Chapter 7 – Responses to Comments

The Draft EIR for the proposed Metro Gold Line Foothill Extension – Azusa to Montclair was made available for a 45-day public review and comment period pursuant to the State CEQA Guidelines, Sections 15105 and 15087, beginning on August 5, 2012 and ending on October 5, 2012. The Metro Gold Line Foothill Extension Construction Authority also held public meetings to receive comments on the Draft EIR on September 20, 2012, at 5:30 p.m. in Montclair, and on September 24, 2012 at 5:30 p.m. in La Verne.

Written comments received during the public review period for the Draft EIR are presented in chronological order by the date of correspondence. Each comment letter is designated a number, and individual comments within each letter are also numbered. Written comments were received from the following persons:

1. Schaar, Rev. Christopher. August 22, 2012.

2. Wayne, Seymour. August 24, 2012.

3. Johnston, Dorothy. August 27, 2012.

4. Blackburn, Gregor, Branch Chief, Floodplain Management and Insurance Branch, FEMA, U.S. Department of Homeland Security. August 29, 2012.

5. Restivo, Al. September 7, 2012.

6. Vidales, Frank, Acting Chief, Forestry Division, Prevention Services Bureau, County of Los Angeles Fire Department. September 12, 2012.

7. Guerin, Holly. September 13, 2012.

8. Singleton, Dave, Program Analyst, Native American Heritage Commission. September 17, 2012.

9. Glavan, Frank. September 18, 2012.

10. Tammy. September 19, 2012.

11. Bennett, Brian. September 25, 2012.

12. Jordan, Patrick J., Commander, Homeland Security Division, Transit Services Bureau, County of Los Angeles Sheriff's Department. September 25, 2012.

13. Farmer, Walt. September 29, 2012.

14. Sultze, Jack. September 29, 2012.

15. Fowler, Barbara. October 5, 2012.

16. Lowry, Linda. City Manager, City of Pomona. October 1, 2012.

17. Russi, Bob, City Manager, City of La Verne. October 1, 2012.

18. Misso, Craig, Director, Facilities Planning and Operations. October 2, 2012.

19. Rafiq Ahmed, Project Manager, Brownfields and Environmental Restoration Program, Department of Toxic Substances Control. October 3, 2012.

20. Wray, Philip, Deputy Director, Development Services/City Engineer, City of Arcadia. October 4, 2012.

21. Desatnik, Brian, Director of Community Development, City of Claremont. October 4, 2012.

22. Morris, Curtis, Mayor, City of San Dimas. October 4, 2012.

23. Caldwell, D.H. October 4, 2012.

24. Lustro, Steve, Community Development Director, City of Montclair. October 4, 2012.

25. Raza, Adriana, Customer Service Specialist, Facilities Planning Department, County Sanitation Districts of Los Angeles County. October 4, 2012.

26. David A. Davies, Director of Public Works, City of Glendora. October 5, 2012.

27. Silverstein, Robert, Silverstein Law Firm on behalf of the Storage Centers LLP. October 5, 2012.

28. Taylor, Paul C., Los Angeles County Metropolitan Transportation Authority (Metro). December 19, 2012.

29. Doran, William, Director, Engineering and Construction, Metrolink. October 5, 2012.

30. West, Deidre, Manager, Environmental Planning Team, Metropolitan Water District of Southern California. October 5, 2012.

31. Nadler, Jonathan, Southern California Association of Governments. October 5, 2012.

32. Clive K. Houston-Brown, Associate Vice President for Facility & Technology Services & Chief Information Officer, University of La Verne. October 5, 2012.

33. Ulloth, John Jay and James Henry Washington. October 5, 2012.

34. Kukla, Dawn, Senior Environmental Planner, Division of Environmental Planning, Department of Transportation (Caltrans), District 7. October 5, 2012.

35. Scoot Morgan, Director, State Clearinghouse, State of California, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit. October 5, 2012.

36. Griswold, Scott. October 6, 2012.

37. Bowers, Norm. October 5, 2012.

38. Chien, Jui Ing, Park Planner, County of Los Angeles Department of Parks and Recreation. October 10, 2012.

39. Garabetian, Anton, Program and Project Supervisor, Rail Crossings Engineering Section, Consumer Protection and Safety Division, California Public Utilities Commission. October 15, 2012.

Responses to the comments are provided following each comment. Appropriate updated information and revisions to the Draft EIR in response to comments and information received are identified in underline in the Final EIR.

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From:	Firstpasa@aol.com
To:	Lisa Levy Buch
Subject:	GOLD LINE EXTENSION
Date:	Wednesday, August 22, 2012 12:41:32 PM

Dear Ms. Levy-Buch:

I wanted to voice my strong support for the extension of the Gold Line from Azusa to Claremont. This project is shovel ready and needs to be started and completed as soon as possible. As a resident of Glendora who is employed in Pasadena I would regularly use this extension. 1-1

Please register my support for this project!
Thank You!

The Reverend Christopher Schaar
Senior Pastor, Historic First Lutheran Church of Pasadena
cell 626.786.7315

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1. Schaar, Rev. Christopher, August 22, 2012.

Response 1-1

Your support of the project is acknowledged.

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SEYMOUR WAYNE
PRIVATE INVESTIGATOR
355 S. GLENWOOD
GLENDORA, CALIFORNIA 91741-3546
Office (626) 963-7827

License Number
DQ 000145

August 24, 2012

Lisa Levy Levy Buch
406 E. Huntington Dr., Suite 202
Monrovia, Ca. 91016-3633

Ms Buch:

My home is located north of the railroad tracks that will be carrying the Metro Gold Line extension.

My wife and I are looking forward to this project being completed. We are so used to having trains go by the tracks that now exist near our home, that we hardly ever notice them. 2-1

We believe in progress and feel the extension of the Line is headed in the right direction.

We fully are supportive of this proposed extension.

Thank you,

Seymour Wayne

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2. Wayne, Seymour, August 24, 2012.

Response 2-1

Your support of the project is acknowledged.

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From: Dorothy Johnston
To: Lisa Levy Buch
Subject: gold line comments
Date: Monday, August 27, 2012 7:54:26 PM

Like pretty much everything released so far. Have some concerns on how this will all fit through Claremont, but if that city is in agreement with your plan, then that is good. My main concern is the lack of a station between downtown Glendora and San DImas (whose location is too far to the east). I would like to recommend that since you are already building a grade separation at Lone Hill, why not make this into a elevated station ? It is almost halfway between these to stations and serve the auto mall and too huge shopping centers. This seems such a no-brainer when we are trying to get people out of their cars for even short trips like going shopping. I would also like improvements at the Pomona station in terms of connecting bus service on Garey. Seems the Metrolink platform and now yours, are pretty far from Garey, thus negating easy transfers to a major north-south Bus line. I also have concerns with the Indian Hill crossing in Claremont from just observing what pedestrians and some cars do there. The one building is so close to the line, it creates a bad blind spot. This should be grade separated with both Metrolink and MTA going under Indian Hill.

3-1

3-2

3-3

3-4

Thank You. Mark R. Johnston, 4185 van buren st, chino, ca 91710

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3. Johnston, Dorothy, August 27, 2012.

Response 3-1

The Construction Authority has and continues to work with the City of Claremont and other cities in the project study area.

Response 3-2
A station in the vicinity of Eucla Avenue (near the Foothill Village Shopping Center) was studied as the station to serve San Dimas in the 2007 Final EIR.

The current location for the San Dimas Station between San Dimas Avenue and Walnut Avenue was identified as the preferred station location by the City of San Dimas. This site also has more space available for a dedicated parking structure.

The current Glendora Station location at Glendora and Vermont Avenues was presented at the project scoping meetings in winter 2010/2011. This location was determined to be the preferred station location due to its proximity to the downtown Glendora area.

The stations along the Project are currently spaced in approximately 1.5 - 2 mile increments.

Adding a station at Lone Hill Avenue would both increase project cost and slow down trains, increasing the travel time between Montclair and downtown Los Angeles.

Response 3-3

The Construction Authority recently completed a “Bus Interface Study” for the Pasadena to Azusa segment of the Metro Gold Line Extension; the study serves as a planning guide for transit agencies and stakeholder Cities, as well as for the Construction Authority. The Construction Authority intends to conduct a similar study for the Azusa to Montclair extension at the time the project enters advanced engineering and design.

Response 3-4

Per the Metro Grade Crossing Policy for Light Rail Transit, the Milestone 1 – Initial Screening evaluation is performed first followed by Milestone 2 – Detailed Analysis and Milestone 3 – Verification. Milestones 2 and 3 go into a greater detailed analysis and are performed if the results of Milestone 1 show "Possible At Grade Operation" or worse.

The Draft EIR analysis for the Indian Hill grade crossing in City of Claremont indicated that the highest peak hour volumes at this crossing intersection would not meet the warrants for grade-separation per the application of the Metro Grade Crossing Policy. In addition, The Metro Light Rail Transit Design Standards establishes adequate sidewalk widths at station areas to provide safe pedestrian circulation and identifies various pedestrian and bicycle safety measures at grade crossings to mitigate potential impacts.

Sight distance conditions will be improved with the proposed wider sidewalks for this crossing location. As an additional safety measure, the project definition includes quadrant gates (spanning all traffic lanes) and pedestrian gates at this location.

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U.S. Department of Homeland Security
FEMA Region IX
1111 Broadway, Suite 1200
Oakland, CA. 94607-4052

FEMA

August 29, 2012

Ms. Levy Buch, Construction Authority Director
Public Affairs
Metro Gold Line Foothill
Extension Construction Authority
406 E. Huntington Drive, Suite 202
Monrovia, California 91016-3633

Dear Ms Buch:

This is in response to your request for comments regarding the Metro Gold Line Foothill Extension Azusa to Montclair Environmental Impact Statement (EIS)/Environmental Impact Report (EIR).

Please review the current effective countywide Flood Insurance Rate Maps (FIRMs) for the County of Los Angeles (Community Number 065043), Maps revised September 26, 2008; and City of Montclair (Community Number 060276), Maps revised August 28, 2008. Please note that the City of Montclair, Los Angeles County, California is a participant in the National Flood Insurance Program (NFIP). The minimum, basic NFIP floodplain management building requirements are described in Vol. 44 Code of Federal Regulations (44 CFR), Sections 59 through 65.

A summary of these NFIP floodplain management building requirements are as follows:

- All buildings constructed within a riverine floodplain, (i.e., Flood Zones A, AO, AH, AE, and A1 through A30 as delineated on the FIRM), must be elevated so that the lowest floor is at or above the Base Flood Elevation level in accordance with the effective Flood Insurance Rate Map.

- If the area of construction is located within a Regulatory Floodway as delineated on the FIRM, any ***development*** must not increase base flood elevation levels. **The term *development* means any man-made change to improved or unimproved real estate, including but not limited to buildings, other structures, mining, dredging, filling, grading, paving, excavation or drilling operations, and storage of equipment or materials.** A hydrologic and hydraulic analysis must be performed *prior* to the start of development, and must demonstrate that the development would not cause any rise in base flood levels. No rise is permitted within regulatory floodways.

4-1

- All buildings constructed within a coastal high hazard area, (any of the "V" Flood Zones as delineated on the FIRM), must be elevated on pilings and columns, so that the lowest horizontal structural member, (excluding the pilings and columns), is elevated to or above the base flood elevation level. In addition, the posts and pilings foundation and the structure attached thereto, is anchored to resist flotation, collapse and lateral movement due to the effects of wind and water loads acting simultaneously on all building components.

- Upon completion of any development that changes existing Special Flood Hazard Areas, the NFIP directs all participating communities to submit the appropriate hydrologic and hydraulic data to FEMA for a FIRM revision. In accordance with 44 CFR, Section 65.3, as soon as practicable, but not later than six months after such data becomes available, a community shall notify FEMA of the changes by submitting technical data for a flood map revision. To obtain copies of FEMA's Flood Map Revision Application Packages, please refer to the FEMA website at http://www.fema.gov/business/nfip/forms.shtm.

4-1

Please Note:

Many NFIP participating communities have adopted floodplain management building requirements which are more restrictive than the minimum federal standards described in 44 CFR. Please contact the local community's floodplain manager for more information on local floodplain management building requirements. The Montclair floodplain manager can be reached by calling Angelic Bird, Emergency Services Coordinator, at (909) 626-1217. The Los Angeles County floodplain manager can be reached by calling George De La O, Senior Civil Engineer, at (626) 458-7155.

4-2

If you have any questions or concerns, please do not hesitate to call Michael Hornick of the Mitigation staff at (510) 627-7260.

Sincerely,

Gregor Blackburn, CFM, Branch Chief
Floodplain Management and Insurance Branch

cc:
Angelic Bird, Emergency Services Coordinator, City of Montclair
George De La O, Senior Civil Engineer, Los Angeles County
Garret Tam Sing/Salomon Miranda, State of California, Department of Water Resources, Southern Region Office
Michael Hornick, NFIP Planner, DHS/FEMA Region IX
Alessandro Amaglio, Environmental Officer, DHS/FEMA Region IX

4. Blackburn, Gregor, Branch Chief, Floodplain Management and Insurance Branch, FEMA, U.S. Department of Homeland Security, August 29, 2012.

Response 4-1

The information provided about the National Flood Insurance Program (NFIP) is acknowledged. All Metro Gold Line Foothill Extension construction and operation activities would be in compliance with regulations pertaining to floodplains, floodways, and flood hazard areas, as applicable.

Response 4-2

The information about local floodplain management building requirements adopted by NFIP participating communities, including Montclair, is acknowledged. All Metro Gold Line Foothill Extension building would be constructed in compliance with the floodplain management requirements as applicable.

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From: Al Restivo [al@oaktreeassociates.com]
Sent: Tuesday, August 28, 2012 9:45 AM
To: Lisa Levy Buch
Subject: Montclair

Getting public light rail to Montclair and hopefully to the airport is an absolute necessity. I trust that this will be moved along and that the usual government foot dragging will not be the case. If the Chinese can build a railroad in 3 years, we should be able to build this extension in 1 year. After all, it is only 12 miles. Let's get moving on this without delay. Let's get the lawyers out of the way and start building this year! It will get lots of cars off the freeway—that is if you folks are smart and connect the stations by bus to where people live. They have done this in NYC for years. Why not Los Angeles County?
Sincerely,

5-1

AL C. RESTIVO, PH.D.
4338 Oakwood Avenue
La Cañada Flintridge, California 91011
818-952-1969

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5. Restivo, Al, September 7, 2012.

Response 5-1

Your support of the project is acknowledged. Construction of the Metro Gold Line Foothill Extension from Azusa eastward is anticipated to begin in 2016-2017. This construction schedule is dependent on funding availability.

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COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294
(323) 881-2401

DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

September 12, 2012

Ms. Levy Buch, Director of Public Affairs
Metro Gold Line Foothill Extension
Construction Authority
406 E. Huntington Drive, Suite 202
Monrovia, CA 91016-3633

Dear Ms. Buch:

DRAFT ENVIRONMENTAL IMPACT REPORT, METRO GOLD LINE FOOTHILL EXTENSION FROM AZUSA TO MONTCLAIR PROJECT, EXTENDS THE EXISTING METRO GOLD LINE BY 24 MILES TO THE EAST, FROM THE CITY OF PASADENA TO THE CITY OF MONCLAIR, AZUSA-CITRUS STATION TO THE CITY OF MONTCLAIR TRANSCENTER, EAST OF MONTE VISTA AVE IN MONTCLAIR, (FFER #201200116)

The Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

PLANNING DIVISION:

Section 3.5.2.2, paragraph one, should be amended as follows: "With the exception of the **Cities** of **La Verne and** Montclair which ~~is~~ **are** served by ~~its~~ **their** City Fire Department**s**, fire protection..." 6-1

LAND DEVELOPMENT UNIT:

ACCESS REQUIREMENTS

1. Every building constructed shall be accessible to Fire Department apparatus by way of access roadways, with an all-weather surface of not less than the prescribed width. The roadway shall be extended to within 150 feet of all portions of the exterior walls when measured by an unobstructed route around the exterior of the building. 6-2

2. Turning radii shall not be less than 32 feet. This measurement shall be determined at the centerline of the road. A Fire Department approved turning area shall be provided for all driveways exceeding 150 feet in-length and at the end of all cul-de-sacs.

3. All on-site driveways/roadways shall provide a minimum unobstructed width of 28 feet, clear-to-sky. The on-site driveway is to be within 150 feet of all portions of the exterior walls of the first story of any building. The centerline of the access driveway shall be located parallel to and within 30 feet of an exterior wall on one side of the proposed structure.

6-2

WATER REQUIREMENTS

1. Fire sprinkler systems are required in ALL residential and most commercial occupancies. For those occupancies not requiring fire sprinkler systems, it is strongly suggested that fire sprinkler systems be installed. This will reduce potential fire and life losses. Systems are now technically and economically feasible for residential use.

2. The development may require fire flows up to 8,000 gallons per minute at 20 per square inch residual pressure for up to a four-hour duration, as outlined in the 2011 County of Los Angeles Fire Code Appendix BB, Section BB 105. Final fire flows will be based on the size of buildings and types of construction used.

3. Fire hydrant spacing shall be 300 feet and shall meet the following requirements:

   a) No portion of lot frontage shall be more than 200 feet via vehicular access from a public fire hydrant.

   b) No portion of a building shall exceed 400 feet via vehicular access from a properly spaced public fire hydrant.

   c) Additional hydrants will be required if hydrant spacing exceeds specified distances.

   d) When cul-de-sac depth exceeds 200 feet on a commercial street, hydrants shall be required at the corner and mid-block.

   e) A cul-de-sac shall not be more than 500 feet in length when serving land zoned for commercial use.

6-3

GENERAL REQUIREMENTS:

1. The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows and fire hydrants.

2. Specific fire and life safety requirements for the construction phase will be addressed at the building fire plan check. There may be additional fire and life safety requirements during this time.

3. Fire Department requirements for access, fire flows and hydrants are addressed during the building permit stage.

6-4

4. Some of the proposed stations are located within the area described by the Forester and Fire Warden as a Fire Zone 4, Very High Fire Hazard Severity Zone (VHFHSZ). All applicable fire code and ordinance requirements for construction, access, water mains, fire hydrants, fire flows, brush clearance and fuel modification plans, must be met.

5. The County of Los Angeles Fire Department, Land Development Unit comments are only general requirements. Specific fire and life safety requirements will be addressed at the building and fire plan check phase. There may be additional requirements during this time.

6. The County of Los Angeles Fire Department, Land Development Unit appreciates the opportunity to comment on this project.

7. The statutory responsibilities of the County of Los Angeles Fire Department, Land Development Unit, are the review of and comment on, all projects within the unincorporated areas of the County of Los Angeles. Our emphasis is on the availability of sufficient water supplies for firefighting operations and local/regional access issues. However, we review all projects for issues that may have a significant impact on the County of Los Angeles Fire Department. We are responsible for the review of all projects within Contract Cities (cities that contract with the County of Los Angeles Fire Department for fire protection services). We are responsible for all County facilities, located within non-contract cities. 6-4

   The County of Los Angeles Fire Department, Land Development Unit may also comment on conditions that may be imposed on a project by the Fire Prevention Division, which may create a potentially significant impact to the environment.

8. Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department, Land Development Unit Inspector, Claudia Soiza, at (323) 890-4243.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

1. The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources and the County Oak Tree Ordinance.

2. The loss of Oak tree habitat should be mitigated pursuant to the provisions of the adjacent cities Oak Tree Ordinance. 6-5

3. Under the Los Angeles County Oak Tree Ordinance, a permit is required to cut, destroy, remove, relocate, inflict damage or encroach into the protected zone of any tree of the Oak genus located in unincorporated Los Angeles County which is 25 inches or more in circumference (eight inches in diameter), as measured 4½ feet above mean natural grade.

4. We have not received an Oak Tree Permit application or report for review. An Oak Tree Permit may be required for this project.

HEALTH HAZARDOUS MATERIALS DIVISION:

1. The Draft EIR refers to onsite and offsite soil contamination with hazardous substances. However, it does not identify the oversight agency for mitigation of the contaminated soils. The oversight agency should be identified. 6-6

   Furthermore, the statement in Section 3.9.4.1, HW-3, is incorrect. Soils contaminated with metals above Soluble Thresholds Limit Concentration (STLC), do not require removal. To manage cost and protect public health and environment, a risk based cleanup levels should be established for the identified contaminants. Excavated soils with metals concentration above STLCs has to be disposed of as California hazardous waste. 6-7

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,

Frank Vidales

FRANK VIDALES, ACTING CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

FV:ij

6. Vidales, Frank, Acting Chief, Forestry Division, Prevention Services Bureau, County of Los Angeles Fire Department, September 12, 2012.

Response 6-1

Information in Section 3.5 of the Final EIR has been updated to reflect that the City of La Verne has its own fire department.

Response 6-2

The roadway and driveway access requirements specified by the County of Los Angeles Fire Department are noted. The final design of the project facilities will comply with applicable local fire standards.

Response 6-3

The local water requirements regarding sprinkler design, fire flow, and hydrant spacing specified by the County of Los Angeles Fire Department are noted. The final design of the project facilities will comply with applicable local water requirements. The project does not include any residential or commercial occupancies.

Response 6-4

The requirements specified by the County of Los Angeles Fire Department are noted. The final design of the project will comply with applicable code and ordinance requirements and fire and life safety requirements as listed in the comment. The Construction Authority will address specific fire and life safety requirements at the time of the building and fire plan check.

Response 6-5

The project area comprises urban development along the existing rail corridor. There is no oak tree habitat within or adjacent to the project area. There is an area in Glendora where the project biologist noted the presence of coastal live oak trees. However, that area is outside of the railway right-of-way and would not be impacted by the project construction. Therefore, an Oak Tree Permit would not be required.

The proposed project will be constructed in compliance with all applicable tree ordinances. Mitigation Measure B-2 requires compliance with local jurisdiction tree preservation ordinances prior to taking any action to trim or remove significant or heritage trees. .

Response 6-6

The Department of Toxic Substances Control (DTSC) will be an oversight agency, with local Fire Department or Department of Public Works providing oversight if any UST removal is necessary, and the Regional Water Quality Control Board (RWCB) providing oversight if any groundwater contamination is encountered above regulatory limits.

Response 6-7

A requirement to establish a risk-based cleanup levels in the Soil Mitigation Plan has been included in the Mitigation Measure HW-3. The Plan will be reviewed and approved by the oversight agency. If excavated soil contains metals above the STLC, in compliance with existing regulations the soil would be disposed of as a California Hazardous Waste.

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From: Guerin, Holly [mailto:HGuerin@CBANK.COM]
Sent: Thursday, September 13, 2012 10:49 AM
To: Lisa Levy Buch
Subject: FW: Goldline Noise
Importance: High

Lisa,

I'm unable to attend the two meetings set for September but have a major concern. I live in a new development located at Foothill Blvd. and Grand Ave. in Glendora called the Arboreta.

My question

- Are there any plans to construct a sound barrier to protect the home owners in the Arboreta and Vintage property? The track runs in front of our development where we currently contend with the beer company's train noise which is less frequent then the projected schedule for the Goldline. 7-1

This will become a serious noise and air quality issue for us all and I need to report to our two associations the impact this will have on our area?

Sincerely,

Holly

Holly Guerin
Vice President/Sr. RM
Community Bank
505 E. Colorado Blvd.

Pasadena, Ca. 91101-2002
Work: 626 568-2233
Cell: 626 483-4600
Fax: 626 795-4964

7. Guerin, Holly, September 13, 2012.

Response 7-1

The residences in the Arboreta and Vintage property (located in the northwest quadrant of the Foothill Boulevard and Grand Avenue intersection in Glendora) were included in the noise and vibration impact assessment. As shown in Figure 3.11-8 and Figure 3.11-9 in the Draft EIR, a sound barrier was recommended to reduce noise levels at the Arboreta and Vintage property. The noise and vibration analysis for the city of Glendora can be found in Section 3.11.7 of the Draft EIR.

As described in Section 3.5 of the Draft EIR, operation of the project—which uses electrically-powered light rail trains and not the gasoline or diesel fuels that generate air pollutant emissions and are used by freight and Metrolink—would not substantially degrade air quality. Furthermore, as described in Section 3.1 of the Draft EIR, the project is expected to reduce mobile source air toxics (MSAT) emissions in the region resulting, generally improved air quality.

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STATE OF CALIFORNIA Edmund G. Brown, Jr., *Governor*

NATIVE AMERICAN HERITAGE COMMISSION
915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-6251
Fax (916) 657-5390
Web Site www.nahc.ca.gov
ds_nahc@pacbell.net

September 17, 2012

Ms. Lisa Levy Buch, Project Planner
Metro Gold Line Foothill Extension Authority
406 E. Huntington Drive, Suite 202
Monrovia, CA 91016-3633

Re: SCH#2010121069; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the **"Metro Gold Line Foothill Extension – Azusa to Montclair Project;"** located east of Los Angeles parallel and between I-210 and I-10; Los Angeles and San Bernardino Counties, California.

Dear Ms. Buch:

The Native American Heritage Commission (NAHC) is the State of California 'Trustee Agency' for the protection and preservation of Native American cultural resources pursuant to California Public Resources Code §21070 and affirmed by the Third Appellate Court in the case of EPIC v. Johnson (1985: 170 Cal App. 3rd 604).

This letter includes state and federal statutes relating to Native American historic properties or resources of religious and cultural significance to American Indian tribes and interested Native American individuals as 'consulting parties' under both state and federal law. State law also addresses the freedom of Native American Religious Expression in Public Resources Code §5097.9.

The California Environmental Quality Act (CEQA – CA Public Resources Code 21000-21177, amendments effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the CEQA Guidelines defines a significant impact on the environment as 'a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ...objects of historic or aesthetic significance." In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE), and if so, to mitigate that effect. The NAHC recommends that the lead agency request that the NAHC do a Sacred Lands File search as part of the careful planning for the proposed project.

The NAHC "Sacred Sites,' as defined by the Native American Heritage Commission and the California Legislature in California Public Resources Code §§5097.94(a) and 5097.96. Items in the NAHC Sacred Lands Inventory are confidential and exempt from the Public Records Act pursuant to California Government Code §6254 (r).

Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway. Culturally affiliated tribes and individuals may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We strongly urge that you make contact with the list of Native American Contacts on the attached list of Native American contacts, to see if your proposed project might impact Native American cultural resources and to obtain their recommendations concerning the proposed project. Pursuant to CA Public Resources Code § 5097.95, the NAHC requests cooperation from other public agencies in order that the Native American consulting parties be provided pertinent project information. Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e). Pursuant to CA Public Resources Code §5097.95, the NAHC requests that pertinent project information be provided consulting tribal parties, including archaeological studies. The NAHC recommends *avoidance* as defined by CEQA Guidelines §15370(a) to pursuing a project that would damage or destroy Native American cultural resources and Section 2183.2 that requires documentation, data recovery of cultural resources.

Furthermore, the NAHC if the proposed project is under the jurisdiction of the statutes and regulations of the National Environmental Policy Act (e.g. NEPA; 42 U.S.C. 4321-43351). Consultation with tribes and interested Native American consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 *et seq*), 36 CFR Part 800.3 (f) (2) & .5, the President's Council on Environmental Quality (CSQ, 42 U.S.C 4371 *et seq.* and NAGPRA (25 U.S.C. 3001-3013) as appropriate. The 1992 *Secretary of the Interiors Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes. Also, federal Executive Orders Nos. 11593 (preservation of cultural environment), 13175 (coordination & consultation) and 13007 (Sacred Sites) are helpful, supportive guides for Section 106 consultation. The aforementioned Secretary of the Interior's *Standards* include recommendations for all 'lead agencies' to consider the historic context of proposed projects and to "research" the cultural landscape that might include the 'area of potential effect.' 8-1

Confidentiality of "historic properties of religious and cultural significance" should also be considered as protected by California Government Code §6254(r) and may also be protected under Section 304 of he NHPA or at the Secretary of the Interior discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C., 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APEs and possibility threatened by proposed project activity.

Furthermore, Public Resources Code Section 5097.98, California Government Code §27491 and Health & Safety Code Section 7050.5 provide for provisions for inadvertent discovery of human remains mandate the processes to be followed in the event of a discovery of human remains in a project location other than a 'dedicated cemetery'.

To be effective, consultation on specific projects must be the result of an ongoing relationship between Native American tribes and lead agencies, project proponents and their contractors, in the opinion of the NAHC. Regarding tribal consultation, a relationship built around regular meetings and informal involvement with local tribes will lead to more qualitative consultation tribal input on specific projects.

Finally, when Native American cultural sites and/or Native American burial sites are prevalent within the project site, the NAHC recommends 'avoidance' of the site as referenced by CEQA Guidelines Section 15370(a). 8-1

If you have any questions about this response to your request, please do not hesitate to contact me at (916) 653-6251.

Sincerely,

Dave Singleton
Program Analyst

Cc: State Clearinghouse

Attachment: Native American Contact List

Native American Contacts
Los Angeles and San Bernardino Counties
September 17, 2012

Pechanga Band of Mission Indians
Paul Macarro, Cultural Resources Manager
P.O. Box 1477 Luiseno
Temecula , CA 92593
(951) 770-8100
pmacarro@pechanga-nsn.gov
(951) 506-9491 Fax

Gabrielino Tongva Nation
Sam Dunlap, Cultural Resources Director
P.O. Box 86908 Gabrielino Tongva
Los Angeles , CA 90086
samdunlap@earthlink.net

(909) 262-9351 - cell

Ramona Band of Cahuilla Mission Indians
Joseph Hamilton, Chairman
P.O. Box 391670 Cahuilla
Anza , CA 92539
admin@ramonatribe.com
(951) 763-4105
(951) 763-4325 Fax

Morongo Band of Mission Indians
Michael Contreras, Cultural Heritage Prog.
12700 Pumarra Road Cahuilla
Banning , CA 92220 Serrano
(951) 201-1866 - cell
mcontreras@morongo-nsn.gov
(951) 922-0105 Fax

San Manuel Band of Mission Indians
Carla Rodriguez, Chairwoman
26569 Community Center Drive Serrano
Highland , CA 92346
(909) 864-8933
(909) 864-3724 - FAX
(909) 864-3370 Fax

San Manuel Band of Mission Indians
Ann Brierty, Policy/Cultural Resources Departmen
26569 Community Center. Drive Serrano
Highland , CA 92346
(909) 864-8933, Ext 3250
abrierty@sanmanuel-nsn.gov
(909) 862-5152 Fax

Gabrieleno/Tongva San Gabriel Band of Mission
Anthony Morales, Chairperson
PO Box 693 Gabrielino Tongva
San Gabriel , CA 91778
GTTribalcouncil@aol.com
(626) 286-1632
(626) 286-1758 - Home
(626) 286-1262 -FAX

Serrano Nation of Mission Indians
Goldie Walker, Chairwoman
P.O. Box 343 Serrano
Patton , CA 92369

(909) 528-9027 or
(909) 528-9032

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2010121069; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the Metro Gold Line Foothill Extension - Azusa to Monclair; Los Angeles and San Bernardino counties, California.

Native American Contacts
Los Angeles and San Bernardino Counties
September 17, 2012

LA City/County Native American Indian Comm
Ron Andrade, Director
3175 West 6th St, Rm. 403
Los Angeles , CA 90020
randrade@css.lacounty.gov
(213) 351-5324
(213) 386-3995 FAX

Gabrielino-Tongva Tribe
Bernie Acuna
1875 Century Pk East #1500 Gabrielino
Los Angeles , CA 90067
(619) 294-6660-work
(310) 428-5690 - cell
(310) 587-0170 - FAX
bacuna1@gabrieinotribe.org

Ti'At Society/Inter-Tribal Council of Pimu
Cindi M. Alvitre, Chairwoman-Manisar
3094 Mace Avenue, Apt. B Gabrielino
Costa Mesa, , CA 92626
calvitre@yahoo.com
(714) 504-2468 Cell

Gabrielino-Tongva Tribe
Linda Candelaria, Chairwoman
1875 Century Pk East #1500 Gabrielino
Los Angeles , CA 90067
lcandelaria1@gabrielinoTribe.org
626-676-1184- cell
(310) 587-0170 - FAX

Tongva Ancestral Territorial Tribal Nation
John Tommy Rosas, Tribal Admin.
Private Address Gabrielino Tongva
,
tattnlaw@gmail.com
310-570-6567

Gabrieleno Band of Mission Indians
Andrew Salas, Chairperson
P.O. Box 393 Gabrielino
Covina , CA 91723
(626) 926-4131
gabrielenoindians@yahoo.com

Gabrielino Tongva Indians of California Tribal Council
Robert F. Dorame, Tribal Chair/Cultural Resources
P.O. Box 490 Gabrielino Tongva
Bellflower , CA 90707
gtongva@verizon.net
562-761-6417 - voice
562-761-6417- fax

This list is current only as of the date of this document.

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Native American Contacts
Los Angeles and San Bernardino Counties
September 17, 2012

Kern Valley Indian Council
Robert Robinson, Co-Chairperson
P.O. Box 401
Weldon , CA 93283
brobinson@iwvisp.com
(760) 378-4575 (Home)
(760) 549-2131 (Work)

Tubatulabal
Kawaiisu
Koso
Yokuts

Ernest H. Siva
Morongo Band of Mission Indians Tribal Elder
9570 Mias Canyon Road
Banning , CA 92220
siva@dishmail.net
(951) 849-4676

Serrano
Cahuilla

SOBOBA BAND OF LUISENO INDIANS
Joseph Ontiveros, Cultural Resource Department
P.O. BOX 487
San Jacinto , CA 92581
jontiveros@soboba-nsn.gov
(951) 663-5279
(951) 654-5544, ext 4137

Luiseno

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2010121069; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the Metro Gold Line Foothill Extension - Azusa to Monclair; Los Angeles and San Bernardino counties, California.

8. Singleton, Dave, Program Analyst, Native American Heritage Commission, September 17, 2012.

Response 8-1

The information regarding state and federal statutes relating to Native American historic properties or resources of religious and cultural significance to American Indian tribes and interested Native American individuals is acknowledged. The project is an extension of the Metro Gold Line light rail transit line from Azusa to Montclair with two new light rail tracks located within the existing Metro's rail right-of-way that has separate, existing tracks used by Metrolink and BNFS freight heavy trains. As such, the right-of-way has been substantially disturbed as have been the adjoining areas developed with a wide range of urban industrial, commercial, residential, and other uses.

The Draft EIR evaluated the project's potential impacts on cultural resources, in Section 3.6, Cultural Resources. All of the recommendations included in the comment were incorporated into the preparation of the Cultural Resources section of the Draft EIR, including the federal and state statutes, historic context and cultural landscape, archeological and historic resources database searches, and project area surveys.

The analysis in the Draft EIR indicated that there were no Native American cultural resources recorded in the Sacred Land File along the project's proposed alignment.

The Mitigation Measure CR-1, as listed in Section 3.6 of the Final EIR, is as follows:

- CR-1—If buried cultural resources are uncovered during construction, all work shall be halted in the vicinity of the archaeological discovery until a qualified archaeologist can visit the site of discovery and assess the significance of the archaeological resource. In the event that any artifact or an unusual amount of bone, shell, or non-native stone is encountered during construction, work will be immediately stopped and relocated to another area. The Construction Authority will stop construction within 100 feet of the exposed resource until a qualified archaeologist can evaluate the find (see 36 CFR 800.11.1 and CCR, Title 14, Section 15064.5[f]). Examples of such cultural materials might include ground stone tools such as mortars, bowls, pestles, and manos; chipped stone tools such as projectile points or choppers; flakes of stone not consistent with the immediate geology such as obsidian or fused shale; historic trash pits containing bottles and/or ceramics; or structural remains. If the resources are found to be significant, they will be avoided or will be mitigated consistent with State Historic Preservation Office (SHPO) Guidelines. All construction equipment operators will attend a preconstruction meeting presented by a professional archaeologist retained by the Construction Authority that will review types of cultural resources and artifacts that would be considered potentially significant, to ensure operator recognition of these materials during construction.

  In the event of an accidental discovery of any human remains in a location other than a dedicated cemetery, the steps and procedures specified in Health and Safety Code Section 7050.5, California Environmental Quality Act (CEQA) Section 15064.5(e), and Public Resources Code Section 5097.98 shall be implemented. No further excavation or disturbance of the area or any nearby area reasonably suspected to overlie adjacent remains until the coroner is contacted and the appropriate steps taken pursuant to Health and Safety Code §7050.5 and Public Resource Code §5097.98. If the coroner determines the remains to be Native American, the coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours. If Native American human remains are discovered

during project construction, it shall be necessary to comply with state laws relating to the disposition of Native American burials that are under the jurisdiction of the NAHC (Pub. Res. Code Section 5097). For remains of Native American origin, no further excavation or disturbance shall take place until the most likely descendant of the deceased Native American(s) has made a recommendation to the landowner or the person responsible for the excavation work regarding means of treating or disposing of the human remains and any associated grave goods, with appropriate dignity, as provided in the Pub. Res. Code Section 5097.98; or the NAHC is unable to identify a most likely descendant or the descendant fails to make a recommendation within 48 hours after being notified. In consultation with the most likely descendant, the project archaeologist and the Construction Authority shall determine a course of action regarding preservation or excavation of Native American human remains, and this recommendation shall be implemented expeditiously. If a most likely descendent cannot be located or does not make a recommendation, the project archaeologist and the Construction Authority shall determine a course of action regarding preservation or excavation of Native American human remains, which shall be submitted to the NAHC for review prior to implementation.

The analysis concluded that potential impacts on cultural resources would be eliminated or reduced with the prescribed mitigation measure, as well as federal, state, and/or local regulatory requirements and/or permits pertaining to these resources, and therefore impacts are considered less than significant with mitigation.

The Construction Authority also contacted and provided the Notice of Preparation of the EIR and the Notice of Availability of the Draft EIR to the Native American representatives, including the Gabrielino Tongva Indians of California Tribal Council.

From: Metro Gold Line [mailto:no-reply@foothillextension.org]
Sent: Tuesday, September 18, 2012 10:46 AM
To: Linda Manning
Subject: Questions/Comments Form Submission

Submitted: 2012-09-18 10:46 AM

Name: Frank Glavan
Address: 440 West Foothill Blvd
City/State/Zip: Glendora/Ca/91741
Phone: 626-963-9402
Cell Phone:
Ok to Text Construction Alerts? yes
Email Address: frankglavan@yahoo.com

Comments/Questions: after viewing the study area map/map, sheet 3, appendix c, affected parcels, ? if the existing right of way will be needed at 440 west foothill blvd. we currently lease from mta a section of the right of way for office employee parking. thanks for your consideration. 9-1

E-Newsletters and Updates: yes
Construction Alerts:
I Will Ride Updates: yes
Business Opportunity Updates:
Board Meeting Notices and Agendas:

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9. Glavan, Frank, September 18, 2012.

