and information that was not provided.

5-11

5. The Draft SEIR 3, under Section 3.2.7, Long Term Parking Impact, indicates that no parking impact will result from the station parking relocation. On the contrary, relocating the Gold Line Station's proposed 289 parking spaces to the existing Park and Ride location would result in the loss of an additional 175 valuable parking spaces (existing spaces not being accommodated or accounted for with the Gold Line Parking relocation to the City's Park and Ride) in the heart of San Dimas' historic downtown.

This loss of crucial and irreplaceable parking spaces in the downtown area would not only adversely and negatively affect the downtown businesses, but also impact the community at large. The City hosts various annual parades, car shows, bike races, as well as the Memorial Day and Veterans Day observance days at Freedom Park. With the immediate loss of this daily available critical parking to the community any time of year, where do these patrons, visitors and attendees park?

5-12

The Draft SEIR 3 fails to address the adverse and negative impact on the loss of this critical and daily available parking and its subsequent affect to the immediate neighborhood, businesses, community, and community at large.

As previously mentioned, the Draft SEIR 3 acknowledges that the existing Park & Ride facility with 175 parking spaces serves as the patron parking for the bus lines, but does not discuss the removal of the parking spaces during construction. Thus, the short-term impacts on the circulation system have not been considered. In addition, the Draft SEIR 3 fails to consider the current use of the parking facility by patrons of the Downtown businesses and the businesses themselves. The Draft SEIR 3 does not adequately analyze the impacts resulting from the loss of these parking spaces, narrowly relying on its use by patrons of Foothill Transit only.

5-13

In addition, the Draft SEIR 3 does not adequately address the increased traffic on surrounding residential roadways to access the parking facility, and the Authority's conclusion that drivers will typically use major streets is not substantiated. "To facilitate CEQA's informational role, an EIR must contain facts and analysis, not just the agency's bare conclusions or opinions." (*Habitat & Watershed Caretakers v. City of Santa Cruz* (2013) 213 Cal.App.4th 1277, 1303.) An EIR's conclusions must be supported by substantial evidence. (*Laurel Heights Improvement Ass'n v. Regents of the Univ. of Cal.* (1988) 47 Cal.3d 376, 409.)

5-14

Moreover, there is a potential design hazard related to vehicles queueing at the San Dimas Avenue/Commercial Street traffic signal, which needs to be fully analyzed and addressed. The preparation and function of an EIR is to ensure that government officials who decide to build or approve a project do so with a full understanding of the environmental consequences. Equally important, the public is assured those consequences have been taken into account. (*Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 449; *Citizens Against Airport Pollution v. City of San Jose, supra*, 227 Cal.App.4th at 796.)

5-15

Additionally, traffic delays with the proposed relocation of the parking facility, as well as deficiencies and inaccuracies related to pedestrian access need to be analyzed and mitigated. CEQA requires the Authority to evaluate the project's traffic safety impacts on pedestrians, cyclists, and transit riders. (See *City of Maywood v. Los Angeles Unified Sch. Dist.* (2012) 208 Cal. App. 4th 362, 392-95 (holding EIR was inadequate because it failed to analyze and mitigate project impacts on pedestrians).)

5-16

6. The loss of an approximately 2.25-acre Park and Ride property in the City's downtown would also result in the City losing its potential to develop this land for housing needs or TOD. A development that provides a balance of both community parking and housing provides more vibrancy to the downtown. Quite likely, based on current development proposals, this property may be developed with up to 52 residential units with ample parking available for the community.

5-17

7. The Authority states that, based on coordinated internal discussions between them and Foothill Transit, commuter bus lines 492 and 499 would not operate to downtown Los Angeles once Phase 2B is completed and operational to Pomona.

a. The planned projected completion of Phase 2B is estimated to be mid-2025, plus another 6 months or more for Metro to render the service fully operational (which is approximately 4 years away). In the meantime, where do patrons of the community park or get picked up during the construction of the station parking?

5-18

Has the Authority made any parking provisions for these commuters during this interim period as part of so-called coordinated arrangement with Foothill Transit? What are the short-term impacts on the circulation system associated with vehicles that currently utilize the San Dimas Park & Ride facility being diverted to a different location within the City?

5-18
(Cont.)

- b. With the Authority stating that Foothill will cease bus lines 492 and 499, does this imply that commuters will now have only one mode of public transportation to Downtown Los Angeles to choose from? With the opening of the I-10 Freeway express lane projected by end of 2023, the estimated commute time to Los Angeles will be much shorter than Metro’s projected time to Downtown Los Angeles. Why will this alternative bus mode of transportation cease and, if so, where do these commuters park during the two-year gap of Phase 2B opening?

5-19

In addition, this parking facility is not limited or restricted to patrons of Foothill Transit and is available to rideshare, vanpool, etc., as well as serving as additional parking for the Downtown businesses and patrons. Without replacement of the existing 175 spaces, parking will be constrained, impacting Downtown businesses and adjacent residential neighborhoods. The reduced parking provided for the station is already likely to result in overflow parking onto adjacent residential neighborhoods, as acknowledged by the need for Parking Management Plans (PMPs). The removal of existing parking spaces that would occur with the Project Modifications would exacerbate this impact. The Draft SEIR 3 does not adequately analyze the impacts resulting from the loss of these parking spaces, narrowly relying on its use by patrons of Foothill Transit only.

5-20

- c. The Authority has stated that an internal coordination or agreement has been concluded with Foothill Transit to cease operation of lines 492 and 499. Has this been discussed with the Foothill Transit Board? Are there any formal approvals in place? Why was the City not involved as part of this discussion? In fact, according to a June 25, 2021 Foothill Transit Board Executive Board Meeting staff report, the report states that the use of the City’s Park and Ride for station parking will necessitate Line 499 being realigned to an alternate location for customers who currently utilize Line 499 at the park and ride. No action has or is being considered to cease operations of the lines, but rather, the consideration of the City’s Park and Ride for Project parking will impact the location, traffic, and parking impacts for Foothill Transit passengers and as such has not been considered in the Draft SEIR 3. Further, according to the Foothill Transit leadership, Foothill Transit is waiting to see what occurs at the Park and Ride to initiate coordination. Thus, the Draft SEIR 3 does not properly analyze the impacts resulting from changes to lines or worse is premised on faulty assumptions of changes to the lines.

5-21

- d. The need for parking specifically at the City’s Park and Ride is not just driven by the needs of Foothill Transit commuters. As noted, during the lockdown due to the pandemic, Foothill was operating with minimal bus service – possibly due to when a lot of commuters opted to stay and work from home. However, even during those times, the City’s Park and Ride was heavily used on a daily basis. The daily patrons parking there are part of car pools, local business customers, employees, as well as transit riders, too. Currently, the Feed and Grain Store uses the Park and Ride for offloading supplies. This use will be eliminated in the proposed modifications,

5-22

with no mention of any mitigation measures.

5-22
(Cont.)

The heavy daily use of the Park and Ride shows the latent need of parking in the heart of downtown. How does the Authority plan to replace this critically needed parking in the downtown?

Again, the Draft SEIR 3 fails to address the adverse and negative impact from the loss of this critical and daily available parking and its subsequent affect to immediate neighborhood, businesses, community, and the community at large.

5-23

In addition to the Park and Ride serving Foothill Transit riders, rideshare, vanpool, as well as serving as additional parking for the Downtown businesses and patrons, it provides parking for employees of the Curative Lab located at 430 S. Cataract Avenue. Employees are then shuttled to their location of employment. The loss of the availability to park at the Park and Ride will create impacts to the surrounding residential neighborhoods. Eliminating the parking for Curative Lab would result in traffic and parking impacts not reasonably contemplated when looking at just the Park & Ride. The Draft SEIR 3 does not address this or analyze the impacts. In addition, the Authority's analysis of parking during construction is deficient, and the loss of daily parking for commuters and patrons has not been adequately analyzed or mitigated. The Authority must also identify and adopt feasible mitigation measures to reduce those impacts, if feasible. (Pub. Res. Code § 21083(b)(2); CEQA Guidelines § 15064(h)(1)).

5-24

As a further example, the negative impact to the housing development located at San Dimas Avenue and Commercial Street has not been analyzed or mitigated. Not only will parking be reduced, but vehicle queueing will become an issue, which was an issue raised with the Authority in our prior response letter. Consequently, the Authority must consider feasible mitigation measures in a revised and recirculated Draft SEIR 3.

5-25

8. The Draft SEIR 3 does not adequately address the increased traffic on surrounding residential roadways in order to access the parking facility. The statement that "typically, drivers would use major streets such as San Dimas Avenue and would choose a more direct route to the station parking facility" is not substantiated. Access to the station parking would occur from residential streets. With the permanent street closure to vehicular traffic on Monte Vista Avenue, vehicles accessing the parking facility from Monte Vista Avenue have no other option but to travel through residential neighborhoods.

5-26

9. The Project Modifications propose a new access road from Commercial Street. This access road would be located just west of an existing driveway providing access to the residential and live/work development located at the southwest corner of Commercial Street and San Dimas Avenue. The interaction of vehicles exiting the parking lot and queuing on Commercial Street at the San Dimas Avenue/Commercial Street traffic signal could potentially impede vehicles attempting to turn left from Commercial Street into the existing driveway causing vehicles to queue into the intersection; however, no mitigations are proposed. How will this impact emergency vehicle responses? Currently the businesses and residents park within the Park and Ride or on Commercial Street. Reference is made to a Parking Management Plan; however, it is unclear how the Gold Line Authority will develop the plan, and as it is a limited life organization, how will the parking plan be managed after the Gold Line Authority is dissolved? This potential design hazard needs to be addressed in the Draft SEIR 3.

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10. Draft SEIR 3 Page 3-19 references “controlled parking entrances and exits”. What kind of controls will be utilized? Depending upon the types of controls and location, there could be a potential for vehicles to queue onto neighboring residential streets. This potential needs to be addressed. 5-28
11. The approved SEIR 2 incorporates bus drop off and onboarding within the station parking lot. The proposed configuration in the Draft SEIR 3 eliminates buses in the parking lot. This has significant impacts on: 5-29
- a. The ability to provide cross connection with other bus lines.
 - b. The potential increase in bus stops on Bonita Avenue creates a potential backup on Bonita Avenue that may impact the freight crossing at Cataract Ave.
 - c. Eliminates bus staging which currently occurs in the Park and Ride Lot.
12. No mitigations or improvements were proposed for the Bonita/San Dimas Ave bus stops to accommodate additional ridership. 5-30
13. The intersection of San Dimas Avenue and Commercial Street will be severely impacted, including creating traffic back-ups at the northbound left turn lane to access the Park and Ride. This should be further studied and require mitigation measures to prevent northbound vehicles from turning into the Grove Station development to turn around and bypass the back-up created at the northbound left turn lane. 5-31
14. 3.1.4 Mitigation Measures and Recommendations - LTR-1 states that the Authority shall cooperate with the City and contribute funding for a new traffic signal at the intersection of San Dimas Avenue at Second Street when warranted. 5-32
- a. The relocation of the station parking to the City Park and Ride will result in an exponential increase in traffic delays because all the commuters parked at the Park and Ride will cross San Dimas Avenue at the railroad crossing – both during peak AM and PM hours and intermittently during the off-peak hours. On page 3-8 it states that “a traffic evaluation was completed in May 2021 for the proposed east-west crosswalk just south of the Project ROW... The results of the operation and queueing analysis for the northbound and southbound approaches at San Dimas Avenue indicated that the Project with Project Modifications would not result in a substantial increase in traffic delay, and signal operations for the crosswalk at San Dimas Avenue would result in minimal delays compared to the delays experienced at the nearby intersections.”
- Almost 90% of the commuters will opt to cross at this crosswalk – it’s only ingrained human nature to cross at the shortest and closest point. The increase in pedestrian crossing frequency and activities will further compound and add to delays already experienced by drivers when the train is stopping or leaving the station. This additional delay, in particular for southbound San Dimas Avenue north of Bonita Avenue, will initiate driver behavior to take “short cuts” through the residential streets. Neighborhoods were not designed for cut through traffic in order to avoid delays as traffic backs up at Bonita Avenue. Why was the traffic evaluation which was completed in May 2021 not provided for review?
- With the relocation of the station parking lot to the Park and Ride, the Authority

must consider installing a traffic signal as part of the current project now, rather than when fully warranted. Secondly, when it's fully warranted, how does the City collect its contribution? Upon completion of Phase 2B, the Authority is dissolved and non-existent. Again, how does the City collect the contributions?

5-32
(Cont.)

- b. The Draft SEIR 3 states that additional traffic would be expected on Monte Vista Avenue and Commercial Street to enter and exit the parking lot. Any subsequent impacts will be addressed by a Parking Management Plan (PMP) – a PMP that states it would prohibit on-street parking for transit patrons and any of the neighborhoods that are impacted by traffic would be addressed by means of the Authority working with City to install traffic calming elements around the parking lot such as speed humps/bumps and signage. This statement completely disregards and ignores the City's initial comments in the NOP to consider various traffic calming mitigation measures that would mitigate transit patrons traffic flow from the residential neighborhood.

5-33

Again, we reemphasize the City's NOP comments recommending various traffic calming measures, which would mitigate the traffic flow of transit patrons in and out of the residential neighborhood as a result of the Gold Line's proposal to relocate station parking to the Park and Ride, which will result in a substantial increase in traffic volume within the existing quiet neighborhood along Cataract Avenue, Railway Street, and Commercial Street. Therefore, to deter and restrict traffic entering Commercial Street from Cataract Avenue or Railroad Street, and/or turning right onto Commercial Street when exiting from the station parking primary driveway/aisle, it is recommended that the following specific mitigation measures be considered and reviewed for implementation by the Authority:

5-34

- I. Restrict commuter traffic from entering and exiting at Railway Street/Monte Vista Avenue/Park and Ride and allow access for emergency vehicles only.

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- II. The acquisition of Successor Agency properties on Cataract Avenue and utilization of Metro Gold Line's right-of-way south of the rail lines to create a vehicular bypass to Railway Street and Commercial Street, thereby potentially reducing traffic impacts on surrounding residential streets.

5-36

- III. Extend Park and Ride driveway/aisle approximately 4 to 6 feet south of the center line of Commercial Street leaving approximately 12 to 13-foot-wide lane open for eastbound traffic only.

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- IV. Extend this restricted eastbound lane up to Shirlmar Street by means of landscaped curb extensions with entry and exit allowing for street parking for the two residents on the north side of Commercial, adjacent to the Park and Ride.

5-38

- V. The eastbound approach of Commercial Street at San Dimas Avenue should be modified to provide two eastbound lanes.

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- VI. The segment of Commercial Street between Shirlmar Street and the

5-40

Park and Ride’s primary entrance will be restricted to allow eastbound traffic only, thereby also providing emergency and vehicular connectivity for residents of this neighborhood to downtown and San Dimas Avenue.

5-40
(Cont.)

VII. Extension of the primary Park and Ride driveway/aisle allows for smooth flow of traffic in and out of the station parking lot without much delay.

5-41

VIII. Traffic signal timing and intersection improvements at San Dimas Ave/Commercial Street to mitigate impacts to the entrance of the HOA south of Commercial Street/west of San Dimas Ave resulting from queuing associated with the relocated station parking access.

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The combination of the extended entrance and curb extension will minimize traffic from the station’s Park and Ride entering into the neighborhood because patrons using the facility will be forced to use the main entrance which will keep the separation of traffic flow to the major arterials and off residential streets as intended.

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15. In Section 4.13.3.4 Long - Term Safety Impacts, the Draft SEIR 3 details that the relocation of the station parking has the potential to result in increased safety impacts for motorists, bicyclists, and pedestrians as a result of the additional parking spaces provided, and potential additional vehicular activity associated with station access from the relocated parking facility. It further expounds that 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 ... to recue potential automobile and pedestrian/bicycle conflicts. However, none of these have been studied or proposed as mitigations. The Draft SEIR 3, in fact, ignores the conclusion of this section and indicates no mitigations are required. As referenced above, CEQA requires the Authority to evaluate a project’s traffic safety impacts on pedestrians, cyclists, and transit riders. (*See City of Maywood v. Los Angeles Unified Sch. Dist.* (2012) 208 Cal. App. 4th 362, 392-95 (holding EIR was inadequate because it failed to analyze and mitigate project impacts on pedestrians).)

5-44

16. The realignment of the public alley north of Commercial Street to meet the Park and Ride’s primary drive aisle restricts the eastbound right turn for residents, trash service, other utility vehicles and fire safety equipment. This layout needs to be redesigned in order to allow access for the residents. Also, these residents would need access rights to use the new access road.

5-45

17. Tables 3-6 and 3-7 show the level of service for the AM and PM peak hours for the following intersections:

- San Dimas Avenue/Bonita Avenue
- San Dimas Avenue/Arrow Highway
- Walnut Avenue/Arrow Highway
- San Dimas Avenue/Railway Street
- San Dimas Avenue/Commercial Street

5-46

With the relocation of the parking to the Park and Ride, motorists coming from the west ends of the City and adjacent cities to the west will travel through and add delays to the intersections of Cataract Avenue/Arrow Highway and Cataract Avenue/Bonita Avenue. The level of service analysis should include these additional two intersections.

5-46
(Cont.)

18. On page ES-3, the Draft SEIR 3 states that the proposed San Dimas parking facility would also include a Kiss and Ride area to allow for pick-ups and drop-offs. Buses would no longer enter the parking lot. Instead, the bus drop-off for Foothill Transit would now be located at the intersection of Bonita Avenue and San Dimas Avenue. An intersection that would now be more congested since there are two existing Foothill Transit stops, located at the northeast and southeast of the intersection of Bonita Avenue at San Dimas Avenue for bus line 492. Where would the bus stop for commuter bus line 499 be located? The existing intersection was modified due to the Gold Line and is already congested, thus the addition of two new bus stops would compound further delays at an intersection that is already experiencing substantial delays. In addition, increased pedestrian crossing on San Dimas Ave south of the tracks will add to the delays at Bonita/San Dimas Ave, potentially backing up eastbound traffic across the freight tracks at Bonita/Cataract Ave.

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19. The impacts to Cataract Avenue/Bonita Ave and Cataract Ave/Arrow Highway were not studied. These intersections are closest to the freeways and the entire west side of City. Much of the parking commuters will be approaching from this direction. These intersections will be severely impacted and need to be studied.

5-48

20. Where is the traffic study from May 2021 that was referenced in the Draft SEIR 3? Why was this not available for review?

5-49

Aesthetics

21. The Draft SEIR 3 Aesthetics discussion identifies eight residences located along the border of Commercial Street and states the fronts of these residences face away from the Project site and views of the Project site from the back are buffered. However, the analysis does not take into consideration the residential property located south of Commercial Street that directly faces Freedom Park and the proposed location of the new access road. Therefore, the aesthetics discussion is deficient, as the analysis only considers some of the residential properties in the area. An EIR's description of the environmental setting must be contain sufficient information to "permit the significant effects of the project to be considered in the full environmental context." CEQA Guidelines, § 15125(c). "If the description of the environmental setting 'is inaccurate, incomplete or misleading, the EIR does not comply with CEQA.'" (*Cleveland Nat'l Forest Found. v. San Diego Assn. of Governments* (2017) 17 Cal.App.5th 413, 439.) An accurate description of the environmental setting is critical, because the significance of an activity may vary with the setting. CEQA Guidelines, § 15064(b). A "project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant." (*Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 718, 721; CEQA Guidelines, § 15300.2(a).)

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22. In addition, the Draft SEIR 3 fails to consider views of the Project site from pedestrians utilizing Commercial Street, fails adequately address the impacts of the portion of Freedom Park that is proposed to be removed in order to construct an access road, and fails to address the introduction of lighting from vehicle headlights which will impact certain

5-51

residences. Because the Draft SEIR 3 fails to properly study these significant impacts on aesthetics, the Draft SEIR 3 fails to live up to its role as an informational document. The Authority's failure here "precludes informed decision making and informed public participation, thereby thwarting the statutory goals of the EIR process." (*Ass'n of Irrigated Residents v. County of Madera* (2003) 107 Cal.App.4th 1383, 1391.)

5-51
(Cont.)

23. The Draft SEIR 3 focuses the discussion and associated impact conclusions on the portion of the Project site that is comprised of the current San Dimas Park & Ride facility, relying on the fact that it is currently a parking facility and would continue to be a parking facility: "As discussed, the vividness, intactness, and unity of the Project Site would remain similar to existing conditions with the implementation of the Project Modifications as the parcel would continue to be used as a paved parking facility". However, the Project Site extends beyond the existing San Dimas Park & Ride facility. The Draft SEIR 3 does not adequately address the portion of Freedom Park that is proposed to be removed in order to construct an access road or the Kiss and Ride Area. Views of Freedom Park in this area are intact with large mature trees and landscaping that provide visual relief from the surrounding development. The 2013 FEIR did not contemplate the removal of a similar resource, as a similar resource is not located within the previously considered parking location.

5-52

24. The Draft SEIR 3 does not discuss the Project's introduction of lighting associated with the headlights of vehicles exiting the parking lot from the proposed access road that would directly impact the residence located south of Commercial Street that fronts Commercial Street and Freedom Park; this condition does not currently exist and would not have occurred at the previously considered parking location.

5-53

Air Quality/Greenhouse Gas Emissions

25. The Draft SEIR 3 does not fully analyze the air quality impacts to surrounding residents and does not propose proper mitigation (i.e. upgrading residential air filtration systems and enhancing First/Last Mile improvements) to reduce the potential air quality impacts. The proximity of the relocated Gold Line station parking lot to the existing Park and Ride will result in an increase of traffic to the surrounding residential neighborhoods and if proper parking is not provided, these future riders will circulate and park within surrounding private and public parking lots or along residential or commercial streets. The result of these vehicles circulating around the surrounding residential neighborhoods looking for parking will increase emissions/air pollutions and therefore increase Green House Gas (GHG) Emissions and air quality impacts.

5-54

26. In this regard the Gold Line Authority (GLA) should also evaluate, quantify and mitigate the effects of greenhouse gas (GHG) emissions as part of the overall air quality assessment. This topic was not clearly addressed in the 2013 FEIR.

5-55

Community Parks and Open Space

27. The Draft SEIR 3 is deficient as it discounts the importance of the portion of Freedom Park proposed for acquisition because it does not contain park facilities or features. However, this area is vegetated, including mature trees and serves as an open space resource for the surrounding community. The removal of a portion of Freedom Park is a long-term impact which was not contemplated in the 2013 FEIR, and the Draft SEIR 3 fails to describe the magnitude and severity of this impact, including in communities and

5-56

neighborhoods located in this area. The Draft SEIR 3 fails to identify feasible mitigation measures that would effectively reduce the Project’s impacts on the visual character and quality.

5-56
(Cont.)

Cultural Resources

28. The Draft SEIR 3 indicates the AB 52 consultation process is ongoing and will be further documented as part of future CEQA documentation, but fails to identify what future CEQA documentation is being referenced. Under AB 52, if consultation has begun, an EIR cannot be certified unless the consultation process between the tribe and the lead agency has concluded. Thus, the Draft SEIR 3 inadequately describes the AB 52 consultation process.

5-57

Noise and Vibration

29. The Draft SEIR 3 inaccurately states that, when compared to the SEIR 2 location, residential structures abutting the relocated San Dimas parking facility are farther away from potential noise and vibration-intensive construction activities and concludes a reduction in both construction noise and construction vibration levels at adjacent receptors. SEIR 2 Table 4.11-4 shows a distance of 45 feet from the closest sensitive receptor to the reconfigured parking facility. Construction activities associated with the Project Modifications (new access road) would occur immediately adjacent to the residential property that abuts Freedom Park; the residence is located at a distance of less than 45 feet and should be analyzed accordingly.

5-58

Similar to the construction impacts discussion, the long-term impacts discussion identifies the closest noise-sensitive receptor as 60 feet. This measurement is to the parking area. The Draft SEIR 3 should also address the noise associated with the proposed access road which would be located immediately adjacent to a sensitive receptor.

30. No mitigations were proposed for the house adjacent to the new entrance onto Commercial Street. There will be significant queuing of vehicles exiting the station parking onto Commercial Street. This will create noise concerns for this residence.

5-59

31. The 2013 FEIR (page 3.11-17) states noise control measures when working near residences would be required, which includes conformance with the noise requirements of each City. "Limiting construction activities to weekday daytime hours (typically 7 a.m. to 6 p.m.) and employing typical measures for minimizing noise during construction requirement, combined with the mitigation described in Section 3.11.5, would mitigate construction impacts to a less than significant level." This is contradictory to the Draft SEIR 3 (Section 3.1.2.3), which states short-term construction impacts from temporary lane closures and detours "...would be limited by scheduling certain construction activities during night hours, outside of the AM and PM peak commuting periods, and through the use of clearly signed detour routes where necessary." The Draft SEIR 3 Noise analysis does not analyze nighttime construction activities. This inconsistency needs to be addressed and remedied. If nighttime construction activities will occur, the noise analysis needs to identify any resulting noise impacts to sensitive receptors. To "inform the public and responsible officials of the environmental consequences of their decisions before they are made." (*Laurel Heights Improvement Ass'n v. Regents of the Univ. of Cal.* (1993) 6 Cal.4th 1112, 1123.) Again, the Authority must analyze noise impacts and potentially feasible mitigation measures for the significant nighttime construction noise impacts

5-60

caused by the Project.

5-60
(Cont.)

Safety and Security

32. As acknowledged in the Draft SEIR 3 “[t]he relocated and reconfigured parking facility would be located in a more residential area than previously approved, with adjacent residential land to the west and south. Therefore, the facility would be located in an area with a different safety and security setting than what was previously analyzed.” As we had previously noted, there are safety and security concerns with relocating the parking facility to the Park & Ride. Specific attention should be provided to the interface between the Project site, the alley, and the residential uses located south of the alley and that currently there is a clear line of site across the alley between Monte Vista Avenue and San Dimas Avenue, as well as visibility from the existing Park & Ride facility. This visibility could be limited with the introduction of the access road and other improvements, resulting in security and safety concerns within the alley. The Draft SEIR 3 does not adequately address safety and security concerns. The Authority is legally required to mitigate or avoid the significant impacts of the projects it approves whenever it is feasible to do so. (Pub. Res. Code § 21002.1(b).) “In the case of the adoption of a plan, policy, regulation, or other public project, mitigation measures can be incorporated into the plan, policy, regulation, or project design.” (CEQA Guidelines § 15126.4(a)(2).)

5-61

33. With the Station Parking being so close to residential properties, the frequency of calls to law enforcement will increase and the expected response time will be immediate. Draft SEIR 3 provides no details of how the Gold Line Authority will mitigate these requirements. This will impact local law enforcement and impact their ability to respond to other calls through the City. The Draft SEIR 3 must provide a detailed plan for Metro and LASD Transit Services Bureau response to mitigate impacts to local safety and law enforcement. SS-4 security mitigations indicates a security plan for LRT operations shall be implemented but the mitigation measure references surveillance by law enforcement including local jurisdiction security personnel. Gold Line Authority is proposing the use of local enforcement without cost mitigations.

5-62

Water Quality and Resources

34. The Draft SEIR 3 long-term Impacts discussion states “[t]here would be a decreased amount of impervious surface compared to the Approved Project since the proposed San Dimas parking location is a smaller site than the approved location.” This is not an accurate characterization. The approved location is already impervious and although the acreage of the parking facility may be reduced with the Project Modifications, the amount of impervious surface as a result of the Project Modifications would not be decreased. The Project Modifications would acquire a portion of Freedom Park for an access road, converting an existing pervious surface to impervious conditions. When an EIR gives “conflicting signals to decision-makers and the public about the nature and scope of the activity being proposed,” the courts have found it “fundamentally inadequate and misleading.” (*San Joaquin Raptor Rescue Center v. County of Merced*, 149 Cal.App.4th 645, 655-56.).

5-63

General Comments

35. The station parking design standards require the parking lot to meet local landscape design standards. The configuration of the parking lot as proposed does not comply with

5-64

City Code requirements. The increased landscaping requirements will result in the elimination of several parking stalls. This combined with the ADA requirements which were also not addressed will likely reduce the number of stalls available to less than 289.

5-64
(Cont.)

36. The project calls for trees to be relocated. What trees will be relocated and to what location?

5-65

37. Construction emissions will now be closer to residential homes than previous. Construction parking will impact the neighborhood and mitigation was not addressed.

5-66

The Draft SEIR 3's lackluster approach to impact analysis and mitigation violates CEQA. A lead agency cannot simply conclude that an impact is significant and unavoidable and move on. A conclusion of residual significance does not excuse the agency from (1) performing a thorough evaluation and description of the impact and its severity before and after mitigation, and (2) proposing all feasible mitigation to "substantially lessen the significant environmental effect." (CEQA Guidelines § 15091(a)(1); see also *id.* § 15126.2(b) (requiring an EIR to discuss "any significant impacts, including those which can be mitigated but not reduced to a level of insignificance" (emphasis added).) Consequently, the Authority cannot legally certify the Draft SEIR 3 until it satisfies all the above CEQA requirements and, instead, it must consider further feasible mitigation measures in a revised and recirculated Draft SEIR 3.

5-67

Sincerely,



Chris Constantin
City Manager



Jeff Malawy
City Attorney

Cc: City Council
Henry K. Noh, Director of Community Development
Shari Garwick, Director of Public Works

Attachment:
City of San Dimas NOP Letter, November 17, 2021

City Council

Emmett Badar, Mayor
Eric Weber, Mayor Pro Tem
Denis Bertone
John Ebner
Ryan A. Vienna

City Manager

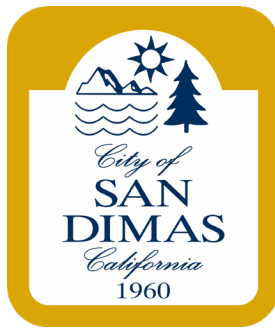
Chris Constantin

Assistant City Manager

Brad McKinney

City Attorney

Jeff Malawy



Director of Administrative Services

Michael O'Brien

Director of Community Development

Henry K. Noh

Director of Parks and Recreation

Scott Wasserman

Director of Public Works

Shari Garwick

November 17, 2021

Lisa Levy Buch, Chief Communications Officer
Metro Gold Line Foothill Extension Construction Authority
406 E. Huntington Drive, Suite 202
Monrovia, CA 91016-3633

Subject: Comments on Notice of Preparation of Draft Supplemental EIR (DSEIR) Metro Gold Line Extension Phase 2B – San Dimas Parking Lot Relocation

Dear Ms. Buch:

The City of San Dimas appreciates the opportunity to provide comments on the referenced DSEIR. The City of San Dimas continues to support the completion of the Gold Line Foothill Extension to Montclair, **as long as the City's and our community's concerns are fully mitigated to our satisfaction.** The following comments are based on the Notice of Preparation of a Draft Supplemental Environmental Impact Report received on October 15, 2021. The DSEIR needs to address and fully mitigate the following potential impacts regarding the proposed relocation of the San Dimas Gold Line Station parking lot to the existing Park and Ride lot.