Response 9-1

The Project alignment was designed to avoid impacting the current Metro leased property on the north side of the right-of-way at 440 West Foothill Boulevard. Along this portion of the alignment, the minimum clearance between the centerline of the LRT track and the edge of leased area is approximately 8 feet. This is a sufficient distance to build a fence and still allow a safe space between the track and the fence. Therefore, the parking at this location will not be impacted by the Project.

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From: tazipser@gmail.com
To: Lisa Levy Buch
Subject: comment
Date: Wednesday, September 19, 2012 4:11:49 PM

Hi Lisa,

I really want to see the completion of the Gold Line to Claremont.
The Azusa to Claremont extension segment needs to be in the updated expansion plan.
There needs to be a half-cent sales tax for this.

I would travel to Pasadena and areas beyond on the Gold Line.

10-1

--
Tammy

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10. Tammy, September 19, 2012.

Response 10-1

Your support of the project is acknowledged.

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From:	Brian Bennett
To:	Lisa Levy Buch
Subject:	comments on Azusa to Montclair Draft EIR
Date:	Tuesday, September 25, 2012 12:13:40 PM

Lisa Levy Buch
Director of Public Affairs
Metro Gold Line Foothill Extension Construction Authority

After attending yesterday's Azusa to Montclair Draft EIR Public Meeting in La Verne I have a few comments.

Are provisions being made to insure that construction of the Gold Line extension will not preclude future use of portions of the existing railroad right of way for bicycle and pedestrian paths?

The railroad rights of way established in the infancy of what has grown to be a densely populated area now constitute a precious resource. It's inconceivable that great swaths of land such as this could be cleared for public use under current circumstances. While I wholeheartedly and enthusiastically support the Gold Line project, it seems wise to proceed in a manner that also preserves the promise of future complementary uses of the land along the rail line.

While a continuous bike path may not be feasible within the right of way due to space constraints, many portions are of sufficient width to allow for a future path – if care is taken in the construction of the Gold Line project. Whenever possible the rail infrastructure (tracks, catenary poles, electrical equipment, etc.) should be situated in such a way as to leave unobstructed strips of open space suitable for future use. 11-1

The historical trend in the railroad industry towards concentrating on enhancement of major trunk routes for freight, while abandoning many branch lines and spurs used for local delivery, should be also considered. It is conceivable that at some point in the future BNSF may curtail local freight operations on this "dead end" branch line. The orientation of light rail and freight tracks should be arranged keeping in mind the impact of possible future abandonment of the freight tracks (for example, tracks could be laid-out such that any vacant land will be adjacent to the freight line, ensuring the widest possible future use within the right of way).

Many parts of the right of way hold great promise as part of a network of bike paths and lanes. We should keep in mind that the ultimate success of a public transportation system does not happen in isolation; the interplay of rail, highway, bicycle, and pedestrian facilities along with harmonious development creates an interdependent web of infrastructure that supports more livable communities. Wise transportation planning happens when we have a broad vision of the possibilities for the future.

Brian Bennett

2235 Pattiglen Ave.
La Verne, CA 91750
bkbennett@earthlink.net

member of the Pomona Valley Bicycle Coalition

11. Bennett, Brian, September 25, 2012.

Response 11-1

While the bike path along the alignment is outside the purview of this project, the Authority acknowledges the community's strong support for bicycle facilities. To the extent possible, accommodations will be made for bicycles at all project stations, as the project is refined in the preliminary engineering and final design phase.

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County of Los Angeles
Sheriff's Department Headquarters
4700 Ramona Boulevard
Monterey Park, California 91754-2169

LEROY D. BACA, SHERIFF

September 25, 2012

Metro Gold Line Foothill Extension
Construction Authority
406 E. Huntington Drive, Suite 202
Monrovia, CA 91016-3633

To Whom it May Concern:

The purpose of this correspondence is to reply on behalf of the Los Angeles County Sheriff's Department's (LASD) Transit Services Bureau (TSB) to the Draft Environmental Impact Report (Draft EIR) regarding the Azusa to Montclair Extension. My comments are not reflective of any concerns that may be raised by LASD's San Dimas Sheriff's Station, which services the City of San Dimas along this proposed alignment.

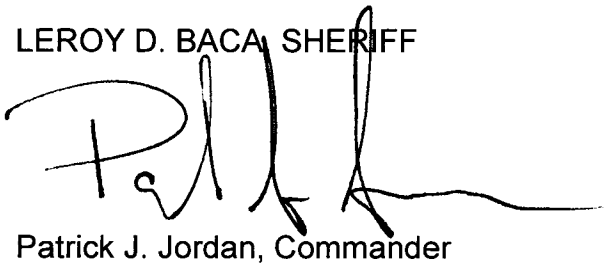
TSB provides law enforcement services by contract to the Los Angeles County Metropolitan Transportation Authority (Metro). Currently, TSB's deputy sheriffs and fare enforcement security assistants assigned to the existing Gold Line work from the Gateway Building in Downtown Los Angeles. If the Gold Line Extension should extend to Montclair as proposed in this latest expansion, the response times and shift deployment issues will be impacted by the distances involved from our current staffing location in Los Angeles to the new termination point in Montclair. Consideration should be given to providing a field office of sufficient size to house TSB personnel assigned to the easternmost portion of the Gold Line Extension. Metro has reviewed locations in the La Verne/Pomona area as possible field office locations. 12-1

Should you require any additional information regarding this matter, please contact Lieutenant George Grein of my office, at (213) 922-3687. Lieutenant Grein currently serves as by Transit Liaison to Metro for construction issues, and he works directly with the Gold Line Foothill Extension Construction Authority on TSB issues related to this project.

Thank you.

Sincerely,

LEROY D. BACA, SHERIFF



Patrick J. Jordan, Commander
Homeland Security Division
Transit Services Bureau

12. Jordan, Patrick J., Commander, Homeland Security Division, Transit Services Bureau, County of Los Angeles Sheriff's Department, September 25, 2012.

Response 12-1

As discussed in the Draft EIR, Section 3.12, law enforcement services will be provided for the project facilities by Metro Transit Security and Los Angeles County Sheriff's Department. The analysis in the Draft EIR concluded that, with the currently provided security services, there will be no significant impact to safety with the incorporation of Mitigation Measures SS-1 through SS-8, identified in the Draft EIR.

The question of a field office is within the purview the operating agency (Metro), and not within the Construction Authority's.

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From:	Lisa Levy Buch
To:	Laura Langford
Subject:	DEIR Comment
Date:	Thursday, October 04, 2012 1:02:46 PM

From: Metro Gold Line [mailto:no-reply@foothillextension.org]
Sent: Saturday, September 29, 2012 5:18 PM
To: Linda Manning
Subject: Questions/Comments Form Submission

Submitted: 2012-09-29 05:18 PM

Name: Walt Farmer
Address: 1418 8th Street, #266
City/State/Zip: Upland, CA 91786
Phone:
Cell Phone:
Ok to Text Construction Alerts?
Email Address: wlfarmer@earthlink.net

Comments/Questions: I support construction of the Metro Gold Line - Azusa to Montclair light rail construction project. I hope that you will adopt the Build Alternative. According to Section 2.6.1.4 for the EIR, "The No Build Alternative would result in increased traffic congestion and deterioration of LOS for roadway segments and intersections would result in deterioration of performance of bicycle and pedestrians movements along the project corridor." 13-1

E-Newsletters and Updates:
Construction Alerts:
I Will Ride Updates:
Business Opportunity Updates:
Board Meeting Notices and Agendas: yes

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13. Farmer, Walt, September 29, 2012.

Response 13-1

Your support of the project is acknowledged.

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September 29, 2012

Lisa Levy Buch
Director of Public Affairs
Metro Gold Line Foothill Extension Construction Authority
406 East Huntington Drive, Suite 202
Monrovia, CA 91016

Dear Ms. Buch:

I attended the September 21, 2012 public meeting and wish to record the following comments for the EIR:

Towne Avenue Flyover

There is an important issue in play involving the existing Metrolink trains and the crossing at this major thoroughfare. The frequency of trains and the duration of the blockage of traffic flow when trains are approaching and passing creates a serious public safety problem. It is not infrequent that emergency vehicles, fire, paramedic and ambulances, must wait for long periods of time before they can pass these crossings. This is an issue that should have been addressed before Metrolink service was first established. But that was then and this is now. 14-1

Given that many millions of dollars are to be spent on the flyover for Goldline trains only, there is now an opportunity for a joint project by the Authorities to solve the serious public safety issue at the Towne Avenue crossing. Join together, fund and build a full grade separation at this intersection.

Indian Hill Blvd.

Existing Metrolink train traffic creates gridlock where other heavily travelled streets intersect the crossings. For instance, while trains are waiting at Claremont station and passing through the City, traffic already backs up several blocks in both directions. With the addition of Gold Line trains coming at 10 minute intervals during hours when vehicle traffic is heaviest, surface street traffic will be brought to a near standstill on the main thoroughfare through the City of Claremont. A grade separation at the Indian Hill Boulevard crossing must be a part of this plan. 14-2

Respectfully submitted,

Jack Sultze
155 Marywood Avenue
Claremont, CA 91711-4831

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14. Sultze, Jack, September 29, 2012.

Response 14-1

The proposed flyover at Towne Avenue is designed not to grade separate traffic but rather to allow the LRT tracks to switch sides with the freight/Metrolink track so that the BNSF freight can serve customers on the north side of the track in Pomona. The Construction Authority studied this intersection and all others along the alignment to determine which would be adversely affected by increased train traffic. Per Metro grade crossing criteria, traffic at the Towne Avenue grade crossing does not warrant a grade separation and one would not be built, were it not for the need for the LRT tracks to cross the freight/Metrolink track. The grade crossing analysis and its results are provided in Section 2.6.7 of the Draft EIR.

Response 14-2

A grade separation at Indian Hill Boulevard is unwarranted per Metro grade crossing criteria, discussed in Section 2.6.7 of the Draft EIR. In general, grade separation results in environmental and cost impacts and as a result the project is designed entirely at-grade except at Lone Hill Avenue and Towne Avenue where track switchovers require an elevated structure (flyover).

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From: Barbara Fowler [mailto:brbirds@uia.net]
Sent: Monday, October 01, 2012 11:28 PM
To: Lisa Levy Buch
Cc: Barbara Fowler
Subject: Metro Gold Line light rail transit (LRT) EIR, by Oct. 5, 2012

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

Dear Authority and Ms. Buch,

We appreciated your organization's presentation of the proposed six-city extension of the Gold line between Azusa and Montclair at Hillcrest Retirement Center in LaVerne, CA last week. We are Claremont residents and concerned about the proposed thousand car garage on First Street with accompanying retail center, and 10 trains per hour passing our homes and north-south streets, plus the sounds and vibrations involved with the trains.

Our concerns remain:

1. There should be no commercial use at College Ave. and First St. The intersection and the streets in the vicinity are busy with other uses: school children and youth, bicycle paths, and senior citizens, as well as daily shoppers in the Village area of Claremont. This is an isolated and improper location to which to add retail vehicles and shoppers. The core of Claremont is already too dense, and College Avenue is primarily a residential and school neighborhood close to the tracks, requiring sensitive support, not destruction and further crowding and appearance more appropriate to a much bigger urban area or city. 15-1

2. A massive three story parking structure for one thousand cars must have green set backs on College Avenue and First Street which match those on the opposite sides of the street, allow for large trees, and have historically and aesthetic architecture in keeping with Claremont's history and ambience. While utilizing environmentally sound principles it must not look like the average industrial-style minimalist LEEDS structure or show off an architect's desire to be different and notable. 15-2

3. The EIR must mark and consider all access roads to and from the one thousand car structure so citizens will know what will happen to their surrounding residential and college and collector streets if this portion of the Gold Line goes through. We did not hear or see this at the meeting. The EIR lacks long-term environmental and financial impact reality without this crucial detail - partly because of State laws which now require the speed limit be tested and changed when streets are worked on, and speed limits changed according to how fast people are driving. Adding a thousand daily cars to the old core of town will speed up the constant changing of speeds throughout town, changing both safety and ambience, both of which are major EIR considerations. 15-3

4. We were appreciative that the crossing bars are tightly designed to prevent passage by cars and bicycles while trains are going through, and will make their noise only when descending, not when ascending. However, 10 trains per hour all day long, making that frequent a sound and vibration, plus blocking north-south intersections, is a questionable huge price for the whole population to pay for the relatively few people who really need the trains. The suburban towns do not need that density of trains with the size and frequency of MetroLink trains and busses available. It will just give more excuse for further more intense growth and development of the land, a boon to developers and people wanting to shop and recreate elsewhere than in their own town. It is not the time to encourage either of those 15-4

things. We doubt that this is the best way to maintain property values and create local wealth at this point in time in outlying suburbs like Claremont. 15-4

5. Our colleges are for the most part residential, and our businesses are encouraged to hire locally, so encouraging a highly mobile population with expensive frequent Gold Line trains seems less efficient and cost-effective than perfecting the MetroLink trains to service the east end of Los Angeles County and the Ontario Airport on MetroLink's way to Riverside. 15-5

Sincerely,

Barbar and Ray Fowler
272 W. 7th St.
Claremont, CA 91711
brbirds@uia.net

15. Fowler, Barbara, October 5, 2012.

Response 15-1

Any potential commercial use within the Claremont parking structure would be developed in the future and is not a specific and necessary feature of the project. As stated in Section 3.15 of the Draft EIR, any future new development would be coordinated with each City's land use plans and zoning regulations.

Response 15-2

The proposed 1,000 vehicle parking garage proposed at the southeast corner of First and College is compatible with the scale of development along the south side of First Street west of College Avenue. With the exception of the historic Claremont depot, adjoining development, east from College Avenue to Indian Hill Boulevard tends to be three stories in height. The parking garage would be consistent with this development. The density reflects the goals of the Claremont General Plan which seeks to preserve the small town character and pedestrian-oriented design character of the Village north of First Street while also capitalizing on the railroad station area as an "activity node."

Although the existing landscaping at the garage site will be removed to accommodate construction activities, the Construction Authority will work with the City of Claremont to ensure that commensurate landscaping will be installed, and that the parking garage architectural design will be appropriate to its design context adjoining Claremont Village and Pomona College (to the north).

Response 15-3

The traffic analysis for the EIR took into consideration the major access routes to and from the parking structure location. Access to and from the parking structure was evaluated with the assumption that traffic will use the major arterials to reach the station from their origin. Consequently, vehicles accessing the parking structure from the east and west directions will utilize First Street and vehicles accessing the parking structure from the north and south directions will utilize Indian Hill Boulevard, College Avenue and Claremont Boulevard/Mills Avenue.

Response 15-4

As referenced in Section 3.11 of the Draft EIR, it is possible for Cities to submit petitions to the Federal Railroad Administration (FRA) for quiet zones that preclude the need for trains to sound their horns. The project includes the installation of supplemental safety measures, such as four quadrant gates, that are sufficient for a quiet zone waiver, although the final determination concerning quiet zones is made by the FRA, not the Construction Authority.

The project as proposed provides for 10 minute headways, which translates to six trains per hour in each direction, during peak periods, and 20 minute headways, which translates to 3 trains per hour in each direction, during off-peak periods.

Any potential traffic impacts at grade crossings were evaluated in the Draft EIR and are described in detail in Chapter 2.

Regarding induced development, the project could potentially attract new transit-oriented development around the light rail transit stations. As stated in Section 3.15 of the Draft EIR, any potential future development would be consistent with land use designations and zoning regulations established by each city and reflective of the city's long-term planning goals, objectives and policies for growth.

Regarding impacts to property values, economic impacts are not required to be analyzed under CEQA, unless they result in physical effects on the environment.

Response 15-5

The project will serve a different market than the commuter-oriented Metrolink service, which focuses on regional long-distance travel. The project will serve a different study area, including three cities with no Metrolink service – Glendora, San Dimas and La Verne. Section 1.2 of the Draft EIR specifies the objectives that this project is designed to meet.

THE CITY OF
POMONA

LINDA C. LOWRY
City Manager

Office of the City Manager

October 1, 2012

Ms. Lisa Levy Buch
Director of Public Affairs
Metro Gold Line Foothill Extension Construction Authority
406 E. Huntington Drive, Suite 202
Monrovia, CA 91016-3633

SUBJECT: COMMENTS ON DRAFT ENVIROMENTAL IMPACT REPORT (DEIR) FOR METRO GOLD LINE FOOTHILL EXTENSION FROM AZUSA TO MONTCLAIR

Dear Ms. Levy Buch:

The City of Pomona thanks you for this opportunity to provide our comments on the subject DEIR. We look forward to follow-up actions by the Gold Line Construction Authority to address and mitigate project environmental impacts commented on in this letter and the accompanying attachments. The Authority's efforts to provide a project that will benefit the region and our community is appreciated.

The City of Pomona (hereinafter the "City"), secured the assistance of Urban Crossroads, Inc. to review the Metro Gold Line Foothill Extension DEIR for the purpose of identifying potential transportation-related impacts and issues related to proposed light rail operations within the City, along with potential impacts related to the proposed Gold Line extension in the context of overall rail activities. The City also secured the assistance of Cooper-Carry, Inc. to review station planning, land use, Transit Oriented Development, and related matters associated with the proposed Azusa to Montclair Extension Project (Project). The comments provided by these consultants in the attachments to this letter are also provided as comments from the City.

URBAN CROSSROADS, INC. QUALIFICATIONS

Urban Crossroads, Inc. was founded in the year 2000 by a group of professionals whom had worked together for the better part of a decade. Our professional staff includes 21 traffic planners, engineers, noise and air quality specialists, systems experts, and technicians in our corporate office in Irvine and branch offices located in Riverside and Carlsbad.

Urban Crossroads, Inc. specializes in transportation planning/engineering, context sensitive design and sustainability strategies, travel demand modeling, infrastructure funding, and information systems for governmental agencies and the business community.
Urban Crossroads routinely works with public sector clients to provide accurate and reasonable traffic projections and to achieve the best possible designs for positive change in the urban

City Hall, 505 S. Garey Ave., Box 660, Pomona, CA 91769, (909) 620-2051, Fax (909) 620-3707

environment. Our personnel have performed major assignments for over 30 different cities in California, as well as regional organizations such as the Southern California Association of Governments (SCAG), the Coachella Valley Association of Governments (CVAG), and the Orange County Transportation Authority (OCTA). Urban Crossroads, Inc. has also provided on-call services for the counties of Orange, Riverside and Imperial, and currently provides contract traffic engineering services to the City of Rancho Santa Margarita.

Key staff members involved in this review include: Mr. John Kain, AICP (President of Urban Crossroads, Inc.), Mr. Carleton Waters, PE (Principal), and Ms. Marlie Whiteman, PE (Director of Transportation Modeling). Resumes of these key staff members are provided as Attachment "A" to this letter report.

City staff provided comments on the Gold Line Foothill Extension/Pomona Stations in a letter dated February 1, 2011. This letter documents the ongoing concerns regarding the transportation related comments in that letter (traffic analysis issues, preference for below-grade rail separation at Towne Avenue, Pomona Station design, and coordination of rail and related transit operations, etc.), and raises additional concerns on the current DEIR.

We reviewed the following DEIR and traffic analysis materials:

- Metro Gold Line Foothill Extension – Azusa to Montclair, Draft Environmental Impact Report (Metro Gold Line Foothill Extension Construction Authority, March 2012)
- The Metro Grade Crossing Policy Initial Screening (Milestone 1) Metro Gold Line Foothill Extension Azusa to Montclair Draft Memorandum (Fehr & Peers, March 2011
- Transportation Technical Report for the Draft EIR (prepared by Intueor, August 2011 and updated by Parsons Brinckerhoff, August, 2012)

Based on our review of the above documents, the following key omissions/issues have been identified that require further evaluation and mitigation:

THE DEIR FAILS TO ADDRESS POTENTIAL VEHICULAR IMPACTS AT GRADE CROSSINGS

Existing at-grade street crossings in the City are located at Fulton Road, Garey Avenue, and Towne Avenue. Fulton Road is a 2-lane road, while Garey Avenue and Towne Avenue are 4-lane roads. Each crossing has gates that control the automobile traffic when a train is using the crossing.

In 2011, the City had requested analysis of the maximum vehicle queue length caused by blockages related to at-grade train crossings of City streets, including the average duration of the blockages and estimated number of affected vehicles/day. The DEIR includes a very brief screening analysis that concludes that the Garey Avenue crossing does not require a grade separation. The screening analysis ignores potential delays and queuing impacts associated with the Garey Avenue at-grade crossing. 16-1

An initial screening of proposed light rail crossings is included in the Fehr & Peers March 2011 technical memorandum, which documents peak hour automobile traffic volumes and number of lanes on Fulton Road, Garey Avenue, and Towne Avenue. It is assumed that there will be 5

Metrolink trains per hour and 6 Metro Gold Line trains per hour during morning and evening peak periods. These statistics were used to determine whether or not at-grade operation should be feasible. Expected queue lengths have not been evaluated in the DEIR.

Urban Crossroads, Inc. staff has performed a field review of train activity at the Garey Avenue rail crossing in the AM peak period (between 7:00 a.m. and 9:00 a.m.) and in the PM peak period (between 4:00 p.m. and 6:00 p.m.). Existing conditions data collected by Urban Crossroads, Inc. indicate that both delays and queues that occur under existing conditions are already substantial and may affect the operation of adjacent signalized intersections. Documentation of this field review is included in Attachment C, which contains Urban Crossroads, Inc. Technical Memorandum #2. Automobile queues were counted as the gate crossings were closed. Based upon field review of current Metrolink activity, up to 4 Metrolink trains per hour were counted during peak periods. Existing freight train activity is generally local in nature, and limited to approximately one train per day in the City. 16-1

The proposed light rail operations will add approximately 8 minutes of street automobile delay per hour at the Garey Avenue crossing, assuming the light rail train average queues will be similar to the Urban Crossroads, Inc. evening peak hour observations for current Metrolink service. This amounts to approximately 230 additional vehicles experiencing stop delays each hour during peak periods.

At the Fulton Road crossing, parking is permitted in the northbound direction within close proximity of the gate control. The need for on-street parking at this location needs to be evaluated to determine whether available existing and future parking is safe and adequate. 16-2

In 2011, the City recommended a joint agreement between Metrolink, Gold Line, and the applicable Freight Operators to establish acceptable train daily minimum and maximum separation at crossings, thereby limiting the long-term impact to the community. This issue appears to have been ignored in the DEIR. 16-3

In 2011, the City had noted that the local preferred alternative is to consider a grade separation at the Garey Avenue crossing. The results of the Metro Grade Crossing Policy Initial Screening (Milestone 1) for Garey Avenue conclude that this location is assigned to the "at-grade should be feasible" group with light rail operations. However, at-grade crossing impacts, including delays, and the effects of queue backups to and through adjacent arterial intersections are completely ignored in the DEIR and must be addressed. Additional analysis of project direct and cumulative impacts related to at-grade crossing delays and queuing impacts to adjacent intersections is necessary to provide a complete and defensible evaluation of potential impacts. Potential mitigation, including grade separation via a depressed grade separation must be included in the final environmental documentation, including quantitative evaluation of the potential mitigation that such a treatment would provide in terms of reducing project impacts related to delays and queuing to less than significant levels. 16-4

THE DEIR FAILS TO ADDRESS POTENTIAL PEDESTRIAN/BICYCLE IMPACTS AT GRADE CROSSINGS

Pedestrian activity was observed at all three of the existing at-grade street crossings. The Fulton Road and Garey Avenue rail crossings are proposed to remain at-grade with the Metro Gold Line Phase II light rail service. At both of these locations, pedestrian and bicycle activity 16-5

occurs during peak periods (see Attachment B, Urban Crossroads, Inc. Technical Memorandum #1). Sidewalk improvements, with appropriate positioning of railroad crossing gate controls are needed. 16-5

THE DEIR ANALYSIS OF ARTERIAL INTERSECTION TRAFFIC IMPACTS IS INSUFFICIENT

The Transportation Technical Report for the DEIR indicates that "Forecasts for the No Build Alternative would account for background growth in traffic due to additional regional and sub-regional land use development (cumulative projects) and population growth" (page 16). Additional analysis is needed to directly consider reasonably foreseeable (known) new/infill projects and analyze potential traffic diversion to other arterials as a result of at-grade crossing delays. Diverted traffic from Garey Avenue could potentially trigger impacts at Fulton Road/Arrow Hwy and Towne Avenue/Arrow Hwy. Traffic diversion has not been evaluated in the DEIR. Discussion about the traffic patterns to and from the Fairplex and a future Pomona Gold Line station was recommended in 2011, and remains a concern. 16-6

It should be noted that the forecast volumes for intersection 66 (Fulton Road/Bonita Avenue) indicate a four leg intersection. Fulton Road at Bonita Avenue is actually an offset intersection (the northerly Fulton Road intersects Bonita Avenue approximately 240' west of the southerly Fulton Road intersection). Neither of these two halves of the intersection has an opposing driveway, so we have deduced that the EIR analyzed it as a single combined intersection. 16-7

Pages 2-76 of the DEIR states that "Similar to the TSM Alternative, adjustments to traffic flow patterns as a result of the Build Alternative were determined by using projections from the transportation model developed for this study. The 2035 No Build Alternative and the Build Alternative model data were compared to determine the effects of the Build Alternative on traffic flow and circulation patterns. The peak period link data from each model output were used in this analysis." The DEIR and Transportation Technical Report conflict in statements about the traffic model used in developing the forecasts (The Transportation Technical Report refers to the SCAG's RTP models, while the DEIR indicates a model was developed for this work effort). 16-8

The DEIR summary of improvements with the Build Alternative does not list improvements for intersections in the City, but the document references future traffic operations in the Transportation Technical Report, which does list improvements at two intersections. At the intersection of Fulton Road at Bonita Avenue (analyzed as a single intersection), a traffic signal is recommended in the Transportation Technical Report. Improvements are recommended at the intersection of Garey Avenue at Bonita Avenue, which are characterized as restriping improvements. These improvements would likely require physical improvements, as there is an existing curbed median. 16-9

THE DEIR FAILS TO ADEQUATELY ADDRESS VEHICULAR POMONA STATION ACCESS

The existing Pomona Station is located north of the Metrolink line (between the BNSF and Metrolink tracks) east of Fulton Road and west of Garey Avenue. Access to the existing Pomona Metrolink station is provided by a driveway from Fulton Road (located between the Metrolink rail and BNSF freight rail lines). The station parking area also has access south to West Santa Fe Street, which connects to North Garey Avenue and West Arrow Highway via **private streets**: Supply Street, Stair Street, and Amberson Street. 16-10

The DEIR and its supporting technical documents provide no exhibits to show the traffic distribution for the proposed light rail Pomona Station parking structure. The combined Metro Gold Line and Metrolink parking demand at the proposed Pomona Station are projected to be 1,000 spaces by 2035. The existing Metrolink parking lots contain approximately 250 spaces, requiring the construction of 750 new spaces (pages 1-12 of the DEIR), but in Section 2.6.4 (Parking), the DEIR indicates that the Pomona Station would require 1,050 spaces by 2035 (with existing Metrolink parking listed as 350 spaces). These additional spaces are proposed to be provided in a shared Gold Line/Metrolink parking structure adjacent to this spur line. This site is currently an occupied industrial building (pages 2-102 of the DEIR calls it an unoccupied building).

According to the project description (pages 1-26), access to the Pomona Station would be either from Bonita Avenue (via the north-south road located just west of Pomona Pediatrics) or from Garey Avenue (via the driveway located just north of the freight tracks). Neither of these potential driveways was analyzed in the Transportation Technical Report or DEIR. The parking section indicates that "Vehicular access would be via a driveway from Garey Avenue on the north side of the structure." However, Urban Crossroads, Inc. has attempted to determine the traffic volume distribution in the vicinity of the Pomona Station (see Exhibit A of Attachment C, which contains Urban Crossroads, Inc. Technical Memorandum #2). Traffic volume differences between the No Build and Build scenarios imply that the surrounding area analysis was performed with the driveway on Bonita Avenue, which results in several hundred vehicles turning at the driveway in the Build scenario. At this assumed driveway to Bonita Avenue, there is an existing striped median lane, which accommodates westbound left turns into the driveway. Analysis of potential station access driveways is recommended to determine appropriate intersection configurations, and any necessary future improvements if the project is approved. 16-10

No summary of the resulting trip generation was provided for the Pomona light rail parking garage. As described in Attachment C to this letter, which contains Urban Crossroads, Inc. Technical Memorandum #2, Urban Crossroads, Inc. has estimated that the new parking garage will generate an AM peak hour inbound station volume of 549 vehicles (including approximately 50 kiss-and-ride vehicles, which would also be outbound in the same peak hour). The PM peak hour outbound station volume would be slightly less, around 509 vehicles (including approximately 46 kiss-and-ride vehicles, which would also be inbound in the same peak hour). Pomona station access analysis is inadequate, as the access intersections that will ultimately serve hundreds of vehicles during peak hour operations have not been explicitly evaluated.

THE DEIR FAILS TO ADEQUATELY ADDRESS POMONA STATION PEDESTRIAN/BICYCLE ACCESS

At 4.5 levels (about 45 feet high), the proposed light rail Pomona Station parking structure, which is addressed in the DEIR, would require about a 1.5 acre area. A pedestrian bridge over the BNSF freight and Metro Gold Line tracks would connect the new parking garage with the new Metro Gold Line platform and the existing Metrolink platform.

In 2011, the City had expressed concerns with the platform location as it relates to pedestrian accessibility. At that time, the City also requested that the access and rights to the property for the north parking structure be identified. Since that time, the City has received a SCAG Compass Blueprint grant and is in the process of preparing a station area plan with the expertise of a TOD design firm (Cooper Carry) that proposes to shift this location west 16-11

approximately 300-400 feet to be in line with the existing Metrolink station platform to create a better pedestrian access system between the two platforms. The City would request that consideration of this new location be included for the Final EIR (FEIR), and that additional mitigation related to pedestrian and bicycle crossings in the vicinity of the Pomona Station and each of the at-grade crossings within the City must be included in the FEIR. 16-11

The City's station area plan proposes to consider converting large existing warehouse space into parking garages directly north and south of the existing Metrolink station platform that would phase parking stalls rather than construct full buildout of parking stalls at the front end of the project. The City would request that the additional optional parking spaces be identified in the three large warehouse buildings north and south of the existing Metrolink station platform as a second option. 16-12

THE DEIR ASSESSMENT OF LOCAL TRANSIT SERVICES INTERFACE WITH THE POMONA STATION IS INSUFFICIENT

Additional bus service is included for improved access to the light rail system (see pages 2-73 and pages 2-75 of the DEIR). For the Pomona Station, the DEIR proposes that Route 492 be diverted for the Pomona Station, and additional buses would be provided. The DEIR recommendation for a bus stop with possible turnout for Foothill Transit Route 291 on Garey Avenue north of the railroad tracks, and the DEIR's suggestion of a potential off-street transit center needs to be further analyzed. 16-13

The DEIR suggests that parcels adjacent to the station could be considered for park-and-ride and/or related improvements. A key goal of improving transit service throughout southern California is to increase the intensity of development in the vicinity of transit stations. Transit oriented development (TOD) is a key aspect of viable transit service. In turn, TOD must be supported by enhanced facilities and environment for non-motorized access to transit stations such as the proposed Pomona Station. Such facilities include enhanced pedestrian environments, including wider sidewalks and "street furniture" and amenities such as benches and landscaping, are a critical aspect of accommodating the proposed project and encouraging maximum utilization of the proposed system. 16-14

Bus route connections to the proposed light rail, including provisions for getting buses into and out of the station / parking area, are important connectivity issues which need to be addressed in conjunction with a realistic analysis of roadway and pedestrian access to the proposed light rail Pomona Station. 16-15

THE DEIR FAILS TO ADDRESS POTENTIAL TOWNE AVENUE FLYOVER IMPACT TO RESIDENCES IN POMONA

In 2011, the City had requested analysis of project impacts to visual resources by obstructing views along the portion near Towne Avenue where elevated grade separation is being proposed, should be addressed. The locally preferred alternative is to consider a below grade rail separation at this location. Because of the extensive amount of existing and planned residential development in close proximity to the proposed Towne Avenue flyover (not addressed in the DEIR), consideration should be given to a light rail line underpass of Towne Avenue and the freight line. 16-16

Exhibit B of Attachment C, which contains Urban Crossroads, Inc. Technical Memorandum #2, shows the City residential neighborhoods east of Garey Avenue along the Metro Gold Line Phase II. On both sides of the existing BNSF freight and Metrolink rail lines west of Towne Avenue, existing and planned residential sites are located adjacent to the right-of-way.

The DEIR describes the 1.4-mile light rail alignment in the City as "entirely adjacent to commercial and industrial areas or Metrolink right-of-way with the exception of one 500 foot stretch of residential area along the north side of the Metro right-of-way just west of Carnegie Avenue." This description is not accurate. For example, the Serenity Villas Senior Community is located just north of the existing freight line east of Garey Avenue and south of Bonita Avenue. On both sides of the existing BNSF freight and Metrolink rail lines west of Towne Avenue, existing and planned residential sites are located adjacent to the right-of-way. 16-15

East of Towne Avenue, the light rail flyover ramps transitions down to the northerly edge of the rail right-of-way. In this vicinity, there is a proposed residential community on the southeast corner of Towne Avenue and East Bonita Avenue, and an existing gated multi-family residential site. The freight track would cross under the light rail flyover at Towne Avenue to return to the south side of the Metro right-of-way and later join the tracks of Metrolink's San Bernardino Line just east of Carnegie Avenue. Towne Avenue flyover visual impacts to adjacent City residential areas have not been considered in the DEIR; potential mitigation options, including a possible underpass (the locally preferred alternative) were not evaluated. 16-16

Other mitigation options may include special features on the proposed Towne Avenue flyover to buffer adjacent residences from noise and visual impacts, as well as consideration of noise mitigation walls or sound-insulation and window modifications at nearby homes. Mitigation of the flyover visual and noise impacts could also be partially addressed via lowering of the existing rail lines, Towne Avenue, and potentially other area streets (even a minor lowering of several feet may provide mitigation). Minimization of the height of the flyover structure itself should also be analyzed with respect to the use of materials that would reduce the height of the flyover structure above the surrounding grade to the lowest height possible in order to mitigate the visual impact of the flyover.

THE DEIR FAILS TO ADDRESS EMERGENCY ACCESS IMPACTS

Emergency response times have not been evaluated in the DEIR. There is a fire station on Bonita Avenue about a ¼ mile east of Garey Avenue. Response times of emergency vehicles from the fire station would be affected by blockages of Garey Avenue resulting from at-grade crossing. Since the proposed light rail operations will more than double the existing occurrences of street blockages and delays on Garey Avenue, the potential for impacts to fire truck response time may be significant. 16-17

THE DEIR TECHNICAL APPENDICES THAT DISCUSS NOISE AND VIBRATION ARE INADEQUATE BASED ON A MISREPRESENTATION OF WHAT THE CURRENT AND FUTURE LAND USES ARE ADJACENT TO THE RAIL RIGHT OF WAY

Because the error in describing the existing and future adjacent land uses as non-sensitive, non-residential the noise section of the noise technical report failed to take measurements in 2011 and is relying on 2003 noise measurement data which is nearly a decade old. The reason stated for not taking measurements was that there are few residences located near the right of 16-18

way. The attached exhibits outline four to five existing residential neighborhoods and the City's draft general plan update indicates future proposed residential land uses that will eventually replace older industrial and commercial uses in the areas adjacent to the rail right of way.

Many suggested measures are recommended for all of the cities along the LRT corridor between Glendora and Montclair including sound walls, low impact frogs, sound insulation along 2nd stories, sound insulation at grade crossings, and petition areas for quiet zones. The only recommended noise or vibration related suggested measures outlined for Pomona is a single 400' ballast mat for at grade vibration mitigation. Every other City along the route has multiple sound and vibration controls proposed except for Pomona. A startling example of this is that every city with the exception of Pomona has proposed quiet zone crossing petition recommended intersections and every city with the exception of San Dimas has multiple recommended quiet zone locations. 16-18

THE DEIR DEPENDS ON DEFERRED MITIGATION OF NOISE AND VIBRATION IMPACTS

Mitigation measures defer to final design plans by stating that the issues of noise and vibration controls will be designed during final design plans. This is an issue due to the proximity of older, new and future sensitive single family and multi-family residential structures that were overlooked in the DEIR. Technical devices listed such as "low impact frogs" are discussed but not committed to for instance for the flyover structure at Towne Avenue, which are close to residential uses. 16-19

THE DEIR REFERS TO MULTIPLE SPUR USERS IN LA VERNE AND POMONA THAT TRIGGER A FLYOVER STRUCTURE TO BE PLACED

These comments are inconsistent with earlier conversations at meetings between the Gold Line Authority staff and City staff where the statement was made that only two drivers of spur lines necessitated the flyover structure. The two users stated were Miller Brewing in Irwindale and a warehouse in Pomona. 16-20

THE DEIR STATES THAT ACQUISITION IS NECESSARY FOR THE TPSS BUILDING YET THE APPENDIX FIGURES DO NOT INDICATE A FULL OR PARTIAL TAKE

The square footage required for the TPSS building appears to be transposed and clarification is necessary to indicate whether or not acquisition is actually necessary. 16-21

THE DEIR INCORRECTLY STATES THE REQUIREMENTS AND PROCESSES FOR PROTECTION OF MATURE TREES IN THE CITY OF POMONA

The language is incorrect in stating what is required to remove a tree in the City . The statements made apply in some circumstances but outside of historic districts many of the statements are incorrect. 16-22

THE DEIR INCORRECTLY DESCRIBES POMONA IN THE LAND USE SECTION ON PAGE 3.10-32

Pomona discussion leaves out the discussion of the additional three residential neighborhoods and it leaves out discussion of future planned uses. The chapter heading of this section states that this section will describe existing and planned uses in each of the cities. There is no 16-23

discussion in the section on the future planned land uses contemplated in the City's draft General Plan Update. Many parcels surrounding the proposed LRT tracks are going to have a General Plan Designation of "Urban Neighborhoods". Excerpt from Draft General Plan states: North Railroad Track Neighborhoods: Gradually, obsolete and vacant workplaces uses in the areas along the northern railroad tracks will transition to a mix of multi-family housing and newer workplace buildings that are more compatible with the residential character of these neighborhoods. Streetscape improvements and railroad track corridor landscape buffering will improve the character of this urban neighborhood, making it more visually appealing and pedestrian friendly. Please refer to page 74 of the Draft General Plan Update, available on the main page of the City of Pomona website. The current work being conducted by Cooper Carry for the Pomona Compass Blueprint Station Area Plan was not addressed or incorporated as discussion for the future changes to this neighborhood. 16-23

THE DEIR INFERS THAT A RELIANCE ON A STATEMENT OF OVERRIDING CONSIDERATIONS WILL BE PART OF THE FINAL DEIR APPROVAL FOR VISUAL IMPACTS TO POMONA FOR THE FLYOVER STRUCTURE MITIGATION MEASURE VIS 5 IS VAUGE

Mitigation Measure for long-term impacts stating that all walls, structures and fences shall be properly screened or incorporate design features to improve appearance and reduce visual intrusion. Measure VIS 5 is too vague in describing how the flyover "structure" will not create visual blight to existing and proposed residential neighborhoods on both sides of the proposed elevated tracks and the surrounding community, including the view corridor along Towne Avenue. "Incorporate design features" is not defined well enough to determine if visual impacts are addressed. A proper mitigation measure would be to locate the track grade separation below grade in an open trench system or to relocate the user in Pomona, which is demanding the use of the rail spur on the north side of the right- of-way. 16-24

SUMMARY AND RECOMMENDATIONS

In summary, the following aspects of the DEIR are currently inadequate and need to be addressed and mitigations incorporated into the project prior to approval of the FEIR for the Metro Gold Line Extension:

- At-grade crossing impacts, including street vehicular delays, and the effects of queue backups to and through adjacent arterial intersections need to be specifically analyzed.
- Pedestrian/bicycle accommodations need to be added to the recommended at-grade crossing features for Fulton Road and Garey Avenue.
- Arterial roadway intersection impacts due to realistic light rail Pomona Station parking garage access locations and traffic diversion due to at-grade rail crossing delays need to be explicitly accounted for in an updated analysis.
- Evaluation of Pomona Station access intersections that will ultimately serve hundreds of vehicles during peak hour operations need to be added to the updated traffic analysis.
- Pedestrian/bicycle access to the proposed Pomona Station needs to be considered/mitigated.
- Evaluation of Pomona Station transit connectivity via the actual access links and intersections that will ultimately serve the proposed light rail parking garage needs to be evaluated.