5-68

Transportation and Parking

1. The City is extremely concerned about the impact to the surrounding residents and downtown businesses caused by the reduction in number of parking spaces provided in the proposed relocated station parking design. The original 2013 FEIR requirement of 450 parking spaces was reduced to 289 parking spaces (Supplemental EIR, 2021) due to implementing Metro's Supportive Transit Parking Program Management Plan constrained parking model. Relocating the Gold Line Station parking into the existing Park and Ride location would result in the loss of an additional 175 valuable parking spaces (existing 175 Park and Ride parking spaces not being reconstructed or accounted for with the Gold Line parking relocation to the Park and Ride) in the heart of our downtown. Such a reduction in the number of parking spaces in downtown would negatively impact our downtown business community. Under parking the station and reducing valuable downtown parking capacity will result in impacts to private property, as well as, Municipal parking lots and public streets in the vicinity of the Gold Line station parking lot. These impacts and mitigation measures must be evaluated and assessed as a part of the Draft SEIR and clearly indicate how the project will not have an impact on the City's streets, residential neighborhoods, and nearby businesses.

5-69

2. A Parking Management Study is needed to fully address overflow parking onto adjacent commercial and residential neighborhoods. The study must include a discussion related to the anticipated impacts and mitigation measures (i.e. required parking enforcement, fully funding additional City staffing and costs related to mitigating parking related impacts associated with the Gold Line, etc.) to offset the impacts of the overflow parking and traffic created by the Gold Line Station.

5-70

3. Currently, the existing Park and Ride is developed with 175 parking spaces, in addition to a dedicated bus stop and bus shelter for Foothill Transit which supports regional transportation. The City is concerned about the potential impact to the Foothill Transit bus services and the need to provide additional bus patron parking, in addition to the approximately proposed 289 parking spaces to only accommodate the future Gold Line Station patrons. The bus service provides a critical mode of public transportation and the proposed alternative would potentially eliminate this mass transit alternative.

5-71

In the 2013 FEIR, the Gold Line Authority (GLA) committed to conduct a Bus Interface Study by completion of the Design Phase. To date, no study has been completed. This is an area of concern for the City given the change to the project scope and the elimination of Foothill Transit within the existing City Park and Ride Facility. This study will require Foothill Transit to reroute or eliminate valuable mass transit services. The GLA should complete this study without further delay.

5-72

4. The pedestrian routes from the relocated Gold Line parking within the proposed Park and Ride lot location need to be fully analyzed. The previous Gold Line parking location (City Yard) provided a direct and safe pedestrian pathway that went underneath the light rail tracks to the station. The relocated parking lot within the Park and Ride will result in a pedestrian conflict at San Dimas Avenue and will result in significant vehicular traffic impacts on north and south bound San Dimas Avenue, in addition to east and west bound traffic on Bonita Avenue and Arrow Highway. This will be the result of the number of peak hour pedestrian traffic crossing at San Dimas Avenue, in addition to the number of train crossing signals that are activated approximately twice (trains travelling east and west bound) every 6 minutes. Mitigation needs to be provided to prevent pedestrians from jaywalking across San Dimas Avenue and the longer traffic delays from the number of pedestrian crosswalk signals and the number of train signals disrupting the vehicular traffic movement along San Dimas Avenue.

5-73

Studies need to be conducted to fully analyze the impact to this crossing that simulate and evaluate the traffic impacts on San Dimas Avenue, in addition to the pedestrian safety and liability due to the increase in pedestrian crossing along this crossing intersection.

5. The proposed Gold Line parking relocation to the Park and Ride will result in an increase of traffic volumes within existing quiet single-family residential neighborhoods along Railway Street and Commercial Street. Therefore, traffic calming mitigation measures need to be fully analyzed that will fully mitigate and divert this traffic away from these residential neighborhood streets. These mitigation measures could include, but are not limited to:

5-74

- a. Closure of the Monte Vista ingress/egress of Park and Ride;
- b. Traffic calming mitigation measures on Railway and Commercial Streets, such as installation of cul-de-sac(s), speed humps, or other potential traffic calming mitigation measures;
- c. Consider an additional vehicular ingress/egress along San Dimas Avenue to reduce traffic related impacts to the surrounding residential neighborhoods.

- d. The acquisition of Successor Agency properties on Cataract and utilization of Metro Gold Line’s right-of-way south of the rail lines as a bypass to Railway and Commercial reducing traffic loads on those residential streets. | 5-74 (Cont.)
- 6. Mitigation measures shall be implemented to reduce the vehicular queuing exiting the proposed relocated Gold Line parking lot. | 5-75
- 7. All ADA pedestrian pathway concerns within the proposed relocated parking lot and the surrounding rights-of-way shall be fully analyzed and mitigated. | 5-76
- Tree Preservation, Landscaping and Water Quality** |
- 8. The City of San Dimas is a Tree USA City and preservation of the mature trees is a priority. Any City-owned trees proposed for removal shall be evaluated per City’s Tree Preservation Ordinance per Chapter 13.36. A Tree Removal Permit Application will be required to be submitted to the Parks and Recreation Department for review. | 5-77
- 9. The proposed station and parking lot landscape and irrigation shall comply with the City’s Water Efficient Landscapes Chapter 18.14. | 5-78
- 10. The City is concerned with the thermal effects of the parking lot as proposed and its contribution to an urban heat island. The project must incorporate large shade trees, vegetation/landscape and lighter colored pavement to mitigate these impacts. | 5-79
- 11. The proposed station and parking lot shall provide Low Impact Development (LID) proposal to comply with City, County and State water quality requirements. | 5-80
- Air Quality/Greenhouse Gas Emissions** |
- 12. The air quality impacts to surrounding residents shall be fully analyzed and mitigated (i.e. upgrading residential air filtration systems and enhancing First/Last Mile improvements). The proximity of the relocated Gold Line station parking lot to the existing Park and Ride will result in an increase of traffic to the surrounding residential neighborhoods and if proper parking is not provided, these future riders will circulate and park within surrounding private and public parking lots or along residential or commercial streets. The result of these vehicles driving around looking for parking will increase emissions/air pollutions and therefore increase Green House Gas (GHG) Emissions. | 5-81
- 13. Revised and updated estimates to circulation, land use, ridership and traffic/parking are necessary to prepare an appropriate analysis of the environmental effects on air quality with the revised project. Utilizing the FEIR 2013 data will result in an inadequate analysis especially in light of the availability of new ridership data and changes in Metro policies regarding parking, parking fees and First/Last Mile improvements. | 5-82
- 14. In this regard the Gold Line Authority (GLA) should also evaluate, quantify and mitigate the effects of greenhouse gas (GHG) emissions as part of the overall air quality assessment. This topic was not clearly addressed in the 2013 FEIR. | 5-83
- Noise and Vibration** |
- 15. The impact to the surrounding residences from the additional traffic related noise shall be fully mitigated including but not limited to: | 5-84

- a. Construction of new sound walls; and
- b. Retrofitting all surrounding affected residence windows with dual pane glass and other treatments to reduce the noise impact with special emphasis to residences experiencing the highest traffic and noise flows.

5-84
(Cont.)

Public Service/Safety Concerns

16. There are safety and security concerns by relocating the Gold Line parking to the existing Park and Ride due to it being surrounded by and in close proximity to single-family residences. There is some evidence that terminus or near-terminus stations are affected negatively by increased criminal activity. Such impacts have been evident with the opening of the Gold Line Phase 2B project. Mitigation measures need to be incorporated to address these concerns including but not limited to:

- a. Funding and providing law enforcement presence, preferably a new satellite law enforcement office located within the new parking lot;
- b. Installation of camera systems in all parking facilities and use of security software which is compatible with local law enforcement needs and enhanced ability for cameras to pan, tilt, zoom and record, providing clear, high quality observation during night and day, as well as providing needed hardware and viewing capability at the local law enforcement offices; and
- c. Installation of city approved parking lot and alley lighting that is shielded and does not spill over or impact surrounding residences.

5-85

Community Parks and Open Space

17. The impact to the existing Freedom Park by reducing the parkland area and removing existing mature trees and landscaping in order to facilitate the construction of new vehicular ingress/egress shall be fully mitigated.

- a. Installing and maintaining adequate camera systems as specified in 16b to provide for observation and response to Freedom Park as this location will be unduly impacted by activity coming from the Park and Ride.

5-86

Land Use

18. The proposed project relocation will affect surrounding land uses especially as they relate to both traffic, parking, air quality, noise and safety impacts. There is clear evidence that surrounding land uses are severely impacted when station parking and access are inadequate or poorly designed. These impacts can severely affect nearby parking facilities, businesses and residences.

Furthermore, the State legislature is mandating major land use changes around transit stations in both adopted and anticipated legislation. These changes in growth are induced by and directly related to the station location. These changes are intended to supersede existing zoning resulting in a growth inducing impact not considered at all by any of the EIRs for the project. These changes likely render much of the traffic and related analysis invalid.

5-87

Economic

19. Relocating the Gold Line parking to the Park and Ride will negatively impact the heart of our downtown businesses by losing 175 valuable parking spaces. Due to this loss of parking, this not only effects the current businesses and their economic vitality but will affect the economics and viability of the future expansion and development of the new San Dimas Downtown that the City is

5-88

currently in the process of generating a new Specific Plan for.

5-88
(Cont.)

20. The proposed Park and Ride parking lot site plan eliminates and negatively impacts the existing Feed and Grain business (located within the barn at 150 S. Monte Vista) by eliminating their ability to use the existing Park and Ride lot to offload merchandise. The impact to this business shall be fully mitigated.

5-89

21. Analyze the property value impacts to the surrounding residential and commercial uses with the relocation of the Gold Line parking to the Park and Ride lot.

5-90

22. The elimination of the Park and Ride lot used for bus parking, would negatively impact the City's Proposition C funds by reducing the amount of funds the City receives and which can be utilized to support regional transportation improvements. This impact shall be fully mitigated.

5-91

The City of San Dimas looks forward to working cooperatively to address these major issues as part of the revised project in order to maximize the benefits for Metro, the GLA, the surrounding residents, businesses and property owners. You are welcome to contact the City for assistance or further explanation of any of these comments.

5-92

Sincerely,



Henry K. Noh
Director of Community Development

Cc: City Council
Chris Constantin, City Manager
Shari Garwick, Director of Public Works
Jeff Malawy, City Attorney

**Comment Letter 5: Chris Constantin, City Manager & Jeff Malawy, City Attorney
(City of San Dimas)**

Comment Response 5-1

Comment includes introductory remarks. No environmental concerns or issues are described, therefore, no response is needed.

Comment Response 5-2

No specific environmental concerns or issues are described, therefore, no response is needed.

Comment Response 5-3

The Draft SEIR 3 fully analyzed the impacts as related to the proposed use of the park areas for the road access improvements. As illustrated in Figures 1-2 and 1-4, the new access road includes two lanes, one in each direction, for vehicles to enter and exit the parking facility across a portion of the area designated as Freedom Park. All areas illustrated in Figures 1-2 and 1-4 were evaluated as part of the CEQA analysis. As discussed in Section 1.2.3, fencing and landscape would be provided along the perimeter of the proposed parking facility footprint, and along the new access road on Commercial Street. Further, as stated in Section 1.2.3, "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." Although clearly disclosed in the project description the project description has been augmented to include additional mention of partial acquisition of Freedom Park and that "the new access road would include two-lanes, one in each direction, to allow vehicles to turn right into the parking facility from Commercial Street, and left or right when exiting onto Commercial Street. Vehicles would continue to exit the parking facility south on San Dimas Avenue and Monte Vista Avenue, and west on Railway Street."

Section 4.6.3.3 states the new access road provided along Commercial Street would require the partial acquisition of the western portion of two parcels from the City to build a two-way road along the western portion of Freedom Park. The two parcels required for partial acquisition include (8390-021-902) and (8390-021-903). The area where the access road would be placed is currently a vegetated area that contains no park facilities or amenities. Use of this area for the proposed access road would not impact the Freedom Park memorial monument, therefore, the Project Modifications would not impact the Veterans Monument. In addition, a sitting wall or fence would be provided to Freedom Park as part of the Project Modifications. Public access to the western portion of the park would be buffered during construction of the Project Modifications to allow for work vehicles to access the site. However, park access would remain open on the eastern portion of Freedom Park during construction activities. The new roadway would be designed in accordance with city and LACOFD design requirements to allow access and adequate response times for emergency services. In addition, landscaped areas would be provided on both sides of the roadway and along the perimeter of the parking facility, and would be in accordance with the City's tree preservation ordinance and design requirements.

Comment Response 5-4

Revised language in Section 3.3, Traffic Circulation, to describe vehicle access from Commercial Street via San Dimas Avenue to the proposed San Dimas parking facility. Reference to access via San Dimas Avenue was provided in order to reference the primary arterial access road, but the comment is correct that the direct access to the lot is via Commercial and Monte Vista.

Comment Response 5-5

As discussed in Section 1.2.3, access to the San Dimas Gold Line Station platform would also be revised under the Project Modifications. Access will occur only from the western side (San Dimas Avenue) of the station platform. No pedestrian or bicycle access to the San Dimas Station platform will be provided from the eastern (Walnut Avenue) side of the platform as a result of relocation of the station parking facility. Furthermore, additional right-of-way would be required from the private properties along Walnut Avenue and Arrow Highway to construct pedestrian access to the east. This access point is no longer included based on the Project Modifications.

Comment Response 5-6

Figure 1-3 was intended to conceptually illustrate the difference in location from the Approved Project San Dimas parking location versus the Project Modifications San Dimas parking location, thus it did not include all access detail as provided in Figures 1-2 and 1-4. Minor inconsistency between the exhibits does not undermine the accuracy or stability of the project description. Figure 1-3 has been updated to also show the proposed access road and Kiss and Ride area.

Comment Response 5-7

The Construction Authority no longer proposes acquisition of the parcels mentioned as part of the Project Modifications. The City of San Dimas has engaged with a developer to utilize those two parcels, therefore, parcels 8390-021-915 and 8390-021-916 are not proposed to be cleared under CEQA as part of the Project Modifications.

Comment Response 5-8

Refer to comment response 5-7.

Comment Response 5-9

The Construction Authority no longer proposes acquisition of the two parcels mentioned as part of the Project Modifications, and thus there is no potential Construction Authority use to be analyzed in the SEIR. There is no contemplated future use, or acquisition, of the two referenced parcels for the identified site of the relocated parking lot, therefore, there is no confusion or conflicting signals. Additionally, the two additional parcels are not needed in any way for the relocated parking lot. The City of San Dimas has engaged with a developer to utilize these two

parcels, therefore, parcels 8390-021-915 and 8390-021-916 are not cleared under CEQA as part of the Project Modifications.

Comment Response 5-10

The parking reduction mentioned was evaluated in SEIR 2. It does not constitute an environmental impact under CEQA. 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.

CEQA Guidelines no longer require analysis of intersection level of service and instead consider vehicle miles traveled (VMT) as the primary measure of traffic impact. However, supplemental traffic analysis was conducted and found no substantial changes in traffic operations due to the Project Modifications.

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 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. Implementation of 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 (SS-1).

Comment Response 5-11

The transportation analysis was conducted in accordance with CEQA Guidelines and SB 743 and in accordance with industry standards and customary practices, using VMT as the primary indicator of CEQA impact. The California Resources Agency determined that, in general, transportation impacts are best evaluated by using vehicle miles traveled (VMT). Guidelines §15064.3 require that lead agencies should presume that projects that reduce VMT, such as pedestrian, bicycle, and transit projects, would have a less than significant impact. Based on these guidelines, analysis of VMT was conducted utilizing the anticipated project ridership and changes in travel patterns as identified with the Metro Travel Demand Model. The analysis concluded that the project is anticipated to result in a study area reduction of VMT of approximately 40,074.

However, given that the publication of this document follows the July 1, 2020, date on which CEQA Guidelines §15064.3 and SB 743 apply, this Draft 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 Draft 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).

Comment Response 5-12

In accordance with CEQA Guidelines and SB 743, CEQA does not qualify parking as an environmental impact. 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' LR Account in the same proportion as the original LR 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.

The Construction Authority is responsible for developing a PMP to address the issues related to spillover parking. Additionally, the City will be compensated for the Parking lot by the Authority and these funds are required to be used for a transportation use. 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.

Comment Response 5-13

In accordance with SB 743, CEQA does not qualify parking as an environmental impact. During construction of the Project Modifications, parking 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 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 reduce the number of available Park & Ride spaces for existing Foothill bus service, this does not constitute an impact under CEQA. Additional consolidated information related to analysis of secondary effects is provided in Appendix A Attachment C of the Final SEIR 3.

Comment Response 5-14

CEQA Guidelines no longer require analysis of intersection level of service and instead consider vehicle miles traveled (VMT) as the primary measure of traffic impact. However, a supplemental traffic analysis was conducted and found no substantial changes in traffic operations due to the Project Modifications. The traffic analysis found an increase in delay in the PM Peak Intersection Operations of 7.7 seconds at San Dimas Ave/ Railway St and 4.5 seconds at San Dimas Ave/ Commercial Street, however, both intersections will remain at a traffic level of service A or B (the lowest levels of traffic delay). Traditional traffic demand assignment dictates that drivers will use higher-classification 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 indicates that the LOS on San Dimas will be acceptable, which indicates 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.

Comment Response 5-15

The following general response is provided because the comment does not specify any specific hazards or concerns related to vehicle queue at the San Dimas Avenue/Commercial Street intersection.

As discussed in Section 3.2.6.2 and shown in Table 3-7 of the Draft 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/SimTraffic software), the 95th percentile queue for all approach lanes to the intersection are expected to be accommodated within the existing available storage. Therefore, vehicle queue at the San Dimas Avenue/Commercial Street intersection is not anticipated to cause potential design hazards.

Section 3, Transportation, of the Draft SEIR 3 and the Transportation Technical Memorandum (Appendix A) of the Draft SEIR 3 have been modified to include the results of the queuing analysis for the San Dimas Avenue/Commercial Street intersection (Attachment B of Appendix A). Inclusion of the queueing analysis at San Dimas Avenue/Commercial Street intersection does not change impact determinations.

Comment Response 5-16

A discussion in Section 3.12, the Project Modifications with the 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 will work with the City of San Dimas to identify and fund traffic control on Commercial 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.

Comment Response 5-17

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.

The project as proposed does not include a future development, but it is built not to preclude future development. The future development would be expected to provide a similar number or parking spaces for use by transit users.

Comment Response 5-18

The Construction Authority is reporting information based on coordination conducted with Foothill Transit staff to date. 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. Short term impacts to circulation based on the Project Modifications are addressed by existing mitigation measures CTR-1 through CRT-3.

During construction of the Project Modifications, parking 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 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 reduce the number of available Park & Ride spaces for existing Foothill bus service, this does not constitute an impact under CEQA. Additional consolidated information related to analysis of secondary effects is provided in Appendix A Attachment C of the Final SEIR 3.

Comment Response 5-19

Based on coordination between the Construction Authority and Foothill Transit, Foothill Transit Lines 492 and 499 would no longer operate their current express service to downtown Los Angeles once Phase 2B of the Metro L (Gold) Line Extension is completed to Pomona. However, Foothill Transit is the responsible agency for determining future bus operations. During construction of the Project Modifications, parking 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 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 reduce the number of available Park & Ride spaces for existing Foothill bus service, this does not constitute an impact under CEQA.

The Construction Authority does not have purview over Foothill Transit, they can continue to operate their downtown service if desired, but they will need to identify another location for parking if desired. Travel times to downtown Los Angeles via a new I-10 Express Lane are noted, but have no bearing on CEQA evaluation of the Project Modifications.

Comment Response 5-20

In accordance with CEQA Guidelines and SB 743, CEQA does not qualify parking as an environmental impact. 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' LR Account in the same proportion as the original LR 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, funds from Construction Authority purchase may be available for the City of San Dimas to develop new parking if desired.

As discussed in Section 1.2.3, the Project Description states all jurisdictions would be provided a PMP developed by the Construction Authority that would prohibit on-street parking for transit patrons and that 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.

Comment Response 5-21

The Construction Authority is reporting information based on coordination conducted with Foothill Transit staff to date. 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. 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 they are not a part of the project or Project Modifications. Additional information related to this issue is discussed in Attachment C of Appendix A in the Final SEIR 3.

Comment Response 5-22

In accordance with CEQA Guidelines and SB 743, CEQA does not qualify parking as an environmental impact. 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' LR Account in the same proportion as the original LR 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.

The Construction Authority is responsible for developing a PMP to address the issues related to spillover parking. Additionally, the City will be compensated for the Parking lot by the Authority and these funds are required to be used for a transportation use. 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.

Comment Response 5-23

Refer to comment response 5-22

Comment Response 5-24

In accordance with CEQA Guidelines and SB 743, CEQA does not qualify parking as an environmental impact. 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' LR Account in the same proportion as the original LR 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.

The Construction Authority is responsible for developing a PMP to address the issues related to spillover parking. Additionally, the City will be compensated for the Parking lot by the Authority and these funds are required to be used for a transportation use. 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.

Comment Response 5-25

As discussed in Section 3.2.6.2 and shown in Table 3-7 of the Draft 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/SimTraffic software), the 95th percentile queue for all approach lanes to the intersection are expected to be accommodated within the existing available storage. Therefore, since the San Dimas Avenue/Commercial Street intersection is not anticipated to be substantially affected by the Project, the housing development located near the intersection is also not expected to be substantially affected.

Section 3, Transportation, and the Transportation Technical Memorandum (Appendix A) of the Draft SEIR 3 have been modified to include the results of the queuing analysis for the San Dimas Avenue/Commercial Street intersection (Attachment B of Appendix A). Inclusion of the queuing analysis at San Dimas Avenue/Commercial Street intersection does not change conclusions or impact identified in the impact analysis.

Comment Response 5-26

The assessment of the traffic effects on surrounding residential roadways to the parking facility was based on the location of the park & ride facility on San Dimas Avenue, and the access points on Monte Vista Avenue and Commercial Street near San Dimas Avenue. It is a standard traffic engineering premise that drivers will use higher-classification streets (such as San Dimas Avenue), particularly when operations are acceptable. The traffic analysis results indicated that the LOS will be acceptable, so 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.

Comment Response 5-27

Please see response to comment 5-26.

As discussed in Section 1.2.3, all jurisdictions would be provided a PMP developed by the Construction Authority that would prohibit on-street parking for transit patrons and that 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.

As discussed in Section 3.2.6.2 and shown in Table 3-7 of the Draft 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/SimTraffic software), the 95th percentile queue for all approach lanes to the intersection are expected to be accommodated within the existing available storage.

Section 3, Transportation, of the Draft SEIR 3 and the Transportation Technical Memorandum (Attachment B of Appendix A) of the Draft SEIR 3 have been modified to include the results of

the queuing analysis for the San Dimas Avenue/Commercial Street intersection. Inclusion of the queuing analysis at San Dimas Avenue/Commercial Street intersection does not change impact determinations.

Comment Response 5-28

The Park & Ride facility will not have gates that restrict access or egress. Controls would be in the form of license plate readers or other devices to ensure use by Gold Line transit patrons. Substantial queuing is not anticipated. Section 3, Transportation, of the Draft SEIR 3 and the Transportation Technical Memorandum (Appendix A) of the Draft SEIR 3 have been modified to include the results of the queuing analysis for the San Dimas Avenue/Commercial Street intersection. Inclusion of the queuing analysis at San Dimas Avenue/Commercial Street intersection does not change impact determinations.

Comment Response 5-29

Due to the limitations of the Park & Ride lot size, bus drop-offs cannot be accommodated on-site. The Construction Authority is proposing 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. Traffic analysis documented in the Draft SEIR 3 and Appendix A (Attachments A and B) did not identify traffic congestion or queuing issues that would result in the potential backup mentioned. Moreover, improvements to bus stops are not included as part of the Project Modifications and therefore not discussed in the SEIR.

Comment Response 5-30

The Project Modifications would result in no additional ridership over SEIR 2. However, the Construction Authority is proposing enhancements to adjacent bus stop facilities to accommodate connectivity between the future transit services.

Comment Response 5-31

As discussed in Section 3.2.6.2 and shown in Table 3-7 of the Draft 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/SimTraffic software), the 95th percentile queue for all approach lanes to the intersection are expected to be accommodated within the existing available storage. Therefore, northbound vehicles are not expected to turn into the Grove Station development to turn around.

Section 3, Transportation and the Transportation Technical Memorandum (Appendix A) of the Draft SEIR 3 have been modified to include the results of the queuing analysis for the San Dimas Avenue/Commercial Street intersection (Attachment B of Appendix A). Inclusion of the queuing analysis at San Dimas Avenue/Commercial Street intersection does not change conclusions or impact identified in the impact analysis.

Comment Response 5-32

The traffic evaluation completed in May 2021 was summarized in a technical memorandum that has been included in Appendix A of the Draft SEIR 3. Inclusion of this technical memorandum does not change conclusions or impact identified in the impact analysis.

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 Project Modifications.

The Construction Authority affirms its commitment to contribute funding if a signal is warranted at San Dimas/Second intersection in the future. Analysis documented as part of SEIR 2 demonstrated acceptable level of service in the future with the Project Modifications proposed as part of that CEQA document. Substantial changes in future operations at that intersection are not anticipated based on traffic pattern changes expected under SEIR 3, thus the mitigation measure has not been further revised.

Comment Response 5-33

No CEQA impacts have been identified related to traffic that require additional mitigations. However, as discussed in Section 1.2.3, the Construction Authority will work with the City of San Dimas to incorporate traffic control measures if desired.

The supplementary traffic analysis conducted does not anticipate significant changes in traffic volumes on Railway St that would result in safety impacts. Traditional traffic demand assignment dictates that drivers will use higher-classification streets (such as San Dimas Avenue) over minor access road (such as Railway and Monte Vista) when LOS operations are acceptable and can facilitate the demand without major delays. The traffic analysis results indicates that the LOS on San Dimas will be acceptable, which indicates 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.

Comment Response 5-34

No CEQA impacts have been identified related to traffic that require additional mitigations. The Construction Authority will work with the City of San Dimas to identify and fund traffic control measures on Commercial Street, Monte Vista Avenue, and Railway Street as warranted to reduce potential automobile and pedestrian/bicycle conflicts.

Comment Response 5-35

Restriction of access via Monte Vista and forcing all Park & Ride access via Commercial Street is not recommended as doing so could result in the very thing that the city is trying to avoid and create vehicle queuing impacts at Commercial/San Dimas, which are avoided by providing the

additional access point at Monte Vista. Additionally, Monte Vista is the current access point for the existing Park and ride facility.

The supplementary traffic analysis conducted does not anticipate significant changes in traffic volumes on Railway St that would result in safety impacts. Traditional traffic demand assignment dictates that drivers will use higher-classification streets (such as San Dimas Avenue) over minor access road (such as Railway and Monte Vista) when LOS operations are acceptable and can facilitate the demand without major delays. The traffic analysis results indicates that the LOS on San Dimas will be acceptable, which indicates 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.

Comment Response 5-36

A Developer has plans to utilize those properties, however, the City of San Dimas can influence that design.

Comment Response 5-37

The requested action would eliminate access for residents along Commercial Street and could impede some emergency access. If desired, the Construction Authority will work with the City of San Dimas to provide signage that prohibits right turns from the proposed parking lot onto Commercial Street and to provide other signage/design features to improve transit patron access to the parking facility while reducing effects on residents in the area.

Comment Response 5-38

See comment response to 5-37.

Comment Response 5-39

See comment response to 5-37.

Comment Response 5-40

See comment response to 5-37.

Comment Response 5-41

See comment response to 5-37.

Comment Response 5-42

See comment response to 5-37. Additionally, queueing analysis does not indicate that there would be an issue at this intersection. Signal timing can be adjusted in the future in order to maximize intersection efficiency.

Comment Response 5-43

See comment response to 5-37.

Comment Response 5-44

The CEQA transportation analysis studied potential pedestrians, bicyclists, and transit rider impacts and found that no significant changes in vehicle traffic would occur due to the proposed changes and, thus no mitigation is required.

Traffic calming devices are not proposed as mitigation measures for any CEQA impact, therefore, are not required to be analyzed as mitigation. The Construction Authority nevertheless remains open to future coordination with the City of San Dimas on appropriate signage and control measures to improve parking access for transit patrons while reducing effects on local residents.

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. No further mitigation is required.

Comment Response 5-45

The design has been revised to accommodate right-turns from vehicles, including large vehicles such as garbage trucks and fire engines while restricting access to the alley from the parking lot; see revised Figures 1-2 and 1-4. Vehicles will be able to exit the alley heading eastbound and turn right onto the parking lot driveway and head to Commercial Street allowing access to San Dimas Avenue. Further refinements can be made during final design. The Construction Authority anticipates prohibition of right turns from the parking lot westbound onto the alley via signage.

Comment Response 5-46

As discussed in Section 3.2.2 of the Draft SEIR 3 and Section 1.2 of the Transportation Technical Memorandum (Appendix A), analysis for the proposed Project Modification only includes the six intersections where travel patterns are expected to change, as compared to the 24 intersections included in SEIR 2 for the San Dimas Station. It was determined that operations at the other 18 intersections analyzed in SEIR 2 would remain substantially unchanged since travel patterns at these locations are not expected to change. The analysis for these intersections, which can be found in SEIR 2, still applies. Section 3.2.2 of the Draft SEIR 3 has been modified to further clarify the study area for 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 clear 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.

Comment Response 5-47

Foothill Transit may revise or cancel operation of Route 499. Since a decision on future bus operations resides with Foothill Transit, any relocation of this bus stop would also be determined by Foothill Transit.

The supplemental traffic analysis documented in Chapter 3 of the SEIR and in Appendix A found no substantial delays or queuing due to the Project Modifications (see Attachment B to Appendix A).

Please also see response to comment 5-29.

Comment Response 5-48

As discussed in Section 3.2.2 of the Draft SEIR 3 and Section 1.2 of the Transportation Technical Memorandum (Appendix A), analysis for the proposed Project Modification only includes the six intersections where travel patterns are expected to change, as compared to the 24 intersections included in SEIR 2 for the San Dimas Station. It was determined that operations at the other 18 intersections analyzed in SEIR 2 would remain substantially unchanged since travel patterns at these locations are not expected to change. The analysis for these intersections, which can be found in SEIR 2, still applies. Section 3.2.2 of the Draft SEIR 3 has been modified to further clarify the study area for the Project Modification.

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 clear 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.

Comment Response 5-49

The traffic evaluation completed in May 2021 was summarized in Attachment A of Appendix A to the Final SEIR 3. Inclusion of this technical memorandum does not change conclusions or impact identified in the impact analysis.

Comment Response 5-50

The multi-family residential property located on the south side of Commercial Street that faces north towards Freedom Park and the proposed driveway, would have views of construction activity related to the new access roadway. Approximately four of these units would have windows or property fronts that directly face Freedom Park and the proposed construction. However, views of construction as seen from this residential property would be temporary in

nature and buffered by several trees that line the border of Freedom Park, as well as additional vegetation, landscaping, and structures. Regarding surrounding properties, the front of the single-family residence adjacent to the multi-family property to the west faces away from Freedom Park and has a surrounding wall and tall bushes that would impede views of construction from that property. The single-family residences adjacent to Freedom Park to the west, on the north side of Commercial Street, also have a bordering wall, fence, and trees that would buffer views of construction. In addition, Mitigation Measure VIS-2 would consider temporary construction area screening in areas adjacent to roadways, residences, and businesses, which would minimize short-term construction impacts.