16-25

- The DEIR has completely ignored several existing and planned residential neighborhoods in the City, which are immediately adjacent to the proposed light rail tracks. Towne Avenue flyover visual and noise impacts need to be addressed including mitigation measures. Potential mitigation needs to include evaluation of an underpass (the locally preferred alternative).
- Delays to emergency vehicle access due to at-grade crossings need to be considered as part of the updated traffic analysis.
- Poles for power, communications, and similar installations need to be painted in green, brown, or a similar City approved color to minimize visual impact.
- Proposed landscaping in City approved palette (drought-tolerant, native, etc.) should be illustrated.
- Walls and screening should be incorporated.
- The platform location does not appear to provide free and unobstructed accessibility. The local alternative is to construct the station/platform further to the west to provide connectivity with the Metrolink platform area.
- Identify access and rights to the property for the north parking structure.
- Considering the projected frequency of rail traffic at the proposed crossings, the City of Pomona would strongly recommend a joint agreement between Metrolink, Gold Line, and the applicable Freight Operators to establish acceptable train daily minimum and maximum separation at crossings, thereby limiting the long-term impact to the community.
- The TPSS electrical sub-station (transformer bank or similar power installation) needs design to address aesthetics, noise, and related matters.
- Please see the attached exhibit of residential areas in Pomona relative to the above comments.
- Further analysis of noise and vibration considerations and mitigation measures is needed.
- A secondary optional format of parking structures should be provided as an option as outlined in the draft Cooper Carry planning document (see Attached).
- Re-draft the land use section and correct inconsistencies with land uses outlined.

16-25

Thank you for your consideration of our comments in this matter.

Sincerely,

Linda C. Lowry
City Manager

Attachments:
A. Urban Crossroads, Inc. Technical Memo #1
B. Urban Crossroads, Inc. Technical Memo #2
C. Cooper-Carry Planning Document
D. Prior City of Pomona Letter dated February 1, 2011

c: Jennifer Flores, Project Administrator
Mark Lazzaretto, Community Development Director
Daryl Grigsby, Public Works Director

ATTACHMENT A

URBAN CROSSROADS, INC. TECHNICAL MEMORANDUM #1

16-26

METRO GOLD LINE PHASE II EIR REVIEW

Technical Memorandum #1
September 12, 2012
September 26, 2012 (Revised)

This memorandum presents the initial review of existing conditions along the proposed Metro Gold Line Foothill Extension within the City of Pomona. Urban Crossroads, Inc. staff have reviewed the Draft Environmental Impact Report, attended a kick-off meeting with City staff, conducted two site visits, and reviewed traffic analysis materials:

- The Metro Grade Crossing Policy Initial Screening (Milestone 1) Metro Gold Line Foothill Extension Azusa to Montclair Draft Memorandum (Fehr & Peers, March, 2011)
- Transportation Technical Report for the Draft EIR (prepared by Intueor, August, 2011 and updated by Parsons Brinckerhoff, August, 2012)

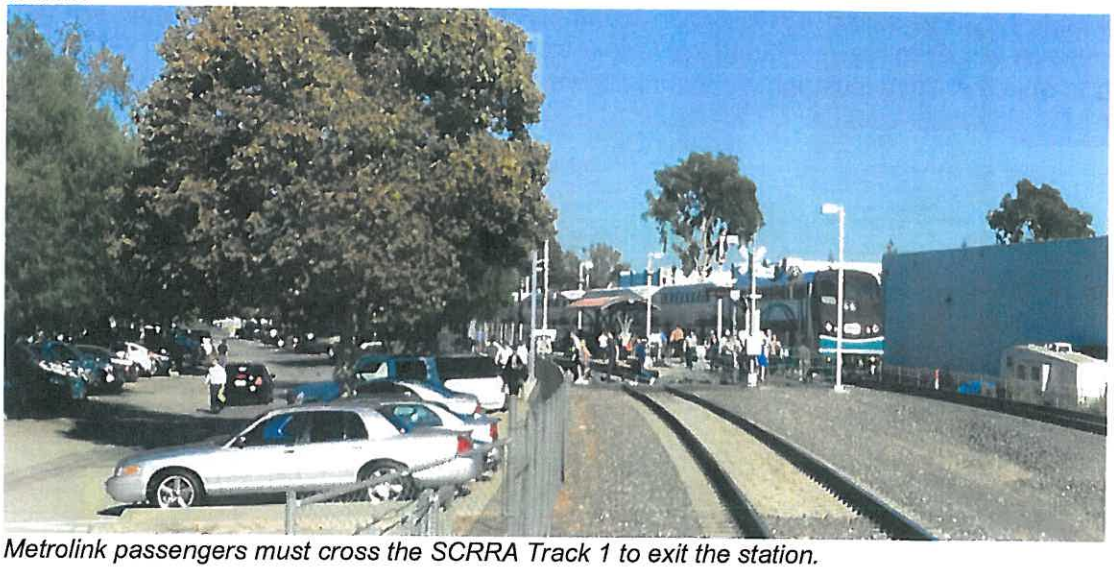
1. SITE VISITS

Urban Crossroads, Inc. staff has visited the site on August 27, 2012 and September 12, 2012. Data has been collected on peak hour train activity. A review of the site characteristics has also been performed.

Physical Characteristics of Existing Rail Lines

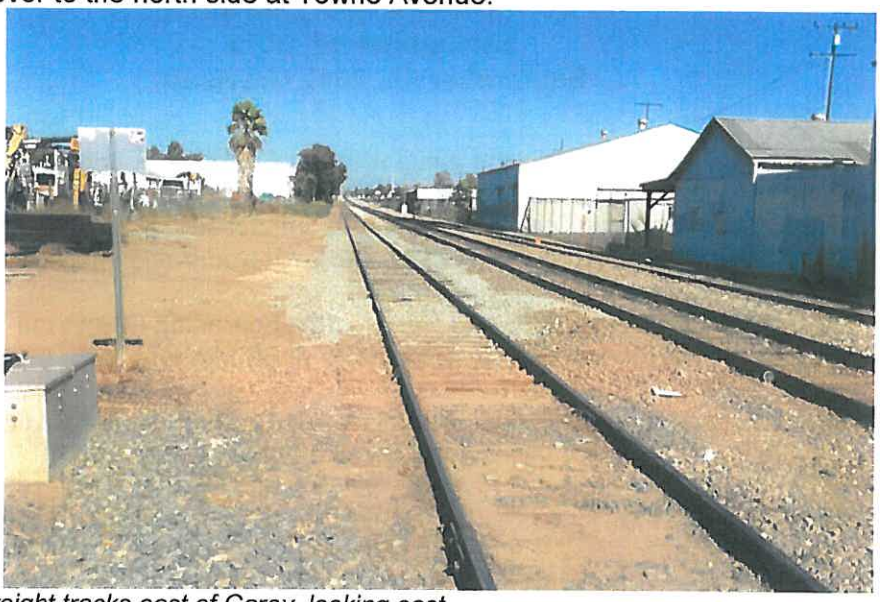
In the City of Pomona, existing BNSF (freight) and Metrolink rail lines are located south of Bonita Avenue and north of Arrow Highway. The existing freight line is north of the existing Metrolink lines.

The Metrolink station (looking east) between Fulton Road and Garey Avenue is pictured below:



Metrolink passengers must cross the SCRRA Track 1 to exit the station.

At this location, the proposed light rail line is on southerly edge of the freight tracks, then crosses over to the north side at Towne Avenue:



Freight tracks east of Garey, looking east.

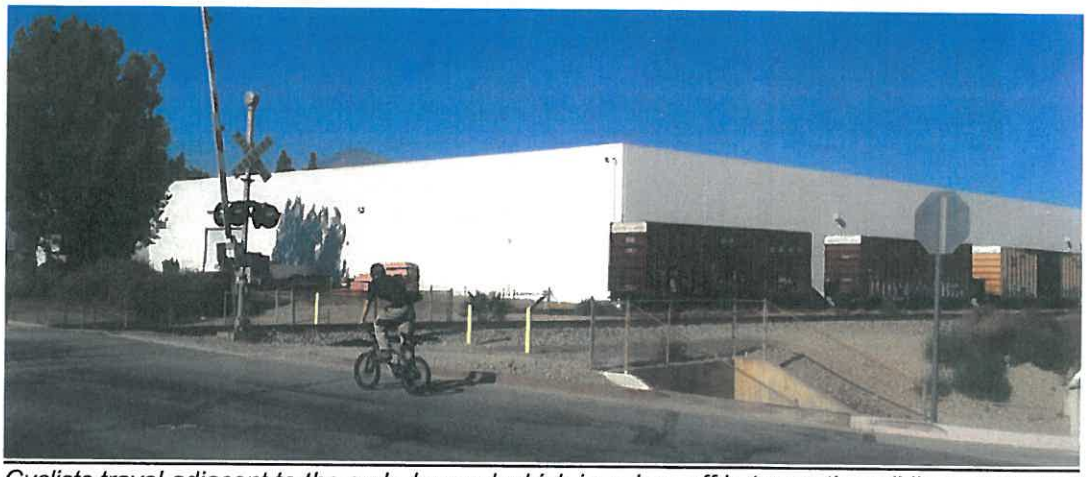
Currently at the Towne Avenue crossing, there are no occupied land uses between tracks. The proposed light rail flyover structure angles from the south side to the north side of the freight rail line (when moving west to east):

North side of freight rail line, looking eastward at Towne Avenue.

Street Crossings

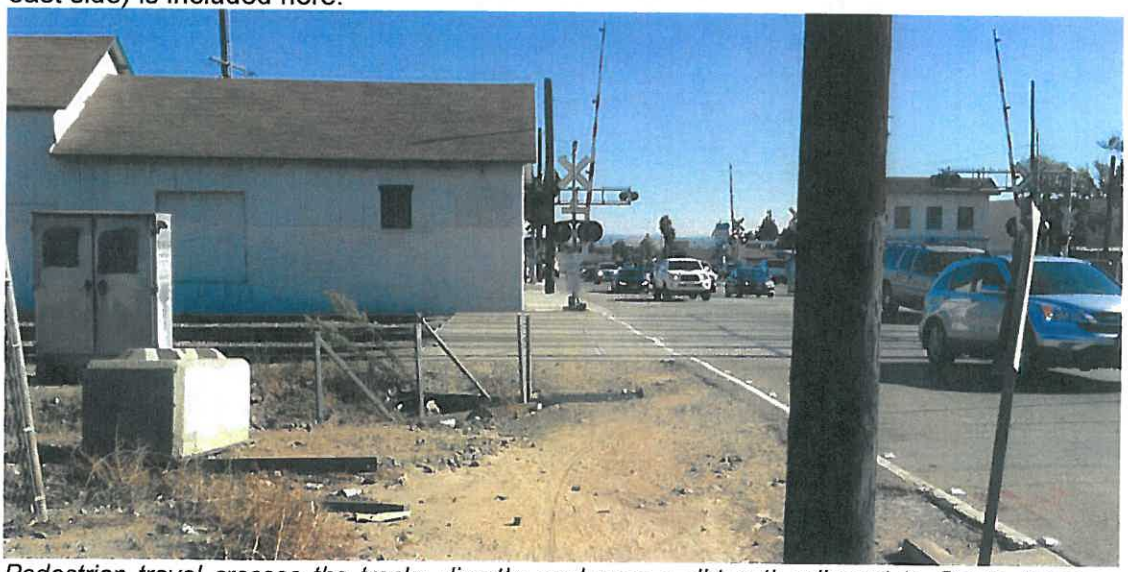
Existing at-grade street crossings are located at Fulton Road, Garey Avenue, and Towne Avenue. Fulton Road is a 2-lane road, while Garey Avenue and Towne Avenue are 4-lane roads. Each crossing has gates that control the automobile traffic when a train is using the crossing.

Pedestrian activity was observed at all three of the at-grade street crossings. A cyclist at the Fulton Road crossing is shown here:



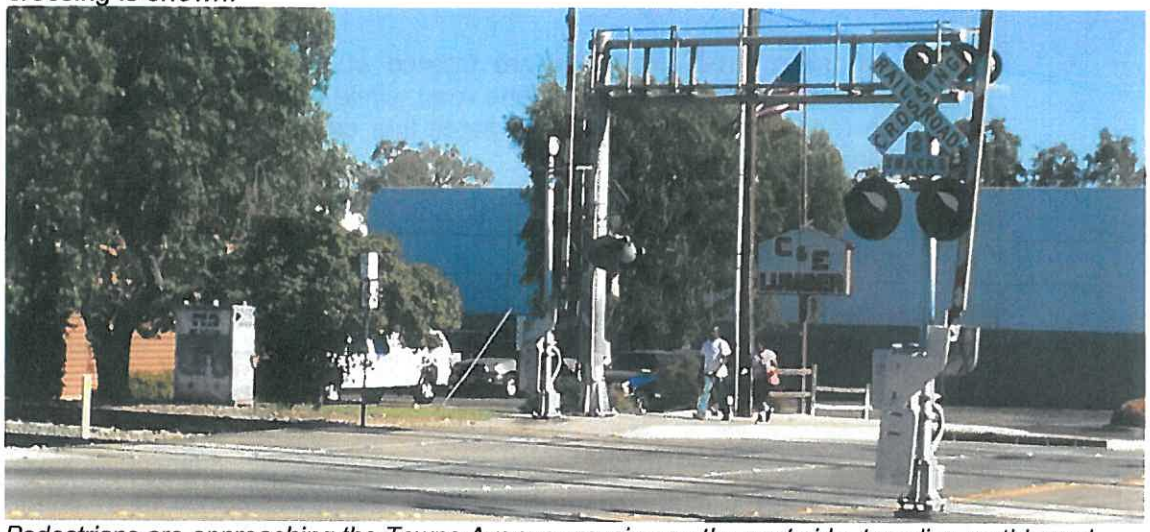
Cyclists travel adjacent to the curb, beyond which is a drop-off between the rail lines at the Fulton Road crossing.

Unimproved pedestrian path at the Garey Avenue crossing (looking southbound from the east side) is included here:



Pedestrian travel crosses the tracks directly, and uses a dirt path adjacent to Garey Avenue, north of the crossing.

Below, northbound pedestrian activity on the east side of the street at the Towne Avenue crossing is shown:



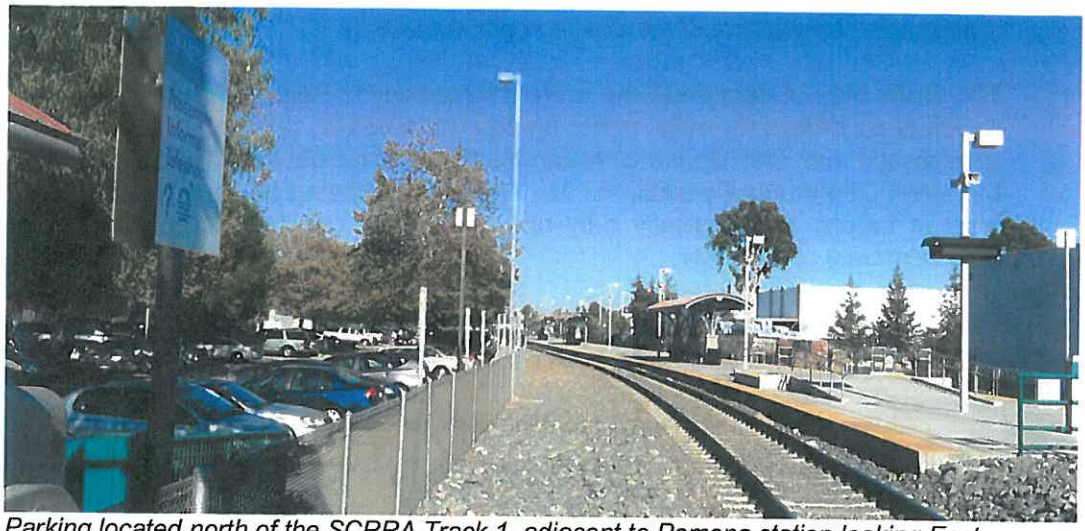
Pedestrians are approaching the Towne Avenue crossing on the east side, traveling northbound.

Existing restriction to southbound pedestrian activity at the Towne Avenue crossing (on the west side):

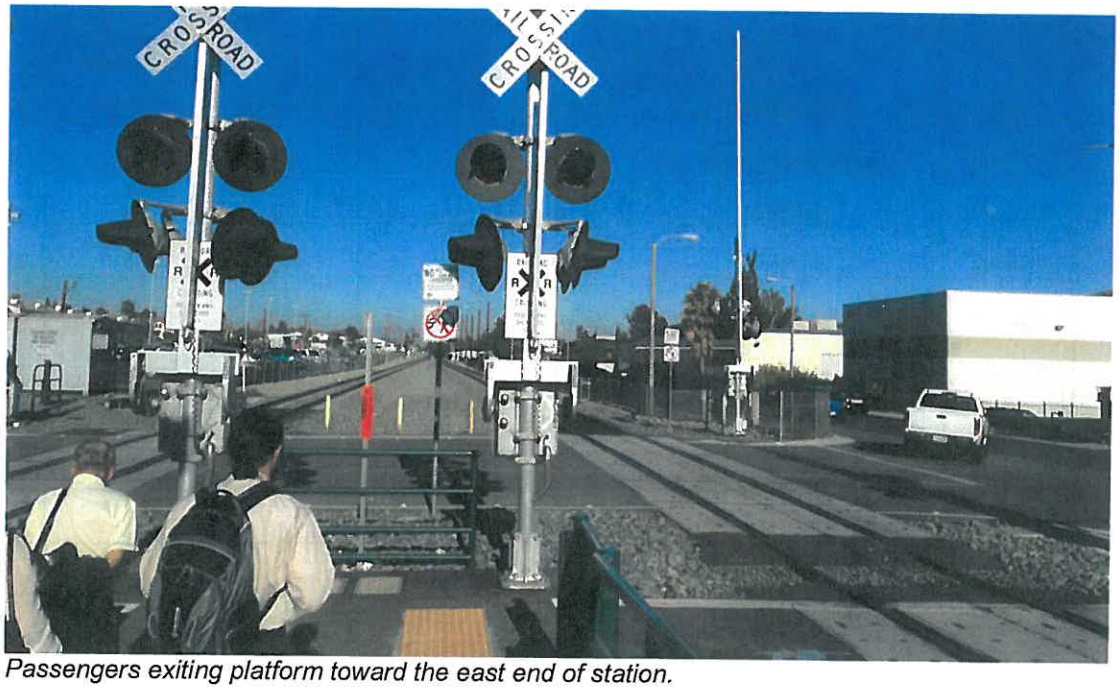
Pedestrian travel is constrained by existing power lines and limited sidewalk connectivity.

Existing Station

The existing Metrolink station is located north of the Metrolink line (between the BNSF and Metrolink tracks) east of Fulton Road and west of Garey Avenue. Access to the existing Pomona Metrolink station is provided by a driveway from Fulton Road (located between the Metrolink rail and BNSF freight rail lines). The station parking area also has access south to West Santa Fe Street, which connects to North Garey Avenue, and West Arrow Highway via **private streets**: Supply Street, Stair Street, and Amberson Street.



Parking located north of the SCRRA Track 1, adjacent to Pomona station looking East.



Passengers exiting platform toward the east end of station.

The future potential Gold Line station would be located northwest of the existing Metrolink station, south of the relocated BNSF tracks, with parking across the freight tracks.

2. EXISTING AND FUTURE OPERATIONS

The Metro Grade Crossing Policy Initial Screening (Milestone 1) Metro Gold Line Foothill Extension Azusa to Montclair Draft Memorandum (Fehr & Peers, March, 2011) indicates that it is assumed that there will be 5 Metrolink trains per hour and 6 Metro Gold Line trains per hour. Based upon field review of current Metrolink activity, 5 trains is a reasonable representation of existing conditions.

The DEIR did not document the current frequency of freight train activity in Pomona and its effect on delays for other traffic modes (automobile, bicycle, pedestrian, etc.). Urban Crossroads, Inc. staff spoke with Eric Northern, Principal Officer Business Management, Metrolink Commuter Operations. Mr. Northern indicated that freight trains are generally local in nature, and typically only use this freight rail line within the City of Pomona approximately once a day.

Urban Crossroads, Inc. staff has performed a field review of train activity at the Garey Avenue rail crossing in the AM peak period (between 7am and 9am).

Garey Avenue Railroad Crossing Survey
(Wednesday, September 12, 2012)

Time	Train Type	Track (N or S)	# of Train Cars	Direction	Number of Approach Lanes	Max Auto Queue (# of Vehicles)	
						NB	SB
6:57 AM	gates down, no train	n/a	0	n/a	2	12	8
7:00 AM	Metrolink	South	5	EB	2	8	4
7:10 AM	Metrolink	South	6	WB	2	11	6
7:33 AM	Metrolink	South	6	WB	2	16	19
7:53 AM	Metrolink	South	7	WB	2	7	14
8:46 AM	gates down, no train	n/a	0	n/a	2	9	26
8:48 AM	Metrolink	South	7	EB	2	12	17
8:51 AM	Metrolink	South	5	WB	2	12	10

Metrolink trains crossed the Garey Avenue crossing six (6) times in the two-hour period, but the gates were down eight times. When a train was stopped at the station, the gates would close because of the proximity of the stopped train at the station to the west, and automobile and pedestrian traffic would wait until the gates were reopened.

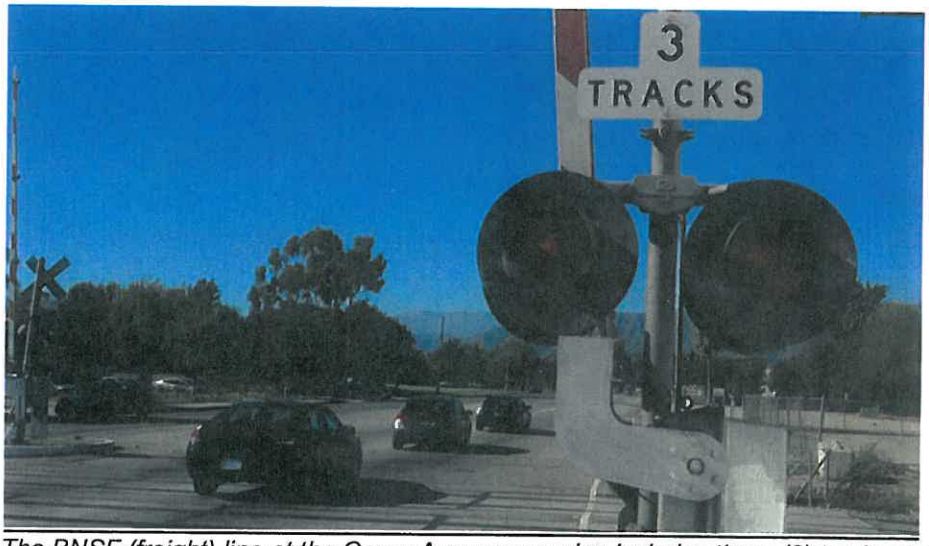
Automobile queues were counted as the gate crossings were closed. For each instance of a closed gate, the combined total number of autos experiencing delay (total of both northbound and southbound) was at least 12 vehicles, and in some instances totaled 35 vehicles. The average number of autos was over 23 vehicles experiencing delay. The longest directional queue was 26 vehicles (13 vehicles per lane, southbound).

A fire station is located on Bonita Avenue (about ¼ mile east of Garey Avenue). If additional at-grade crossings are included, the potential for impacts to fire truck response time may be significant.

The at-grade street crossing of Garey Avenue (looking southbound from the west side) is shown below:

Automobiles are stopped for a Metrolink train at the Garey Avenue crossing. Southbound vehicles are stopped between the BNSF (freight) tracks and the Metrolink tracks.

During the morning peak period, no freight train activity was observed. The at-grade freight line crossing of Garey Avenue (looking northhbound from the east side):

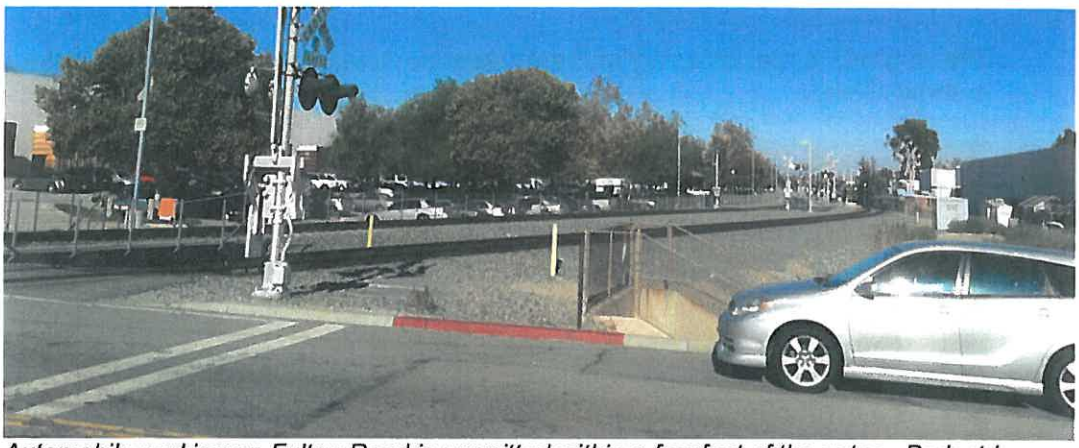


The BNSF (freight) line at the Garey Avenue crossing includes three (3) tracks at grade.

Safety Issues

Pomona Police Department Traffic Bureau accident statistics (2008 to present) near the current grade crossings has been reviewed, but no data was included to indicate the involvement of a train and/or train crossing.

At the Fulton Road crossing, parking is permitted in the northbound direction within close proximity of the gate control:



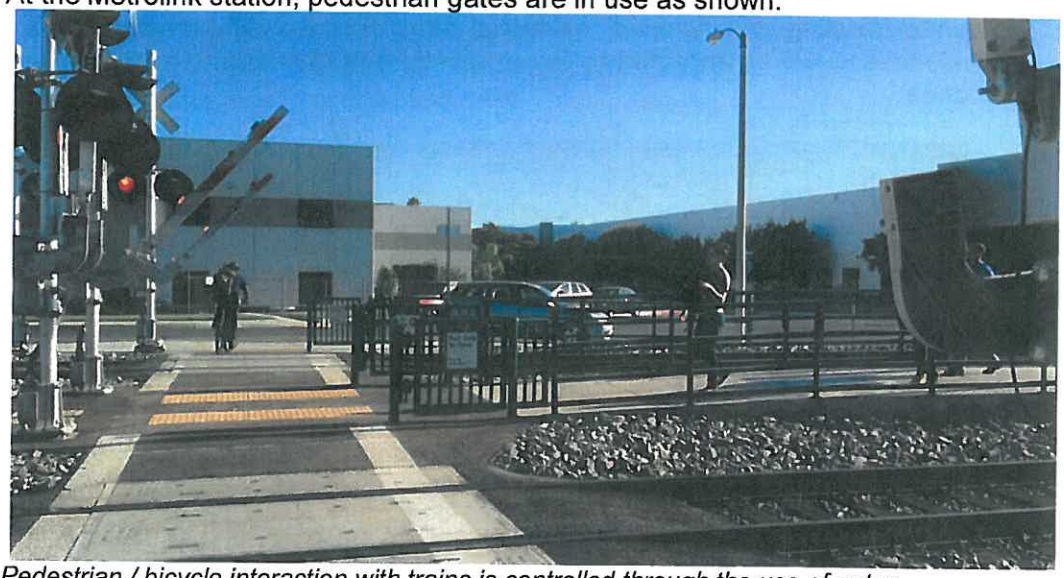
Automobile parking on Fulton Road is permitted within a few feet of the gates. Pedestrian access could be affected by the on-street parking.

The need for on-street parking at this location needs to be evaluated to determine whether available existing and future parking is safe and adequate.

Pedestrian accommodations for the rail crossings at the east edge of the current Metrolink station:

Pedestrian crossings of the tracks at the Metrolink station have special signage, with consideration of people with disabilities.

At the Metrolink station, pedestrian gates are in use as shown:



Pedestrian / bicycle interaction with trains is controlled through the use of gates.

3. RESIDENTIAL PROXIMITY TO LIGHT RAIL

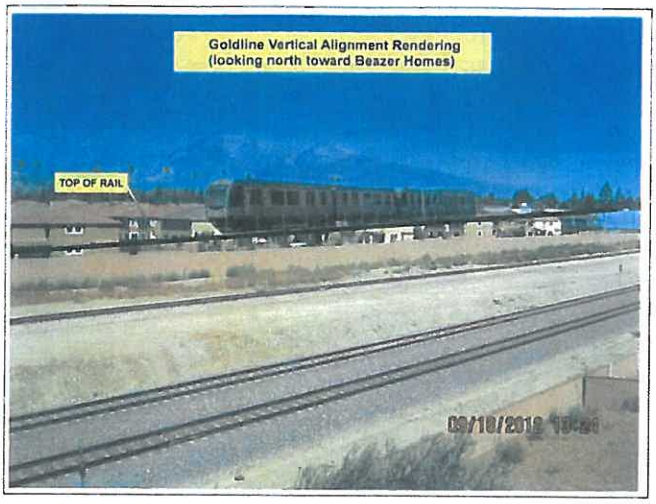
The DEIR describes the 1.4-mile light rail alignment in the City of Pomona as "entirely adjacent to commercial and industrial areas or Metrolink right-of-way with the exception of one 500 foot stretch of residential area along the north side of the Metro right-of-way just west of Carnegie Avenue." This description is not accurate, for example, the Serenity Villas Senior Community is located just north of the existing freight line, east of Garey Avenue and south of Bonita Avenue:

Aerial perspective view of Serenity Villas Senior Community.

On both sides of the existing BNSF freight and Metrolink rail lines west of Towne Avenue, existing and planned residential sites abut the right-of-way. This section of residences would be impacted by the proposed light rail ramping to the flyover at Towne Avenue:

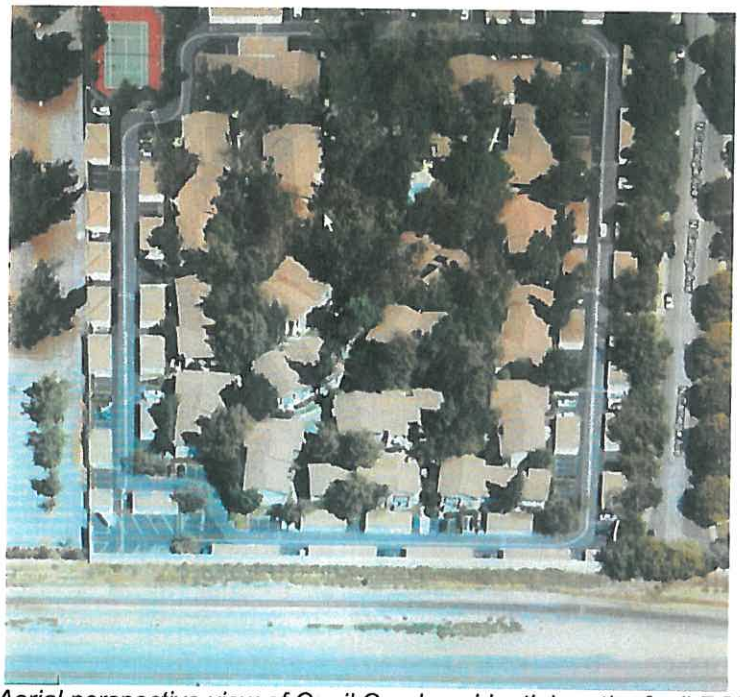
Aerial perspective view of residential abutting rail ROW west of Towne Avenue.

The Arbours (a Beazer development) includes 123 dwelling units. This section of residences would be impacted by the proposed light rail ramping to the flyover at Towne Avenue:



The Arbours (looking north from south of the tracks)

East of Towne Avenue, the light rail flyover ramps transitions down to the northerly edge of the rail right-of-way. In this vicinity, there is a proposed residential community (Tentative Parcel Map 71490, by Xerox Corporation) on the southeast corner of Towne Avenue and East Bonita Avenue, and an existing gated multi-family residential site (Quail Creek). The freight track would cross under the light rail flyover at Towne Avenue to return to the south side of the Metro right-of-way and later join the tracks of Metrolink's San Bernardino Line just east of Carnegie Avenue:



Aerial perspective view of Quail Creek residential north of rail ROW.

ATTACHMENT B

URBAN CROSSROADS, INC. TECHNICAL MEMORANDUM #2

16-27

ATTACHMENT B

URBAN CROSSROADS, INC. TECHNICAL MEMORANDUM #2

METRO GOLD LINE PHASE II EIR REVIEW

Technical Memorandum #2
September 25, 2012
September 27, 2012 (Revised)

This memorandum provides our independent review of the Metro Gold Line Foothill Extension Draft Environmental Impact Report (DEIR) for transportation-related issues of the proposed light rail operations within the City of Pomona, along with potential impacts related to the proposed Gold Line extension in the context of overall rail activities. Potential impacts to all modes of transportation have been considered, including automobile, bicycle, pedestrian, and transit.

The City of Pomona staff had provided comments on the Gold Line Foothill Extension / Pomona Stations in a letter dated February 1, 2011. This memorandum documents the resolution or ongoing concerns regarding said comments.

Urban Crossroads, Inc. staff members have reviewed the following DEIR and traffic analysis materials:

- Metro Gold Line Foothill Extension – Azusa to Montclair, Draft Environmental Impact Report (Metro Gold Line Foothill Extension Construction Authority, March, 2012)
- The Metro Grade Crossing Policy Initial Screening (Milestone 1) Metro Gold Line Foothill Extension Azusa to Montclair Draft Memorandum (Fehr & Peers, March, 2011)
- Transportation Technical Report for the Draft EIR (prepared by Intueor, August, 2011 and updated by Parsons Brinckerhoff, August, 2012)

<u>At-Grade Crossing Impacts</u>
In 2011, the City had requested analysis of the maximum vehicle queue length caused by blockages related to at-grade train crossings of City streets, including the average duration of the blockages and estimated number of affected vehicles/day. An initial screening of proposed light rail crossings is included in the Fehr & Peers March, 2011 technical memorandum, which documents peak hour automobile traffic volumes and number of lanes on Fulton Road, Garey Avenue, and Towne Avenue. It is assumed that there will be 5 Metrolink trains per hour and 6 Metro Gold Line trains per hour during morning and evening peak periods. These statistics were used to determine whether or not at grade operation should be feasible. Expected queue lengths have not been evaluated in the DEIR.

The DEIR also did not document the current frequency of freight train activity in Pomona and its effect on delays for other traffic modes (automobile, bicycle, pedestrian, etc.). Urban Crossroads, Inc. staff spoke with Eric Northern, Principal Officer Business Management, Metrolink Commuter Operations. Mr. Northern indicated that freight trains are generally local in nature, and typically only use this freight rail line within the City of Pomona approximately once a day.

Existing at-grade street crossings in the City of Pomona are located at Fulton Road, Garey Avenue, and Towne Avenue. Fulton Road is a 2-lane road, while Garey Avenue and Towne Avenue are 4-lane roads. Each crossing has gates that control the automobile traffic when a train is using the crossing.

Urban Crossroads, Inc. staff has performed a field review of train activity at the Garey Avenue rail crossing in the AM peak period (between 7am and 9am).

Garey Avenue Railroad Crossing Survey
(Wednesday, September 12, 2012)

Time	Train Type	Track (N or S)	# of Train Cars	Direction	Number of Approach Lanes	Max Auto Queue (# of Vehicles)	
						NB	SB
6:57 AM	gates down, no train	n/a	0	n/a	2	12	8
7:00 AM	Metrolink	South	5	EB	2	8	4
7:10 AM	Metrolink	South	6	WB	2	11	6
7:33 AM	Metrolink	South	6	WB	2	16	19
7:53 AM	Metrolink	South	7	WB	2	7	14
8:46 AM	gates down, no train	n/a	0	n/a	2	9	26
8:48 AM	Metrolink	South	7	EB	2	12	17
8:51 AM	Metrolink	South	5	WB	2	12	10

Metrolink trains crossed the Garey Avenue crossing six (6) times in the morning peak two-hour period, but the gates were down eight times. When a train was stopped at the station, the gates would close because of the proximity of the stopped train at the station to the west, and automobile and pedestrian traffic would wait until the gates were reopened.

Automobile queues were counted as the gate crossings were closed. For each instance of a closed gate, the combined total number of autos experiencing delay (total of both northbound and southbound) was at least 12 vehicles, and in some instances totaled 35 vehicles. The average number of autos was over 23 vehicles experiencing delay during the morning peak period. The longest directional queue was 26 vehicles (13 vehicles per lane, southbound).

Urban Crossroads, Inc. staff also performed a field review of train activity at the Garey Avenue rail crossing in the PM peak period (between 4pm and 6pm).

Garey Avenue PM Peak Period Railroad Crossing Survey
(Wednesday, September 19, 2012 – 4pm to 6pm)

Time (Start)	Time (End)	Duration (m:ss)	Train Type	Track (N or S)	# of Train Cars	Direction	Number of Approach Lanes	Max Auto Queue (# of Vehicles)	
								NB	SB
4:08:05	4:09:05	01:00	gates down, no train	n/a	0	n/a	2	20	12
4:11:30	4:12:30	01:00	Metrolink	South	5	EB	2	18	5
4:35:24	4:39:00	03:36	Metrolink	South	7	EB	2	37	46
4:43:30	4:44:33	01:03	Metrolink	South	6	WB	2	24	30
5:11:30	5:13:00	01:30	gates down, no train	n/a	0	n/a	2	16	26
5:13:30	5:14:15	00:45	Metrolink	South	7	EB	2	4	27
5:28:00	5:29:00	01:00	gates down, no train	n/a	0	n/a	2	21	9
5:30:00	5:30:45	00:45	Metrolink	South	6	EB	2	19	12
5:53:20	5:54:20	01:00	Metrolink	South	8	EB	2	14	16
6:00:00	6:01:00	01:00	gates down, no train	n/a	0	n/a	2	15	10

Metrolink trains crossed the Garey Avenue crossing six (6) times in the evening peak two-hour period, but the gates were down nine times. As in the AM peak period, when a train was stopped at the station, the gates would close because of the proximity of the stopped train at the station to the west, and automobile and pedestrian traffic would wait until the gates were reopened.

Automobile queues were counted as the gate crossings were closed. For each instance of a closed gate, the combined total number of autos experiencing delay (total of both northbound and southbound) was at least 23 vehicles, and in some instances totaled 83 vehicles. The average number of autos was over 38 vehicles experiencing delay in the PM peak period.

The average duration was 1 minute 16 seconds, but the longest was 3 minutes 36 seconds. The longest directional queue occurred during the 3 minute 36 second closure, and was 46 vehicles (23 vehicles per lane, southbound). In that one instance (at 4:35pm), the gates were lowered for a stopped train, but were not raised until after said train exited the station and crossed the street.

The proposed light rail operations will add approximately 8 minutes of street automobile delay per hour at the Garey Avenue crossing, assuming the light rail train average queues will be similar to the Urban Crossroads, Inc. evening peak hour observations for current Metrolink service. This amounts to approximately 230 additional vehicles experiencing stop delays each hour during peak periods.

The Fulton Road and Garey Avenue rail crossings are proposed to remain at-grade with the Metro Gold Line Phase II light rail service. At both of these locations, pedestrian and bicycle activity occurs during peak periods (see attached Technical Memorandum #1). Sidewalk improvements, with appropriate positioning of railroad crossing gate controls are recommended.

In 2011, the City had noted that the local preferred alternative is to consider a grade separation at the Garey Avenue crossing. The results of the Metro Grade Crossing Policy Initial Screening (Milestone 1) for Garey Avenue conclude that this location is assigned to the "at-grade should be feasible" group with light rail operations.

Emergency response times have not been evaluated in the DEIR. There is a fire station on Bonita Avenue about ¼ mile east of Garey Avenue. Response times of emergency vehicles from the fire station would be affected by blockages / vehicle delays due to increased rail activity at the Garey Avenue rail crossing.

Traffic Projections

Page 2-76 of the DEIR states that "Similar to the TSM Alternative, adjustments to traffic flow patterns as a result of the Build Alternative were determined by using projections from the transportation model developed for this study. The 2035 No Build Alternative and the Build Alternative model data were compared to determine the effects of the Build Alternative on traffic flow and circulation patterns. The peak period link data from each model output were used in this analysis." This statement implies that a transportation model was developed for this work effort, but no other mention / documentation of this transportation model has been found. In comparison, the Transportation Technical Report for the DEIR indicates that "Traffic forecasts in the vicinity of the proposed grade crossing locations in each city were obtained from the 2003 and 2035 SCAG's RTP models to reflect the anticipated growth within the project area." (page 16).

Based on the Transportation Technical Report, the Build Alternative results in a change (decrease) in traffic volumes in Pomona of -1.380%. The study recognizes that intersections surrounding the stations would experience a volume increase, due to station activity.

The report indicates that the light rail station parking is assumed to be 95% occupied, with 70% arriving in the AM peak hour and 65% leaving in the PM peak hour. Ten percent (10%) of vehicles accessing the station are kiss-and-ride patrons. No summary of the resulting trip generation was provided for the Pomona light rail parking garage. Assuming a garage capacity of 750 parked vehicles, the listed factors imply that there is an AM peak hour inbound station volume of 549 vehicles (including approximately 50 kiss-and-ride vehicles, which would also be outbound in the same peak hour), and a PM peak hour outbound station volume of slightly less, around 509 vehicles (including approximately 46 kiss-and-ride vehicles, which would also be inbound in the same peak hour). These station volumes would be offset slightly by the decrease in traffic due to the light rail transportation option.

It should be noted that the forecast volumes for intersection 66 (Fulton Road / Bonita Avenue) indicate a four leg intersection. Fulton Road at Bonita Avenue is actually an offset intersection (the northerly Fulton Road intersects Bonita Avenue approximately 240' west of the southerly Fulton Road intersection). Neither of these two halves of the

intersection has an opposing driveway, so we have deduced that the EIR analyzed it as a single combined intersection.

According to the project description (page 1-26), access to the Pomona Station would be either from Bonita Avenue (via the north-south road located just west of Pomona Pediatrics) or from Garey Avenue (via the driveway located just north of the freight tracks). Neither of these potential driveways was analyzed in the Transportation Technical Report or DEIR. The parking section indicates that "Vehicular access would be via a driveway from Garey Avenue on the north side of the structure." However, Urban Crossroads, Inc. has attempted to determine the traffic volume distribution in the vicinity of the Pomona Station, and the traffic volume differences between the No Build and Build scenarios imply that the surrounding area analysis was performed with the driveway on Bonita Avenue.

A comparison of traffic volumes between the No Build scenario and the Build scenario is shown on Exhibit A. In general, the AM peak hour volume differences grow in the direction of the possible driveway to Bonita Avenue. Over 200 vehicles per hour (vph) are shown on Bonita Avenue traveling eastbound in the AM peak hour from Fulton Road, but not arriving at the next intersection analysis location (Garey Avenue). Westbound, over 450 vph are shown, leaving the Garey Avenue / Bonita Avenue intersection westbound for the AM peak hour, but not arriving at Fulton Road. For the PM peak hour, the westbound traffic on Bonita Avenue is over 200 vph approaching the Fulton Road intersection, with no corresponding volume at Garey Avenue. The eastbound volume on Bonita Avenue in the PM peak hour is over 500 vph at Garey Avenue, without an increase at Fulton Road.

This review of the volumes indicates that the DEIR apparently assumes access to the Pomona Station via Bonita Avenue, which results in several hundred vehicles turning at the driveway in the Build scenario. The direct access to Garey Avenue from the light rail Pomona Station parking structure apparently has not been considered in the DEIR traffic analysis.

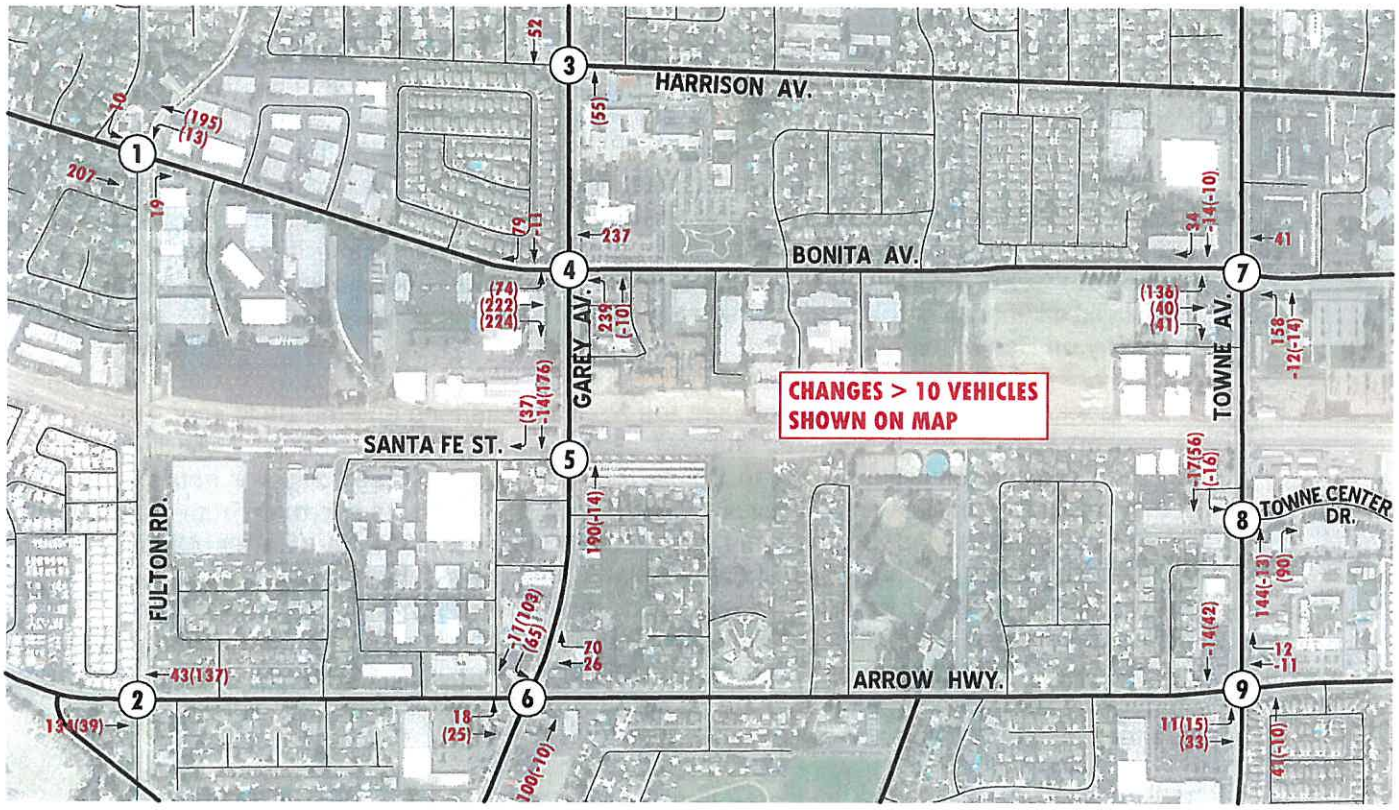
The Transportation Technical Report for the DEIR indicates that "Forecasts for the No Build Alternative would account for background growth in traffic due to additional regional and sub-regional land use development (cumulative projects) and population growth." (page 16). Additional analysis is needed to directly consider new / infill projects and analyze potential traffic diversion to other arterials as a result of at-grade crossing delays. Diverted traffic from Garey Avenue could potentially trigger impacts at Fulton Road/Arrow Hwy and Towne Avenue/Arrow Hwy. Traffic diversion has not been evaluated in the DEIR. Discussion about the traffic patterns to and from the Fairplex and a future Pomona Gold Line station was recommended in 2011, and remains a concern.

Towne Avenue Flyover

East of Garey Avenue, the proposed light rail tracks are located southerly of the BNSF freight tracks. A flyover is proposed for the light rail tracks to cross Towne Avenue and the freight tracks, resulting in repositioning of the light rail to a location northerly of the freight tracks. The proposed light rail flyover structure therefore angles from the south side to the north side of the freight rail line in the vicinity of Towne Avenue (when moving west to east).

EXHIBIT A

COMPARISON OF DEIR BUILD AND NO BUILD SCENARIOS
2035 PEAK HOUR INTERSECTION VOLUMES



1 Fulton Rd. & Bonita Av.	2 Fulton Rd. & Arrow Hwy.	3 Garey Av. & Harrison Av.	4 Garey Av. & Bonita Av.	5 Garey Av. & Santa Fe St.
0(0) 0(-1) 10(-1) → 0(12) ← -1(195) 0(13)	2(-1) 0(0) 7(0) → -1(3) ← 43(137) 0(3)	0(-1) 52(-8) 0(-1) → -1(-2) ← 0(0) 9(-2)	79(-1) -11(-9) -1(-1) → -1(-1) ← 237(-3) -1(-2)	0(37) → ← -14(176)
0(0) 207(-3) 0(0) →	-1(1) 134(39) 0(0) →	0(-1) 0(0) 4(-1) →	-1(74) -3(222) -1(224) →	0(0) -1(-1) →
0(-1) -1(0) 19(-1) ←	1(-1) -1(0) 4(-1) ←	0(2) -6(55) -1(4) ←	239(-2) -7(-10) -2(-2) ←	-1(0) 190(-14) ←

6 Garey Av. & Arrow Hwy.	7 Towne Av. & Bonita Av.	8 Towne Av. & Towne Center Dr.	9 Towne Av. & Arrow Hwy.
2(8) -1(-1) 103) -2(65) → 70(-3) ← 26(-55) -2(-2)	34(-1) -14(-10) -2(-1) → -1(-2) ← 41(-2) -2(-1)	-17(56) 0(-16) → 0(-1) ← -1(0)	4(7) -14(42) -3(9) → 12(-2) ← -1(-7) -1(-3)
18(3) -8(25) -1(3) →	-1(136) -2(40) -1(41) →		11(15) -5(33) -1(3) →
4(-3) -1(-10) -2(-3) ←	158(-2) -12(-14) -1(-2) ←	144(-13) 0(90) ←	-3(-2) 41(-10) -1(-2) ←

LEGEND:

26(31) = AM(PM) PEAK HOUR VOLUMES

Exhibit B shows the City of Pomona residential neighborhoods east of Garey Avenue along the Metro Gold Line Phase II. On both sides of the existing BNSF freight and Metrolink rail lines west of Towne Avenue, existing and planned residential sites abut the right-of-way. The DEIR describes the 1.4-mile light rail alignment in the City of Pomona as "entirely adjacent to commercial and industrial areas or Metrolink right-of-way with the exception of one 500 foot stretch of residential area along the north side of the Metro right-of-way just west of Carnegie Avenue." This description is not accurate, for example, the Serenity Villas Senior Community is located just north of the existing freight line, east of Garey Avenue and south of Bonita Avenue. This section of residences would be impacted by the proposed light rail ramping to the flyover at Towne Avenue. The Arbours (a Beazer development) includes 123 dwelling units. This section of residences would be impacted by the proposed light rail ramping to the flyover at Towne Avenue. East of Towne Avenue, the light rail flyover ramps transitions down to the northerly edge of the rail right-of-way. In this vicinity, there is a proposed residential community (Tentative Parcel Map 71490, by Xerox Corporation) on the southeast corner of Towne Avenue and East Bonita Avenue, and an existing gated multi-family residential site (Quail Creek). The freight track would cross under the light rail flyover at Towne Avenue to return to the south side of the Metro right-of-way and later join the tracks of Metrolink's San Bernardino Line just east of Carnegie Avenue.

In 2011, the City had requested analysis of project impacts to visual resources by obstructing views along the portion near Towne Avenue where elevated grade separation is being proposed should be addressed. The local alternative is to consider a below grade rail separation at this location. Because of the extensive amount of existing and planned residential development in close proximity to the proposed Towne Avenue flyover (not addressed in the DEIR), consideration should be given to a light rail line underpass of Towne Avenue and the freight line.

Pomona Station

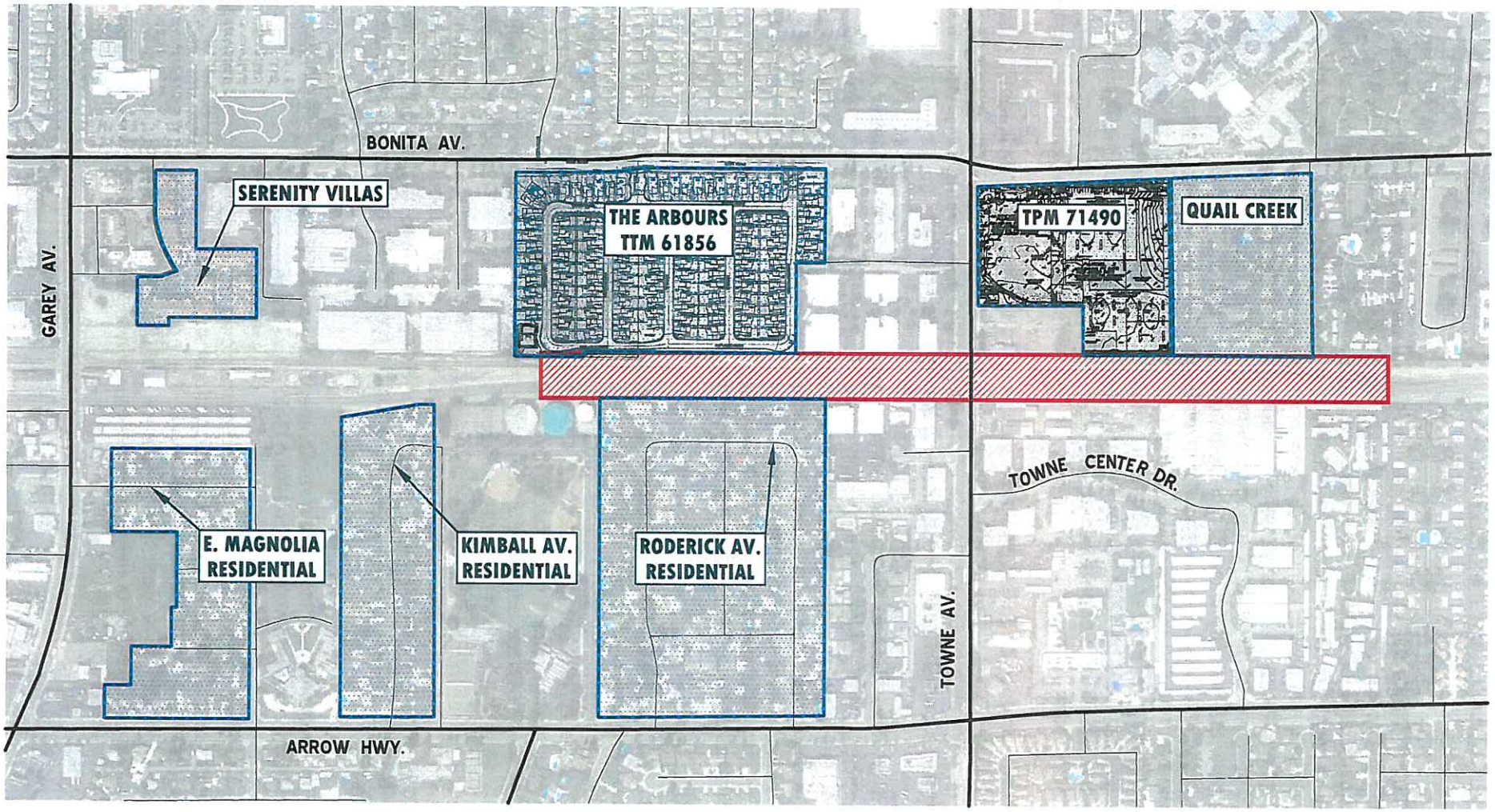
The combined Metro Gold Line and Metrolink parking demand at the proposed Pomona Station are projected to be 1,000 spaces by 2035. The existing Metrolink parking lots contain approximately 250 spaces, requiring the construction of 750 new spaces (page 1-12 of the DEIR), but in Section 2.6.4 (Parking), the DEIR indicates that the Pomona Station would require 1,050 spaces by 2035 (with existing Metrolink parking listed as 350 spaces). These additional spaces are proposed to be provided in a shared Gold Line / Metrolink parking structure adjacent to this spur line. This site is currently an occupied industrial building (page 2-102 of the DEIR calls it an unoccupied building). At 4.5 levels (about 45 feet high) the structure would require about a 1.5 acre area. A pedestrian bridge over the BNSF freight and Metro Gold Line tracks would connect the new parking garage with the new Metro Gold Line platform and the existing Metrolink platform.

The light rail proposal includes a realignment of the BNSF tracks east of Fulton Road further north to accommodate the Metro Gold Line station.

Exhibit C shows the Pomona Station and surrounding transportation / circulation system. As noted in the discussion of traffic projections above, access to the Pomona Station would be either from Bonita Avenue (via the north-south road located just west of Pomona Pediatrics) or from Garey Avenue (via the driveway located just north of the freight tracks). Neither of these potential driveways was analyzed in the Transportation Technical Report or DEIR.

EXHIBIT B

CITY OF POMONA RESIDENTIAL NEIGHBORHOOD LOCATIONS ALONG METRO GOLD LINE PHASE II



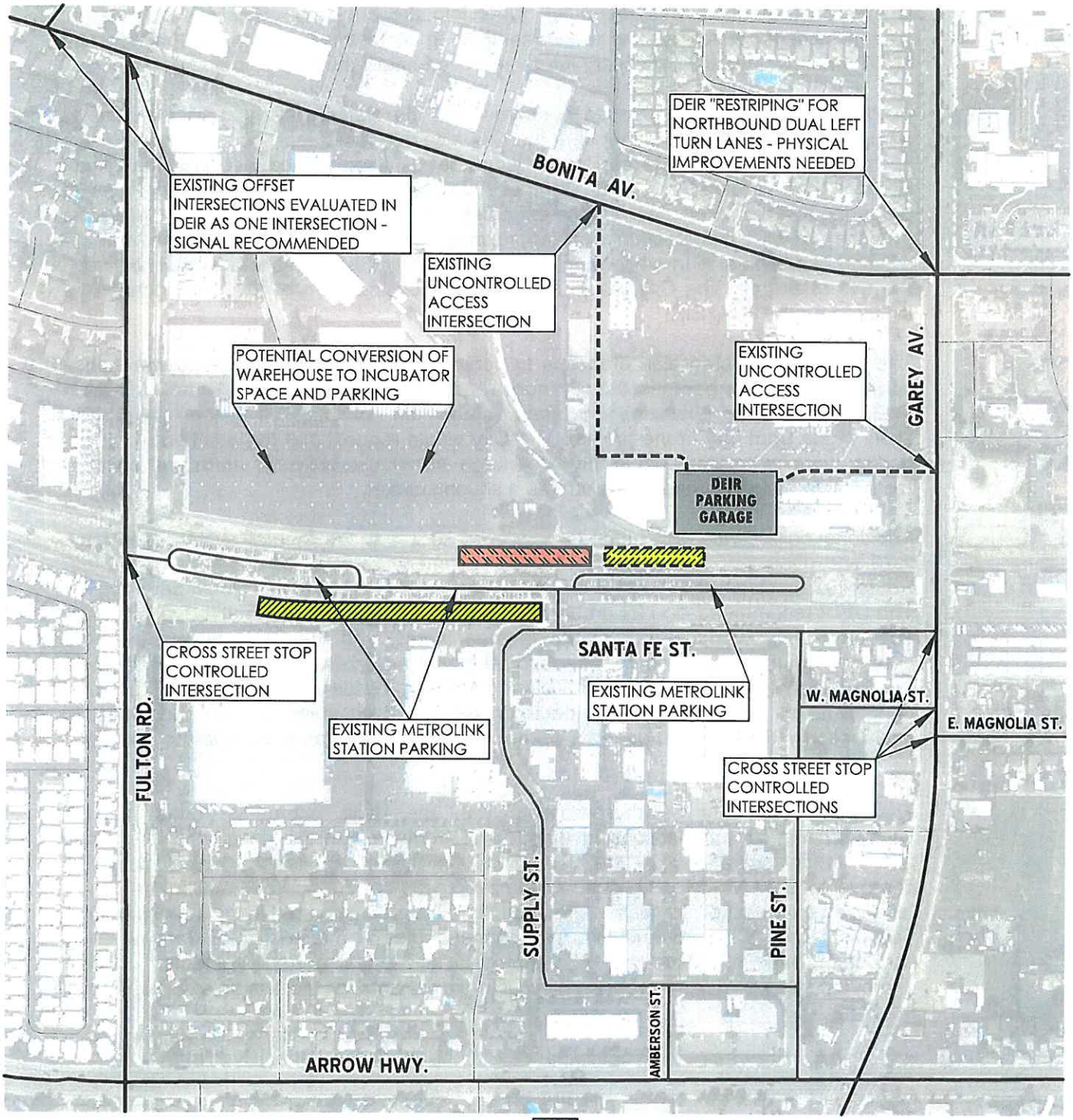
7-104

Metro Gold Line Phase II EIR Review
City of Pomona, CA (JN - 08095:001.dwg)

URBAN CROSSROADS

EXHIBIT C

POMONA STATION ACCESS CONSIDERATIONS
METRO GOLD LINE PHASE II



At the assumed driveway to Bonita Avenue, there is an existing striped median lane, which accommodates westbound left turns into the driveway. Analysis of potential station access driveways is recommended to determine appropriate intersection configurations, and any necessary future improvements if the project is approved.

In 2011, the City had expressed concerns with the platform location as it relates to pedestrian accessibility. At that time the City also requested that the access and rights to the property for the north parking structure be identified. Since that time, the City of Pomona has received a SCAG Compass Blueprint grant and is in the process of preparing a station area plan with the expertise of a TOD design firm (Cooper Carry) that proposes to shift this location west approximately 300-400 feet to be in line with the existing Metrolink station platform to create a better pedestrian access system between the two platforms. The City would request that consideration of this new location be included for the Final EIR.

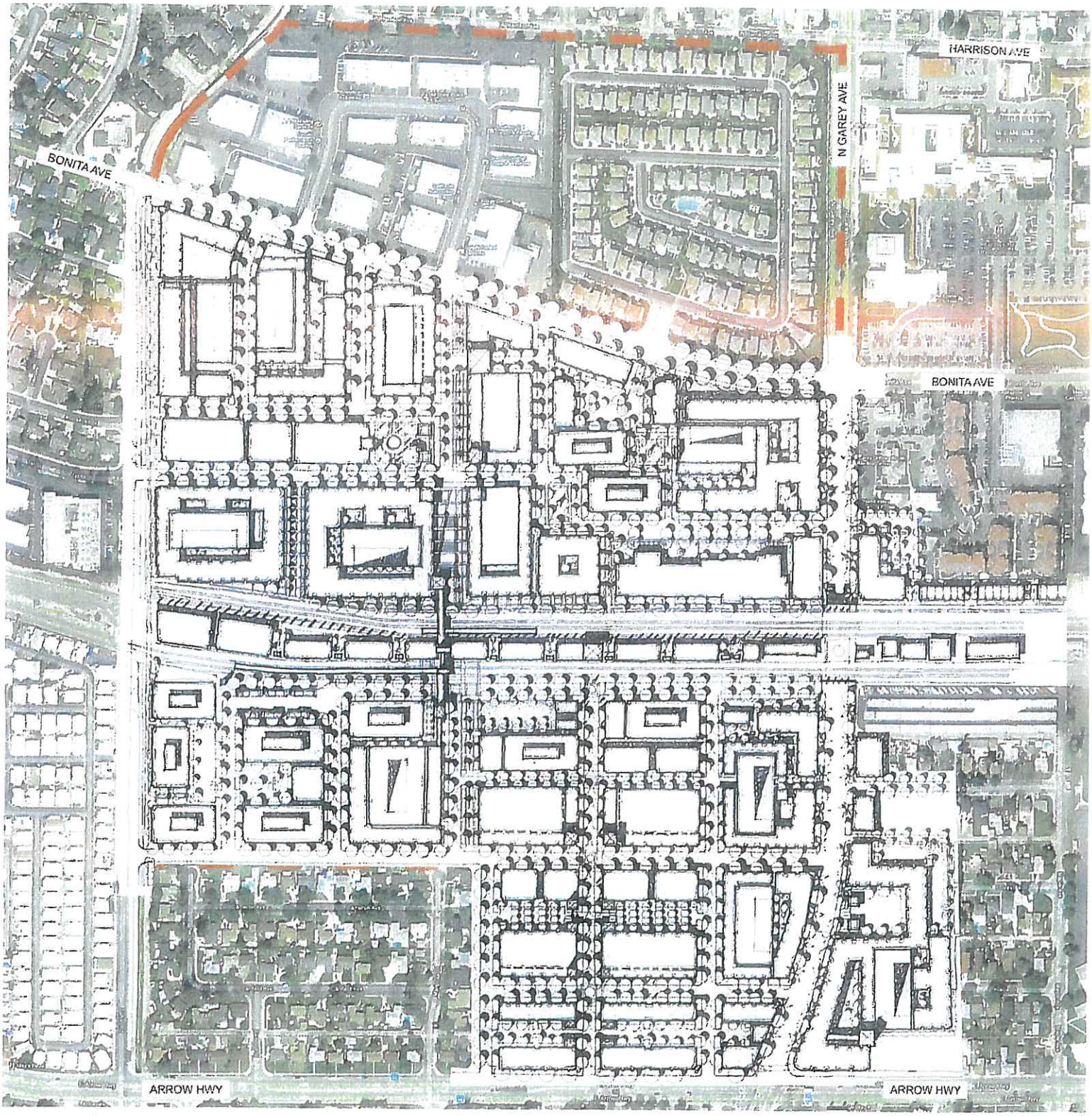
The City's station area plan proposes to consider converting large existing warehouse space into parking garages directly north and south of the existing Metrolink station platform that would phase parking stalls rather than construct full buildout of parking stalls at the front end of the project. The City would request that the additional optional parking spaces be identified in the three large warehouse buildings north and south of the existing Metrolink station platform as a second option.

Additional bus service is included for improved access to the light rail system (see page 2-73 and page 2-75 of the DEIR). For the Pomona Station, the DEIR proposes that Route 492 be diverted for the Pomona Station, and additional buses would be provided. The DEIR recommendation for a bus stop with possible turnout for Foothill Transit Route 291 on Garey Avenue north of the railroad tracks, and the DEIR suggestion of a potential off-street transit center needs to be further analyzed. Bus route connections to the proposed light rail, including provisions for getting buses into and out of the station / parking area, are important connectivity issues which need to be addressed in conjunction with a realistic analysis of roadway and pedestrian access to the proposed light rail Pomona Station.

The DEIR summary of improvements with the Build Alternative does not list improvements for intersections in the City of Pomona, but the document references future traffic operations in the Transportation Technical Report, which does list improvements at two intersections. At the intersection of Fulton Road at Bonita Avenue (analyzed as a single intersection), a traffic signal is recommended in the Transportation Technical Report. Improvements are recommended at the intersection of Garey Avenue at Bonita Avenue, which are characterized as restriping improvements. These improvements would likely require physical improvements, as there is an existing curbed median.

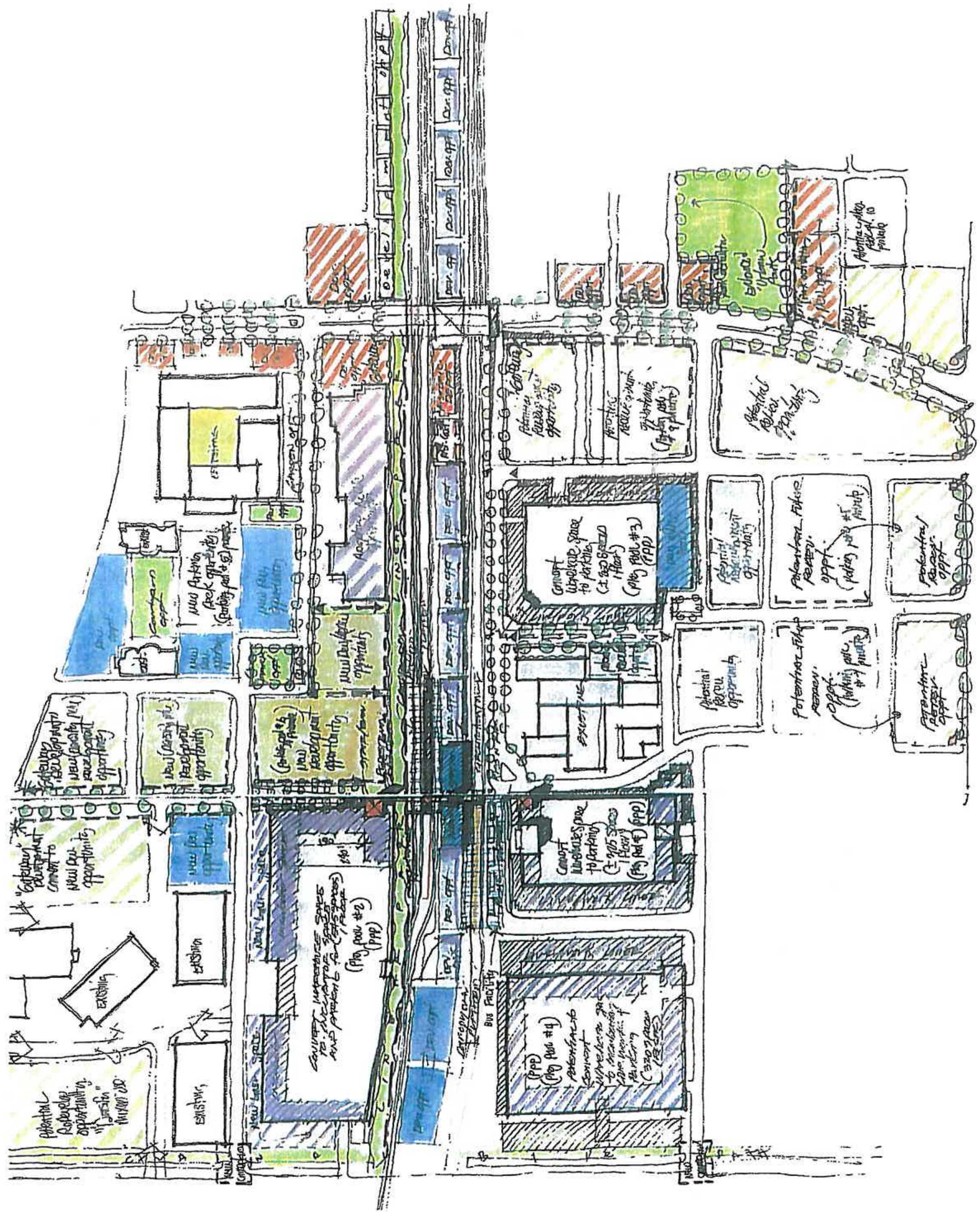
ATTACHMENT C

COOPER-CARRY PLANNING DOCUMENT



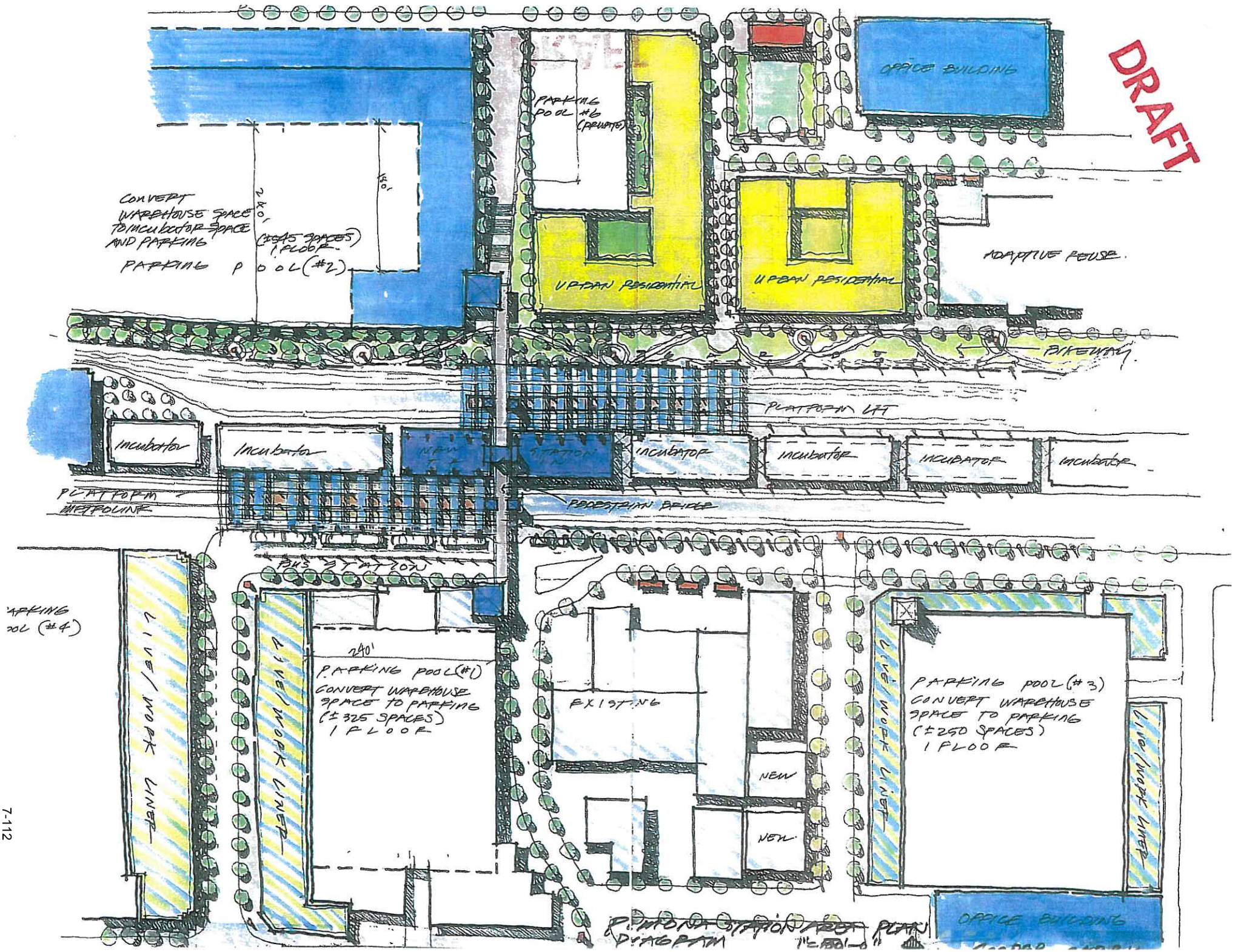
COOPER CARRY

DRAFT



POMONA STATION AREA PLAN
SCALE: 1"=100'-0"
COOPER CARRY

DRAFT


DRAFT
OFFICE BUILDING
PARKING POOL #6 (PRIVATE)
CONVERT WAREHOUSE SPACE TO INCUBATOR SPACE AND PARKING
(±345 SPACES) 1 FLOOR
PARKING POOL (#2)
URBAN RESIDENTIAL
URBAN RESIDENTIAL
ADAPTIVE REUSE
BIKEWAY
PLATFORM LIFT
INCUBATOR
INCUBATOR
INCUBATOR
INCUBATOR
INCUBATOR
PLATFORM
TRAMPOLINE
PEDESTRIAN BRIDGE
BUS STATION
PARKING POOL (#4)
LIVE/WORK LINER
LIVE/WORK LINER
240'
PARKING POOL (#1)
CONVERT WAREHOUSE SPACE TO PARKING
(±325 SPACES)
1 FLOOR
EXISTING
NEW
NEW
LIVE/WORK LINER
PARKING POOL (#3)
CONVERT WAREHOUSE SPACE TO PARKING
(±250 SPACES)
1 FLOOR
LIVE/WORK LINER
OFFICE BUILDING
DIAGRAM

ATTACHMENT D

PRIOR CITY OF POMONA LETTER DATED FEBRUARY 1, 2011

THE CITY OF
POMONA

Office of the City Manager

LINDA C. LOWRY
City Manager

February 1, 2011

Ms. Lisa Levy Buch
Director of Public Affairs
Metro Gold Line Foothill Extension Construction Authority
406 E. Huntington Drive, Suite 202
Monrovia, CA 91016

SUBJECT: GOLD LINE FOOTHILL EXTENSION / POMONA STATION

Dear Ms. Levy Buch:

The City of Pomona would like to take this opportunity to support preparation of a new focus EIS/EIR for this leg of the project to identify and mitigate project impacts to local communities as result of proposed rail operation and alignment. The following comments illustrate Pomona's concerns regarding the project's environmental impact and suggest further analysis and consideration in order to build a balanced project for the community.