Comment Response 5-51

Impacts to Freedom Park for the proposed access road would be less than significant. 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 existing land uses. In addition, impacts to residences resulting from vehicle headlights from usage of the proposed access road would be fleeting and temporary. This is consistent with the typical lighting environment experienced by residential properties in urban and suburban areas. Lighting from the vehicle headlights would be buffered by the proposed wall and landscaping, as well as existing trees and vegetation that border Freedom Park.

Comment Response 5-52

In a binding letter of intent signed on June 17, 2021 between the City of San Dimas and Construction Authority, the City desires that the Project's parking facility be located on the west portions of parcels (902 and 903) within Freedom Park for the new access road. 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 existing land uses. Although the access road would require the removal of vegetation, including several trees, the new landscaping would be relocated/replaced in accordance with the Construction Authority's Tree Removal Policy prepared for the Project to further delineate the boundaries of the Freedom Park amenities. Additionally, use of the relocated and reconfigured parking facility could increase visibility for transit patrons and encourage continued enjoyment of the park. Mitigation Measure VIS-1 would ensure impacts to tree removal are less than significant, as replacement/relocation of trees would be determined by a qualified arborist and follow applicable landscape guidelines and design strategies consistent with the Metro Rail Design Criteria (MRDC), the Construction Authority's Tree Removal Policy, and in compliance with the city's tree preservation ordinances.

Comment Response 5-53

As discussed in Comment Response 5-51, impacts to residences resulting from vehicle headlights from usage of the proposed access road would be fleeting and temporary. Lighting from the vehicle headlights would be buffered by the proposed wall and landscaping, as well as

existing trees and vegetation that border Freedom Park. Although the introduction of vehicle headlights from the proposed access road would somewhat alter existing conditions, vehicle lighting conditions do currently exist in the surrounding setting. Freedom Park and the San Dimas parking facility are located in an urban area with commercial and residential businesses with regular traffic from vehicles, particularly vehicles that use the current parking facility. The introduction of vehicle headlights from the proposed access road would not significantly alter existing lighting conditions.

This multi-family residential use is located in a Downtown/Old Town area of San Dimas where there is an existing higher level of lighting (both pedestrian level lighting and standard street lighting) already present. Being in the city's downtown area, this property is already currently subject to additional lighting from vehicle headlights traveling in a downtown area that attracts people/drivers/vehicles from throughout the city. Specifically, vehicle headlights are currently temporarily directed onto the first level of this property when vehicles travelling southbound on San Dimas Avenue turn right onto Commercial Street. Currently vehicle headlights are temporarily directed onto the first level of the residential building when vehicles turn into the property's driveway on the south side of Commercial Street (turning right into the complex from traveling eastbound on Commercial; turning left into the complex from traveling westbound on Commercial). So headlights from the new driveway would not be something new the residents are not already experiencing. Any vehicle headlights from vehicles exiting the new proposed project driveway on the north side of Commercial Street would be temporary and fleeting as the vehicles would generally be in constant movement. There are some bushes and small trees directly in front of some parts of the residential building that could help to block some new lighting.

Comment Response 5-54

As discussed in Section 4.2.3.3, the modified parking configuration would be located on approximately 2.57 acres of land that is currently used as an existing Park & Ride lot for Foothill Transit. It is anticipated that the reconfiguration and relocation of the parking facility would result in less construction (duration and equipment) than previously disclosed in the 2013 FEIR and subsequent environmental actions. In addition, the relocation of the parking facility would also result in fewer relocations of facilities that would have been 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. 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.

As discussed in Section 1.2.3, the Project Modifications would reconstruct the existing transit parking facility to provide approximately 114 additional parking spaces over the existing number (for a total of approximately 289 spaces), which is consistent with the approved Project. The

Gold Line Foothill Extension Phase 2B Parking Analysis report completed for Metro used the Supportive Transit Parking Program (STPP) model to determine the number of parking spaces needed for the station. This model is used for Metro rail projects throughout the county and is consistent with regional growth demands. Parking management plans and parking enforcement are expected to occur around the station to prevent the effects of overflow parking in the surrounding areas. Based on experience with Phase 2A of the Gold Line and other project openings, the traveling public quickly adjusts to an understanding of available parking and will adjust their travel to/from stations accordingly. Therefore, substantial VMT associated with parking searches is not anticipated. Furthermore, the Project Modifications would provide infrastructure that supports alternative modes of access for bicycles and pedestrians, which would encourage alternative modes of transportation, reducing the number of vehicles in the area. During operations, the Project Modifications would not impact ridership levels or result in a change to the anticipated VMT saving associated with implementation of the Project. Therefore, Project Modifications would still reduce criteria air pollutant emissions and the associated air quality impacts to human health. Thus, the Project with implementation of the Project Modifications would continue to represent a regional air quality benefit and reduce air quality impacts to human health in the region.

As described in Section 4.2.3.4, the Project Modifications would result in changes to local traffic circulation in the surrounding area; however, the affected intersections would not experience a significant change in vehicle volumes or delay that would cause a significant localized air quality impact to the surrounding area. Since the modified San Dimas Station parking location would be located on an existing San Dimas Park & Ride lot, vehicle activity associated with the modified San Dimas Station parking lot would not result in a substantial new source or type of emissions to the surrounding residential neighborhood. The type of vehicle traffic to and from the station would be primarily light duty autos and trucks, which are not substantial sources of toxic air contaminant emissions, such as diesel PM. Further, as described in Section 3.1.2.4, the Project would continue to result in a net reduction of 40,074 vehicle miles traveled per day in the Study Area, and therefore, reduce the associated criteria air pollutant and GHG emissions in the Study Area, and offset any vehicle circulation activity that could occur.

Comment Response 5-55

Impacts related to greenhouse gas emissions associated with implementation of the Project are described and evaluated in Section 4.4, Climate Change, of the Draft SEIR. As stated in Section 4.4.3.3, the modified parking configuration would require less construction equipment and a shorter construction duration than originally assumed in the 2013 FEIR. In addition, the Project Modifications would result in fewer relocations of facilities that would have been required under the location approved in the SEIR 2. Therefore, the short-term GHG emissions impacts of the Project Modifications would be no greater than those identified by the 2013 FEIR and subsequent environmental actions. As described in Section 4.4.3.4, long-term operation of the Project, with implementation of the proposed Project Modifications would continue to result in substantial VMT savings of 370,805 per day for the region and 40,074 per day for the Study Area. Therefore, the Project, with the Project Modifications, would continue to reduce GHG emissions and result in a net reduction in GHG emissions. Long-term impacts of the Project

Modifications would be no greater than those identified by the 2013 FEIR and subsequent environmental actions, and no new or more severe significant impacts would occur. Therefore, no new mitigation is required.

Comment Response 5-56

Section 4.6.3.3 states the new access road provided along Commercial Street would require the partial acquisition of the western portion of two parcels from the City to build a two-way road along the western portion of Freedom Park. The two parcels required for partial acquisition include (8390-021-902) and (8390-021-903). The area where the access road would be placed is currently a vegetated area that contains no park facilities or amenities. Use of this area for the proposed access road would not impact the Freedom Park memorial monument, therefore, the Project Modifications would not impact the Veterans Monument. In addition, landscaping and a sitting wall or fence would be provided to Freedom Park as part of the Project Modifications. Public access to the western portion of the park would be buffered during construction of the Project Modifications to allow for work vehicles to access the site. However, park access would remain open on the eastern portion of Freedom Park during construction activities. The new roadway would be designed in accordance with city and LACOFD design requirements to allow access and adequate response times for emergency services. In addition, landscaped areas would be provided on both sides of the roadway and along the perimeter of the parking facility, and would be in accordance with the City's tree preservation ordinance and design requirements. Section 4.6.3.4 also states, new landscaping would be provided to replace existing vegetation and to further delineate the boundaries of the Freedom Park amenities. Additionally, use of the relocated and reconfigured parking facility could increase visibility for transit patrons and encourage continued enjoyment of the park. Public access to the park would remain open during operations.

As discussed in Section 4.1.3.3, the Project Modifications have the potential to result in short-term impacts to visual resources that would include temporary visual obstructions, distractions, and interferences within the existing visual environment due to the presence of construction equipment and construction objects (e.g., staged/stockpiled building materials, traffic barricades, signage, construction personnel, and lighting should work be conducted in the evening hours). These activities would be visible from residences, businesses, roadways, and portions of the City of San Dimas Freedom Park adjacent to the areas where the modifications are planned. Visitors of the Veterans Monument at the City of San Dimas Freedom Park would have northwest-facing views of construction activity. However, the size of the three monument structures as well as the bordering wall and landscaping of the park would obstruct views of construction. In addition, approximately two residences located on the west side of Monte Vista Avenue would have east-facing views of construction activity. The east-facing views would be partially impeded by surrounding landscaping with trees and vegetation. Approximately eight residences are located along the southern border of Commercial Street. However, the fronts of these residences face away from the Project Site, and views of the Project site from the back are buffered by the residences' parking garages, storage structures, fences, gates, and/or backyards. In addition, since the Project Site currently serves as the San Dimas Park & Ride parking lot, construction would entail less equipment, materials, and construction activities than

those evaluated in the 2013 FEIR for the approved parking location. Construction activities are not expected to create new shadow effects on sensitive users. Implementation of mitigation measures identified in the 2013 FEIR and subsequent environmental actions would reduce short-term construction-related visual quality impacts associated with the Project Modifications to less than significant (VIS-1 through VIS-3).

Comment Response 5-57

Future CEQA documentation referred to is the Final SEIR 3. Language will be revised in the Final SEIR 3 once consultation is concluded. The Draft SEIR is correct by stating consultation is ongoing at time of development of that report.

Comment Response 5-58

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.

Additional supplemental analysis was prepared to confirm that there would not be operational or construction impacts as a result of the driveway location. This analysis concluded that noise levels would be below the level of moderate impact and would be further reduced as a result of the wall that is present along the western edge of the proposed access driveway. The additional analysis and other changes to the noise analysis have been clearly identified in a revised Noise Memorandum that is provided as Appendix C to the Final SEIR 3.

Comment Response 5-59

Noise from automobile sources is primarily attributable to tire interaction with pavement at speed. Speeds would be very low at the entry/exit and there is an existing wall located along the eastern edge of the property in question that will provide shielding from automobile noise. No noise mitigation measures were prescribed at the home because no noise impacts were determined at that receptor. See also Comment Response 5-58.

Comment Response 5-60

Nighttime construction is not anticipated in association with the Project Modifications. Previously identified construction noise impacts on the project will remain significant and unavoidable with implementation of mitigation measures N-1 and N-2. However, no new construction noise

impacts have been identified and as discussed in Section 1.2.3, a combination of screen wall, other fencing and/or landscaping may be provided along the perimeter of the proposed San Dimas parking lot along Monte Vista Avenue and on the southern edge of the Project Modifications near the alley.

Comment Response 5-61

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 will work with the City of San Dimas to identify and fund traffic control on Commercial Street and Monte Vista Avenue as warranted to reduce potential automobile and pedestrian/bicycle conflicts.

As discussed in Section 1.2.3, a combination of screen wall, other fencing and/or landscaping may be provided along the perimeter of the proposed San Dimas parking lot along Monte Vista Avenue and on the southern edge of the Project Modifications near the alley. Additionally, the Project site would continue to be used as a parking facility. As discussed in Section 4.1.3.4, mitigation measures VIS-4 and VIS-5 would ensure that the facility design, landscaping, and lighting are appropriate for the site and fit the surrounding community, which would also enhance the unity and intactness of the views of the site.

Comment Response 5-62

As discussed in Section 4.6.3.3, potential short-term construction impacts to police protection services would be related to traffic and disruptions along access routes. Construction vehicles could temporarily increase traffic congestion and road closures, or road constriction based on the construction of the Project Modifications. Intermittent traffic congestion would be temporary and would not substantially affect police response times. A Traffic Management Plan (TMP), as described in Chapter 3 of this Draft SEIR 3, would be implemented to address traffic issues during construction (CTR-3). The TMP would include provisions for coordinating with police departments to maintain emergency service coverage during Project Modification construction, consistent with the 2013 FEIR and subsequent environmental actions. Short-term police protection impacts associated with the Project Modifications would be less than significant. Additionally, the affected police and fire departments would not experience impacts that would not be considered typical for operation of parking facilities. The Project Modifications would not substantially increase the demand for local police or fire protection services as the LASD Transit Services Bureau would address most emergency calls. It is anticipated that construction of surface lots as opposed to parking garages allows police and emergency service providers to have greater visibility and accessibility of the parking facilities, which may reduce the amount of time it takes to respond to calls. Additionally, the existing site is already used as a parking lot, so impacts would be similar to existing conditions, and may only incrementally increase due to the increase in the number of parking spaces. Therefore, the Project Modifications would not result in the need for additional long-term police officers or firefighters.

Comment Response 5-63

As discussed in Section 4.14.3.4, the Project would introduce new impervious surfaces; however, the extent would be minimal and would not alter the drainage or increase the amount of runoff significantly since most of the areas where parking facilities would be developed are already developed with buildings and other impervious materials. Furthermore, the Project Modifications would largely be located on an area of current impervious surface since it is already in use as a parking facility. The relocated and reconfigured parking facility would include landscaped areas such as parking islands, areas adjacent to pedestrian walkways and other site perimeter locations. There would be a decreased amount of impervious surface associated with the Project compared to the Approved Project since the proposed San Dimas parking location is approximately 2.57 acres as compared with the Approved Project location which is a site of approximately 3.36 acres. Although there would not be less impervious area in the City of San Dimas, the Project Modifications result in less impervious area devoted to the project. Bioswales could be added within the Project Modifications footprint if space permits to capture and treat potential runoff pollutants that can accumulate as a result of parked vehicles.

Comment Response 5-64

The Park & Ride Facility will be designed to Metro Rail Design Criteria and local landscape codes to the extent practicable. The Construction Authority is not required to adhere to City Code requirements. It is anticipated that the parking lot can accommodate 289 spaces, including appropriate ADA and landscaping features.

Comment Response 5-65

As discussed in Section 4.1.3.3, the new proposed parking facility would be constructed in the City of San Dimas, which contains its own tree protection ordinance as discussed in the 2013 FEIR and subsequent environmental actions. Potential removal of trees may be protected by the City's ordinance when the site is being cleared to construct the proposed surface parking lot. While the Construction Authority is not subject to local ordinances, it has opted to voluntarily comply with local tree protection ordinances to the extent feasible. The construction of the relocated parking facility may require two or more existing trees to be removed from the City of San Dimas Freedom Park related to the potential new driveway, in addition to trees and shrubs located in planters within the existing parking lot. Although the Project Modifications would require minor landscaping including tree replacement/relocation, the required permitting and replacement/relocation of trees would maintain a similar level of vividness with the implementation of the Project Modifications. Trees and landscaped areas that require removal would be replaced/relocated in accordance with the Construction Authority's Tree Removal Policy prepared for the Project.

Comment Response 5-66

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 and new impacts are not anticipated. 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. Additional information is provided in Appendix A Attachment C.

Parking for construction equipment will primarily occur on the construction site and not result in impacts on the neighborhood.

Comment Response 5-67

The CEQA analysis included in Draft SEIR 3 is equivalent with prior Project analysis for consistency and is in line with engineering and design information currently available. As discussed in Section ES.1.3, no new or more severe impacts have been identified with implementation of the Project Modifications, and the modifications do not result in new significant impacts beyond those previously identified for the Project. As such, implementation of the Project Modifications would not result in new or significant impacts per CEQA Guidelines, and no additional alternatives beyond those considered in the 2013 FEIR need to be analyzed. Further, all previously identified mitigation remains in place and applicable to the proposed project modifications.