Traffic Analysis (Station and Rail)
The following comments are based on the review of Metro Gold Line Phase II Traffic and Transportation Section of the FEIR document dated February 2007, and proposed design modifications currently under consideration:

1. The FEIR did not state how many trains/day currently block crossings in Pomona. The FEIR should describe the maximum vehicle queue length caused by these blockages including the average duration of the blockages and estimated number of affected vehicles/day.

2. Impacts of the potential elimination of Fulton Road ingress/egress at the existing/future Metrolink parking lot need to be addressed.

3. Impacts to Garey Avenue as a result of the potential Fulton Road cul-de-sacs need analysis and mitigation or a revised proposal. The local preferred alternative is to consider a grade separation at the Garey Avenue crossing.

4. The potential Fulton Road closure and cul-de-sacs need police, fire, and City of La Verne's review with any comments being addressed.

5. The SCAG travel demand model should be used to adjust existing counts for future traffic scenarios based on growth rates from each city.

6. The FEIR traffic volume forecast does not appear to have considered the cumulative projects to determine an accurate traffic forecast.

7. It is not clear that the study considered increases in BNSF freight traffic and Metrolink service in the evaluation of build-out intersection delay analysis. The new traffic analysis should address this issue clearly.

8. The new study should provide expected queue length and delays for traffic stopped at all crossings.

9. The new study should consider and analyze potential traffic diversion to other arterials as a result of an at-grade crossing blockage. Diverted traffic from Garey Avenue could potentially trigger impacts at Fulton Road/Arrow Hwy and Towne Avenue/Arrow Hwy.

10. The proposed Pomona Light Rail Station is about ½ mile from the Pomona Fairplex. Currently, Metrolink operates special train service to this station during the LA County Fair. Discussion about the traffic impact to and from the Fairplex and a future Pomona Gold Line station is recommended.

11. The current study does not consider potential traffic impacts of shuttles that would likely be used to link the Gold Line Station near Garey Avenue to various activity centers.

12. The study should evaluate the impact to police, fire, and ambulance response times at proposed crossings. There is a fire station on Bonita Avenue about ¼ mile east of Garey Avenue. Response times of emergency vehicles from the fire station would be affected by blockages of Garey Avenue resulting from at-grade crossing.

13. The study should evaluate the safety and impact to pedestrians at proposed crossings.

14. Impacts to Garey Avenue, Bonita Avenue, Towne Avenue, and Santa Fe Street need further analysis and potential modifications to proposed improvements.

Visual Quality/Aesthetics (Station and Rail)

1. Project impacts to visual resources by obstructing views along the portion near Towne Avenue where elevated grade separation is being proposed should be addressed. The local alternative is to consider a below grade rail separation at this location.

2. Poles for power, communications, and similar installations need to be painted in green, brown, or a similar City approved color to minimize visual impact.

3. Proposed landscaping in City approved palette (drought-tolerant, native, etc.) should be illustrated.

4. Walls and screening should be incorporated.

Station Design Alternative

1. Preliminary design of the Pomona Station location does not appear to accommodate pedestrians within the track. Also the platform location does not appear to provide free and

unobstructed accessibility. The local alternative is to construct a station/platform on the north side of the outside rail.

2. The long-narrow parking structure in the middle of the tracks appears to be a practical/possible alternative.

3. Pedestrian crossings of tracks should be avoided, reduced and/or improved.

4. Access: ingress, egress and movement on site appears overly restrictive for this area.

5. Identify access and rights to the property for the north parking structure

Rail and Related Transit Operation

1. Considering the projected frequency of rail traffic at the proposed crossings, the City of Pomona would strongly recommend a joint agreement between Metrolink, Gold Line, and the applicable Freight Operators to establish acceptable train daily minimum and maximum separation at crossings, thereby limiting the long-term impact to the community.

2. Bus and similar transit connectivity (on-site bus access and turn-around) is needed.

General Design

1. If any electrical sub-station (transformer bank or similar power installation) is needed, then the proposed site of the electrical installation needs to be provided with the design to address aesthetics, noise, and related matters.

2. Please see the attached exhibit of residential areas in Pomona relative to the above comments.

3. Further analysis of noise considerations and mitigation measures is needed.

Thank you for your consideration of our comments in this matter.

Sincerely,

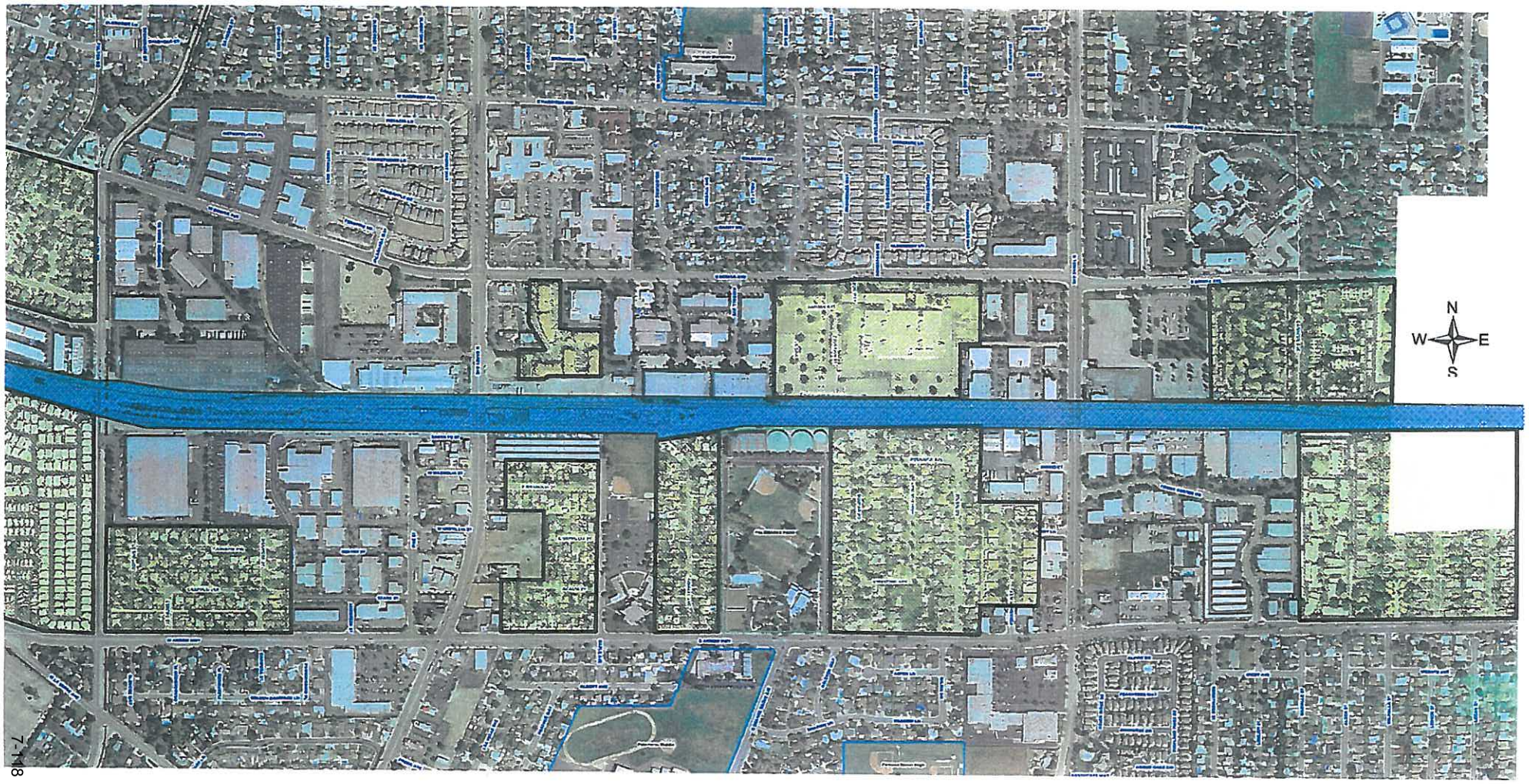
Linda C. Lowry
City Manager

Attachment: Exhibit of Residential Areas in Pomona

cc: Jennifer Flores, Project Administrator
Mark Lazzaretto, Community Development Director
Daryl Grigsby, Public Works Director

Pomona North Rail Line

Residential Neighborhoods



16. Lowry, Linda, City Manager, City of Pomona, October 1, 2012.

Response 16-1

Per the Metro Grade Crossing Policy for Light Rail Transit, the Milestone 1 – Initial Screening evaluation is performed during the conceptual planning phase of the project. Milestone 2–Detailed Analysis and Milestone 3–Verification are generally performed during preliminary engineering and environmental clearance phase of the project.

The detailed analysis of the grade crossing (Milestone 2), which includes a queuing analysis and other detailed evaluations is generally performed if the results of Milestone 1 show "Possible At Grade Operation". The initial screening results for the grade crossings within the City of Pomona indicated that the highest peak hour volumes at the three City of Pomona crossing intersections would not meet the warrants for grade-separation per the application of the Metro Grade Crossing Policy, and therefore the recommendation of "At Grade Operation Should be Feasible" was determined for these three crossings in the Draft EIR.

The comment regarding the traffic operations at Garey Avenue and the supporting field review data by the City's consultant are acknowledged. Please see Response 16-4.

Response 16-2

South of the Fulton Avenue grade crossing, no change in on-street parking is proposed. North of the grade crossing, there would be 25' to 30' less curb space (which would be one or two spaces) for parking along the east side of the street, as a result of the existing BNSF track being relocated approximately 25' to 30' to the north. Parking needs for Metrolink and Gold Line passengers are addressed by the proposed parking structure which will adequately meet the future needs of Metrolink and Gold Line passengers through at least year 2035.

Response 16-3

The Metro Gold Line, Metrolink, and the BNSF (freight) operate independently from one another and establish their own schedules according to each organization's operating requirements. Therefore, any schedule coordination to attain specific separations would involve a prolonged and complex multi-agency process that may or may not result in a coordination of the three schedules. Changing the operational schedules of BNSF and Metrolink trains is not within the Construction Authority's purview. However, traffic impacts resulting from all three services were evaluated in the traffic analysis.

Response 16-4

In response to the comment an additional traffic and train operations analysis was conducted using VISSIM software. The following intersections were evaluated:

- ☐ Garey Avenue and Bonita Avenue
- ☐ Garey Avenue and Santa Fe Street

☐ Garey Avenue and Arrow Highway

Garey Avenue is a four (4) lane north-south arterial with an existing Metrolink and BNSF (freight) railroad crossing between Bonita Avenue and Arrow Highway. As specified in the project's Draft EIR (released August 21, 2012), the proposed Metro Gold Line Foothill Extension light rail (LRT) tracks would be located north of the Metrolink tracks in this location. The proposed Metro Gold Line station in Pomona would be located northeast of the existing Metrolink station.

VISSIM MODEL ASSUMPTIONS
Train Operations

Information in the Technical Memorandum #1 by Urban Crossroads shows Metrolink trains crossing Garey Avenue six (6) times in the morning during a two-hour period. It also shows that the gates were down a total of eight (8) times during the same period. In the evening, trains crossed Garey Avenue (6) times during a two-hour period, and the gates were down a total of nine (9) times.

Video recorded during Parsons Brinckerhoff's field observation on November 27, 2012 shows that the average gates-down time is 60 seconds; this data point was used in the model. A Metrolink train was classified as 2 locomotives and 5 cars, approximately 785 feet in length. Based on that information, a VISSIM model was built for a one-hour period with the gates down four (4) times in the AM peak, and six (6) times in the PM peak, as shown in Table 1.

Table 1. Metrolink Schedule

AM Peak			
Inbound (Time)	Train Type	Outbound (Time)	Train Type
6:09	Express	6:52	Metrolink Regular
6:30	Metrolink Regular		
6:50	Metrolink Regular		
6:57	Gates down, no train		
PM Peak			
Outbound (Time)	Train Type	Inbound (Time)	Train Type
5:05	Metrolink Regular		
5:11	Gates down, no train		
5:23	Metrolink Regular		
5:28	Gates down, no train		
5:55	Express		
5:59	Metrolink Regular		

Operations for the proposed Metro Gold Line were assumed to include 12 trains—6 inbound and 6 outbound trains—during the peak hour, equating to 10 minutes headways during both the AM and PM peaks. The BNSF freight was assumed to be between 10-30 cars, up to approximately 2,000 feet long. The freight train is scheduled as one (1) train to Irwindale in the morning and one (1) train from Irwindale in the afternoon, for a total of two trains a day.

VISSIM Model Creation

The detailed VISSIM model creation for the Garey Avenue network proceeded as follows:

- Aerial photography from Google Earth was stitched together to create the links and connectors along the corridor. Having the correct scaling was essential for this network.
- Lane assignments, vehicle inputs, routing decisions, and vehicle compositions were coded to represent existing and future conditions.
- Driving behavior parameters including car following and lane change parameters were specified as prescribed by Wiedeman.
- Standard/default speed ranges were used in the model.
- Traffic signal timing was used with the Ring Barrier Controller (RBC), the interface of simulating actuated control from signal heads and detectors.
- Each simulation was recorded for one (1) hour each during the AM and PM peak with a 600-seconds seeding time to load the initial travel demand.
- The measures of effectiveness (MOEs) were extracted for five (5) model runs and averaged.

Model Calibration and Validation

The model was calibrated to the traffic counts to meet the thresholds of the *FHWA Traffic Analysis Toolbox Volume III: Guidelines for Applying Traffic Microsimulation* using the GEH statistic. The model validation was carried out using the VISSIM output of queue length or number of vehicles queued when the gate crossings were closed. Existing queue lengths were obtained through field observation by Urban Crossroads on Wednesday, September 12, 2012 and Parsons Brinckerhoff on Tuesday, November 27, 2012. The model validation effort was completed to ensure that existing conditions were accurately replicated in the model. Table 2 summarizes the field observation and the model data for PM peak hour.

Table 2. Validation Summary of Maximum Auto Queue

Field Observation							
Time (Start)	Time (End)	Duration (Seconds)	Train Type	Direction		Max Auto Queue (# of vehicles)	
						NB	SB
5:11:30	5:13:00	90	Gates down, no train	n/a		16	26
5:13:30	5:14:15	45	Metrolink	EB		4	27
5:28:00	5:29:00	60	Gates down, no train	n/a		21	9
5:30:00	5:30:45	45	Metrolink	EB		19	12
5:53:20	5:54:20	60	Metrolink	EB		14	16
5:53:20	6:01:00	60	Gates down, no train	n/a		15	10
	Average	60				15	17
VISSIM OUTPUT							
Time (Start)	Time (End)	Description		Queue Length (ft)		Max Auto Queue (# of vehicles)*	
				NB	SB	NB	SB
5:00:00	6:00:00	1-hour peak simulation and 60 seconds gates down with and without train		321	373	13	15

** Average passenger car length = 25 feet*

CONCLUSIONS

One of the main issues for existing and future conditions is that gates go down when no train is present. Typically, the false "gate down" comes from a Metrolink 1 minute (60 seconds) to 1 minute and 30 seconds (90 seconds) prior to the train arrival. This "bouncing gate" condition is the main issue in the Build scenario, as well. As a result, the following mitigation measures are required for adequate levels of service.

MITIGATION MEASURES

1. The existing inaccurate Metrolink track circuitry needs to be recalibrated to eliminate false gate closures.
2. It would be beneficial to provide preemption to adjacent signals. Preemption is justified when long queues would gridlock the intersection. In the preemption state, all vehicular phases not directing traffic toward the railroad tracks would be allowed to be served. It is noted that only Bonita Avenue would actually experience queues that would reach all the way to the intersection. Therefore, the intersection of Garey Avenue and Bonita Avenue should have an interconnection with the railroad signaling and allow for preemption when trains are present.
3. Additionally, to ensure adequate levels of service, it is necessary to make Bonita Avenue protected/permitted in the east/west direction. Currently, the provision is for permitted turns only onto Garey Avenue.

Scenarios and Traffic Volumes

The following scenarios were modeled in VISSIM for both the AM and PM peak hour:

Existing – 2010 (baseline) conditions

The baseline model used the existing lane geometry and traffic counts. Detailed AM and PM peak-hour intersection turning movement counts and roadway segment daily traffic volumes were collected in 2010 to represent existing traffic volumes on a typical weekday. Figure 1 shows the existing AM and PM peak hour turning movements.

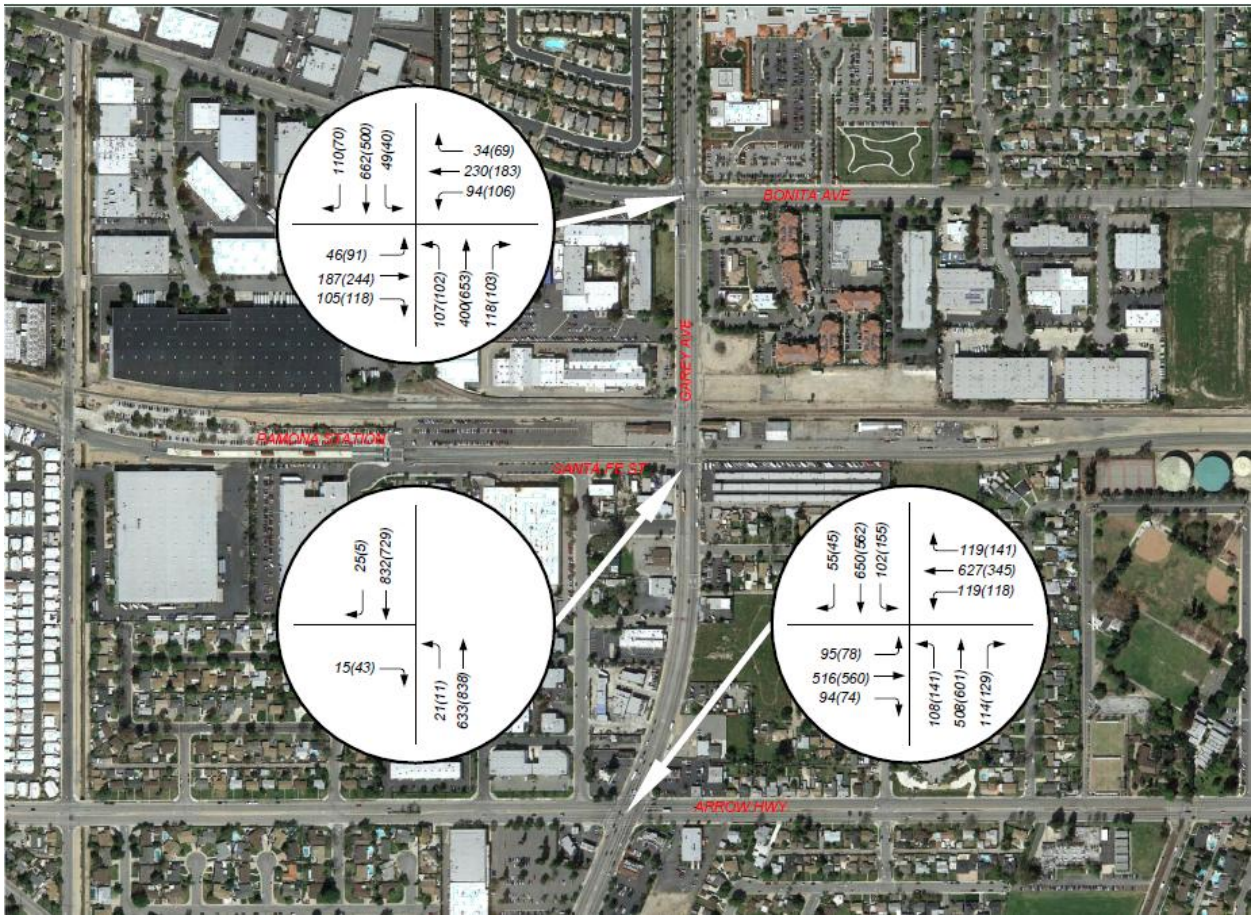


Figure 1. Existing 2010 AM (PM) Peak Hour Traffic Volumes

No Build – Year 2035

The No Build scenario used the existing condition lane geometry with traffic forecasts developed for the horizon year of 2035. Traffic projections for the No Build Alternative were developed by applying growth factors (ranging from 0.6% to 0.9% annual growth rate for the corridor cities) to the existing peak hour traffic data.

Figure 2 shows the No Build 2035 AM and PM peak hour traffic volumes.

Figure 2. No Build 2035 AM (PM) Peak Hour Traffic Volumes

Build – Year 2035

The Year 2035 Build scenario utilized traffic forecasts developed for the horizon year of 2035 with the existing condition lane geometry along Garey Avenue but with the addition of the proposed configurations for light rail and freight tracks. The identified mitigation measures were also included in this scenario. The proposed Build Alternative would put LRT tracks in the same right-of-way as the Metrolink, but light rail trains would operate on separate tracks and use different platforms than the Metrolink commuter trains. The freight track would merge with the Metrolink track, resulting in two light rail tracks and two Metrolink/freight tracks at the Garey Avenue intersection. Traffic projections for the Build Alternative were developed by applying growth factors (ranging from 0.6% to 0.9% annual growth rate for the corridor cities) to the existing peak-hour traffic data.

Figure 3 shows the Build 2035 AM and PM Peak Hour traffic volumes.

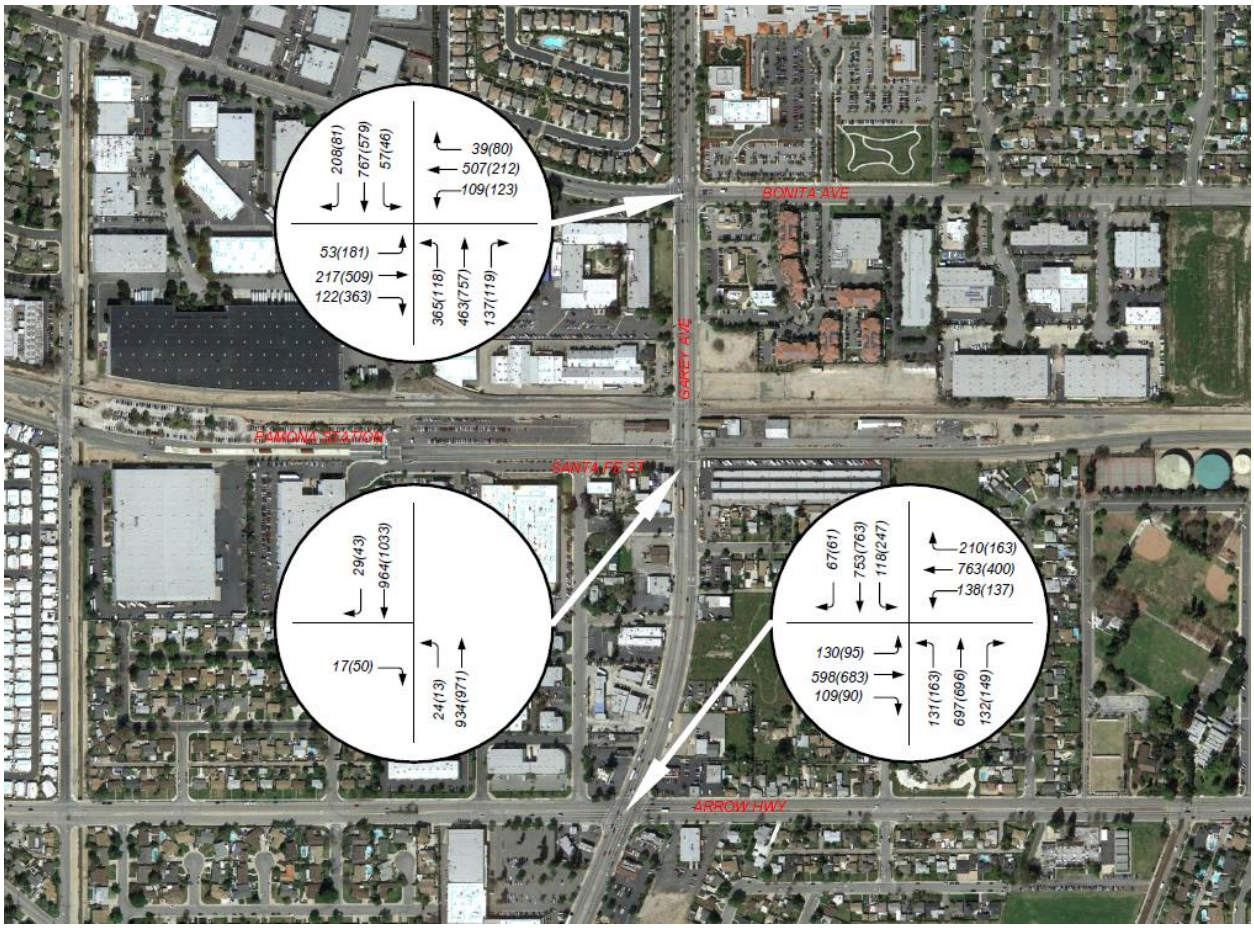


Figure 3. Build 2035 AM (PM) Peak Hour Traffic Volumes

The intersection operating conditions under Existing (2010), the No Build (2035), and the Build (2035) scenarios were compared to identify significantly affected locations. Table 3 and Table 4 show intersection delay and LOS during the AM and PM peak hour for each of the study intersections.

Table 3. Delay and Level of Service (LOS) for AM Peak Hour

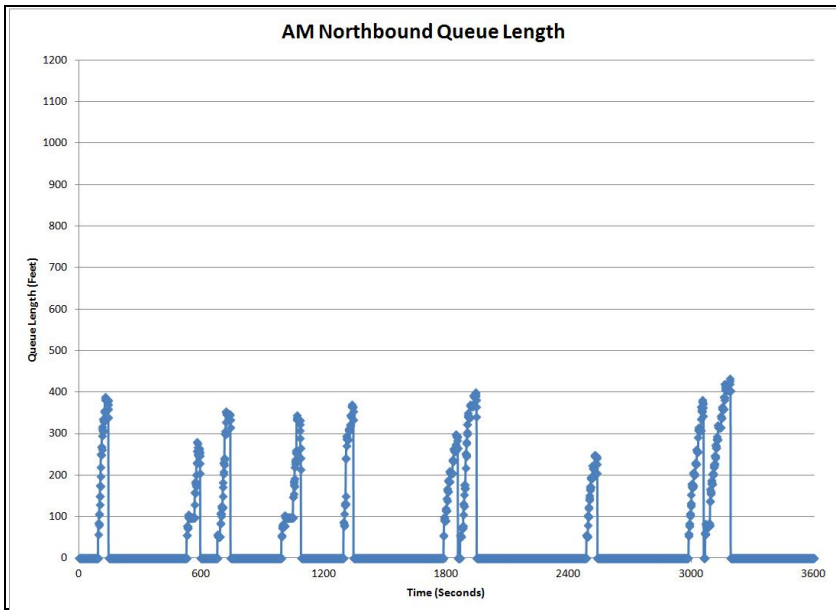
Approaches	Garey Avenue					
	Delay (sec/veh)			LOS		
	Existing (2010)	No Build (2035)	Build (2035)	Existing (2010)	No Build (2035)	Build (2035)
Garey Ave & Bonita Ave	**25**	**25**	**36**	**C**	**C**	**D**
Northbound Garey Ave	**16**	**16**	**25**	**B**	**B**	**C**
left	*64*	*62*	*38*	*E*	*E*	*D*
through	*8*	*9*	*16*	*A*	*A*	*B*
right	*5*	*5*	*23*	*A*	*A*	*C*
Southbound Garey Ave	**15**	**15**	**22**	**B**	**B**	**C**
left	*59*	*56*	*18*	*E*	*E*	*B*
through	*13*	*14*	*25*	*B*	*B*	*C*
right	*6*	*6*	*11*	*A*	*A*	*B*
Eastbound Bonita Ave	**31**	**32**	**30**	**C**	**C**	**C**
left	*54*	*54*	*43*	*D*	*D*	*D*
through	*39*	*39*	*38*	*D*	*D*	*D*
right	*9*	*9*	*10*	*A*	*A*	*A*
Westbound Bonita Ave	**59**	**63**	**81**	**E**	**E**	**F**
left	*81*	*86*	*91*	*F*	*F*	*F*
through	*51*	*57*	*79*	*D*	*E*	*E*
right	*46*	*46*	*87*	*D*	*D*	*F*
Garey Ave & Santa Fe St	**3**	**2**	**8**	**A**	**A**	**A**
Northbound Garey Ave	**3**	**3**	**10**	**A**	**A**	**A**
left	*11*	*12*	*22*	*B*	*B*	*C*
through	*3*	*3*	*10*	*A*	*A*	*A*
Southbound Garey Ave	**2**	**2**	**5**	**A**	**A**	**A**
through	*2*	*2*	*5*	*A*	*A*	*A*
right	*3*	*0*	*9*	*A*	*A*	*A*
Eastbound Santa Fe St	**11**	**10**	**11**	**B**	**A**	**B**
right	*11*	*10*	*11*	*B*	*A*	*B*
Garey Ave & Arrow Hwy	**34**	**33**	**38**	**C**	**C**	**D**
Northbound Garey Ave	**21**	**22**	**26**	**C**	**C**	**C**
left	*58*	*60*	*65*	*E*	*E*	*E*
through	*16*	*16*	*21*	*B*	*B*	*C*
right	*12*	*12*	*18*	*B*	*B*	*B*
Southbound Garey Ave	**20**	**21**	**26**	**B**	**C**	**C**
left	*56*	*52*	*65*	*E*	*D*	*E*
through	*15*	*18*	*21*	*B*	*B*	*C*
right	*17*	*11*	*19*	*B*	*B*	*B*
Eastbound Arrow Hwy	**44**	**43**	**47**	**D**	**D**	**D**
left	*73*	*67*	*91*	*E*	*E*	*F*
through	*41*	*40*	*40*	*D*	*D*	*D*
right	*29*	*33*	*34*	*C*	*C*	*C*
Westbound Arrow Hwy	**48**	**49**	**53**	**D**	**D**	**D**
left	*88*	*96*	*150*	*F*	*F*	*F*
through	*43*	*43*	*41*	*D*	*D*	*D*
right	*33*	*33*	*34*	*C*	*C*	*C*

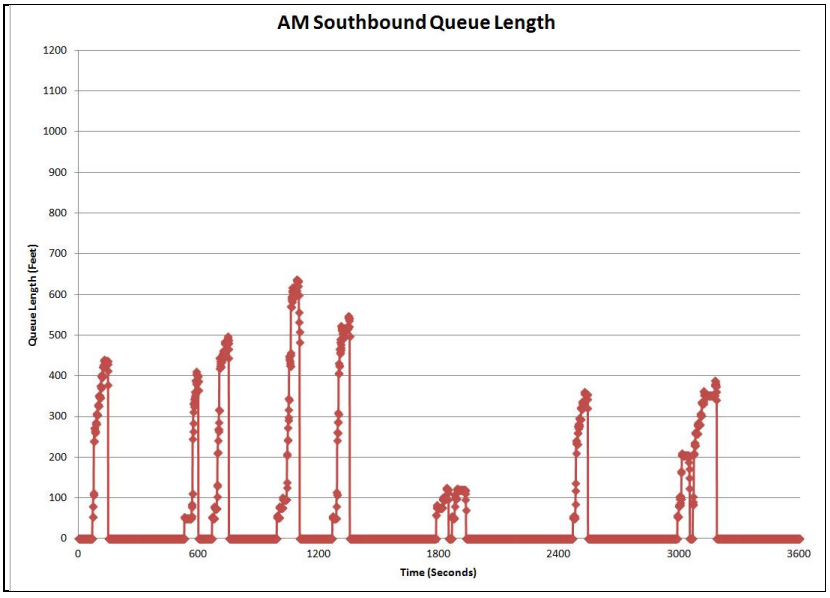
Table 4. Delay and Level of Service (LOS) for PM Peak Hour

Approaches	Garey Avenue					
	Delay (sec/veh)			LOS		
	Existing (2010)	No Build (2035)	Build (2035)	Existing (2010)	No Build (2035)	Build (2035)
Garey Ave & Bonita Ave	**25**	**25**	**34**	**C**	**C**	**C**
Northbound Garey Ave	**17**	**17**	**28**	**B**	**B**	**C**
left	*55*	*53*	*31*	*E*	*D*	*C*
through	*11*	*12*	*27*	*B*	*B*	*C*
right	*8*	*13*	*29*	*A*	*B*	*C*
Southbound Garey Ave	**14**	**16**	**24**	**B**	**B**	**C**
left	*50*	*54*	*20*	*D*	*D*	*C*
through	*13*	*14*	*27*	*B*	*B*	*C*
right	*6*	*6*	*6*	*A*	*A*	*A*
Eastbound Bonita Ave	**35**	**35**	**45**	**C**	**D**	**D**
left	*54*	*54*	*46*	*D*	*D*	*D*
through	*39*	*40*	*56*	*D*	*D*	*E*
right	*10*	*10*	*29*	*A*	*A*	*C*
Westbound Bonita Ave	**51**	**52**	**40**	**D**	**D**	**D**
left	*68*	*71*	*54*	*E*	*E*	*D*
through	*44*	*44*	*33*	*D*	*D*	*C*
right	*43*	*44*	*34*	*D*	*D*	*C*
Garey Ave & Santa Fe St	**3**	**3**	**7**	**A**	**A**	**A**
Northbound Garey Ave	**3**	**3**	**8**	**A**	**A**	**A**
left	*11*	*13*	*20*	*B*	*B*	*B*
through	*3*	*3*	*8*	*A*	*A*	*A*
Southbound Garey Ave	**2**	**2**	**5**	**A**	**A**	**A**
through	*3*	*2*	*5*	*A*	*A*	*A*
right	*1*	*0*	*6*	*A*	*A*	*A*
Eastbound Santa Fe St	**10**	**10**	**13**	**B**	**B**	**B**
right	*10*	*10*	*13*	*B*	*B*	*B*
Garey Ave & Arrow Hwy	**35**	**35**	**27**	**C**	**C**	**C**
Northbound Garey Ave	**26**	**25**	**17**	**C**	**C**	**B**
left	*71*	*64*	*15*	*E*	*E*	*B*
through	*18*	*18*	*18*	*B*	*B*	*B*
right	*15*	*14*	*14*	*B*	*B*	*B*
Southbound Garey Ave	**26**	**29**	**17**	**C**	**C**	**B**
left	*61*	*67*	*20*	*E*	*E*	*B*
through	*17*	*19*	*16*	*B*	*B*	*B*
right	*16*	*20*	*15*	*B*	*B*	*B*
Eastbound Arrow Hwy	**46**	**46**	**42**	**D**	**D**	**D**
left	*65*	*65*	*35*	*E*	*E*	*C*
through	*44*	*44*	*44*	*D*	*D*	*D*
right	*36*	*36*	*38*	*D*	*D*	*D*
Westbound Arrow Hwy	**45**	**45**	**37**	**D**	**D**	**D**
left	*66*	*66*	*37*	*E*	*E*	*D*
through	*44*	*44*	*39*	*D*	*D*	*D*
right	*32*	*32*	*31*	*C*	*C*	*C*

For the Year 2035 Build scenario during the AM peak hour, the Northbound queue at the train gate was approximately 433 feet (17 vehicles) and the Southbound queue was approximately 637 feet (25 vehicles), as shown in Figure 4.

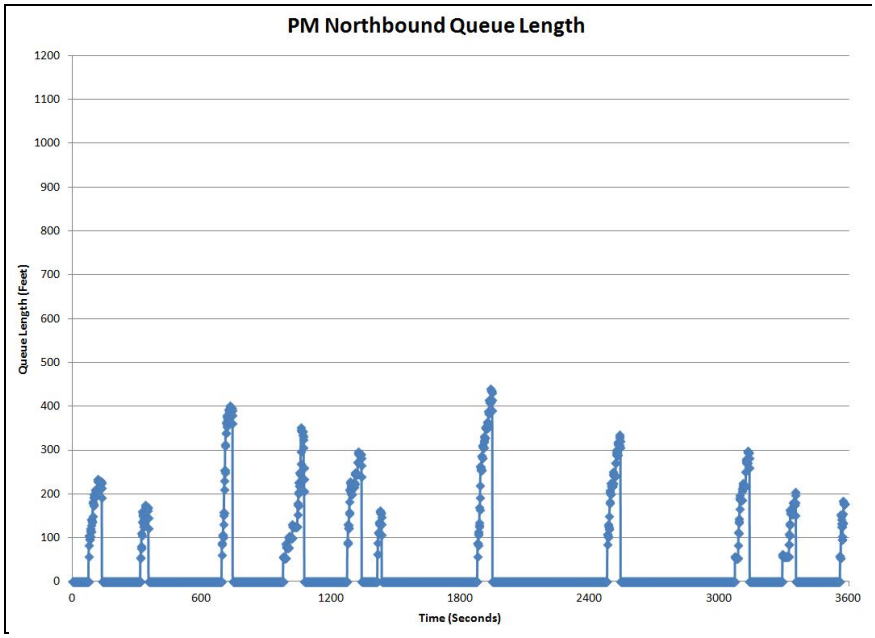
Figure 4. AM Peak Hour Northbound and Southbound Queues

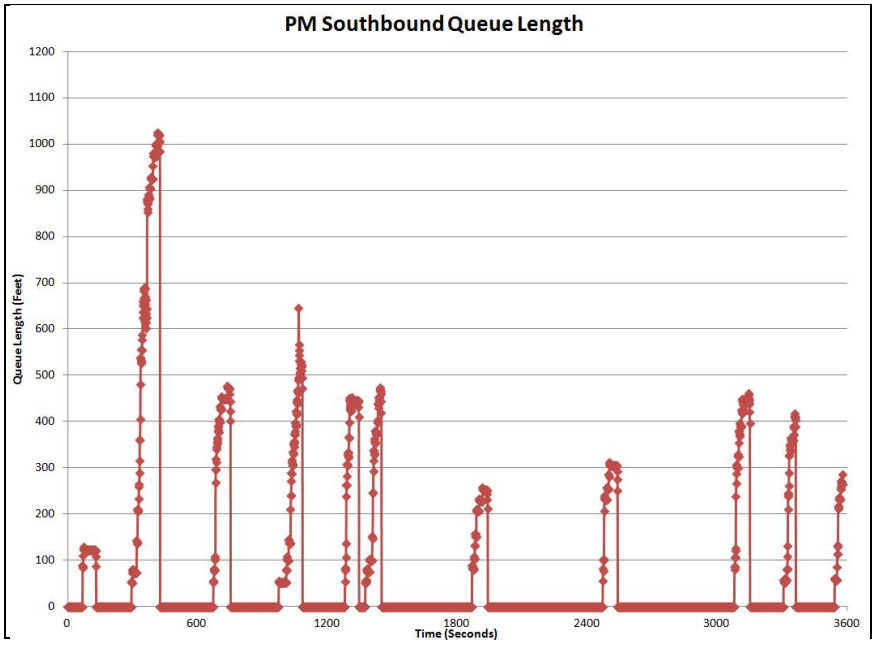




For the Year 2035 Build scenario during the PM peak hour, the Northbound queue at the train gate was approximately 441 feet (18 vehicles) and the Southbound queue was approximately 1025 feet (41 vehicles), as shown in Figure 5.