Comment Response 5-68

Comment includes introductory remarks. No environmental concerns or issues are described, therefore, no response is needed.

Comment Response 5-69

In accordance with CEQA Guidelines and SB 743, CEQA does not qualify parking as an environmental Impact. 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' LR Account in the same proportion as the original LR 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.

The proposed use would reserve all spaces for Metro Park & Ride patrons during normal commute times. However, there is potential to enter an agreement with Metro to use the parking facility on weekends and after commuting hours, which would allow use for businesses and events in downtown San Dimas.

Comment Response 5-70

As discussed in Section 1.2.2. of the Draft SEIR 3, the Construction Authority will prepare a Parking Management Plan (PMP) to address the concerns identified. Adoption and implementation of the PMP is the responsibility of the city along with acceptance of the offer for enforcement from Metro.

Comment Response 5-71

Elimination of the Foothill Transit line is not part of the Project or Project Modifications. Foothill Transit may modify or cancel the bus service once the LRT service opens. The replacement of bus service with LRT service is considered a transit enhancement.

Comment Response 5-72

The Construction Authority completed analysis related to the Bus Interface Study and has conducted coordination with Foothill Transit staff on future bus operations. The shuttle bus evaluated in the 2019 SEIR is not part of the current service plan, therefore, this analysis was not included in the ridership evaluation. The Construction Authority continues to work with Foothill Transit and other bus service providers on appropriate transit service conditions. Commitments made in the 2013 FEIR and subsequent environmental actions remain in effect.

Comment Response 5-73

Section 3.1.2.4 of the Draft SEIR 3 describes the pedestrian features included in the Project to address safety concerns related to the connection between the proposed parking lot and the San Dimas station. In addition, the safety analysis presented in Section 4.13.3 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 will work with the City of San Dimas to identify and fund traffic control on Commercial Street and Monte Vista Avenue as warranted to reduce potential automobile and pedestrian/bicycle conflicts.

Comment Response 5-74

Please refer to response to comment 5-37. In addition, a supplemental evaluation (not required by CEQA) was conducted to determine the transportation effects of the proposed Project Modifications to the surrounding roadway system compared to the previous proposed location. A discussion of this supplemental evaluation is provided in Section 3.2 of the Draft SEIR 3.

Based on the results of the evaluation, no substantial changes in traffic operations due to the Project Modifications are anticipated. The traffic analysis found an increase in delay in the PM Peak Hour Intersection Operations of 7.7 seconds at San Dimas Ave/ Railway St and 4.5 seconds at San Dimas Ave/ Commercial Street, however, both intersections will remain at a traffic level of service A or B (the lowest levels of traffic delay). Therefore, the residential neighborhoods is not anticipated to be substantially affected by the proposed Project Modification.

Since no CEQA impacts are identified no mitigation is required. Nevertheless, the Construction Authority has committed to work with the City of San Dimas to identify project features, signage and other design considerations to improve transit patron access and reduce effects on surrounding residences.

Traditional traffic demand assignment dictates that drivers will use higher-classification 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 indicates that the LOS on San Dimas will be acceptable, which indicates 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.

Comment Response 5-75

Typically, vehicle queue is minimal when the intersection is operating at LOS A as shown in Table 3-7 of the Draft SEIR 3. However based on the analysis model (Synchro/SimTraffic software), the 95th percentile queue for all approach lanes to the intersection are expected to be accommodated within the existing available storage. Therefore, vehicle queue is not anticipated to cause potential design hazards.

Section 3, Transportation, of the Draft SEIR 3 and the Transportation Technical Memorandum (Appendix A) of the Draft SEIR 3 have been modified to include the results of the queuing analysis for the San Dimas Avenue/Commercial Street intersection (Attachment B of Appendix A). Inclusion of the queueing analysis at San Dimas Avenue/Commercial Street intersection does not change conclusions or impact identified in the impact analysis.

Comment Response 5-76

The Park & Ride facility and pedestrian/ADA pathways will be designed to meet all Metro Rail Design criteria.

Comment Response 5-77

As discussed in Section 4.3.3, the City of San Dimas where the new proposed parking facility would be constructed contains its own tree protection ordinance as discussed in the 2013 FEIR and subsequent environmental actions. As discussed in Section 1.2.3, the Project Modifications would require the removal of large trees within Freedom Park for implementation of the new access road, and trees located within landscaped planters in the existing parking lot. The

potential removal of trees within Freedom Park and in landscaped planters within the existing parking lot, may be protected by the City's ordinance when the site is being cleared to construct the proposed surface parking lot. While the Construction Authority is not subject to local ordinances, it has opted to voluntarily comply with local tree protection ordinances to the extent feasible. Trees and landscaped areas that require removal would be replaced/relocated in accordance with the Construction Authority Tree Removal Policy prepared for the Project. This would be conducted via implementation of mitigation measures identified in the 2013 FEIR and subsequent environmental actions that would reduce potential short-term, direct construction-related impacts associated with the Project Modifications to less than significant (B-2).

Comment Response 5-78

As discussed in Section 4.14.3.4, the relocated and reconfigured parking facility would include landscaped areas such as parking islands, areas adjacent to pedestrian walkways and other site perimeter locations. The Construction Authority is not bound by City requirements, however, intends to work with the City of San Dimas to provide appropriate landscaping and irrigation.

Comment Response 5-79

As discussed in Section 4.1.3.4, although the Project Modifications would require minor landscaping including tree removal, the required permitting and relocation of trees would maintain a similar level of vividness with the implementation of the Project Modifications. Trees and landscaped areas that would be removed during construction would be relocated/replaced in accordance with the Construction Authority's Tree Removal Policy prepared for the Project, which would maintain existing thermal levels and would not contribute to the urban heat island. Similarly, the amount of impervious surface would remain similar to existing conditions as implementation of the Project Modifications would not cause significant change to the landscape. The Project site would continue to be used as a parking facility. The Project Modifications would result in less project-associated impervious surface than the Approved Project.

Comment Response 5-80

As discussed in Section 4.14.3.3, the Project Modifications would not result in increased levels of ground disturbance, therefore no increase of potential short-term surface water impacts is anticipated. The Project Modifications would be required to comply with all applicable water quality permits and regulations. Consistent with the Project, construction of the Project Modifications would be required to comply with NPDES permits described in Section 3.14.1 of the 2013 FEIR, Section 3.11.1 of SEIR 1, and Section 4.14.3.3 of SEIR 2. Compliance would include preparation of a Storm Water Pollution Prevention Plan and deployment of stormwater BMPs such as those described in the 2013 FEIR and subsequent environmental actions. As such, the Project Modifications would not violate water quality standards or discharge requirements, substantially alter the existing drainage pattern of the site, or contribute to runoff water that would exceed existing or planned capacity.

Comment Response 5-81

As discussed in Section 1.2.3, the Project Modifications would reconstruct the existing transit parking facility to provide approximately 114 additional parking spaces over the existing number (for a total of approximately 289 spaces), which is consistent with the approved Project. The Gold Line Foothill Extension Phase 2B Parking Analysis report completed for Metro used the Supportive Transit Parking Program (STPP) model to determine the number of parking spaces needed for the station. This model is used for Metro rail projects throughout the county and is consistent with regional growth demands. Parking management plans and parking enforcement are expected to occur around the station to prevent the effects of overflow parking in the surrounding areas. Based on experience with Phase 2A of the Gold Line and other project openings, the traveling public quickly adjusts to an understanding of available parking and will adjust their travel to/from stations accordingly. Therefore, substantial VMT associated with parking searches is not anticipated. Furthermore, the Project Modifications would provide infrastructure that supports alternative modes of access for bicycles and pedestrians, which would encourage alternative modes of transportation, reducing the number of vehicles in the area.

As described in Section 4.2.3.4, the Project Modifications would result in changes to local traffic circulation in the surrounding area; however, the affected intersections would not experience a significant change in vehicle volumes or delay that would cause a significant localized air quality impact to the surrounding area. Since the modified San Dimas Station parking location would be located on an existing San Dimas Park & Ride lot, vehicle activity associated with the modified San Dimas Station parking lot would not result in a substantial new source or type of emissions to the surrounding residential neighborhood. The type of vehicle traffic to and from the station would be primarily light duty autos and trucks, which are not substantial sources of toxic air contaminant emissions, such as diesel PM. Further, as described in Section 3.1.2.4, the Project would continue to result in a net reduction of 40,074 vehicle miles traveled per day in the Study Area, and therefore, reduce the associated criteria air pollutant and GHG emissions in the Study Area, and offset any vehicle circulation activity that could occur.

Comment Response 5-82

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 existing land uses. Furthermore, building a parking facility adjacent to the existing Project ROW is consistent with the San Dimas General Plan. The Project Modifications would be constructed on the existing parking lot and the western portion of Freedom Park which is zoned as "Creative Growth", as compared to the previously approved site which consists of industrial land use. The Project Modifications would be consistent with existing and planned land uses and development of the reconfigured parking facility would not prevent future re-development that could include additional features permitted in the Creative Growth zoning designation.

The Draft SEIR did not identify any significant land use changes. The reconfiguration of parking will be in accordance with Metro parking policy guidance and this CEQA document evaluates the impacts of the revised parking configuration and circulation (i.e., LOS analysis) in Section 3.2. The travel demand model, as described and presented in SEIR 2, was calibrated to incorporate Metro's updated parking policy. As described in Section 3.2, the Project Modifications would not result in changes to travel demand. Furthermore, as described in Section 3.1.2.4, the Project Modifications would not change ridership levels at any of the proposed stations and would, therefore, not change VMT for the region or Study Area. As a result, updated ridership estimates are not necessary. Since the Project would continue to result in substantial VMT savings, the Project would continue to result in an air quality benefit to the region. Section 4.2.3.4 evaluates the impact of the changes to local traffic circulation in the surrounding area; however, the affected intersections would not experience a significant change in vehicle volumes or delay that would cause a significant localized air quality impact to the surrounding area. Therefore, no new or more severe significant impacts to air quality would occur.

Comment Response 5-83

Impacts related to greenhouse gas emissions associated with implementation of the Project are described and evaluated in Section 4.4, Climate Change, of the Draft SEIR. As stated in Section 4.4.3.3, the modified parking configuration would require less construction equipment and a shorter construction duration than originally assumed in the 2013 FEIR. In addition, the Project Modifications would result in fewer relocations of facilities that would have been required under the location approved in the SEIR 2. Therefore, the short-term GHG emissions impacts of the Project Modifications would be no greater than those identified by the 2013 FEIR and subsequent environmental actions. As described in Section 4.4.3.4, long-term operation of the Project, with implementation of the proposed Project Modifications would continue to result in substantial VMT savings of 370,805 per day for the region and 40,074 per day for the Study Area. Therefore, the Project, with the Project Modifications, would continue to reduce GHG emissions and result in a net reduction in GHG emissions. Long-term impacts of the Project Modifications would be no greater than those identified by the 2013 FEIR and subsequent environmental actions, and no new or more severe significant impacts would occur. Therefore, no new mitigation is required.

Comment Response 5-84

No new noise impacts were identified. Thus, no noise mitigation in the form of noise barriers or structural retrofitting were recommended.

Comment Response 5-85

The proposed site for the relocated parking lot is already used for Foothill Transit parking, therefore, it is not anticipated that the Project Modifications would significantly exacerbate the safety and security concerns as mentioned. As discussed in Section 1.2.3, Crime Prevention

Through Environmental Design (CPTED) features would be incorporated in the Project Modifications to provide a safe, secure, and comfortable transit system. CPTED principles for transit stations include open visible platforms, adequate lighting, signage, emergency telephones, a public address system, and security camera monitoring systems. Furthermore, as discussed in Section 4.13.3.3, incidents of crime would not likely increase during construction for areas adjacent to the Project Modifications. However, incidents of property crime could occur at construction sites (e.g., theft of construction machinery and materials), although they would be minimized through implementation of standard site security practices by contractors. Further, implementation of mitigation measures identified in the 2013 FEIR and subsequent environmental actions would reduce potential short-term construction-related security impacts associated with the Project Modifications to less than significant (SS-2).

Consistent with the 2013 FEIR and subsequent environmental actions, CPTED features would be incorporated in the Project Modifications to provide a safe, secure, and comfortable transit system. With the incorporation of mitigation measures SS-3 through SS-10, long-term impacts of the Project Modifications would be no greater than those identified by the 2013 FEIR and subsequent environmental actions. No new or more severe significant impacts would occur.

Comment Response 5-86

As discussed in Section 4.3.3, the City of San Dimas where the new proposed parking facility would be constructed contains its own tree protection ordinance as discussed in the 2013 FEIR and subsequent environmental actions. As discussed in Section 1.2.3, the Project Modifications would require the removal of large trees within Freedom Park for implementation of the new access road, and trees located within landscaped planters in the existing parking lot. The potential removal of trees within Freedom Park and in landscaped planters within the existing parking lot, may be protected by the City's ordinance when the site is being cleared to construct the proposed surface parking lot. While the Construction Authority is not subject to local ordinances, it has opted to voluntarily comply with local tree protection ordinances to the extent feasible. Trees and landscaped areas that require removal would be relocated/replaced in accordance with the Construction Authority Tree Removal Policy prepared for the Project. This would be conducted via implementation of mitigation measures identified in the 2013 FEIR and subsequent environmental actions that would reduce potential short-term, direct construction-related impacts associated with the Project Modifications to less than significant (B-2).

In a binding letter of intent signed on June 17, 2021 between the City of San Dimas and Construction Authority, the City desires that the Project's parking facility be located on the west portions of parcels (902 and 903) within Freedom Park for the new access road. Acquisition of a portion of Freedom Park is not anticipated to impact existing park facilities or result in a significant community facility impact from reduced parkland facilities.

Additionally, Section 4.13.3.4 states security camera monitoring would also be placed near Freedom Park for additional security.

Comment Response 5-87

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 existing land uses. Furthermore, building a parking facility adjacent to the existing Project ROW is consistent with the San Dimas General Plan. The Project Modifications would be constructed on the existing parking lot and the western portion of Freedom Park which is zoned as “Creative Growth”, as compared to the previously approved site which consists of industrial land use. The Project Modifications would be consistent with existing and planned land uses and development of the reconfigured parking facility would not prevent future re-development that could include additional features permitted in the Creative Growth zoning designation.

As discussed in Section 4.15.5, the Project Modifications would not introduce the potential for new induced growth beyond that already identified for the Project in the 2013 FEIR and subsequent environmental actions. The parking facility relocation and reconfiguration represents minor design refinements that would not modify the already identified transit service improvements. The reconfigurations are not expected to introduce any changes to the already analyzed and approved evaluation of growth-inducing impacts provided in the approved 2013 FEIR and subsequent environmental actions. The Project Modifications do not include the development of employment-generating uses that might otherwise provide direct or indirect growth-inducing impacts. As described in the 2013 FEIR and subsequent environmental actions, the Project Modifications are not anticipated to attract growth directly or indirectly beyond that already envisioned in SCAG’s 2012-2035 RTP/SCS. The corridor cities’ land use plans recognize and account for the approved 2013 FEIR and subsequent environmental actions, and any future new development would be consistent with each city’s land use plans and regulations. No new or increased significant impacts would occur.

Comment Response 5-88

In accordance with CEQA Guidelines and SB 743, CEQA does not qualify parking as an environmental impact. 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’ LR Account in the same proportion as the original LR 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.

The Construction Authority is responsible for developing a PMP to address the issues related to spillover parking. Additionally, the City will be compensated for the Parking lot by the Authority and these funds are required to be used for a transportation use. Therefore, the City has the

potential opportunity to use the acquisition funds for establishing a new parking facility for use by business patrons in downtown San Dimas.

As described in Section 1.2.3, 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. As such, additional parking spaces would be provided for transit riders. Additionally, 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 Draft SEIR.

Comment Response 5-89

The Feed and Grain business is not permitting to use the existing Park and Ride lot for Foothill Transit for retail/business parking. 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' LR Account in the same proportion as the original LR 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.

Comment Response 5-90

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 Draft SEIR. In general property values have been shown to increase in locations throughout the US where transit stations are nearby and easily accessible.

Comment Response 5-91

A binding letter of intent between the Construction Authority and City of San Dimas was approved on June 17, 2021 stating the City does not desire the Project's parking facility to displace the City Yard Parcel and desires instead that the Project's parking facility be located on property owned by the City and identified as Los Angeles County. The Authority is willing to pursue relocating the Project's parking facility onto the New Parcels, subject to obtaining applicable environmental approvals and other satisfactory terms and conditions. Additionally, the Construction Authority also commits to work with the City and Foothill Transit, the current user of the largest portion of the New Parcels, to implement a reasonable transition plan which will further multimodal transportation in the region. According to Proposition A and C Local Return Guidelines (2007 Edition), the Project Modifications would be eligible for Proposition C funding under Project Code 110 (Fixed Route Service): service enhancements related to

bus/rail interface, and Project Code 290 (Park and Ride Lots): projects must be coordinated with Metro and appropriate affected transit operator(s). Economic effects related to a reduction of Proposition C funds for the City of San Dimas are beyond the scope of CEQA assessment.

Comment Response 5-92

The Construction Authority is pleased to continue coordination efforts with the City of San Dimas for the proposed Project Modifications.

From: [Lisa Levy Buch](#)
To: [Hertz, Robert](#); [Chris Burner](#); [Koon, Jessica](#)
Cc: [Mitch Purcell](#); [Laura Langford](#); [Chris Lowe](#)
Subject: [EXTERNAL] Comment: DRAFT SEIR 3 (location of relocation of parking for San Dimas Station to San Dimas Park and Ride location)
Date: Monday, April 04, 2022 4:13:33 PM

From: AOL Security <lmlawcwm@aol.com>
Sent: Saturday, April 2, 2022 12:45 PM
To: Lisa Levy Buch <LLevyBuch@foothillgoldline.org>
Subject: DRAFT SEIR 3 (location of relocation of parking for San Dimas Station to San Dimas Park and Ride location)

The DRAFT SEIR is inadequate because it does not address the environmental impact of the removal the landscaping in the Park and Ride parking lot. The landscaping consists of large planters including large mature trees installed in the parking lot to reduce the environmental impact of the parking lot when it was built. There is no analysis of the environmental impact on the residential neighborhood of greatly increasing the capacity of the parking lot. The impacts include air quality, noise, and increased traffic on residential streets. The impacts are not properly addressed or completely ignored.

6-1
6-2

Curtis W. Morris
243 E. Fourth Street
San Dimas, CA 91773

Telephone 909-638-7249

Comment Letter 6: Morris, Curtis W. (Resident)

Comment Response 6-1

As discussed in Section 4.3.3, the City of San Dimas where the new proposed parking facility would be constructed contains its own tree protection ordinance as discussed in the 2013 FEIR and subsequent environmental actions. Potential removal of trees may be protected by the City's ordinance when the site is being cleared to construct the proposed surface parking lot. While the Construction Authority is not subject to local ordinances, it has opted to voluntarily comply with local tree protection ordinances to the extent feasible. This would be conducted via implementation of mitigation measures identified in the 2013 FEIR and subsequent environmental actions that would reduce potential short-term, direct construction-related impacts associated with the Project Modifications to less than significant (B-2). Additionally, any trees that require removal would be relocated/replaced in accordance with the Construction Authority's Tree Removal Policy prepared for the Project. The parking lot will be designed in accordance with Metro design criteria that include landscaping requirements for surface parking areas.

Comment Response 6-2

A supplemental traffic evaluation (not required by CEQA) was conducted to determine the transportation effects of the proposed Project Modifications to the surrounding roadway system compared to the previous proposed location. A discussion of this supplemental evaluation is provided in Section 3.2 of the Draft SEIR 3. Based on the results of the evaluation, no substantial changes in traffic operations due to the Project Modifications are expected. The traffic analysis found an increase in delay in the PM Peak Hour Intersection Operations of 7.7 seconds at San Dimas Ave/ Railway St and 4.5 seconds at San Dimas Ave/ Commercial Street, however, both intersections will remain at a traffic level of service A or B (the lowest levels of traffic delay). Therefore, the residential neighborhoods is not anticipated to be substantially affected by the proposed Project Modification.

Analysis related to issues of air quality and noise are included in sections 4.2 and 4.12 of the Draft SEIR 3 respectively. No new significant impacts were identified and no new mitigation measures are thus proposed.

From: [Lisa Levy Buch](#)
To: [Hertz, Robert](#); [Chris Burner](#); [Koon, Jessica](#)
Cc: [Mitch Purcell](#); [Chris Lowe](#); [Laura Langford](#)
Subject: [EXTERNAL] Comment: SEIR REPORT
Date: Monday, April 04, 2022 4:10:37 PM

From: Brenda Dalton <gymnasticcoach@hotmail.com>
Sent: Sunday, April 3, 2022 9:14 AM
To: Lisa Levy Buch <LLevyBuch@foothillgoldline.org>; Santos Luna <smky7stmn@aol.com>; Brenda Dalton <gymnasticcoach@hotmail.com>
Subject: SEIR REPORT

Dear Lisa Levy Busch,

We adamantly oppose the movement of the Gold Line Parking from its original approved industrial location (close to the San Dimas Sherriff's station) to the residential area of the Park and Ride lot on Monte Vista.

7-1

I live on Railway Street. My children enjoy playing in our front yard. I am concerned about their safety as the parking lot, if moved to Monte Vista, will undoubtedly attract an increased number of homeless people, trash, added traffic and increased crime. This would be better mitigated by the parking lot staying in its original, approved location closer to the San Dimas Sherriff's Station, the fire station and the Gold Line Station itself.

7-2

Commuters will absolutely use Railway Street as an overflow parking opportunity. This will take up our personal parking spaces that allows friends and family to come over for a visit or a special event.

7-3

The City of San Dimas and any affected businesses, were aware many years ago, about the proposed location of the Gold Line Station and parking lot. Over the last 16 years, they have done nothing to prepare for this moment. Do not make the Railway residents pay for their lack of planning.

7-4

In contrast, we purchased our homes fully aware of the Gold Line coming through, but what we were never aware of was that the parking lot could or would be moved to the Park and Ride at the end of our street!

7-5

Please don't allow us to lose our hometown neighborhood.

7-6

Sincerely,
Santos and Tiffany Luna

P.S. We are on vacation, so I have authorized my neighbor to send this email to you on my behalf.

Comment Letter 7: Luna, Santos and Tiffany (Residents)

Comment Response 7-1

Opposition of the Project Modifications is noted and will be considered by the Construction Authority.

Comment Response 7-2

Supplemental traffic analysis was conducted and found no substantial changes in traffic operations due to the Project Modifications. The supplementary traffic analysis conducted does not anticipate significant changes in traffic volumes on Railway St that would result in safety impacts. Traditional traffic demand assignment dictates that drivers will use higher-classification streets (such as San Dimas Avenue) over minor access road (such as Railway and Monte Vista) when LOS operations are acceptable and can facilitate the demand without major delays. The traffic analysis results indicates that the LOS on San Dimas will be acceptable, which indicates 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. The City of San Dimas also has the authority to prohibit traffic on Railway St between Cataract and Monte Vista if desired.

CEQA safety analysis determined that Implementation of the mitigation measures identified in the 2013 FEIR and subsequent environmental actions would reduce long-term impacts associated with the Project Modifications to less than significant (SS-3 through SS-10). 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.

Comment Response 7-3

As discussed in Section 1.2.3, all jurisdictions would be provided a PMP developed by the Construction Authority that would prohibit on-street parking for transit patrons and that 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. The City of San Dimas also has the authority to prohibit traffic on Railway St between Cataract and Monte Vista if desired and/or to implement a system of permit parking in the neighborhood.

Comment Response 7-4

Opposition of the Project Modifications is noted and will be considered by the Construction Authority.

Comment Response 7-5

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 from Commercial Street 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. Furthermore, building a parking facility adjacent to the existing Project ROW is consistent with the San Dimas General Plan.

Comment Response 7-6

The Project Modifications would not displace existing housing units to construct the reconfigured San Dimas Station parking facility. No new or more severe significant impacts would occur.

From: [Lisa Levy Buch](#)
To: [Hertz, Robert](#); [Chris Burner](#); [Koon, Jessica](#)
Cc: [Mitch Purcell](#); [Laura Langford](#); [Chris Lowe](#)
Subject: [EXTERNAL] SEIR 3 Comment
Date: Monday, April 04, 2022 4:08:18 PM

From: Paul Looney <simplsol@aol.com>
Sent: Sunday, April 3, 2022 10:09 PM
To: Lisa Levy Buch <LLevyBuch@foothillgoldline.org>
Cc: Paul Looney <simplsol@aol.com>
Subject: Response to the SEIR - 3

Ms. Buch,

I am very disappointed by the limited consideration given to the input provided by my fellow San Dimas Citizens. I am not alone. Many of us believe our efforts were in vain, that Metro has not listened, and a very dangerous change to the agreed to plan is in process.

8-1

Here is the formal reply:

Response the the SEIR - 3 (SCH No. 2010121069)

By

Paul Looney

San Dimas Resident

8-2

The SEIR - 3, Evaluating Relocation of the San Dimas Station Parking Facility notes the meetings held on this subject. In addition, there were petitions with over 100 signature and numerous individual submissions. The vast majority of these opposed the relocation of the parking facility.

8-3

Major concerns were raised about the relocation that have not been addressed by the SEIR - 3.

Rather than review all of them, I'd like to concentrate on the top two issues raised during the review. These two issues are: safety and parking. Either is sufficient to prevent the relocation but neither has been addressed satisfactory in the report - with the exception of restoring the stoplight at the intersection of San Dimas Ave. and the railroad crossing, it appears that all of our work, input, advice and concern was disregarded.

8-4

In the subsequent paragraphs I will refer to the parking lot off Arrow Hwy. as the Original plan and the parking lot off San Dimas Ave. (currently used as a Park and Ride for the Foothill Transit busses) as the Alternate plan. Note that the Original plan was approved by Metro and the City of San Dimas in January of 2021. Note also that the majority of the town, responding to this suggested move, has been adamantly opposed to the move. Here are two of the reasons:

8-5

Safety

1. The Original plan called for entrance/exit to the station and parking from Arrow Hwy. This has fewer side businesses, less in and out traffic, and more room for traffic mitigation - such as turn lanes and traffic lights.

The Alternate plan has parking entrance through a residential neighborhood, adjacent to San Dimas Ave. which is one of the busiest streets in the city - already congested before the addition of the station.

8-6

2. The Original plan had provided entrance from the parking structure to the station without crossing major streets.

The Alternate plan calls for approximately 400 people to cross the heavily trafficked San Dimas Ave. twice a day.

8-7

3. The Original plan allowed riders to enter the station from the parking lot without crossing any of the Metro tracks.

The Alternate plan requires all riders entering the station from the new parking lot to cross the southern Metro track - regardless of which direction they are taking the train.

8-8

4. The Original plan accommodated future station platform expansion to the East, an additional half block to Walnut St. - with riders still entering the center of the station.

The Alternate plan will push future congestion out onto San Simas Ave.

8-9

5. The Original plan accommodated entrance from Walnut St., including the Senior Housing on the North side of the tracks and business located off of Walnut on Arrow Hwy. I will discuss Sheriff and Para-Medical access below.

The Alternate plan offers no compensating accommodation.

8-10

6. The Alternate plan is geographically only a half block farther from the Fire and Police Departments - but there is no direct access from these two departments on Walnut St. They will have to go around the station on Arrow Hwy. or Bonita - two streets that are very heavily trafficked now, and expected to be more so in the future.

8-11

6. During the reviews citizens of San Dimas expressed concerns about adequate policing. The SEIR - 3 mentions that as a possible problem but says Metro will provide extra policing if it proves necessary; they do not say how much policing, for how long, or at what price. The Original plan provided a direct line-of-sight from the Sheriff's Station to both the station and the parking lot. The Original plan also provide for the removal of the City Maintenance Yard, which is retained in the Alternate plan, and will reduce access from the Sheriff's Station to both the Metro Station and parking for the station.

8-12

7. The Original plan had room for large "Kiss and Ride" on the same side of the street as the station.

The Alternate plan has a smaller lot on the opposite side of San Dimas Ave. The Original site would be more conducive to drop-offs, reducing congestion, increasing safety.

8-13

Parking

Two of the most interesting paragraphs in the SEIR - 3 are:

3.2.4 Parking Analysis Methodology

"The travel demand model used for the 2013 FEIR and subsequent environmental analysis constrains ridership and parking demand to the available parking provided by the Metro Foothill Gold Line Extension Project. This model constraint ties the parking demand to the parking spaces provided, rather than indicating total unconstrained parking demand. The model constrains ridership and station access by assigning all trips a non-parking mode of access after the parking facility reaches capacity each day, such as Kiss & Ride, transit, walking, and bicycling.

8-14

The travel demand model does not allow for overflow parking onto adjacent streets or private businesses...”

8-14
(Cont.)

In other words: the parking analysis does not even pretend to look at the “need” for parking but looks only at “available” parking. This is crazy!

1. Pre-Pandemic the Alternate parking lot was already beyond capacity. Riders taking the busses were parking on residential streets and adjacent business lots.

8-15

2. The current lot has approximately 177 spaces (depending on how you calculate motorcycle parking and electric vehicle charging stations).

8-16

3. San Dimas City Guideline call for minimizing asphalt and maximizing vegetation. The current Park and Ride is one of the most beautiful parking lots in the city, here is how the SWIR - 3 describes it:

“The majority of the reconfigured parking areas are paved and devoid of vegetation.”

8-17

This is disproven by the pictures included in the SEIR - 3.

The Alternate plan calls for bulldozing all the trees, shrubs, and flowers in the existing lot.

4. The Alternate plan will only increase the spaces from the already inadequate parking by 112;, at best and most optimistic; 177 to 289

8-18

5. According to the SEIR - 3, the San Dimas Station is supposed to accommodate approximately 1640 daily boardings - but only 289 parking spaces?

8-19

The original plan, for the original parking (again I remind you, this was the “approved” plan) called for 450 parking spaces.

That number was probably conservative.

8-20

The need for those 450 space has not been remove by a bureaucratic slight-of-hand. Those spaces ARE needed. The only place that can reasonably and safely accommodate them are at the Original plan site.

1. According to our local paper, Mayors along the existing Gold Line/ L Line route are already complaining about inadequate parking forecast and provided by Metro.

8-21

2, One of the main reasons for the Gold Line/ L Line was to get rides out of cars. If this is successful, and I think it will be, then many more parking spaces will be required just for this.

8-22

3. Rides that now park in the Downtown Park and Ride and ride down to the Via Verde Park and Ride will now be contending with former bus riders from Via Verde coming north to board the Metro Down Park and Ride.

8-23

4. Previously, all drivers parking in the Downtown Park and Ride were boarding west-bound busses. The extension of the Gold Line/ L Line adds east-bound rides - especially as it is extended on to Montclair and eventually on to Ontario International.