Figure 5. PM Peak Hour Northbound and Southbound Queues





CONCLUSIONS

As shown, of most concern to future traffic operations during both AM and PM peak hours is the Southbound queue which backs up through the adjacent signalized intersection of Garey Avenue and Bonita Avenue, which is approximately 750 feet away.

As shown in Figure 5, the greatest queues are observed in the PM peak hour with the maximum Northbound queue length of approximately 441 feet (18 vehicles) and the maximum Southbound

> queue length of approximately 1,025 feet (41 vehicles) which happens when there are two trains (Metrolink and LRT) scheduled back to back. However, the backups are short-lived and the maximum Southbound queue length occurs only once. As shown in Table 3, even with these queues, the intersection LOS of Bonita Avenue and Garey Avenue is worse in the AM than in the PM peak hour because of both traffic and train conditions. In the AM peak hour, the predominant movement is to the West and South, and in the PM peak hour to the East and North. Therefore, when the queues are the longest in the southbound direction in the AM peak hour, movements toward the track are impacted the greatest. These movements are the southbound through and westbound left. These movements are the heaviest in the AM peak hour and experience the longest delay. This causes longer delay, especially for the westbound left movement. Nonetheless, as shown, with the identified mitigation measures in place, the Build Alternative results in LOS D in the AM peak both at Garey Avenue and Bonita Avenue. With the identified mitigation measures in place, the intersection of Garey Avenue and Arrow Highway also results in LOS D in the AM peak hour. Since the LOS would not worsen below LOS D in the AM peak hour, impact at these locations would not be significant. In the PM peak hour, both intersections would continue to operate at LOS C.

This information has been included in the Final EIR.

Response 16-5

The Metro Light Rail Transit Design Standards establish sidewalk widths at station areas to provide for safe pedestrian circulation and identify various pedestrian and bicycle safety measures at grade crossings to mitigate potential impacts, including quadrant and pedestrian gates. Quadrant gates (with gates spanning the entire roadway) and pedestrian gates are included as part of the project at these three rail crossing locations.

Response 16-6

"Background growth" as referenced in the Draft EIR refers to general population growth and land use development in the region, and is accounted for in the data forecasts that were developed by SCAG and used in the travel demand model. These forecasts provide a general degree of growth at a level that is appropriate for a planning-level evaluation. Specific developments that are planned but were not in existence at the time of the analysis were not studied. Furthermore, including specific developments in the forecasts would risk "double-counting" the growth already accounted for as "background growth."

The grade crossing analysis in the Draft EIR did not identify at-grade crossing delays at Garey Avenue of a magnitude that would result in the diversion of traffic to adjacent arterials. Please also see Response 16-4.

Response 16-7

The traffic analysis did include the analysis of the intersection of Fulton Road/Bonita Avenue as a single combined intersection.

Response 16-8

The SCAG model was used to develop future vehicular traffic volumes. This clarification has been included in the Final EIR.

Response 16-9

The improvements in question are listed in the Draft EIR as LTR-4 and LTR-5 in Section 2.8.2.

Response 16-10

The Final EIR clarifies that the industrial building on the site of the proposed parking structure is currently occupied. The traffic analysis was performed with the assumption that vehicular access to/from the parking structure is from Bonita Avenue, and the Final EIR clarifies that access to the station parking structure is via Bonita Avenue. The reference to vehicular access from Garey Avenue has been removed.

The Draft EIR traffic analysis evaluated the traffic impacts on Bonita Avenue, factoring in the total number of spaces available to Pomona Station passengers: 1,000 spaces (250 spaces in the existing surface lot and 750 spaces in the proposed structure). In response to the comment, additional analysis was conducted for the parking structure access point ("driveway") at Bonita Avenue. Since the surface lot would be accessed separately from the structure, this additional analysis took into consideration only the number of spaces in the structure (750). Based on this number of spaces, it is estimated that the access point would see volumes of 574 and 533 vehicles in the AM and PM peak hours, respectively.

The access analysis forecasts LOS B operations for the access point at Bonita Avenue, assuming the following traffic control and lane configurations:

- Signalization at the intersection of Bonita Avenue and Pomona Station Access Driveway, with a protected westbound left turn phase (arrow).
- Two lanes in the northbound direction of the Pomona Station Access Driveway, one designated as a left turn only lane and the other designated as a right turn only lane.
- Providing a striped westbound left turn lane in the existing median of Bonita Avenue. Due to the potential queuing of vehicles entering the parking structure in the AM peak hour, a 300-foot left turn storage length is estimated so that the left turn vehicles do not block the westbound through movement along Bonita Avenue.
- Eastbound right turns to the Pomona Station Access Driveway would be made from the shared eastbound through and right turn lane – no special treatment is required for this direction.

Response 16-11

The City's suggestion of an alternative station site is acknowledged. However, the analysis of the project's environmental impacts was based on the currently proposed station site, which was presented and scrutinized as part of the public scoping process for the project conducted in late 2010 and early 2011. It is not feasible for the Construction Authority to consider a new station location at this time.

The Metro Light Rail Transit Design Standards identify various pedestrian and bicycle safety measures at grade crossings to mitigate potential impacts.

Response 16-12

Parking at the Pomona Station is proposed to be located at the site of an existing safe manufacturing company which was presented and scrutinized as part of the public scoping process for the project conducted in late 2010 and early 2011. It is not feasible for the Construction Authority to consider a new parking location at this time. The number of spaces provided at the parking structure and the existing surface parking lot is forecasted to be sufficient at least through year 2035**.**

Response 16-13

The potential off-street transit center on Garey Avenue is not part of the proposed project, and was therefore not formally studied as part of this project. The Construction Authority will cooperate with the City and Foothill Transit should a transit center be pursued at this location. Please also see Response 16-15.

Response 16-14

Like the existing Metro Gold Line stations, the proposed station would include amenities supporting transit passengers in accordance with Metro's standards. The Draft EIR addressed the station design issues by requiring the design to "feature materials, landscaping, art, and other Metro Gold Line Foothill Extension elements developed by the station design team that includes architects, landscape architects, and lighting experts. Surface treatments shall be provided at the face of safety walls and at roadway/pedestrian portals, and landscaping along safety walls outside of the LRT portal shall be provided where feasible to provide wall screening."

This mitigation measure (VIS-5) has been expanded to clarify that the station design is to incorporate features pursuant to the standards established the in Metro's Rail Design Criteria. The goal of the Criteria is to create site-adapted designs that reflect the specific urban context of each station and that enhance the neighborhood context in which the project is proposed. <u>According to the Criteria, careful consideration must be given to station compatibility with proposed future development in the neighborhood of each station, and where applicable, future extensions and/or connecting line transfers.</u> The Criteria also require that the Design Team work through the Construction Authority with the local jurisdictions and stakeholder groups to achieve design approvals for project visual elements (Please also see Response 16-24).

Also, improvements such as wider sidewalks, street furniture and amenities could be incorporated into the TOD that is considered for development around the station in the future by the City, which is under the City's purview.

Response 16-15

The Construction Authority intends to conduct a "Bus Interface Study" at the time the project enters advanced engineering and design. A Bus Interface Study serves as a planning guide for transit agencies and stakeholder Cities, as well as for the Construction Authority. This study will take into account bus

transit service, including routes and bus stops as they exist closer to the time that the project is built, because undertaking the study now would require speculation as to the specifics of future bus service, including exact routes, service frequencies, locations of bus stops, among others.

Response 16-16

The comment concerns the proposed Towne Avenue flyover with respect to adjacent existing and planned residential uses. The proposed flyover addresses the need for, and is designed to allow, the LRT tracks to cross over the BNSF freight/Metrolink tracks as the LRT shifts from south to north of the BNSF/Metrolink tracks. The comment promulgates the City's preference for a below grade rail separation for the light rail at Towne Avenue in the form of an open trench, or for lowering the existing rail lines, lowering Towne Avenue, and lowering other area streets to mitigate impacts of the flyover.

A below grade separation was reviewed and found to possess several engineering and environmental challenges along with additional construction impacts. The entire underpass would need to be at least 1,500 feet in length to meet Metro Design Criteria. Construction activity would result in greater noise and vibration impacts as well as visual impacts due to the construction footprint. Additional construction easements may also be needed to accommodate necessary equipment.

The excavation and grading associated with below grade construction would require an extended period for trench wall construction, the relocation of existing utilities, and construction of bridges for the BNSF/Metrolink tracks. This type of construction would also require extended periods of crane and truck activity associated with the installation of rebar and placement of concrete. The amount of excavated material would increase the haul loads and routes through adjacent neighborhoods and would require more traffic detours and lane closures.

The City also suggested lowering the BNSF/Metrolink trackbed or Towne Avenue by several feet so that a smaller portion of the flyover would be visible from the existing development. Lowering the BNSF/Metrolink trackbed and Towne Avenue is not feasible, as it would require extensive construction and could result in drainage problems. In addition, the Construction Authority has no purview to lower either the Metrolink or BNSF rail lines.

As stated in the Draft EIR, the proposed Towne Avenue flyover would be designed in accordance with the City of Pomona design policies and Mitigation Measures VIS-4 and VIS-5 would be applied to minimize visual impacts related to lighting and design characteristics of the proposed flyover. In addition, to further optimize the height of the proposed flyover the following mitigation measure has been included in the Final EIR:

> **VIS-6** – The final design of the Towne Avenue flyover structure shall include considerations of materials and design refinements to reduce the height of the flyover structure above the surrounding grade to the lowest height feasible.

The Final EIR has also been updated to include information that there are additional residential uses adjacent to the alignment within Pomona. Please see Responses 16-18 and 16-24, which address the noise and visual issues and mitigations in detail in relation to this information.

Response 16-17

Emergency access and response times are addressed in Section 3.5 of the Draft EIR.

The fire station on Bonita Avenue mentioned in the comment is LACFD Station 186 and has a response time of under 6 minutes as described in Section 3.5 of the Draft EIR.

As discussed in detail in Response 16-4, an additional VISSIM analysis has been conducted in response to the City's comments about traffic conditions at Garey Avenue and Bonita Avenue. The analysis indicated that with the identified mitigation measures in place, the Build Alternative results in LOS D in the AM peak at both Garey Avenue and Bonita Avenue. With the identified mitigation measures in place, the intersection of Garey Avenue and Arrow Highway also results in LOS D in the AM peak hour. Since the LOS would not worsen below LOS D in the AM peak hour, impact at these locations would not be significant. In the PM peak hour, both intersections would continue to operate at LOS C. Therefore, no significant emergency access disruptions would occur. Additionally, emergency responses to areas south of the LRT alignment from the LACFD fire station 186 would continue to utilize the existing Towne Avenue crossing as it is utilized currently and therefore, the proposed project would not affect this location for emergency access.

The Construction Management Plan (CMP) discussed in the Draft EIR includes provisions for coordinating with the police and fire departments of the affected Cities to develop alternate routes or adjust service areas, thereby allowing the departments to maintain emergency service coverage areas and response times during project construction. Similarly, access disruptions could also be minimized by developing and implementing alternate routes or amending service areas, as necessary, to maintain emergency service coverage areas and response times following project completion.

Los Angeles County Fire Department (LACFD) was provided an opportunity to review and comment on the Draft EIR findings; the Construction Authority has not received any comments from the LACFD concerning the Draft EIR analysis of emergency response times or access.

Response 16-18

The existing residential land uses, including the single-family residences located west of Towne Avenue and south of the project right-of-way and the Quail Creek residential community located east of Towne Avenue and south of the right-of-way were identified as noise sensitive land uses and included in the Draft EIR noise analysis in Section 3.11.

In response to the comment an additional noise study was completed for the Serenity Villas Senior Community, located at the northeast intersection of Garey Avenue and the project's right-of-way. The cluster applicable to Serenity Villas is referenced in Section 3.11 of the Final EIR as "WB1a". The proposed westbound light-rail tracks are approximately 190 feet from the closest buildings in the community. The existing noise at the Serenity Villas Senior Community was estimated using the measured noise level at site LT-15. Measurement site LT-15 was located about 100 feet from the existing Metrolink tracks south of the right-of-way and had a measured noise level of 62 dBA Ldn. That noise level was adjusted to account for the greater distance between the Serenity Villas and the Metrolink tracks, which are the dominant noise source in the area. The existing noise level at the Serenity Villas Senior Community was estimated to be 58 dBA Ldn. The FTA moderate noise impact threshold for an existing noise level of 58 dBA Ldn is an increase of 2.4 decibels over the existing level. The predicted

future noise level at the Serenity Villas is 59.9 dBA Ldn under a theoretical "worst case" scenario with a train traveling at a maximum design speed of 65 miles per hour. The predicted increase of 1.9 dB and is below the Federal Transit Administration (FTA) impact threshold.

The predicted vibration level at the Serenity Villas Senior Community was also below the FTA impact threshold. The predicted vibration level at Serenity Villas is 66 VdB; the FTA impact threshold is 72 VdB.

Overall, the noise measurement sites were selected to represent a range of existing noise conditions along the corridor. Noise measurements in 2011 were repeated at select sites to verify the October 2003 measurements. Sites with repeat measurements include LT-14 in La Verne and LT-17 in Claremont. The results showed negligible difference in 24-hour noise levels between the 2003 and 2011 noise measurements. The conclusion from these results is that the 2003 noise measurements are still valid.

In general, the noise study attempted to conduct a noise measurement within 0.5-mile of all noise sensitive receivers. The existing noise levels in Pomona were documented with two long-term noise measurements in 2003, which were within 0.5- mile of all existing sensitive receivers. Therefore, no additional measurements were performed in 2011. The two measurement sites are:

- LT-15 at 2655 at Deodar Road, Pomona
- LT-16 at Mountain Village Senior Apartments, Claremont (approximately 500 feet from the Claremont-Pomona border)

Noise and vibration mitigation measures were recommended at locations where an impact was identified. Recommendations to petition for a quiet zone were made only at intersections where noise impact from the proposed project was identified at nearby residences. However, a quiet zone can be implemented even if it was not recommended as a noise mitigation measure. Implementing a quiet zone requires cooperation by all jurisdictions involved with the grade crossing and is contingent on approval by the Federal Railroad Administration (FRA). The Construction Authority does not have the authority to declare a quiet zone but will cooperate in preparing petitions to FRA for quiet zone designations. Standard grade crossing safety equipment for the Metro Gold Line Foothill Extension should be sufficient to meet FRA's supplemental safety measures requirement for designation of a quiet zone. The Construction Authority will work with local jurisdictions to try to secure quiet zones where appropriate. During that collaboration, the Cities can identify the grade crossings where quiet zones would be beneficial to the City.

This updated information has been included in Section 3.11.7 of the Final EIR.

Response 16-19

The Draft EIR identifies locations where potential noise and vibration impacts were projected and recommended mitigation measures to achieve noise and vibration levels below the (FTA) threshold for moderate impact. The Draft EIR recommends mitigation measures only where predictions exceeded the applicable FTA threshold. Mitigation measures would be refined further during final design because refinements to the plans or advances in mitigation options may provide additional insights into what constitutes the most effective mitigation measure to achieve the FTA threshold criteria. The mitigation

measures identified in the Draft EIR however, commit the project to achieving the FTA threshold criteria regardless of the mitigation measure employed.

Low-impact frogs are specified to mitigate noise and vibration levels at locations where the trains can switch between eastbound and westbound tracks (commonly referred to as crossovers). Low-impact frogs are not a mitigation measure applicable to the flyover structures (such as at Towne Avenue).

Response 16-20

As discussed in Section 1.3.3.1 of the Draft EIR, two flyover structures "are necessary to allow the freight and LRT tracks to 'switch places': to maintain the required track separation between the BNSF freight and LRT tracks that would share a right-of-way, the BNSF freight tracks will be shifted and placed south of the LRT alignment in the City of Glendora for the first 4.3 miles of the project, but further east, the freight tracks would need to be placed *north* of the LRT alignment in order for BNSF trains to continue service to freight customers in Pomona and La Verne, whose properties are to the north of the right-of-way. The flyovers would eliminate the need for LRT at-grade crossings at these locations; however, the existing at-grade crossing would remain in place for the BNSF/Metrolink tracks."

As the spur lines are operated by a freight railroad, detailed information concerning the number and exact type of freight customers is not within the Construction Authority's purview.

Response 16-21

The TPSS buildings within the limits of the City of Pomona are labeled "B-8" and "B-9" in the Draft EIR (Appendix A). Both B-8 and B-9 would be located entirely on right-of-way or property owned by LACMTA (Metro) and neither structure would require property acquisition. Please note that the right of way boundaries shown in the engineering drawings (Appendix A) do not necessarily indicate the full extent of the property entitled to LACMTA, since—as in the case of B-8 and B-9—the LACMTA owns parcels adjacent to those indicated as constituting the right-of way.

Response 16-22

The description of the Pomona Protection and Preservation Ordinance in Section 3.2.1.1 of the Final EIR has been updated to include the requirements and processes for protection of mature trees in the City of Pomona.

Response 16-23

The Draft EIR Land Use section generally describes the broad land uses adjacent to the project alignment in the City of Pomona. These broad categories include predominant land uses and do not include parcel-by-parcel information. The Draft EIR land use data were shown on SCAG maps that show existing land use data on a regional scale. SCAG data were used to ensure consistency in land use terminology and analysis throughout the 12.3-mile long corridor. The Draft EIR concluded that the proposed project would not divide an established community, would be compatible with surrounding land uses, and would be consistent with the local plans and policies.

In response to the comment, a follow-up land use survey of the alignment was also conducted on November 12, 2012. The results of the land use survey were then compared to County of Los Angeles

land use data and generally, the land use survey was consistent with land uses identified in the County of Los Angeles data.

A summary of the land use survey and maps based on County of Los Angeles GIS data (July 2012) have been included in Final EIR to identify land uses in the surrounding area, and the discussion of existing and proposed land has been updated based on the survey and the County data. Information about existing uses has been updated in Section 3.10.2.4 as follows:

> "The proposed alignment would traverse the northern portion of the City of Pomona. Land uses in the surrounding area include residential, industrial and commercial uses (see Figures 3.10-19 through 3.10-22). Residential uses are located north and south of the alignment and in the surrounding area. Existing residential uses along the alignment include the Serenity Villas Senior Center and the Arbours apartments. Other residential uses in the area include the Quail Park gated community, the Carriage Walk single-family residential homes, the El Sereno apartments and other multi-family residential uses located near the Pomona and Claremont border.
>
> Other existing uses include the Palomares Park, RV parking uses and the Casa Hervera Industrial Park. Commercial and retail uses are located adjacent to this industrial park. The Casa Colina Rehabilitation Center is located north of the alignment along Bonita Avenue. The City of Pomona Fire Station 186 is located north of the alignment along Bonita Avenue east of the Serenity Villas Senior Center. A Metrolink parking lot is located northwest of the proposed station area."

Additionally, information about the planned uses, as included in the current ongoing work on the Pomona Compass Blueprint Station, has been included in Section 3.10.3.4 of the Final EIR as follows:

> "Planned uses for the surrounding area include residential uses along the alignment and adaptive reuse uses near the proposed station. A new single-family residential development (The Arbours) is under construction in the area. As previously stated, concepts for the Pomona Compass Blueprint Station Area Plan are currently being developed. This Plan will focus on existing and future land uses located around the proposed station. Current concepts include alternatives that identify new reuse opportunities that would be located near existing uses, including converting warehouses to include parking. The envisioned land uses include urban residential, live/work, office, and other adaptive reuse thereby creating a pedestrian friendly atmosphere. The proposed station would be consistent with these planned land uses."

Clarification of the evaluation methodology was included in Section 3.10.3.1 of the Final EIR as follows:

> "Specifically, existing and planned land uses have been identified and analyzed using the adopted General Plans, zoning codes, zoning maps, and applicable specific plans of the Cities in which the proposed project would be located. In some cases, draft plans have also been discussed in the analysis of planned land uses. Information regarding existing and planned uses, <u>zoning and land use policies</u> in the vicinity of the alignment as well as stations, parking, and TPSS sites was used to determine the compatibility of the proposed project with the project's surroundings."

The land use analysis in the Draft EIR relied on adopted plans and policies, and provided information (page 3.10-5 of Draft EIR) that the City of Pomona was updating its General Plan. The Draft EIR

included a discussion describing the City of Pomona draft General Plan on page 3.10-5 as follows: "At the time of this environmental document's preparation, a draft General Plan was out for public review. The 2011 draft General Plan identifies future Metro Gold Line and potential High Speed Rail expansions. According to the 2011 draft General Plan, the foundation for the transportation programs of the General Plan should be to align new development with transit networks and improve connectivity between systems. The 2011 draft General Plan identifies transit-oriented districts throughout the City. These districts would feature a mix of uses located close to major transit stops or transportation crossroads. The districts are intended to take advantage of transit service by concentrating potential rider populations of residents, workers, and visitors next to stations and creating settings to encourage connectivity."

In response to the comment, the following current information about "urban neighborhoods" has been included in Section 3.10.1.2 of the Final EIR:

> "According to the draft General Plan, some of the areas surrounding the alignment would be designated Urban Neighborhoods. This designation would include moderately intense clusters of development that would contain a mix of uses. According to Figure 6.3 of the draft General Plan, the areas west of White Avenue both north and south of the alignment and east of Towne Avenue, south of the alignment would be designated Urban Neighborhood.
>
> Additionally, as of November 2012, concepts for the Pomona Compass Blueprint Station Area Plan are being developed. This Plan will focus on existing and future land uses located around the proposed Gold Line station. Current concepts include alternatives that identify new reuse opportunities that would be located near existing uses. The concepts include converting warehouses to include parking and the envisioned land uses include urban residential, live/work, office, and other adaptive reuse, thereby creating a pedestrian friendly atmosphere."

The proposed project would be consistent with the draft General Plan as it would improve connectivity between transit-oriented districts throughout the City and be compatible with the future designation of "Urban Neighborhoods." Additionally, the proposed project would be consistent with the draft General Plan's description of the development of a Gold Line station within the City. [The information above is based on personal communication with Tamseel Mir and with Cooper Carry Project Manager, Joe McClyde on November 30, 2012.]

Response 16-24

VIS-5 in the Draft EIR states, "Station design shall feature materials, landscaping, art, and other Metro Gold Line Foothill Extension elements developed by the station design team that includes architects, landscape architects, and lighting experts. Surface treatments shall be provided at the face of safety walls and at roadway/pedestrian portals, and landscaping along safety walls outside of the LRT portal shall be provided where feasible to provide wall screening." The goal of the Criteria is to create site-adapted designs that reflect the specific urban context of each station and that enhance the neighborhood context in which the project is proposed. They also require that the Design Team work through the Construction Authority with the local jurisdictions and stakeholder groups to achieve design approvals for project visual elements (e.g., retaining walls, pole locations). The mitigation measure has been clarified in Section 3.13.4 of the Final EIR to include specific design features described in Metro's Design Criteria as follows:

"VIS-5—All walls, structures and fences shall be properly screened or incorporate design features to improve appearance and reduce visual intrusion pursuant to the standards established in the Metro Rail Design Criteria. The goal of the Criteria is to create site-adapted designs that reflect the specific urban context of each station and that enhance the neighborhood context in which the project is proposed. The Criteria include artwork, signage, advertising, landscaping, and guidelines for the selection of materials and finishes. Station design shall feature materials, landscaping, art, and other elements consistent with Metro Rail Design Criteria, and developed by the station design team that includes architects, landscape architects, and lighting experts. Surface treatments shall be provided at the face of safety walls and at roadway/pedestrian portals, and landscaping along safety walls outside of the LRT portal shall be provided where feasible to provide wall screening. Per Metro Rail Design Criteria, artwork will be provided at each station and will be designed by professional artists. According to the Criteria, careful consideration must be given to station compatibility with proposed future development in the neighborhood of each station, and where applicable, future extensions and/or connecting line transfers. Neighborhood culture and character shall be emphasized through artwork. The Designer should become familiar with the general aspects of the entire system in order to determine how his individual project relates to the whole. The Landscape Architect shall coordinate design and production of construction drawings with Designers and Metro Art to ensure that landscaping, facilities architecture, site engineering and station art are visually and functionally compatible. Coordination is particularly important with regard to the design of lighting, paved surfaces, walls and site furnishings. Metro Facilities Maintenance group shall be involved in the review and comment stage of landscape design review submittals."

In addition, as recommended by the City, the design objective to minimize the height of the flyover as much as possible has been included as a mitigation measure VIS-6 in the Final EIR as follows:

"VIS-6 – The final design of the Towne Avenue flyover structure shall include considerations of materials and design refinements to reduce the height of the flyover structure above the surrounding grade to the lowest height feasible."

The below grade separation (open trench) suggested to replace the proposed flyover at Towne Avenue is addressed in Response 16-16. Relocating the freight railroad's customer to obviate the need for the flyover is an infeasible option as it is beyond the Construction Authority's purview to do so.

The comment also suggests an inappropriate reliance on a Statement of Overriding Considerations as part of the Final EIR approval. As stated in the Introduction of the Draft EIR, the purpose of the EIR is to "evaluate the environmental effects of the Metro Gold Line Foothill Extension from Azusa to Montclair (Azusa to Montclair Extension). The proposed extension of this Light Rail Transit (LRT) system constitutes a project for the purposes of the California Environmental Quality Act (CEQA). Pursuant to CEQA requirements, the full extension to Montclair has been evaluated in order to address the potential effects of the entire project, from the City of Glendora in Los Angeles County to the City of Montclair in San Bernardino County.

According to the *Guidelines for Implementation of the California Environmental Quality Act,* an "EIR is an informational document which will inform public agencies, decision makers, and the public generally

of the significant environmental effects of a project on the environment, identify possible ways to minimize the significant effects, and describe alternatives to the project.

This Draft EIR is an informational document to be used by decision makers, public agencies, and the general public. It is not a policy document of the Construction Authority.

The EIR will be used by the Construction Authority in assessing impacts of the proposed project. During the project implementation process, mitigation measures identified in the EIR will be applied to the project by the Construction Authority and other involved agencies."

The *CEQA Guidelines* permit the lead agency to adopt a statement of overriding considerations to approve a project which will result in significant effects that were "identified in the final EIR but not avoided or substantially lessened" (Section 15093 of the *CEQA Guidelines*). The approval of the project itself is a separate action by the lead agency; the EIR's role is to present information about the project's potential environmental impacts to the decision makers and the public. As discussed above, additional specific information has been included in Mitigation Measure VIS-5 and an additional Mitigation Measure VIS-6 has been added to address visual impacts of the flyover at Towne Avenue.

Response 16-25

The comment summarizes previous comments, which are addressed in Responses 16-1 through 16-24 above.

Response 16-26

Please see Response 16-1 concerning grade-crossing separation, Response 16-2 concerning on-street parking, Response 16-4 concerning traffic impacts at Garey Avenue; Response 16-5 concerning sidewalk and gates, Response 16-8 concerning land use, 16-11 concerning the station location.

Response 16-27

Please see Response 16-4 concerning crossing impacts, Response 16-6 concerning background growth assumptions used in the traffic analysis, 16-10 concerning station access and traffic, Responses 16-14 and 16-15 concerning transit connections, and Response 16-6 concerning the Towne Avenue flyover.

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CITY OF LA VERNE
CITY HALL
3660 "D" Street, La Verne, California 91750-3599
www.ci.la-verne.ca.us

October 1, 2012

Lisa Levy Buch, Public Affairs Director
Metro Gold Line Foothill Extension
Construction Authority
406 Huntington Drive, Suite 202
Monrovia, CA 91016-3633

Re: **City of La Verne Comments Regarding**
2012 Draft EIR for Metro Gold Line Foothill Extension

Dear Ms. Levy Buch:

Thank you for the opportunity to review and comment on the 2012 draft Environmental Impact Report (EIR) for the Metro Gold Line Foothill Extension. Following are La Verne's comments on the draft document:

1. Transportation - The City of La Verne has a number of comments, questions, and corrections regarding the Traffic (Transportation) section of the document. The primary issues of comment are as follows, followed by an extensive list of comments and corrections provided by the City's Traffic Engineer Warren Siecke.

   A. The City questions the appropriateness of the two signals proposed at White Avenue/First Street and White Avenue/Second Street, particularly given their close proximity to each other. Warrant analyses should be prepared for each. 17-1

   B. The City is generally supportive of the proposed signal at Arrow Highway/A Street, noting it is shown to take future intersection volumes from LOS F to LOS A, but nonetheless requests a signal warrant analysis. 17-2

   C. The City appreciates that none of the at grade crossings in La Verne are proposed for closure by the EIR, but recognizes that previous PUC comments on an earlier environmental document for the project did propose closures. For the record, the City of La Verne remains adamantly opposed to the closure of any at grade crossings in La Verne. These crossings are critical to the City's ability to provide public safety response (Fire, Medical, and Police), given the location of the City's Public Safety facility being located north of Arrow Highway (2061 Third Street), in addition to providing major disruption to vehicular access by an estimated 10,000 or more residents. 17-3

   D. Proposed Improvements addressing traffic impacts (Table 2-30; page 2-101) for La Verne are reversed from what will be required. Should provide left-turn 17-4

pocket for eastbound approach from Arrow Highway. Should provide right-turn for westbound approach from Arrow Highway. 17-4

Metro Gold Line Foothill Extension Draft EIR
Comments From Warren Siecke, City Of La Verne Traffic Engineer

No.	Page	Paragraph or Location	Comment	
1	S-10	LTR-3	A traffic signal warrant analysis should be made before including this as a mitigation measure	17-5
2	2-6		White Ave./McKinley Ave. should be included as a Pomona intersection rather than La Verne.	17-6
3	2-17	Par. 2	Arrow is a 6 lane facility in San Dimas and La Verne.	17-7
4	2-17	Par. 6	Bonita is a 2 lane facility from 3rd St. to east city limit of La Verne..	17-8
5	2-17	Par. 9	White is a 2 lane facility between Arrow and 8th St..	17-9
6	2-20		Enlarge volume number font to make them readable throughout the report.	17-10
7	2-20	#64	Move White/McKinley to Pomona.	17-11
8	2-26		Since capacity is determined by the segment that has the least number on lanes, revise White Ave & Bonita Ave. per comments on page 2-17.	17-12
9	2-30	#51	D Street/Arrow Highway Control is signalized.	17-13
10	2-30	#64	Move White/McKinley to Pomona	17-14
11	2-37	#64	Move White/McKinley to Pomona	17-15
12	2-43	#51	D Street/Arrow Highway Control is signalized.	17-16
13	2-4	#64	Move White/McKinley to Pomona	17-17
14	2-46		See comments on page 2-26	17-18
15	2-48	Par. 1	Explain the proposed BRT routing. This is necessary to understand the streets that may be impacted.	17-19
16	2-53	#64	Move White/McKinley to Pomona.	17-20
17	2-59	#51	D Street/Arrow Highway Control is signalized.	17-21
18	2-60	#64	Move White/McKinley to Pomona.	17-22
19	2-63	#51	D Street/Arrow Highway Control is signalized.	17-23
20	2-64	#64	Move White/McKinley to Pomona	17-24
21	2-67	#51	D Street/Arrow Highway Control is signalized.	17-25
22	2-68	#64	Move White/McKinley to Pomona	17-26
23	2-70		See comments on page 2-26	17-27
24	2-78	Par. 2	Wheeler/Arrow Highway has existing "protected only" signal phasing.	17-28
25	2-78	Par. 4	Westbound right turn pocket at D/Arrow may not be feasible due to the limited right of way. "Protected only" signal phasing is being installed this year.	17-29
26	2-81	#64	Move White/McKinley to Pomona.	17-30
27	2-87	#51	D Street/Arrow Highway Control is signalized.	17-31
28	2-88	#64	Move White/McKinley to Pomona	17-32
29	2-89	2	Does D/Arrow qualify as an "impacted intersection" if it is analyzed as a signalized intersection (which it is existing)?	17-33

30	2-89	2	Throughout the remainder of the report La Verne/Arrow was listed as a La Verne intersection. Change it here for consistency.	17-34
31	2-92	#51	D Street/Arrow Highway Control is signalized.	17-35
32	2-93	#64	Move White/McKinley to Pomona	17-36
33	2-96	#51	D Street/Arrow Highway Control is signalized.	17-37
34	2-97	#64	Move White/McKinley to Pomona	17-38

2. Parking Structure

   A. While the City of La Verne supports the proposed parking structure location, the City would nonetheless encourage an analysis of alternate sites for parking, given this industrial property is privately-owned and is today occupied by a City-approved manufacturing business. Alternative parking sites would logically include Fairplex, SE Arrow and E Street, and First Street sites between E and White. This request for consideration of alternative sites is consistent with City Council request made on June 6, 2011. 17-39

   B. The City would strongly encourage measures to minimize the height of the proposed 6-story parking structure. The structure height could be minimized through the inclusion of sub floors (basement), larger building footprint, and or inclusion of some surface parking as part of project. 17-40

3. Noise- There should be a no horn area for the entire stretch through the La Verne area where residential is less than 200 feet away. 17-41

4. Noise Barriers- Figure 3.11-32 shows the proposed sound barriers located north of Arrow Highway. Sound barriers should also be considered to be constructed on the north side of Arrow Highway between E Street and White Avenue, given proximity to existing residents and anticipated new TOD residential development. There should also be a sound wall constructed north of Arrow Highway between B Street and C Street with the new development of the "Vista La Verne Residence Hall (now occupied with 375 student residents) at the University of La Verne just north of this location (Page 3.11-59). 17-42

5. Full Quad Safety Gates- Only the E Street crossing and White crossing would not have full quadrant gates. Why are the full quad safety gates not being added in this section? (Page 3.12-15) 17-43

6. Deodar Cedar Protection- The City requires permits and the use of a certified arborist for pruning and removal of any heritage trees including Deodar Cedars, Camphors, Oaks, California Sycamores and Southern California Black Walnuts (Page 3.2-2 and 3.13-6) 17-44

7. Visual Impacts
   A. There will be visual impacts from a 6-story parking structure, quite different than the current environment. Should be disclosed, and ideally mitigated by reducing the final height of parking structure. 17-45
   B. Any removal of Deodar Cedars will also result in visual impact. See prior comment regarding permit requirement for pruning or removal of heritage trees. Preservation and/or relocation should be primary objective, with potential for 4:1 replacement, per Heritage Ordinance, as last resort. 17-46

8. Scoping Report (appendix- Table 4)- There is no reference to the public workshop and La Verne City Council study session having expressed concern about the singular parking structure site and a request for evaluation of additional alternate parking structure sites. Please add La Verne City Council's motion and recommendation, from meeting of June 6, 2011, as follows: 17-47

   City is not prepared to identify or recommend one specific site, but rather that all potential alternative parking sites should be considered in the EIS/EIR environmental document. These potential sites include a nearby self storage facility, the adjacent Paper Pak property, the original Fairplex lot, and potential sites on First Street. The City is supportive of the project, including a Gold Line financed parking structure, however the City Council cannot necessarily identify any one of the alternatives as selected or preferred at this time.

The City of La Verne appreciates Gold Line's response to the above comments where applicable, and incorporation of the comments otherwise. The City appreciates the opportunity to participate in the process and looks forward to further progress towards achieving this very worthwhile transit endeavor.

Sincerely,

Bob Russi
City Manager

Cc: Mayor and City Council

17. Russi, Bob, City Manager, City of La Verne, October 1, 2012.

Response 17-1

The comment that the City questions the appropriateness of the identified signalization measures is acknowledged and, as recommended by the City, the Construction Authority will conduct additional signal warrant analysis during the preliminary engineering phase of the project to verify whether signalization at these locations is still warranted. To clarify, the statement "when warranted" was added to the mitigation measure LTR-2 in Section 2.8.2 of the Final EIR.

Response 17-2

As recommended by the City, to verify that this signalization identified in the Draft EIR is appropriate, the Construction Authority will conduct an additional signal warrant analysis Arrow Highway/A Street during the preliminary engineering phase of the project at to verify whether signalization at this location is still warranted. To clarify, the statement "when warranted" was added to in the Summary of Improvements with the Build Alternative in Section 2.6.3.3 of the Final EIR.

Response 17-3

The City's opposition to the closure of any at grade crossings is acknowledged. The Construction Authority is not proposing any at grade crossing closures as part of the Azusa to Montclair project.

Response 17-4

The text in Table 2-30 has been revised accordingly. Please note that the ingress/egress traffic analysis assumed the correct lane configurations.

Response 17-5

As recommended by the City, the Construction Authority will conduct an additional signal warrant analysis during the preliminary engineering phase of the project to verify whether signalization at this location identified in the Draft EIR is still appropriate. To clarify, the statement "when warranted" was added to the mitigation measure LTR-2 in section 2.8.2 of the Final EIR.

Response 17-6

The tables and figures were revised accordingly.

Response 17-7

The text was revised accordingly.

Response 17-8

Bonita Avenue is predominantly a 4-lane roadway for the most part of the study area. The statement "for most of the study area" was added to paragraph 6 of page 2-17 of the EIR.

Response 17-9

White Avenue is predominantly a 4-lane roadway for the most part of the study area. The statement "for most of the study area" was added to paragraph 9 of page 2-17 of the EIR.

Response 17-10

The comment is acknowledged; however, limitations of the software used to generate the figures that show turning movement numbers prevent any font changes.

Response 17-11

The figures and tables were revised accordingly.

Response 17-12

The analysis was revised to reflect a 2-lane capacity for White Avenue in the City of La Verne. The average daily traffic analysis for Bonita Avenue is provided for the segment within the City of San Dimas, where Bonita Avenue has four lanes.

Response 17-13

The control type designation in Table 2-10 was changed from all-way stop to signalized. The intersection was already analyzed as a signalized condition, so the LOS results were not changed.

Response 17-14

The figures and tables were revised accordingly.

Response 17-15

The figures and tables were revised accordingly.

Response 17-16

The control type designation in Table 2-13 was changed from all-way stop to signalized. The intersection was already analyzed as a signalized condition, so the LOS results were not changed.

Response 17-17

The figures and tables were revised accordingly.

Response 17-18

The analysis was revised to reflect a 2-lane capacity for White Avenue in the City of La Verne. The average daily traffic analysis for Bonita Avenue is provided for the segment within the City of San Dimas, where Bonita Avenue has four lanes.

Response 17-19

A description of the TSM alternative and its route was included in Section 1.3.2 of the Draft EIR.

Response 17-20

The figures and tables were revised accordingly.

Response 17-21

The control type designation in Table 2-17 was changed from all-way stop to signalized. The intersection was analyzed as a signalized condition, so the LOS results were not changed.

Response 17-22

The figures and tables were revised accordingly.

Response 17-23

The control type designation in Table 2-18 was changed from all-way stop to signalized. The intersection was already analyzed as a signalized condition, so the LOS results were not changed.

Response 17-24

The figures and tables were revised accordingly.

Response 17-25

The control type designation in Table 2-19 was changed from all-way stop to signalized. The intersection was already analyzed as a signalized condition, so the LOS results were not changed.

Response 17-26

The figures and tables were revised accordingly.

Response 17-27

The analysis was revised to reflect a 2-lane capacity for White Avenue in the City of La Verne. The average daily traffic analysis for Bonita Avenue is provided for the segment within the City of San Dimas, where Bonita Avenue has four lanes.

Response 17-28

The traffic analysis was revised accordingly.

Response 17-29

The City's installation of the "protected only" signal phasing is currently underway, as noted in the City's comment, and would improve the westbound right turn operation at this intersection. The Construction Authority will therefore conduct an additional evaluation of physical conditions that exist with this signal phasing during preliminary engineering to verify the feasibility of a right turn pocket at this location.

Response 17-30

The figures and tables were revised accordingly.

Response 17-31

The control type designation in Table 2-26 was changed from all-way stop to signalized. The intersection was already analyzed as a signalized condition, so the LOS results were not changed.

Response 17-32

The figures and tables were revised accordingly.

Response 17-33

The intersection of D Street/Arrow Highway was already analyzed as a signalized intersection for all alternatives. As discussed in Section 2.9 of the Draft EIR, with the proposed project, LOS A would change to LOS C, which is an acceptable level of service.

Response 17-34

The text was revised accordingly.

Response 17-35

The control type designation in Table 2-27 was changed from all-way stop to signalized. The intersection was already analyzed as a signalized condition, so the LOS results were not changed.

Response 17-36

The figures and tables were revised accordingly.

Response 17-37

The control type designation in Table 2-28 was changed from all-way stop to signalized. The intersection was already analyzed as a signalized condition, so the LOS results were not changed.

Response 17-38

The figures and tables were revised accordingly.

Response 17-39

The City's support of the proposed parking site at La Verne is acknowledged. The proposed parking site and structure were presented and scrutinized as part of the public scoping process for the project conducted in the late 2010 and early 2011, and subsequently studied for environmental impacts. As such, an alternative parking site at La Verne is not under consideration.

A parking facility at the Fairplex or SE Arrow and E Street would result in long pedestrian access routes, and would require long pedestrian bridges over Arrow Highway. The access point to a parking structure on First Street between E and White would likely need to be on First Street, which is a less intensively used and therefore a less desirable street on which to direct traffic from the parking structure. It is also less accessible than Arrow Highway.

Response 17-40

The City's preference for a shorter parking structure is acknowledged. The parking concept for the La Verne Station in Draft EIR is a conceptual preliminary drawing. This concept will continue to be refined as part of advanced engineering that considers specific refinements including footprint dimensions and other factors.

Response 17-41

The City's comment requesting a no horn area through La Verne where residential uses are located less than 200 feet from the project is acknowledged. Implementing a "quiet zone" requires cooperation by all jurisdictions involved with the grade crossing and is contingent on approval by the Federal Railroad Administration (FRA). The Construction Authority cannot declare a quiet zone but will cooperate with the City in preparing petitions to the FRA for quiet zone designations. Standard grade crossing safety equipment for the Metro Gold Line should be sufficient to meet FRA's supplemental safety measures requirement for designation of a quiet zone. During advanced engineering and final design, the Construction Authority will work with local jurisdictions to identify possible quiet zones where appropriate. During that collaboration, the Cities can identify the grade crossings where quiet zones would be beneficial to the City.

Response 17-42

The City's comment regarding sound barriers near existing and future residential development is acknowledged.

The existing residences between E Street and White Avenue are located behind an existing row of buildings and more than 230 feet from away the proposed location of the light-rail tracks. With this shielding by buildings in front and distance from the proposed alignment no noise impact is predicted at these residences. Mitigation measures (such as sound barriers) were recommended only at locations where impact was identified.

The noise and vibration impact analysis is based on existing land uses at the time the environmental assessment was initiated. In response to the comment about the new Vista La Verne Residence Hall, following the same analysis procedure as presented in the Draft EIR, predicted noise levels at the Vista La Verne Residence Hall are below the Federal Transit Administration (FTA) impact threshold. Therefore, a sound wall is not recommended north of Arrow Highway between B Street and C Street.

Response 17-43

The E Street and White Street crossings will not have full quadrant gates because the existing highway median serves the same safety purpose as the fourth quad gate.

At E Street, for southbound lanes the highway median will discourage southbound traffic crossing the tracks in the wrong direction. This configuration is described in Section 3.12.2 of the SCRRA Highway-Rail Grade Crossings Recommended Design Practices and Standards Manual, which applies to this part of the project because SCRRA-operated Metrolink trains operate through La Verne and would share right

of way with the Metro Gold Line. At this location, a fourth gate could be installed to achieve full "quad gate" status but the median makes this unnecessary since it already provides similar safety features.

At White Avenue, for southbound lanes the highway median will discourage northbound traffic crossing the tracks in the wrong direction. This configuration is described in Section 3.12.2 of the SCRRA Highway-Rail Grade Crossings Recommended Design Practices and Standards Manual. In this location a fourth gate could theoretically be installed to achieve full "quad gate" status, but the extra long median also serving the SCRRA crossing, makes this unnecessary and impractical since it provides similar safety features to a quad gate.

Response 17-44

Section 3.2.1.2 has been updated to include information that the City requires a permits and use of a certified arborist for pruning and removal of any heritage tree, including Deodar Cedars, Camphors, California Sycamores, and Southern California Black Walnuts.

Response 17-45

The visual impacts of the 6-level parking garage were considered in Section 3.13 of the Draft EIR, and the visual impacts were found to be less than significant. As discussed in the Draft EIR, although the proposed parking structure, approximately 55 feet high, would be taller than any of the immediately adjacent buildings, the large industrial buildings along the north border of the railroad right-of-way visually buffer the commercial and residential properties north of 1st Street from both the station and parking structure proposed to the south. There are no residences in the immediate vicinity of the proposed parking structure that would be affected by the introduction of new shade or shadow effects. In addition, the structure's height would be substantially below allowable heights of 72 feet for buildings in the Old La Verne Specific Plan area where the site is located. Compliance with City of La Verne design policies and the implementation of Mitigation Measures VIS-4 and VIS-5 will further ensure that the effect of the parking structure and station on visual resources would not be significant. Therefore, a reduction in height is not required to mitigate visual impacts.

Response 17-46

Section 3.13 of the Draft EIR identified removal of the deodar cedars in the City of La Verne as a significant and unavoidable visual impact and identifies Mitigation Measure VIS-1, which includes relocating trees and new and commensurate landscape planting.

The VIS-1 measure has been expanded to include information that: (1) the Foothill Construction Authority Design Team will work with the Cities to develop an appropriate design strategy that minimizes the loss of deodar cedars and incorporates new landscaping of commensurate quality when called for, consistent with the Metro Rail Design Criteria; (2) the Criteria state that landscaping for new facilities shall be designed in conformance with local landscape ordinances and existing plant material shall be preserved, as appropriate; and (3) compliance with local jurisdictions tree preservation ordinances prior to taking any action to trim or remove heritage trees, including required permits, would be required.

Prior to any removal or trimming activities, a certified arborist would conduct a detailed survey and the results of the survey would be presented to the City of La Verne consistent with the City's tree preservation ordinances.

Response 17-47

The Scoping Report summarizes comments received during the scoping period that ended on February 2, 2011, prior to the June 6, 2011 recommendation referenced in the City's comment.

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From:	Craig Misso
To:	Lisa Levy Buch
Subject:	Metro Gold Line Foothill Extension Azusa to Montclair Project
Date:	Tuesday, October 02, 2012 11:28:47 AM
Attachments:	10-02-12 DEIR Response.pdf

Dear Ms. Buch:

The Ontario-Montclair School District (District) appreciates the opportunity to address the Metro Gold Line Foothill Extension Construction Authority, regarding the Draft Environmental Impact Report (DEIR) prepared for the Metro Gold Line Foothill Extension Azusa to Montclair project. The District has reviewed the DEIR findings relative to pollution and air quality, transportation, pedestrian/bike riders/traffic impacts, noise and vibrations, and hazardous materials, during the construction phase and once fully operational following the project's completion. Noted in the DEIR is the provision that appropriate mitigation measures are to be employed during the project's construction and/or following its completion. In light of these findings, the attached comments are provided by the Ontario-Montclair School District in regards to ensuring a safe environment exists for the District's students and staff, including those attending Moreno Elementary School (MES) located approximately .38 miles from the Montclair segment of the project, for the three project alternatives being presented (No Build Alternative, Transportation System Management (TSM) Alternative, and Build Alternative Project).

Should you have any questions please feel free to contact me.

Craig Misso
Director, Facilities Planning and Operations
Ontario-Montclair School District
(909) 418-6369

Ontario-Montclair
School District

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James Q. Hammond, Ed.D.
Superintendent

Kim Stallings
Deputy Superintendent
Administrative Services

Craig E. Misso
Director, Facilities Planning and Operations

FACILITIES PLANNING AND OPERATIONS

Sent Via Certified Mail Receipt No. 7012 1010 0002 2750 1005
Return Receipt Requested

October 2, 2012

Lisa Levy Buch, Director of Public Affairs
Metro Gold Line Foothill Extension Construction Authority
406 East Huntington Drive, Suite 202
Monrovia, California 91016

Re: Metro Gold Line Foothill Extension Draft Environmental Impact Report

Dear Ms. Buch:

The Ontario-Montclair School District (District) appreciates the opportunity to address the Metro Gold Line Foothill Extension Construction Authority, regarding the Draft Environmental Impact Report (DEIR) prepared for the Metro Gold Line Foothill Extension Azusa to Montclair project. The District has reviewed the DEIR findings relative to pollution and air quality, transportation, pedestrian/bike riders/traffic impacts, noise and vibrations, and hazardous materials, during the construction phase and once fully operational following the project's completion. Noted in the DEIR is the provision that appropriate mitigation measures are to be employed during the project's construction and/or following its completion. In light of these findings, the following comments are provided by the Ontario-Montclair School District in regards to ensuring a safe environment exists for the District's students and staff, including those attending Moreno Elementary School (MES) located approximately .38 miles from the Montclair segment of the project, for the three project alternatives being presented (No Build Alternative, Transportation System Management (TSM) Alternative, and Build Alternative Project).

Preliminary Comments.

During construction of the Montclair segment extending from Mills Avenue to Benson Avenue, including the existing grade separation and the new light rail transit (LRT) bridge to be constructed over Monte Vista Avenue, the following areas will require further consideration to avoid adversely impacting daily operations at MES. The District is very interested in knowing the proposed construction timeline for the project and the potential impacts of the mitigation measures to be employed, including the following. 18-1

1. **Traffic Management Control Plan**
   a. Signalization/use of crossing guards
   b. Pedestrian/bike rider access
   c. Student transportation services
   d. Transporting of hazardous materials
   e. Emergency services

2. **Construction Activities**.
   a. Traffic diversion/detours/road closures
   b. Demolition
   c. Operation of construction equipment
   d. Increase in vehicles and related traffic activities
   e. Increase in freight transit activities
   f. Air quality impacts due to increased vehicle and tractor trailer engine idling
   g. Hazardous materials exposure
   h. Noise/vibrations
   i. Storm water drainage effecting road conditions and pedestrian access

18-1

Specific Considerations.

The following comments are submitted relative to the information contained within the DEIR.

1. In Section 2 – Transportation, Table 2-29 indicates a significant reduction in the level of service for the Montclair roadway section analysis from Richton Street to Arroyo Highway. This roadway is anticipated to remain at a "D" category level through 2035. With only one other intersection studied having a similar or lower grade, why were no mitigation measures considered to improve this road segment? 18-2
2. In Section 3.5 – Community Facilities and Parklands, under the subsection titled: Educational Facilities, City of Montclair Policy PF-1.1.1 seeks to protect elementary and secondary school plant investments by preserving the character and quality of residential and non-residential development. What mitigation measures will be proposed to ensure compliance with this policy? 18-3
3. In Section 3.5.2.3 – Schools, the DEIR indicates there are 18 educational facilities, including preschools, public schools, private schools, and colleges and universities, within .25 miles of the project. The MES is located approximately .38 miles outside of the project. What was the rationale for establishing the .25 mile threshold to be applied to educational facilities? Was this criteria used in any other area of the DEIR? If so, the impacts of such evaluation are requested. 18-4
4. In section 3.5.3.3 – Short Term Construction Impacts, subsection titled: Schools, the DEIR, indicates the potential for temporary construction noise impacts would be limited to locations within about 125 feet of the corridor. The MES is located approximately .38 miles outside of the project. What was the rationale for establishing the threshold at 125 feet? 18-5
5. In section 3.5.3.4 – Long Term Impacts, subsection titled: Schools, the DEIR, indicates:
   i. *"There could be safety concerns for younger students who would walk to and from school near the alignment."* What are the specific safety concerns for younger students who walk to and from school near the alignment and what mitigation measures are proposed to ensure their safety?
   ii. This section further states: "*Operations of the project would not substantially increase noise levels or reduce air quality at most schools in the Study Area. However, Schools located within 125 feet of the alignment could be subject to substantial increase in noise and vibration.*" The statement does not address the degree of reduced air quality. The MES is located approximately

18-6

.38 miles outside of the project. What level of noise and vibration and reduced air quality should be expected at this school site?

I. Within this section it is stated no schools in the city of Pomona, San Dimas, or Montclair are located within the .25-mile of the alignment. Why was a .25-mile threshold used for schools? 18-6

6. In section 3.12.2.4 – Emergency Response, subsection titled: City of Montclair, the DEIR, indicates the pedestrian tunnel that crosses under the westbound Metrolink track would be extended. What mitigation measures are proposed to ensure a pathway through this area remains accessible during construction? 18-7
7. In section 3.12.3.4 – Long-Term Impacts, subsection titled: The Cities Affected, the DEIR indicates there will be minor modifications made to the existing grade separation in the City of Montclair. What would comprise these modifications? 18-8
8. In section 3.12.3.5 – Cumulative Impacts, the DEIR, indicates safety concerns would increase locally, particularly if other development and transportation projects are constructed in the vicinity of alignment for the Project. What mitigation measures are proposed to ensure this area remains safe if further development occurs? 18-9
9. In section 3.15. – Growth-Inducing Impacts, the DEIR indicates no significant increase in direct or indirect growth in the cities served by the Project. Please confirm the development areas analyzed include the Project's impact on potential development of the undeveloped properties located directly south of the Montclair segment. 18-10
10. Once the transit station is in full operation, what will be the extent of testing and investigation conducted to verify that the actual environmental conditions affected by the facility's operations are within the thresholds anticipated in the Final EIR? 18-11
11. The District is interested in receiving a copy of your agency's response to the February 2, 2011 Scoping Comments submitted by the EPA. 18-12

Please continue to send public notices and information regarding the Project to me. If you have any questions, please contact me at 909-418-6369.

Sincerely,

Craig Misso
Director, Facilities Planning and Operations

18. Misso, Craig, Director, Facilities Planning and Operations, Ontario-Montclair School District, October 2, 2012.

Response 18-1

The comment that the District has reviewed the Draft EIR and provided the comments to ensure a safe environment for the District's students and staff, including those attending Moreno Elementary School located approximately 0.38-mile from the project, is acknowledged.

The project construction start date and timeline will depend on the project first attaining environmental clearance and then on funding availability.

The Draft EIR included Mitigation Measures CTR-1 and CTR-3 in Section 2.8.1 that include a range of measures, as follows**:**

CTR-1- During final design, site- and street-specific Worksite Traffic Control Plans shall be developed in cooperation with the appropriate departments of transportation in each Azusa-Montclair corridor City and with Los Angeles and San Bernardino Counties, and implemented to accommodate required pedestrian and traffic movements. To the extent practical, traffic lanes will be maintained in both directions, particularly during periods of peak traffic operations. Access to homes and businesses shall be maintained throughout the construction period. To the extent feasible, lane closures shall occur during off-peak, weekend, or nighttime hours.

CTR-3— A Traffic Management Control Plan shall be developed and implemented. The Plan shall be developed in close coordination with local jurisdictions, the local emergency response agencies (including fire departments, police departments, and ambulance services), school districts, and other agencies as appropriate. The Plan shall include, but not be limited to:

- Providing public information through media alerts, flyers, and the Construction Authority's website to alert and inform the community about construction activities and schedules, including planned street and access closures.
- Providing traveler information through traffic advisor radio, changeable message signs (CMS) that includes detour routes.
- Creating a hotline for the community with a direct connection to personnel who can answer questions, provide information, and resolve issues. In addition, field offices shall be opened at specific locations identified as best serving the community and neighborhoods.
- Developing specific street closures and phasing plans, and other measures.
- Posting advance notices indicating when access would be closed or limited on city streets
- Posting signs indicating access routes and alternate access points, as well as announcing that affected businesses are open.
- Placing newspaper notices to indicate street and access closures
- Before any significant bus rerouting changes are made, fliers shall be provided on buses at least two weeks in advance notifying riders of route modifications. In addition, hoods shall be placed over bus-stop signs notifying riders of what modifications have been made to the bus route.

Further details concerning a traffic management control plan, which is part of the Construction Management Plan (CMP) that will be implemented throughout the construction, will be developed and finalized as the project design is refined.

The Construction Authority will work with the Ontario-Montclair School District to ensure the Construction Authority's contractor(s) fully implement the CMP to minimize delays to traffic on Monte Vista Avenue.

Response 18-2

A mitigation measure is considered if the proposed project results in a significant impact to the roadway segment. The Level of Service (LOS) D is considered an acceptable level of service for a roadway segment in urban areas. At LOS D, a roadway segment is anticipated to operate at fair conditions. For the impact to be significant, the LOS due to the project is compared to the No Build LOS (without the project) for the same analysis year, which is the year 2035. If the difference is greater than the significance threshold criteria set forth by the Los Angeles County Traffic Impact Analysis Study Guidelines, then a mitigation measure is to be considered. For the segment of Central Avenue from Richton Street to Arrow Highway, the LOS D is the same for the No Build (i.e., future conditions without the project) and Build conditions (i.e., future conditions with the project). Consequently, the proposed project would not result in a significant impact and no mitigation measures were considered.

Response 18-3

The analysis in Section 3.5 of the Draft EIR concluded that the proposed project would not impact any school properties in Montclair. Also, the rail corridor has been part of the environment for over 80 years and the proposed project would be consistent with this historic rail setting. Therefore, the proposed project would not be inconsistent with this City of Montclair policy, and no mitigation is required.

Response 18-4

As described in Section 3.5 of the Draft EIR, indirect impacts would involve changes to pedestrian or vehicular access. Direct impacts would involve physical acquisition, displacement, or relocation of parkland or a community facility and would occur only at facilities that are adjacent to the alignments. Indirect impacts would be most likely to occur at any facility within 0.25-mile of the project. While most of the construction of the project alignment is anticipated to occur with the existing rail right of way, which would limit the noise effects on any uses that are not adjacent to the alignment, a larger 0.25-mile radius was selected to evaluate the potential for indirect impacts involving changes to pedestrian or vehicular access.

Response 18-5

No construction noise impacts at the MES facility would occur because the MES is located over 2,000 feet from the project and construction activity. As sound dissipates with distance, at this distance construction noise would not be perceptible to persons using the MES facility.

As discussed in Section 3.5 of the Draft EIR, a significant impact to community facilities would occur if the proposed project would result in substantial adverse physical impacts associated with the provision of

new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts. A distance of 125 feet from the corridor was intended to capture only severe effects that would impede the functionality of a community facility or similar land use within this close proximity to the project. Additionally, the project construction will comply with local, state, and regulatory requirements and/or permits, as well as implement noise control mitigation measures N-1 and N-2 described in Section 3.11.

Response 18-6

Safety impacts are discussed in Section 3.12 of the Draft EIR. Issues related to safety of students include the potential for crime and for accidents at at-grade crossings involving student pedestrians and LRT trains. At designated pedestrian crossings where the LRT alignment is located within a school zone, automatic gates for pedestrians would be used. However, there are no pedestrian crossings within school zones within the City of Montclair. Mitigation measures that would further address safety concerns include SS-3, which requires lighting along pedestrian pathways; SS-5, which requires stations to be designed to maximize visibility for pedestrians to minimize crime and improve pedestrian safety; SS-6, which requires security personnel to monitor pedestrian crossing activity at locations with adjacent schools as well as implementation of measures to ensure pedestrian crossing safety; SS-7, which requires a hazard analysis to be prepared by the Construction Authority to determine a design basis for warning devices; and SS-8 which requires traffic warning measures, such as signage, to alert motorists to significant pedestrian activity.

As described in Section 3.5 of the Draft EIR, operation of the project—which uses electrically-powered light rail trains and not the gasoline or diesel fuels that generate air pollutant emissions and are used by freight and Metrolink trains—would not substantially degrade air quality at schools. Furthermore, as described in Section 3.1 of the Draft EIR, the project is expected to reduce mobile source air toxics (MSAT) emissions in the region resulting, generally improved air quality.

Since the MES is beyond 125 feet from the alignment, there would be no long-term noise impacts as stated in Section 3.5 of the Draft EIR.

Please see the Response 18-4 regarding the rationale for the selection of the 0.25-mile radius for the study area.

Response 18-7

The Construction Management Plan that will be finalized as the project design is refined will include strategies and measures, such as alternative routes and pathways, to maintain access. The Construction Authority will work with the Ontario-Montclair School District during the development of the CMP measures to ensure that the pathway remains accessible during construction to the extent possible, and that safe alternate routes will be designated if temporary closure of the pathway is required. .

Response 18-8

The existing grade separation at Monte Vista Avenue will be maintained and there will be no modifications to the grade separation during construction of the new LRT bridge, as described in Section

1.3.3.7 of the Draft EIR. No minor modifications to Monte Vista Avenue are anticipated at this time and this clarification has been included in the Final EIR.

Response 18-9

As described in Section 3.12 of the Draft EIR, mitigation measures would be implemented to reduce safety impacts to a less-than-significant level. These mitigation measures would also serve to reduce the proposed project's contribution to any potential cumulative safety and security impacts. Therefore, it is not expected that the proposed project of the proposed project would result in a significant cumulative impact to safety and security.

Response 18-10

The area south of the project alignment in Montclair is mostly built out. A review of parcels immediately south of the alignment in Montclair identified only one vacant parcel located south of the station. This parcel is zoned for industrial use. The City of Montclair General Plan designates this area as Planned Development, Community Plan, and Conservation Basins. As stated in Section 3.15 of the Draft EIR, the project could potentially attract new transit-oriented development around LRT stations. However, any such future development in Montclair would be subject to the City's land use regulation and would have to be in accordance with the City's land use designations and zoning regulations.

Response 18-11

As part of the project, the adopted Mitigation Monitoring and Reporting Program (MMRP) will be implemented to ensure that the identified mitigation measures are timely implemented, and any long-term mitigation measures are monitored. As part of this program, the results of the monitoring will be reported as specified in the MMRP.

Response 18-12

The Construction Authority reviewed comments received from agencies during the scoping process, but the scoping process does not include the preparation of formal responses to agencies. The comments received during the scoping process were considered in the preparation of the Draft EIR and the Draft EIR was distributed to the agencies for their review.

Department of Toxic Substances Control

Matthew Rodriquez
Secretary for
Environmental Protection

Deborah O. Raphael, Director
5796 Corporate Avenue
Cypress, California 90630

Edmund G. Brown Jr.
Governor

October 3, 2012

Ms. Levy Buch
Construction Authority Director of Public Affairs
Metro Gold Line Foothill Extension Construction Authority
406 E. Huntington Drive, Suite 202
Monrovia, California 91016-3633
llevybuch@foothillextension.org

NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE METRO GOLD LINE FOOTHILL EXTENSION FROM AZUSA TO MONTCLAIR PROJECT, (SCH #2010121069), LOS ANGELES COUNTY

Dear Ms. Buch:

The Department of Toxic Substances Control (DTSC) has received your submitted Draft Environmental Impact Report (EIR) for the above-mentioned project. The following project description is stated in your document:

"The Metro Gold Line Foothill Extension is a phased project that extends the existing Metro Gold Line by 24 miles to the east, from the City of Pasadena to the City of Montclair. Construction of the first phase from the Pasadena Sierra Madre Villa Station to the Azusa-Citrus Station began in late 2011, and construction in anticipated to be completed in late 2015. The proposed project, known as the Metro Gold Line Foothill Extension from Azusa to Montclair, is the next phase of this planned extension. The project would share right-of-way with Metrolink, but the light rail transit (LRT) trains would operate on separate tracks and use different platforms than Metrolink commuter trains. The project would traverse six Southern cities. Each City has an adopted General Plan, and in many of the proposed LRT station areas, Specific Plans guide development. Each City also has a zoning code, which is a set of legal regulations that the city uses to implement the policies and land use designations outlined in the General and Specific Plans. Much of the land uses surrounding the project alignment are industrial or commercial."

Based on the review of the submitted document DTSC has the following comments:

1) The EIR should evaluate whether conditions within the Project area may pose a threat to human health or the environment. Following are the databases of some of the regulatory agencies: 19-1

- National Priorities List (NPL): A list maintained by the United States Environmental Protection Agency (U.S.EPA).
- Envirostor (formerly CalSites): A Database primarily used by the California Department of Toxic Substances Control, accessible through DTSC's website (see below).
- Resource Conservation and Recovery Information System (RCRIS): A database of RCRA facilities that is maintained by U.S. EPA.
- Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS): A database of CERCLA sites that is maintained by U.S.EPA.
- Solid Waste Information System (SWIS): A database provided by the California Integrated Waste Management Board which consists of both open as well as closed and inactive solid waste disposal facilities and transfer stations.
- GeoTracker: A List that is maintained by Regional Water Quality Control Boards.
- Local Counties and Cities maintain lists for hazardous substances cleanup sites and leaking underground storage tanks.
- The United States Army Corps of Engineers, 911 Wilshire Boulevard, Los Angeles, California, 90017, (213) 452-3908, maintains a list of Formerly Used Defense Sites (FUDS).

19-1

2) The EIR should identify the mechanism to initiate any required investigation and/or remediation for any site within the proposed Project area that may be contaminated, and the government agency to provide appropriate regulatory oversight. If necessary, DTSC would require an oversight agreement in order to review such documents.

19-2

3) Any environmental investigations, sampling and/or remediation for a site should be conducted under a Workplan approved and overseen by a regulatory agency that has jurisdiction to oversee hazardous substance cleanup. The findings of any investigations, including any Phase I or II Environmental Site Assessment Investigations should be summarized in the document. All sampling results in which hazardous substances were found above regulatory standards should be clearly summarized in a table. All closure, certification or remediation approval reports by regulatory agencies should be included in the EIR.

19-3

4) If buildings, other structures, asphalt or concrete-paved surface areas are being planned to be demolished, an investigation should also be conducted for the presence of other hazardous chemicals, mercury, and asbestos containing materials (ACMs). If other hazardous chemicals, lead-based paints (LPB) or products, mercury or ACMs are identified, proper precautions should be taken during demolition activities. Additionally, the contaminants should be remediated in compliance with California environmental regulations and policies. 19-4

5) Future project construction may require soil excavation or filling in certain areas. Sampling may be required. If soil is contaminated, it must be properly disposed and not simply placed in another location onsite. Land Disposal Restrictions (LDRs) may be applicable to such soils. Also, if the project proposes to import soil to backfill the areas excavated, sampling should be conducted to ensure that the imported soil is free of contamination. 19-5

6) Human health and the environment of sensitive receptors should be protected during any construction or demolition activities. If necessary, a health risk assessment overseen and approved by the appropriate government agency should be conducted by a qualified health risk assessor to determine if there are, have been, or will be, any releases of hazardous materials that may pose a risk to human health or the environment. 19-6

7) If the site was used for agricultural, livestock or related activities, onsite soils and groundwater might contain pesticides, agricultural chemical, organic waste or other related residue. Proper investigation, and remedial actions, if necessary, should be conducted under the oversight of and approved by a government agency at the site prior to construction of the project. 19-7

8) If it is determined that hazardous wastes are, or will be, generated by the proposed operations, the wastes must be managed in accordance with the California Hazardous Waste Control Law (California Health and Safety Code, Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (California Code of Regulations, Title 22, Division 4.5). If it is determined that hazardous wastes will be generated, the facility should also obtain a United States Environmental Protection Agency Identification Number by contacting (800) 618-6942. Certain hazardous waste treatment processes or hazardous materials, handling, storage or uses may require authorization from the local Certified Unified Program Agency (CUPA). Information about the requirement for authorization can be obtained by contacting your local CUPA. 19-8

9) DTSC can provide cleanup oversight through an Environmental Oversight Agreement (EOA) for government agencies that are not responsible parties, or a Voluntary Cleanup Agreement (VCA) for private parties. For additional information on the EOA or VCA, please see 19-9

www.dtsc.ca.gov/SiteCleanup/Brownfields, or contact Ms. Maryam Tasnif-Abbasi, DTSC's Voluntary Cleanup Coordinator, at (714) 484-5489. 19-9

If you have any questions regarding this letter, please contact Rafiq Ahmed, Project Manager, at rahmed@dtsc.ca.gov, or by phone at (714) 484-5491.

Sincerely,

Rafiq Ahmed
Project Manager
Brownfields and Environmental Restoration Program

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044
state.clearinghouse@opr.ca.gov.

CEQA Tracking Center
Department of Toxic Substances Control
Office of Environmental Planning and Analysis
P.O. Box 806
Sacramento, California 95812
Attn: Nancy Ritter
nritter@dtsc.ca.gov

CEQA # 3642

19. Ahmed, Rafiq, Project Manager, Brownfields and Environmental Restoration Program, Department of Toxic Substances Control, October 3, 2012.

Response 19-1

Section 3.9.2 of the Draft EIR describes the methodology used to establish existing conditions within the study area. As described, the environmental database reports from 2003, 2005, and 2011 were reviewed for local, state, and federal listings for properties within 1,000 feet of the railroad right-of-way. Regulatory database lists were reviewed for cases pertaining to leaking USTs, hazardous waste sites, and other sites of environmental concern. Sites identified during the database review and during the site inspection that pose a potential environmental concern are noted in Section 3.9.2.1 and Section 3.9.2.2 of the Draft EIR.

Response 19-2

Construction of the project will require a number of property acquisitions in the vicinity of station locations, parking structures, and traction power substations. A Phase I ESA for each property will be conducted prior to the acquisition, and if RECs are identified a Phase II ESA would then be conducted. In accordance with existing requirements, regulatory oversight with an appropriate agency will be requested if the results of the Phase II ESA indicate that it is warranted. The agencies include the Department of Toxic Substances Control (DTSC), local Fire Department, or Department of Public Works if any UST removal is necessary, and the Regional Water Quality Control Board (RWCB) if any groundwater contamination is encountered above regulatory limits.

Response 19-3

In accordance with existing requirements any environmental investigation, sampling, and/or remediation would be conducted under a Workplan that would be submitted to the appropriate regulatory agency for approval. The findings of any investigations, including any sampling, would be clearly summarized. The project is currently in the conceptual engineering phase, and any additional investigations and remedial activities, if needed, would occur during the final design and engineering phase, at the time the property acquisition process is being undertaken; therefore, closure, certification, or remediation approval reports are not included in the EIR.

Response 19-4

In accordance with existing requirements, an investigation for the presence hazardous chemicals in building to be demolished will be conducted and documented and any remediation of the contaminants would be remediated in compliance with the applicable California regulations and requirements.

Response 19-5

In accordance with existing requirements, sampling for the presence hazardous chemicals in excavated and imported soils will be conducted and documented. If any soil is contaminated it will be properly disposed of in compliance with all applicable existing requirements and regulations.

Response 19-6

In accordance with existing requirements, a health risk assessment will be conducted if hazardous materials releases are identified during construction of the project that may pose a risk to human health or the environment.

Response19-7

Select soil samples were analyzed for organochlorine pesticides during the Phase II ESA conducted along the railroad right-of-way in 2005. Organochlorine pesticides were not detected above applicable regulatory limits (Section 3.2.9.1 of the Draft EIR). Environmental investigations for additional properties that will be acquired as part of the project will be conducted, as appropriate, based on historic use and hazardous materials use.

Response 19-8

As discussed in Section 3.9.4.2 of the Draft EIR, there are no elements related to the long-term operation of the project that would increase the potential for exposure to hazardous materials.

Response 19-9

The information that the DTSC can provide cleanup oversight through specific agreements for government agencies that are not responsible parties and with private parties is acknowledged.

City of Arcadia

Development Services Department

Jason Kruckeberg
Assistant City Manager/ Development Services Director

October 4, 2012

Ms. Lisa Levy Buch, Director of Public Affairs
Metro Gold Line Foothill Extension Construction Authority
406 East Huntington Drive, Suite 202
Monrovia CA 91016

SUBJECT: Comments on the Draft Environmental Impact Report for Metro Gold Line Foothill Extension Phase 2B

Dear Ms. Levy Buch:

Thank you for this opportunity to review and comment on the Draft Environmental Impact Report for the Metro Gold Line Foothill Extension Phase 2B. The City of Arcadia has long been a partner with the Construction Authority and we are currently working on substantial construction and development efforts to effectuate Phase 2A of the project through Arcadia. As you know, we support the project and your efforts to complete the required environmental review and documentation of Phase 2B of this important project. The clearance of Phase 2B is vitally important to the region as a whole and certainly as it impacts the City of Arcadia. 20-1

We have several comments that we feel have not been adequately addressed in the Draft EIR. We provided a precursor to these comments in our letter of February 4, 2011, when we responded to the Notice of Preparation for the EIR (attached). The City of Arcadia's concerns primarily relate to how the Phase 2B project addresses impacts to facilities planned in Arcadia as part of Phase 2A.

- We understand that a new ridership forecast has been completed. Please describe how the ridership forecast varies from the model used in the Phase 2A EIR. If the model does vary, please explain how the differences may impact facilities (i.e. parking structures) planned for Phase 2A. 20-2

- It appears that the projection year has been modified to 2035 and that parking facilities for the Phase 2B stations are being designed to meet the demand anticipated in the projection year. This methodology differs from that used in the Environmental Impact Report for Phase 2A, which employed a rationale that parking would be provided in "staged implementation" where a certain number of spaces would be necessary on "opening day" and spaces would be added at a projection year of 2025. In the case of the Arcadia parking structure, the EIR states that 300 spaces be provided on "opening day" and that 800 spaces are "forecasted to 20-3

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be necessary" in 2025. There should be analysis within the EIR for Phase 2B as to how the projection year change may impact the timing and provision of these parking spaces in Arcadia. 20-3

- What is the relationship between project opening day and the projection year? Table 2-64 of the 2007 Final EIR for Phase 2A identifies the parking demands for all Phase 2 stations for opening day and the projection year 2025. In that table most all parking estimates for opening day of the 2B cities are significantly lower than the projection year. How does this relationship change in the current EIR? 20-4

Again, we thank you for this opportunity and look forward to the analysis of these questions within the EIR and the overall continued progress on the project.

Sincerely,

Philip A. Wray
Deputy Director of Development Services/City Engineer

cc: Dominic Lazzaretto, City Manager
Jason Kruckeberg, Assistant City Manager/Development Services Director
Linda Hui, Transportation Services Manager

Attachment: February 4, 2011 Letter

City of Arcadia

Development Services Department

Jason Kruckeberg
Assistant City Manager/ Development Services Director

February 4, 2011

Ms. Lisa Levy Buch, Director of Public Affairs
Metro Gold Line Foothill Extension Construction Authority
406 East Huntington Drive, Suite 202
Monrovia CA 91016

SUBJECT: Notice of Preparation of Environmental Impact Report

Dear Ms. Buch:

Thank you for this opportunity to review and comment on the Notice of Preparation of the Environmental impact report for Metro Gold Line Foothill Extension Phase 2B. We support the project and your efforts to environmentally clear this important extension.

We have some comments to be considered. The impacts on the operational capabilities of the stations and parking structures in the Phase 2A segment should be given serious consideration when developing the Phase 2B project scope. How will the Phase 2B project address impacts on Phase 2A facilities? As part of the Phase 2B project, will a new ridership forecast be done? If the new forecast is significantly different from the one that was done as part of Phase 2A project, some mechanisms need to be put in place to remedy any impact on the Phase 2A segment (station, parking, etc.).

Again, we thank you for this opportunity and look forward to the continued progress on the project.

Sincerely,

Philip A. Wray
Deputy Director of Development Services/City Engineer

PAW:pa

cc: Jason Kruckeberg, Assistant City Manager/Development Services Director
Linda Hui, Transportation Services Manager

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20. Wray, Philip, Deputy Director, Development Services/City Engineer, City of Arcadia, October 4, 2012.

Response 20-1

Your support of the project is acknowledged.

Response 20-2

The travel demand model that was used for the 2007 EIR has been updated to meet the Federal Transit Administration's (FTA) requirements so that the project will qualify for federal New Starts funding. Metro updated the model, now called the Corridor Base Model-2009, and presented it to FTA on September 30, 2009, obtaining their concurrence to utilize the new model for the next phases of the corridor projects and transit studies. The Corridor Base Model-2009 was used to develop the ridership forecasts in the current EIR for the Metro Gold Line Foothill Extension Azusa to Montclair project (formerly named "2B").

In addition to updating the model, the horizon year for the project is now 2035 (versus 2025 considered previously), resulting in higher population and employment and a more extensive rail network. In summary, the ridership forecasts have changed for the following reasons:

- Forecast year is 2035
- Socioeconomic factors (population, employment) are higher
- Measure R rail projects expected to be built by 2035 are included. The Metro Gold Line Foothill Extension runs as part of the North-South Line, connected to the current Metro Blue Line by the Regional Connector project in downtown Los Angeles.
- The "constrained" run of the model was used to allow only as many park and ride trips as there are actual parking spaces available. Previously, demand was unconstrained to evaluate the total demand that would exist if parking, theoretically, were in unlimited supply.

The constrained model run is conservative in its estimation of ridership. It incorporates the same framework as the model used previously but takes into account the limited parking at each station location, a factor which affects ridership in the Gold Line's Park and Ride market.

The table below provides a comparison of the estimated ridership per station between the 2007 EIR for the Pasadena to Azusa project and the current EIR for Azusa to Montclair. Although the model predicts more passengers at each station, the parking facilities will not be impacted because the model assumed that parking is constrained to the number of parking spots the Construction Authority plans to construct (please see Response 20-4).