8-24

Adding more police, no matter who pays for them, does not solve this problem. NOR DOE THE SEIR - 3!

8-25

None of these issues are new. The have all ben raised - in great detail.

8-26

Either should firmly, indisputable, and permanently kill any further attempt to use the Alternate plan.

The Original plan was good. The Alternate plan is not.

Please retain the original plan.

Sincerely,

Paul Looney
simplsol@aol.com

8-27

Comment Letter 8: Looney, Paul (Resident)

Comment Response 8-1

Opposition of the Project Modifications is noted and will be considered by the Construction Authority.

Comment Response 8-2

Comment includes introductory remarks. No environmental concerns or issues are described, therefore, no response is needed.

Comment Response 8-3

Opposition of the Project Modifications is noted and will be considered by the Construction Authority.

Comment Response 8-4

In accordance with CEQA Guidelines and SB 743, CEQA does not qualify parking as an environmental impact. As discussed in Section 1.2.3, the Project Description states all jurisdictions would be provided a PMP developed by the Construction Authority that would prohibit on-street parking for transit patrons and that 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.

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. In addition, the Construction Authority has stated in SEIR 3 that they will work with the City of San Dimas to identify and implement appropriate traffic calming and other signage/design features.

Comment Response 8-5

Opposition of the Project Modifications is noted and will be considered by the Construction Authority.

Comment Response 8-6

A supplemental evaluation (not required by CEQA) was conducted to determine the transportation effects of the proposed Project Modification to the surrounding roadway system compared to the previous proposed location. A discussion of this supplemental evaluation is provided in Section 3.2 of the Draft SEIR 3. Based on the results of the evaluation, no substantial changes in traffic operations will occur due to the Project Modifications. The traffic analysis found an increase in delay in the PM Peak Hour Intersection Operations of 7.7 seconds at San Dimas Ave/ Railway St and 4.5 seconds at San Dimas Ave/ Commercial Street,

however, both intersections will remain at a traffic level of service A or B (the lowest levels of traffic delay).

Comment Response 8-7

A discussion of the effects of the pedestrian crossing along San Dimas Avenue is provided on page 3-8 of the Draft SEIR 3. It states that based on the traffic evaluation conducted, the proposed east-west crosswalk just south of the Project right-of-way "would not result in a substantial increase in traffic delay and signal operations for the crosswalk at San Dimas Avenue would result in minimal delays compared to the delays experienced at the nearby intersections."

The traffic evaluation completed in May 2021 was summarized in a technical memorandum that has been included in Appendix A of the Draft SEIR 3. Inclusion of this technical memorandum does not change conclusions or impact identified in the impact analysis.

Comment Response 8-8

Metro Rail Design Criteria includes appropriate pedestrian safety elements at pedestrian grade crossings at stations. There are many instances of pedestrian grade crossings at Metro stations throughout the rail network. All appropriate safety elements will be incorporated at this station and pedestrian crossings.

Comment Response 8-9

A supplemental traffic evaluation (not required by CEQA) was conducted to determine the transportation effects of the proposed Project Modification to the surrounding roadway system compared to the previous proposed location. A discussion of this supplemental evaluation is provided in Section 3.2 of the Draft SEIR 3. Based on the results of the evaluation, no substantial changes in traffic operations will occur due to the Project Modifications. The traffic analysis found an increase in delay in the PM Peak Hour Intersection Operations of 7.7 seconds at San Dimas Ave/ Railway St and 4.5 seconds at San Dimas Ave/ Commercial Street, however, both intersections will remain at a traffic level of service A or B (the lowest levels of traffic delay).

Comment Response 8-10

The primary purpose of the pedestrian access from Walnut was for connection between the Park & Ride facility to the Metro station. Adding a new pedestrian walkway between Walnut and the Metro station would require additional ROW acquisitions that are infeasible at this time.

Comment Response 8-11

As discussed in Section 4.6.3.3, potential short-term construction impacts to police and fire protection services would be related to traffic and disruptions along access routes. Construction vehicles could temporarily increase traffic congestion and road closures, or road constriction based on the construction of the Project Modifications. Intermittent traffic congestion would be temporary and would not substantially affect police response times. A TMP, as described in

Chapter 3 of this Draft SEIR 3, would be implemented to address traffic issues during construction (CTR-3). Potential long-term impacts to police and fire protection services would be related to demand for additional services, safety, and increased response time, but given the proximity of both the Sheriff station and Fire Departments to the site of the Project Modifications, substantial changes to response times over what they would be with the Approved Project are not anticipated. The Project Modifications would not directly induce population growth in the region.

The affected police and fire departments would not experience impacts that would be considered atypical for operation of parking facilities. The Project Modifications would not substantially increase the demand for local police or fire protection services as the LASD Transit Services Bureau would address most emergency calls. It is anticipated that construction of surface lots allows police and emergency service providers to have greater visibility and accessibility of the parking facilities, which may reduce the amount of time it takes to respond to calls. Therefore, the Project Modifications would not result in the need for additional long-term police officers or firefighters.

Comment Response 8-12

As discussed in Section 4.13.3.4, law enforcement personnel would routinely patrol the stations and parking areas to help prevent crime from occurring. See comment response 8-11 for additional information on safety and security.

Comment Response 8-13

A supplemental traffic evaluation (not required by CEQA) was conducted to determine the transportation effects of the proposed Project Modification to the surrounding roadway system compared to the previous proposed location. A discussion of this supplemental evaluation is provided in Section 3.2 of the Draft SEIR 3. Based on the results of the evaluation, no substantial changes in traffic operations would occur due to the Project Modifications. The traffic analysis found an increase in delay in the PM Peak Hour Intersection Operations of 7.7 seconds at San Dimas Ave/ Railway St and 4.5 seconds at San Dimas Ave/ Commercial Street, however, both intersections will remain at a traffic level of service A or B (the lowest levels of traffic delay).

Comment Response 8-14

Reduction of parking spaces associated with Gold Line Phase 2B was evaluated in SEIR 2 and is not the subject of SEIR 3. In accordance with SB 743, CEQA does not qualify traffic and parking as an environmental impact. Metro Rail Design criteria does not require provision of parking at Metro rail facilities. Ridership is not solely dependent on the provision of Parking for transit patrons. High levels of ridership can be achieved with patrons accessing the station via other modes, including Kiss & Ride, bus transfer, biking, and walking.

Comment Response 8-15

As discussed in Section 1.2.3, the Project Description states all jurisdictions would be provided a PMP developed by the Construction Authority that would prohibit on-street parking for transit patrons and that 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.

Comment Response 8-16

Motorcycle and electric vehicle parking is not detailed in the current design. Details for motorcycle and electric vehicle spaces will be further developed as the design is advanced into final design.

Comment Response 8-17

As discussed in Section 4.3.3, the City of San Dimas where the new proposed parking facility would be constructed contains its own tree protection ordinance as discussed in the 2013 FEIR and subsequent environmental actions. As discussed in Section 1.2.3, the Project Modifications would require the removal of large trees within Freedom Park for implementation of the new access road, and trees located within landscaped planters in the existing parking lot. The potential removal of trees within Freedom Park and in landscaped planters within the existing parking lot, may be protected by the City's ordinance when the site is being cleared to construct the proposed surface parking lot. While the Construction Authority is not subject to local ordinances, it has opted to voluntarily comply with local tree protection ordinances to the extent feasible. Trees and landscaped areas that require removal would be relocated/replaced in accordance with the Construction Authority's Tree Removal Policy prepared for the Project. This would be conducted via implementation of mitigation measures identified in the 2013 FEIR and subsequent environmental actions that would reduce potential short-term, direct construction-related impacts associated with the Project Modifications to less than significant (B-2).

Comment Response 8-18

As discussed in Section 1.2.3, the total number of parking spaces would be approximately 289, which would remain consistent with the approved Project.

Comment Response 8-19

The ridership results for the reduced parking spaces were conducted in SEIR 2 based on the 289 spaces available. SEIR 3 makes no changes to the ridership or travel demand methodology.

Comment Response 8-20

The Parking reduction resulting from SEIR 2 was previously approved and is not under evaluation in this SEIR. SEIR 3 does not change the number of provided parking spaces from SEIR 2.

Comment Response 8-21

Metro Rail Design Criteria does not require provision of auto parking at Metro LRT stations. The provision of parking is optional and is dependent on available land, urban form, and travel demand management policy. Refer to Metro Rail Design Criteria Section 6.

Comment Response 8-22

Ridership is not solely dependent on the provision of Parking for transit patrons. High levels of ridership can be achieved with patrons accessing the station via other modes, including Kiss-N-Ride, bus transfer, biking, and walking.

Comment Response 8-23

SEIR 2 evaluated the impacts of reduced parking and did not identify any CEQA impacts. Parking will be provided on a first come/first serve basis for commuters.

Comment Response 8-24

SEIR 2 evaluated the impacts of reduced parking and did not identify any CEQA impacts. Parking will be provided on a first come/first serve basis for commuters.

Comment Response 8-25

As discussed in Section 1.2.3, Crime Prevention Through Environmental Design (CPTED) features would be incorporated in the Project Modifications to provide a safe, secure, and comfortable transit system. CPTED principles for transit stations include open visible platforms, adequate lighting, signage, emergency telephones, a public address system, and security camera monitoring systems. Furthermore, as discussed in Section 4.13.3.3, incidents of crime would not likely increase during construction for areas adjacent to the Project Modifications. However, incidents of property crime could occur at construction sites (e.g., theft of construction machinery and materials), although they would be minimized through implementation of standard site security practices by contractors. Further, implementation of mitigation measures identified in the 2013 FEIR and subsequent environmental actions would reduce potential short-term construction-related security impacts associated with the Project Modifications to less than significant (SS-2).

Comment Response 8-26

No environmental concerns or issues are described, therefore, no response is needed.

Comment Response 8-27

Opposition of the Project Modifications is noted and will be considered by the Construction Authority.

From: [Lisa Levy Buch](#)
To: [Hertz, Robert](#); [Chris Burner](#); [Koon, Jessica](#)
Cc: [Mitch Purcell](#); [Laura Langford](#); [Chris Lowe](#)
Subject: [EXTERNAL] Comment: Draft SEIR for relocation of San Dimas Station
Date: Monday, April 04, 2022 4:09:50 PM

From: AOL Security <lmlawcwm@aol.com>
Sent: Sunday, April 3, 2022 3:19 PM
To: Lisa Levy Buch <LLevyBuch@foothillgoldline.org>
Subject: Draft SEIR for relocation of San Dimas Station

I have the following comments on the Draft SEIR

There is no evaluation that supports there is no new impact from moving the entrance of the parking lot from a six lane highway to two residential streets.

9-1

There is no evaluation of the environmental impact of moving the pickup/drop off location from the Park and Ride parking lot to the intersection of Bonita Avenue and San Dimas Avenue during the years that the Foothill Transit will continue to operate the 499 line and the 452 Line. The 499 line is a successful commuter service and there will be an impact of moving the pick up / drop off point. That is a new impact that will probably be severe, but it appears to have not been studied at all.

9-2

Under the general section ES.2.1.11 Aesthetics, VIS-1, there is a comment that specimen and other large trees will be relocated. Is there any evidence trees the size of those in the Park and Ride lot have every been successfully relocated.

9-3

In 4.1.3.4 Long Term Impacts the report describes the landscaping in the Park and Ride parking lot as sparse. Only a person who has never seen the parking lot, or one who has a low regard for the truth, would make that statement. The same section says the Park and Ride parking lot and the proposed parking lot are both parking lots so there is no environment impact of the new parking lot replace the existing Park and Ride lot. There is in fact a substantial difference between a landscaped parking lot of the size of the Park and Ride lot and a parking lot with more than 100 additional spaces and no interior landscaping. The Park and Ride parking lot is in a residential area and it was designed to fit into a residential area. The new parking lot is in a residential area, but it is not designed for a residential area.

9-4

Whether you can see it or not, other people easily understand the difference in the environmental impact between the approved parking lot and the one now proposed.

9-5

In the words of a very recent appellate court case on the adequacy of EIRs, comments of the members of the public, even if not in the language of highly paid environmental lawyers, are entitled to consideration.

9-6

Curtis W. Morris
243 E. 4th Street
San Dimas, CA 91773

Telephone (909) 638-7249

Comment Letter 9: Morris, Curtis W. (Resident)

Comment Response 9-1

A supplemental traffic evaluation (not required by CEQA) was conducted to determine the transportation effects of the proposed Project Modification to the surrounding roadway system compared to the previous proposed location. A discussion of this supplemental evaluation is provided in Section 3.2 of the Draft SEIR 3. Based on the results of the evaluation, no substantial changes in traffic operations will occur due to the Project Modifications. The traffic analysis found an increase in delay in the PM Peak Hour Intersection Operations of 7.7 seconds at San Dimas Ave/ Railway St and 4.5 seconds at San Dimas Ave/ Commercial Street, however, both intersections will remain at a traffic level of service A or B (the lowest levels of traffic delay).

Comment Response 9-2

A supplemental traffic evaluation (not required by CEQA) was conducted to determine the transportation effects of the proposed Project Modification to the surrounding roadway system compared to the previous proposed location. A discussion of this supplemental evaluation is provided in Section 3.2 of the Draft SEIR 3. Based on the results of the evaluation, no substantial changes in traffic operations will occur due to the Project Modifications. The traffic analysis found an increase in delay in the PM Peak Hour Intersection Operations of 7.7 seconds at San Dimas Ave/ Railway St and 4.5 seconds at San Dimas Ave/ Commercial Street, however, both intersections will remain at a traffic level of service A or B (the lowest levels of traffic delay).

As stated in Section 3.1.2.4 of the Draft SEIR 3, based on coordination between the Construction Authority and Foothill Transit, Foothill Transit Lines 492 and 499 would no longer operate their current express service to downtown Los Angeles once Phase 2B of the Gold Line Extension is completed to Pomona. The Construction Authority has proposed some bus stop improvements to accommodate existing and future bus services. Final decisions on future bus transit rest with the Foothill Transit agency and are beyond the purview of the Construction Authority.

Comment Response 9-3

The Proposed Project would implement several mitigation measures regarding proper tree removal, including B-2 under Biological Resources and VIS-2 under Aesthetics. Implementation of these mitigation measures would ensure impacts regarding removal and relocation of trees would be less than significant. In addition, the Proposed Project would require the approval of permits for tree removal from the City of San Dimas. Any trees that require removal would be relocated/replaced in accordance with the Construction Authority's Tree Removal Policy prepared for the Project.

Comment Response 9-4

As discussed in Section 1.2.3, fencing and landscape would be provided along the perimeter of the proposed parking facility footprint, and along the new access road on Commercial Street. Additionally, a sitting wall or fence would be provided to Freedom Park as part of the Project Modifications. Section 4.14.3.4 also states the relocated and reconfigured parking facility would include landscaped areas such as parking islands, areas adjacent to pedestrian walkways and other site perimeter locations.

As discussed in Section 1.2.3, 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.

Section 4.11.3.4 also states, 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 existing land uses. Furthermore, building a parking facility adjacent to the existing Project ROW is consistent with the San Dimas General Plan. The Project Modifications would be constructed on the existing parking lot and the western portion of Freedom Park which is zoned as “Creative Growth”, as compared to the previously approved site which consists of industrial land use. The Project Modifications would be consistent with existing and planned land uses and development of the reconfigured parking facility would not prevent future re-development that could include additional features permitted in the Creative Growth zoning designation.

Comment Response 9-5

No environmental concerns or issues are described, therefore, no response is needed.

Comment Response 9-6

All comments provided have been considered and responses are provided in Final SEIR 3. No specific environmental concerns or issues are described in this comment. The comment is noted.



Foothill Gold Line

Metro Gold Line Foothill Extension Construction Authority