Station	"2A" Pasadena to Azusa EIR (2007) Ridership	"2B" Azusa to Montclair EIR (2012) Ridership
Arcadia	1,852	2,459
Monrovia	1,593	2,481
Duarte	1,315	1,683
Irwindale	2,166	2,009
Azusa	1,117	2,074
Citrus	765	2,440
Total	8,808	13,144

Response 20-3

The Arcadia Station is in the previous phase of the project, and was not part of the project evaluated in the Draft EIR. In the Pasadena to Azusa ("2A") EIR, the travel demand model identified the need for 300 parking spaces at Arcadia Station in opening year 2012 and 800 parking spaces in the forecast year 2025. For the proposed project, the opening year is 2020 and the forecast year is year 2035 (see Response 20-2). Therefore, in the Draft EIR analysis, it was assumed that there would be 800 parking spaces at the Arcadia Station in both the opening year 2020 and forecast year 2035 model runs. These projections do not change the timing or provision of parking in Arcadia.

Response 20-4

The table below presents the ridership and parking demand forecasted for the Arcadia Station in opening year and in forecast year based on the Draft EIR model runs:

	Opening Year 2020		Forecast Year 2035	
	Ridership	Parking Demand	Ridership	Parking Demand
Arcadia	2,072	303	2,459	448

CITY OF CLAREMONT Community Development Department

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Via U.S. Mail and Email:
llevybuch@foothillextension.org

October 4, 2012

Ms. Levy Buch
Construction Authority Director of Public Affairs
Metro Gold Line Foothill Extension Construction Authority
406 E. Huntington Drive, Suite 202
Monrovia, CA 91016-3633

Dear Ms. Buch:

Notice of Availability of Draft EIR
for the Metro Gold Line Foothill Extension—Azusa to Montclair

The City of Claremont appreciates the opportunity to comment on the Draft EIR for the Metro Gold Line Foothill Extension–Azusa to Montclair. The following are Claremont's comments:

1. Incorrect Identification of Adjacent Land Uses: Throughout the EIR, the uses adjacent to and surrounding the Metro right-of-way in Claremont are incorrectly described as typically commercial and industrial. In Claremont, the amount of residential, park, and educational uses along the project alignment exceed the amount of commercial and industrial property abutting the right-of-way. Specific corrections are as follows:

   A. The route description provided on page 1-27 fails to acknowledge that abutting the north side of the right-of-way are a City park east of Cambridge Avenue, and a mixed residential/commercial complex between Cornell and Oberlin Avenues. Abutting the south side of the right-of-way are multiple- and single-family residential areas between Carnegie and Mountain Avenues, a residential complex between Spring Street and College Avenue, a City park west of Elder Drive, and single-family homes on Elder Drive west of Claremont Boulevard. 21-1

   B. The land use maps on Figures 3.10-22 through 3.10-24 are incorrect as follows: 21-2

      - The following residential complexes are incorrectly identified as commercial:
        - Residential complex east of Carnegie Avenue, north side of Right-of-Way.

- Senior residential complex east of Mountain Avenue, north of the right-of-way.
- Part of the residential complex west of Mountain Avenue, north side of the right-of-way.
- The apartment complex east of Cambridge Avenue, north of the right-of-way.
- Residential complex east of Carnegie Avenue, south of the right-of-way.
- Part of the condominium complex on West First Street, on the north side of the right-of-way.
- Two of the single-family homes on Elder Drive, south of the right-of-way.

21-2

- The City park east of Carnegie Avenue, north of the right-of-way, is incorrectly shown as multi-family residential.
- The Mixed-Use (commercial/residential) development between Cornell and Oberlin Avenues, north of the right-of-way, is incorrectly identified as industrial.
- The Keck Institute (private college) on Wharton Drive, south of the right-of-way is incorrectly identified as industrial.
- The residential complex east of Indian Hill Boulevard, south of the right-of-way is incorrectly identified as "other."
- The residential complex west of College Avenue, south of the right-of-way, is incorrectly identified as Industrial.

C. Paragraph 3.10.2.5 on page 3.10-32 incorrectly states that the project alignment would be entirely bordered by industrial, commercial, or university properties aside from residential areas on the north side between Carnegie Avenue, Indian Hill Boulevard, Claremont Boulevard, and the LA-SB county line. See the above paragraph for corrections. The last sentence of this paragraph is unclear. 21-3

D. The paragraph on page 3.10-40, which describes uses and zoning surrounding the Claremont Station, is unclear and incorrectly identifies the uses and zoning of the surrounding properties. The surrounding area to north includes commercial and office uses in the historic Claremont Village (CV) zoning district. Multi-family residential uses located to the south and office uses to the west are in the Mixed-Use 2 (MU2) zoning district. The proposed parking area located on the existing Metrolink parking site is also in the MU2 zoning district. The water utility site is zoned Public (P). 21-4

2. Required Grade Crossing Improvements: To mitigate the impact of the train horns on the sensitive uses in the areas adjacent to and nearby the right-of-way, it is 21-5

important that a "quiet zone" be established. To ensure that Claremont would be eligible for the quiet zone, all of the grade crossings in Claremont must have supplemental safety measures such as four quadrant gates, pedestrian gates, and other supplemental safety measures to prevent LRT collisions with vehicles, pedestrian, and bicycles. The four quadrant gates, pedestrian gates, and other supplemental safety measures for all four grade crossings should be specifically included as mitigation for potential transportation and noise impacts. 21-5

A. Only the Indian Hill Boulevard grade crossing was evaluated beyond the initial planning-level assessment that determined that the "At-Grade Should Be Feasible." Additional analysis should be done of the other three grade crossings to determine appropriate improvements to address safety issues. This analysis should determine the need for four quadrant gates and pedestrian gates at each grade crossing in Claremont. 21-6

B. On page 2-90, it is stated that the analysis of the Indian Hill Boulevard grade crossing determined improvements are required to maintain safe operations with an on-grade configuration and that the improvements in Table 20-30 are potential recommendations. On page 2-101, in Table 2-30, it is concluded that there would be no impact with the incorporation of the proposed improvements listed in the table. The listed improvements, however, are not included as mitigation measures for the identified impacts. If the improvements are required to address the identified impacts, they should be included as mitigation measures. 21-7

C. On page 3.11-62, the College Avenue grade crossing is <u>not</u> listed as eligible for petition for a quiet zone. It is important to Claremont that the College Avenue grade crossing be eligible to petition for a quiet zone and that the necessary improvements for eligibility be included as part of the mitigation for the Gold Line project. If the quiet zone is not established a number of sensitive uses between Indian Hill and Claremont Boulevards would be negatively affected by the train horns. All four grade crossings must be equipped with all safety equipment (including four quadrant gates and pedestrian gates) in order to implement the quiet zone along the entire right-of-way through Claremont. 21-8

D. On page 3.12-16, it is stated that only three grade crossings would include quad gates, but does not identify which grade crossings would include quad gates, and which one would not. The EIR should provide more specific information on the improvements proposed/required of all four all four grade crossings in Claremont. 21-9

3. <u>Sound Barrier</u>: Sound barriers are proposed adjacent to residential areas along the project alignment. However, in Figure 3.11-27, no sound barriers are shown between Carnegie and Mountain Avenues adjacent to the two residential complexes located north of the alignment (Claremont Cluster Numbers WB1 and WB2), and the two residential complexes to the south (Claremont Cluster Number EB1.) As the predicted noise impacts were determined "severe" for these cluster areas per Table 3.11-18, the sound barriers on the north and south sides of the alignment should be extended west to the City boundary to mitigate the noise impacts to the residents of these areas. 21-10

4. Metrolink Vibration Impacts: Because the existing residential land uses were not correctly identified along the right-of-way, the vibration analysis fails to identify the vibration impacts to these residential uses, specifically within clusters number EB4, EB5 and EB 6. Table 3.11-20 incorrectly identifies only five dwelling units within EB 4 (Indian Hill Boulevard to College Avenue) where there are two large residential complexes, one east of Indian Hill Boulevard, and the other west of College Avenue. No dwelling units were identified in EB5 and EB6 (between College Avenue and Claremont Boulevard), an area where the development consists entirely of single-family dwelling units that back up to the right-of-way. From Indian Hill Boulevard to the City boundary, the Metrolink track will be relocated south to within 20-22 feet of these sensitive uses in EB4, EB5, and EB6, as well as those correctly identified in EB7 (Claremont Boulevard to City boundary). In all four cluster areas, vibration levels are shown to increase more than 3 VdB to 70-75 VdB. Currently in the EIR, vibration mitigation is proposed only for the residential development was correctly identified. Vibration mitigation should be added for the housing complex west of College Avenue (EB4 partial), and for the residential development along Elder Drive (EB5 and EB6). 21-11

5. Descriptions of Freeways and Arterials: On page 2-17, the descriptions for Indian Hill Boulevard and South Mills Avenue/Claremont Boulevard are incorrect. Indian Hill Boulevard is a four-lane secondary arterial between Base Line Road and Foothill Boulevard, a two-lane secondary arterial between Foothill Boulevard and First Street, a four-lane secondary highway between First Street and Arrow Highway, and a four-lane major arterial south of Arrow Highway. South Mills Avenue/Claremont Boulevard is a four-lane secondary arterial north of Arrow Highway and a two-lane collector roadway south of Arrow Highway. 21-12

6. Claremont General Plan goals and policies: Contrary to what is stated in the EIR, the City of Claremont General Plan does have police service, fire protection, and educational policies that would be applicable to the project. See public safety policies 6-1.2, 6-2.1, 6.2-7, 6.9-1, 6-9.4, 9-8.8, and community facilities policies 7-2.9, 7-5.5, 7-10.5. 21-13

7. Community Facilities and Services: Figure 3.5.9, the map of community facilities and services, does not identify Claremont's government center (City Hall, Claremont Library, Claremont Post Office), College Park, El Barrio Park, Rosa Torrez Park, Keck Graduate Institute, Oak Park Cemetery, Blaisdell Park and Memorial Park. All these facilities are within the area shown in the map, should be identified, and included in the analysis of impacts on community facilities and services.

   A. Rosa Torrez Park and El Barrio Park should be included in the list of parks within 0.25 miles of the project (Table 3.5-6). Claremont City Hall, Claremont Library, and the post office should be included in the list of government centers in the study area (Table 3.5-7).

   B. On page 3.5-24, it is stated incorrectly that there are three college/universities within 0.25 of the project alignment. With Keck Graduate Institute, there are four.

21-14

C. On page 3.5-25, the analysis fails to acknowledge that Keck Graduate Institute and Pomona College are adjacent to the project. Pomona College dorms are adjacent to the proposed parking structure site and could be impacted by construction-related activities.

D. On page 3.5-26, Rosa Torrez Park, which is adjacent to the project, should be included in the analysis of parkland.

E. On page 3.5-26, Claremont City Hall, Claremont Library, and the post office should be included in the analysis of government centers.

21-14

F. On page 3.5-28, there is not sufficient analysis on the potential impacts to students attending Oakmont School. It is stated that there is no direct access from the school to the right-of-way. This is incorrect as the school is located on College Avenue, which would provide direct access to the project alignment and the proposed parking structure. Traffic on College Avenue in the vicinity of the school is already congested and construction traffic could impact the safety of children walking to and from the school, and children being picked up by parents who park on College Avenue.

21-15

8. Cultural Resources: City of Claremont Preservation Goals and Policies: On page 3.6-7, the discussion of Claremont's ordinances and plans for the protection of Claremont's historical and cultural resources should include the goals and policies from Claremont's General Plan, specifically Goals 2-5, 2-11, and 2-14, and the specific policies that support these goals. The Citrus Heights Packing House, located between Cornell Avenue and Oberlin Avenue, is adjacent to the project alignment and is more than 50 years old. As such it should be included in the analysis of resources more than 50 years old.

21-16

9. Land Use and Planning: The discussion of land uses, land use designations, applicable plans and policies of Claremont on page 3.10-5 should include a discussion of the Claremont Village Design Plan and the Village Expansion Specific Plan as these plan areas are adjacent to the project alignment.

21-17

If you have any questions, please contact me at (909) 399-5470.

Sincerely,

Brian Desatnik
Director of Community Development

c: Craig Bradshaw, City Engineer

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21. Desatnik, Brian, Director of Community Development, City of Claremont, October 4, 2012.

Response 21-1

The Draft EIR Land Use section generally describes the broad land uses adjacent to the project alignment that include predominant land uses and do not include parcel-by-parcel information. The Draft EIR identified surrounding land uses in the City of Claremont as residential, commercial, industrial, and institutional.

In response to the comment, a follow-up land use survey of the alignment was conducted on November 12, 2012. The results of the land use survey were then compared to the current County of Los Angeles land use data and generally, the land use survey was consistent with land uses identified in the County of Los Angeles data. This information, together with the updated land use maps based on the current County of Los Angeles data, rather than the previously used SCAG maps which showed existing land uses on regional scale, have been included in the Final EIR, including the updated information about the specific uses abutting the project route as identified in the comment. The updated information does not change the land use analysis' conclusions that the project would not divide an established community, and would be compatible with surrounding land uses and consistent with the local plans and policies.

Response 21-2

Please see Response 21-1 regarding land use analysis methodology, land use categories, and the updated information.

Based on the November 12, 2012 survey and the current County of Los Angeles data, the maps in Section 3.10 have been updated accordingly to include the information provided. The updated information does not change the land use analysis' conclusions that the project would not divide an established community, and would be compatible with surrounding land uses and consistent with the local plans and policies.

Response 21-3

This information has been updated in the Final EIR as indicated in Responses 21-1 and 21-2, also the word "entirely" has been deleted in the last paragraph in Section 3.10.2.5 to clarify the information. As noted previously, these updates do not change the conclusions of the land use analysis that the project would not divide an established community, and would be compatible with surrounding land uses and consistent with the local plans and policies.

Response 21-4

Please see the response to comment number 21-1 regarding land use analysis methodology and updates to the Final EIR. The zoning designations were correctly described in Section 3.10 of the Draft EIR. Section 3.10.3.4 of the Draft EIR describes the surrounding area as zoned CV and MU2. This information has been updated in the Final EIR to include the zoning for the water utility site as Public (P).

Response 21-5

The four quadrant gates at grade crossings are part of the project as described in Chapter 1 of the EIR and therefore they are not mitigation measures. All at-grade crossings in the City of Claremont, with the exception of Claremont Boulevard, will be equipped with four quadrant gates and therefore would not foreclose eligibility for a quiet zone designation. Implementing a quiet zone requires cooperation by all jurisdictions involved with the grade crossing and is contingent on approval by the Federal Railroad Administration (FRA). The Construction Authority cannot declare a quiet zone but will cooperate with the Cities in preparing petitions to the FRA for quiet zone designations. A four quadrant gate at Claremont Boulevard is unnecessary as the highway median is used would discourage northbound and southbound traffic crossing the tracks in the wrong direction. This configuration is described in Section 3.12.2 of the SCRRA Highway-Rail Grade Crossings Recommended Design Practices and Standards Manual. At this location a third and fourth gate could theoretically be installed to achieve full "quad gate" status but the extra long median on both sides of the tracks (which include SCRRA) make this unnecessary and impractical, and the proposed configuration still provides similar safety features to a quad gate.

Response 21-6

As stated in Section 2.6.7 of the Final EIR, Metro's *Policy for Grade Crossing for Light Rail Transit* provides a framework for assessing traffic safety and operations related to at-grade crossings and identifying the need for safety treatments or grade separations. The policy includes a systematic review process and identifies corresponding "milestones" before determining the feasibility of a grade crossing. The Milestone 1 – Initial Screening evaluation is performed first followed by Milestone 2 – Detailed Analysis and Milestone 3 – Verification. Milestones 2 and 3 go into a greater detailed analysis and are performed if the results of Milestone 1 show "Possible At Grade Operation" or worse. This detailed analysis of the grade crossing (Milestone 2), includes a queuing analysis and other detailed evaluations.

The Milestone 1 analysis considered all four grade crossing locations in the City of Claremont (Table 2-31 in the Draft EIR). The Milestone 1 analysis concluded that "at grade should be feasible" at all four grade crossings in Claremont and none required further analysis in the Milestone 2 report. Of the four crossings, Indian Hill Boulevard has the highest traffic volumes, but is still within the range of feasibility for an at-grade crossing. The Indian Hill Boulevard crossing was further analyzed in the Draft EIR at the request of the City. Table 2-30 in the Draft EIR listed a range of possible improvements to the Indian Hill grade crossing improve safety. As stated in Section 1.3.3.1 of the Draft EIR, each at grade crossing would have supplemental safety equipment, including quadrant (quad) gates, which serve as an all-way barrier between the LRT tracks and the roadway that prevents LRT collisions with vehicles, pedestrians or bicycles.

Response 21-7

The recommended improvements listed in Table 2-30 in the Draft EIR are subject for further refinement and discussion with the Cities. One of the proposed improvements for each of the grade crossings listed in the table will be implemented to improve the safety of grade crossings. The Construction Authority will work with the Cities to determine the most effective improvements to be implemented. These improvements have been listed in Section 2.6.3 of the Final EIR.

Response 21-8

The table referenced on page 3.11-62 of the Draft EIR lists at-grade crossings near sensitive receivers where noise impact was identified. Noise mitigation measures, such as implementing a quiet zone, are only specifically recommended for locations where noise impact is predicted. However, all four grade crossings will be equipped with all safety equipment (including four quadrant gates and a pedestrian gate) that should be sufficient to meet the Federal Railroad Administration's (FRA) requirement for designation of a quiet zone.

Implementing a quiet zone requires cooperation by all jurisdictions involved with the grade crossing and is contingent on approval by the FRA. The Construction Authority cannot declare a quiet zone but will cooperate with the Cities in preparing petitions to FRA for quiet zone designations. During that collaboration, the Cities can identify the grade crossings where quiet zones would be beneficial to the City, even if the intersection was not specifically recommended.

Response 21-9

Page 3.12-16 of the Draft EIR states that the at-grade crossings at Claremont Boulevard would not have full quadrant gates, but would have equivalent safety/prevention features as stated in the Response 21-5 above. The remaining three at-grade crossings in the City of Claremont (Cambridge Avenue, Indian Hill Boulevard and College Avenue) would be equipped with four-quadrant gates.

Response 21-10

Table 3.11-18 in the Draft EIR did not identify a significant noise impact at Claremont clusters WB1, WB2, or EB1. Therefore, no mitigation is required at these locations.

Response 21-11

The two large residential complexes located east of Indian Hill Boulevard and west of College Avenue were included in the noise and vibration impact assessment. The right-most column in Table 3.11-20 of the Draft EIR lists the number of dwelling units where impact is predicted in the cluster, not the number of dwelling units that exist in that cluster. The footnote in the table has been updated to clarify this information.

Vibration impact is identified if the future predicted vibration level exceeds the current level by 3 dB and where the future predicted level exceeds the 72 VdB threshold. The future predicted level for EB5 and EB6 is 70 VdB. Therefore, no vibration impact was identified in Claremont cluster EB5 and EB6 based on the FTA impact thresholds, and thus the number of dwelling units with predicted impact in those clusters is zero. No vibration mitigation for the Metrolink tracks is recommended for clusters where the predicted levels do not exceed the impact threshold.

A vibration impact was identified at the EB4 cluster at five of the dwelling units in the complex, and vibration mitigation for the Metrolink tracks was recommended for the EB4 cluster (Mitigation Measure N-4).

Response 21-12

The information provided has been incorporated in the Final EIR in Chapter 2, Transportation. The traffic study considered traffic volumes based on daily counts where for the segment of South Mills/Claremont the daily counts were taken is north of Arrow Highway in the 4-lane segment and the traffic analysis is based on this configuration and did not change. For Indian Hill Boulevard, the daily counts were taken near the tracks in the segment between First Street and Arrow Highway, which has a 4-lane roadway configuration which is the one used in the traffic analysis. Per the descriptions within the daily count area, Indian Hill Boulevard is "a four-lane secondary highway" and South Mills/Claremont is "a four-lane secondary arterial" which were assumed to have the same roadway capacity of 32,000 vehicles per day for both 4-lane roadways.

Response 21-13

Information about the General Plan's policies, including policies calling for: the provision of alternative modes of transportation to schools and community facilities (policy 7-5.5); the facilitation of traffic flow in the City to provide effective and comprehensive policing services and enforce laws in an equitable way (policy 6-9.4); the facilitation of traffic safety for motorists and pedestrians through proper street design and traffic monitoring (policy 6-1.2); and the provision of timely responses to emergency and non-emergency police calls 24 hours a day (policy 6-9.3) have been included in Section 3.5 of the Final EIR.

Policies in the General Plan concerning the provision of the operation of a transportation system that provides access to social services (policy 7-2.9); and calling for access equality to educational and informational resources (policy 7-10.5) do not relate to the community facilities discussion. Nonetheless, the proposed project would be consistent with these policies because the project would provide an alternative mode of transportation and means to access social, educational, and other services throughout the region in a manner that does not distinguish or discriminate between users.

Policy 6.2-1 and policy 6.2-7 concern geological hazards, requiring proactive planning to identify and mitigate potential hazards and that major facilities located in hazardous zones submit design analysis, soils, geologic, and seismic report to the City to indicate that an undue hazard does not exist or would not result from construction of the project. Section 3.8, Geologic Hazards, of the Draft EIR discusses safety as it relates to geological hazards and concludes that mandatory compliance with current seismic safety and geotechnical safety requirements and regulations, including safety design standards would result in less than significant impacts related to geologic and seismic concerns.

Policy 6.9-1 calls for a state-of-the-art police station and up-to-date emergency communications systems for the Claremont Police Department and does not relate to the project. The project would not result in construction of or impede the provision of a new police station or associated communication technology.

Policy 9-8.8 does not appear to be part of the 2006 Claremont General Plan posted on the City's website.

Response 21-14

As discussed in Section 3.5 of the Draft EIR, a significant impact related to Community Facilities would occur if the proposed project would result in substantial adverse physical impacts associated with the

provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts.

College Park and El Barrio Park were included in Section 3.5 of the Draft EIR analysis and were listed as parks R-16 and R-17, respectively in Table 3.5-6 on page 3.5-21. Oak Park Cemetery, Blaisdell Park, and Memorial Park are all located approximately 0.5-mile from the project and therefore were not included in the 0.25-mile study area identified in Section 3.5 of the Draft EIR. The project would not impact Oak Park Cemetery, Blaisdell Park and Memorial Park.

Rosa Torrez Park, Keck Graduate Institute, and the Claremont Civic Center are within 0.25-mile of the alignment and the EIR has been updated to include these resources.

Impacts to Rosa Torrez Park would be limited to noise impacts during construction; however, those impacts would be reduced to less than significant levels with implementation of mitigation measures N-1 and N-2.

Similarly, Keck Graduate Institute and the Pomona College dorms would be subject to construction noise and potential increased vibration during operation as Metrolink tracks would be relocated closer to the Graduate school. However, construction noise impacts will be mitigated to less than significant levels, and the increase in vibration during operation would not exceed a significant impact threshold as described on in Section 3.11 of the Draft EIR. There would be no impacts to the Claremont Civic Center as a result of the project.

Response 21-15

As discussed in Section 3.5.3.3 of the Draft EIR, Oakmont Elementary School is located approximately 0.15-mile south of the project alignment. While College Avenue does provide access from the school to the project alignment, access is not direct because the school is separated from the alignment by a city block. This information has been included in the Final EIR as a further clarification.

In addition, the description of construction traffic and student safety in Section 3.5 as it relates to Oakmont Elementary School has been updated to include reference to the Construction Management Plan that would be required of the project, which includes safety measures, such as signage and fencing for pedestrians and motorists, alternative routes, and other measures.

Response 21-16

Section 3.6 of the EIR has been updated to include Claremont's General Plan Goals 2-5, 2-11, and 2-14 and the specific implementation policies. Goal 2-5 of the Claremont General Plan seeks to maintain and enhance Claremont's unique character. Goal 2-11 seeks to promote local history by encouraging context-sensitive design and development. Goal 2-14 seeks to retain and celebrate Claremont's history and heritage. The project would be consistent with each of these goals because project station and parking facility elements would be designed in accordance with City design guidelines and final design will be submitted for plan check to the City for their approval. In addition, Mitigation Measure VIS-5 states (in part) that: "All walls, structures and fences shall be properly screened or incorporate design features to improve appearance and reduce visual intrusion pursuant to the standards established in the Metro Rail

Design Criteria. The goal of the Criteria is to create site-adapted designs that reflect the specific urban context of each station and that enhance the neighborhood context in which the project is proposed. […] Station design shall feature materials, landscaping, art, and other elements consistent with Metro Rail Design Criteria, and developed by the station design team that includes architects, landscape architects, and lighting experts. Surface treatments shall be provided at the face of safety walls and at roadway/pedestrian portals, and landscaping along safety walls outside of the LRT portal shall be provided where feasible to provide wall screening." Accordingly, project design would comply and adhere to the City's preservation goals.

The Citrus Heights Packing House, located along 1st Street between Cornell Avenue and Oberlin Avenue, is not within the Area of Potential Effects (APE) for historic and archaeological resources. Section 3.6.1.3 of the Draft EIR stated that the APE for historic structures is defined as "all parcels directly affected by or adjacent to proposed station areas, construction staging areas or acquisition areas containing building that are 50 years of age or older and are not part of the existing railroad right-of-way." Because there are no proposed new structures, such as a station platform, parking structure, or power sub-station, that would be constructed adjacent to the Citrus Heights Packing House, it was not considered in the APE. The nearest station platform would be located east of Indian Hill Boulevard more than 950 feet from the Citrus Heights Packing House. Although the Packing House is adjacent to the right-of-way (ROW), the APE is not expanded outside the ROW where no changes or modifications are proposed. The existing ROW has been and is presently used as a rail corridor and the introduction of a new LRT transit system would not adversely change the existing use or conditions.

Response 21-17

The EIR has been updated to include discussion of the Village Expansion Specific Plan and the Claremont Village Design Plan in Section 3.10 of the Final EIR.

The Claremont Station is located just west of College Avenue, one block east of the Village Expansion Specific Plan and the Claremont Village Design Plan. The station would enhance the Specific Plan's goals related to land use planning near transit facilities. The station in close proximity to the Design Plan area would encourage pedestrian activity and would help to facilitate the Design Plan's goal to encourage pedestrian access to the area. The project would, therefore, not conflict with the goals of the Specific Plan or the Design Plan.

CITY OF San Dimas CALIFORNIA

October 4, 2012

Ms. Lisa Levy Buch, Director of Public Affairs
Metro Gold Line Foothill Extension Construction Authority
406 E Huntington Drive, Suite 202
Monrovia, California 91016

SUBJECT: Metro Gold Line Foothill Extension Azusa to Montclair - Draft Environmental Impact Report – Phase 2b

Dear Ms. Levy Buch:

The City of San Dimas has had an opportunity to review the recently released Draft Environmental Impact Report (DEIR). Below we have identified six primary areas of concern with the DEIR in addition to a number of miscellaneous concerns that need to be additionally addressed and or evaluated further.

***Parking Structure Issues*:**

1. ***Site Circulation:*** Ingress/egress access to structure from Walnut Avenue may restrict right-turn exit movements from parking garage driveway to Walnut Avenue due to possible safety medians at the grade crossing. The median may also restrict ingress/egress to the Sunnyside (located at 251 North Walnut Avenue) Senior complex. Evaluate impact of proposed safety medians to existing facilities and traffic turning movements. In addition, for better circulation and flow, an alternate egress should be evaluated that connects to Arrow Highway from the parking structure. 22-1

2. ***Impact to Emergency Services:*** With the Sheriff Sub Station and Fire Department located on Walnut Avenue north of grade crossing and parking structure. It should also be noted that emergency access services to the south will likely be adversely affected by a combination of the periodic at- grade crossing gate closures for operations and a confusing circulation pattern/increased traffic at AM/PM peaks. Evaluate impact to Sheriff, and Fire and Paramedics response time at proposed crossing/parking structure location. 22-2

3. ***Other Potential Issues Created by Limited and Restricted Entrance of Walnut Avenue.*** With limited street frontage and long driveways that lead to main parking structure limits the ability to provide any pickup/drop off zone. In addition, with pedestrian access to station being from San Dimas Avenue will likely result in extensive over use of both the private (CVS) and Municipal parking lot north of the tracks as well as the parking area at Grove Station for pickup/drop off zone. This intense use will also increase in commuters parking in these lots and place great deal of strain on the availability of parking for 22-3

existing business. To mitigate these issues consider option for additional parking including the feasibility of expanding the City municipal parking lot north of tracks for additional parking/drop off and pickups by expanding south into existing Metro Gold Line right of way. 22-3

4. ***Impact on City Maintenance Operations.*** The maintenance operations conducted at the site are critical to the daily ongoing operations of the City. The current location is ideally situated proximate to administrative operations at City Hall and relatively central to the City as a whole. It is difficult to identify a feasible site to replace the current one and maintain these same standards. The City is highly concerned that a suitable replacement site can be identified although we also understand that such determinations are made during site acquisition and not the DEIR stage of project development. 22-4

5. ***Other Parking Structure Location:*** Instead of City Yard explore the feasibility of an equivalent spaced structure that incorporates the required commuter parking, existing parking and the pickup/drop-off zone within City municipal parking lot located on the North West corner San Dimas Avenue and LRT crossing. 22-5

6. ***Aesthetics.*** In addition to the required high quality parking structure exterior design, the landscaping on Walnut Avenue entrance shall be designed to be inviting with some public art project. 22-6

Bonita/Cataract Grade Crossing:

The EIR chapter on transportation calls for this intersection to be signalized. However, due to the size and diagonal configuration of the Cataract Avenue/Bonita Avenue, additional studies need to be conducted that address the delay and impact to the traffic operation of an at-grade crossing. With Bonita/Cataract being an unusual intersection and non-standard it is likely that any analysis done for the DEIR assumes that rail alignment crosses through an intersection at a distance of 150 feet. In reality the intersection includes a wide median, which increases the size of the intersection and lengthens the distance that LRT alignment crossing Bonita. Based on existing alignment, the estimated length of this at grade crossing is about 270 feet measured from the northeast corner of the intersection to the southeast corner. This distance is significantly larger than the 150 feet assumed standard analysis. The additional length even with narrowing Bonita will likely have an impact on the traffic delay caused by the LRT crossing. Based on the projected headway of trains crossing the intersection, it's quite likely that intersection will be closed down creating potentially significant delays at the primary east/west entry to the Historic Downtown. This is an addition to normal intersection delays attributed due the proposed signal operations. More studies are needed to prove the feasibility of signalization that also takes into account intersection delays caused by crossing gate delay time and length of crossing. It should be noted that the Bonita/Cataract intersection is unique in both its geometrics and its importance as a Downtown entry. Delays and design options have not been adequately mitigated and no consideration has been given to potential economic impacts to the Downtown area. 22-7

Traffic Circulation and Street Impact

1. ***Crossing Delays:*** The DEIR should analyze and evaluate the expected queue length and expected delays for traffic at all crossings in the City. 22-8

2. ***Street Geometrics:*** Provide additional studies and reviews on impact of the proposed freight track separation being 30' to the westbound LRT from Monte Vista to Walnut. Evaluate the impact of this on all the north and south bound traffic on Monte Vista, San Dimas Avenue and Walnut Avenue. 22-9

3. ***San Dimas Avenue and Second Street:*** A signal warrant analysis should be conducted to determine if signalization at Second Street & San Dimas Avenue is warranted in front of Historic Walker House 22-10

Noise & Vibration:

The DEIR identifies several locations for sound walls and vibration controls. The following additional considerations are needed:

- Sound barrier study shall be extended to include the residential areas on the north west side of Gladstone and railroad crossing 22-11
- With Phase 2 and 3 Grove Station residential project underway south of the proposed station location on San Dimas Avenue, sound barrier shall be considered to mitigate the impact of train, warning horns and other miscellaneous sounds generated that will impact residents residing on south side of the station (Figure 3.11.18). 22-12

TPSS Locations:

The DEIR now indicates two power stations in San Dimas.

1. Why does San Dimas have two TPSS in its jurisdiction (i.e. TPSS #4 and #5) 22-13
2. TPSS #4 location negates the potential viability of developing entire property for a highly visible and viable commercial development. Consider other locations. 22-14
3. TPSS #5 location negatively impacts the existing historic Train Depot. Consider relocating it from its proposed location to north east corner or locations. 22-15
4. Assess any noise impacts from TPSS located adjacent to any residents 22-16

In general any proposed TPSS located in San Dimas shall be architecturally approved by the City and the subject lot or area is irrigated and landscaped to an acceptable standard. 22-17

Other Miscellaneous Concerns:

1. Remove the existing spur/siding line at southeast corner of Bonita Avenue and Cataract Avenue. 22-18
2. Prepare a drainage study to analyze the capacity of all existing storm drains, pipes and culvert systems crossing with the Metro right of way to be in compliance with LA County standards. 22-19
3. Discuss the noise impacts of warning horns. 22-20
4. Aesthetics and visual disturbances, especially poles and overhead wires to the Historic Downtown 22-21 22-22
5. Financial impact to the City on station construction and enhancements. 22-23
6. Adequacy of growth inducing impacts analysis.

Should you wish to discuss any of the above concerns further, please contact Mr. Krishna Patel, Director of Public Works at (909) 394-6245 or Mr. Larry Stevens, Assistant City Manager for Community Development at (909) 394-6281.

Sincerely,

Curtis Morris
Mayor

cc: Krishna Patel, Director of Public Works
Larry Stevens, Assistant to City Manager for Community Development
Blaine Michaelis, City Manager

10-12-05 kp

22. Morris, Curtis, Mayor, City of San Dimas, October 4, 2012.

Response 22-1

As requested by the City, the ingress/egress access to the parking structure from Walnut Avenue based on the location of the safety median and the potential for an alternate egress to Arrow Highway will be considered as part of preliminary engineering for the project.

Response 22-2

Impacts to the Sheriff's substation and Fire Department located on Walnut Avenue were evaluated in Section 3.5 of the Draft EIR. The evaluation concluded the because the project would use the existing at-grade rail crossing at Walnut Street , response times south of the alignment may be increased slightly. However, it is not anticipated that such increase would be substantial because the amount of time it would take for a train to pass would be brief (less than one minute), and multiple alternate routes cross the alignment. In accordance with the Construction Management Plan required for the project, access disruptions would be minimized by developing and implementing alternate routes or amending service areas, as necessary, to maintain emergency service coverage and response times following project completion. As concluded in the Draft EIR, with implementation of the identified mitigation measure impact would be less than significant.

Response 22-3

The design of the station area and parking structure is refined as the design of the project progresses. The Construction Authority will finalize the specifics of the pick-up/drop-off zone locations, considering input from the City. Overuse of the private lots north of the tracks for pick-up/drop-off can be minimized by refining the internal site circulation through design and by restricting pick up and drop off activities on private lots. The number of parking spaces at each station along the project is based on the boardings projections from the transportation model, which estimated that approximately 400 parking spaces would be needed at the San Dimas Station by 2035 (Section 2.6.4 of the Draft EIR). Therefore, the current design of the garage should be adequate to meet demand and additional spaces are not warranted.

Response 22-4

The comment concerning challenges to locating a suitable replacement site for City maintenance operations is acknowledged. The Construction Authority would seek to acquire the city yard site from the City, and would provide the City with any applicable relocation benefits.

Response 22-5

The municipal parking lot location was not considered since the proposed parking garage location avoids pedestrian crossing of a roadway intersection to reach the station, and is therefore more convenient.

Response 22-6

The Construction Authority is committed to neighborhood context-appropriate design. All design elements follow Metro Rail Design Criteria, which state that all structures, walls and fences are to be properly screened or shall incorporate design features that enhance appearance and respect the neighborhood design setting in which they are proposed. Public art is proposed at each railroad station facility, consistent with the Design Criteria.

Response 22-7

The traffic analysis in Chapter 2 of the Draft EIR did take into consideration the unique configuration of the Bonita/Cataract intersection. Due to this configuration, the proposed signalization would include an extended clearance interval times (yellow times) to reflect the longer distance that needs to be cleared by a traveling vehicle. This signalization was assumed in the traffic impact analysis. Table 2-27 and Table 2-28 of the Draft EIR conclude that the project would not result in significant traffic delays at the Bonita/Cataract intersection. In addition, the Milestone 1 grade-crossing analysis identified the Bonita/Cataract intersection as a location that would require detailed engineering-level operation and safety analyses, concluding that an improvement would be required to maintain safe operations with an at-grade configuration. The range of potential improvements is presented in Table 2-30, which includes a recommendation to reconfigure the intersection as a traffic island or re-align Bonita Avenue and reduce the median width to reduce the size of the intersection. The Construction Authority will continue to work with the City of San Dimas to further refine the design of the crossing to incorporate appropriate improvements as the project design progresses.

Response 22-8

As stated in Section 2.6.7 of the Draft EIR, Metro's *Policy for Grade Crossing for Light Rail Transit* provides a framework for assessing traffic safety and operations related to at-grade crossings and identifying the need for safety treatments or grade separations. The policy includes a systematic review process and identifies corresponding "milestones" before determining the feasibility of a grade crossing. The Milestone 1 – Initial Screening evaluation is performed first followed by Milestone 2 – Detailed Analysis and Milestone 3 – Verification. Milestones 2 and 3 go into a greater detailed analysis and are performed if the results of Milestone 1 show "Possible At Grade Operation" or worse. This detailed analysis of the grade crossing (Milestone 2), includes a queuing analysis and other detailed evaluations.

The Milestone 1 analysis considered all seven crossing locations in the City of San Dimas (Table 2-31 in the Draft EIR). The initial screening results for the grade crossings within the City of San Dimas showed three of the seven crossing locations requiring a detailed analysis. These three crossing locations are Gladstone Street, Cataract Avenue/Bonita Avenue and San Dimas Avenue. The Draft EIR analyzed and evaluated expected queue length and delays at these three crossing locations and the adjacent signalized intersections. The Draft EIR also included recommendations for provision of roadway and safety measures to improve the operation of the these three crossing locations, such as provision of four quadrant gates and pedestrian gates, implementation of grade crossing safety education programs for local schools, and installation of potential anti-queuing controls for the adjacent signalized intersections. One of these recommendations will be implemented as agreed to by the City of San Dimas and the Construction Authority.

Response 22-9

As stated in Section 2.6.7 of the Draft EIR, Metro *Policy for Grade Crossing for Light Rail Transit* provides a framework for assessing traffic safety and operations related to at-grade crossings and identifying the need for safety treatments or grade separations. The policy includes a systematic review process and identifies corresponding "milestones" before determining the feasibility of a grade crossing. The Milestone 1 – Initial Screening evaluation is performed first followed by Milestone 2 – Detailed Analysis and Milestone 3 – Verification. Milestones 2 and 3 go into a greater detailed analysis and are performed if the results of Milestone 1 show "Possible At Grade Operation" or worse. Milestone 1 analysis accounts for the train frequency, lane capacity and crossing traffic. Milestone 2 includes an assessment of queuing length between and the rail crossing and the adjacent intersections.

The Monte Vista Avenue crossing and the Walnut Avenue crossing were analyzed in the Milestone 1 analysis, which concluded that at-grade operations should be feasible at both crossings (Table 2-31 in the Draft EIR). The San Dimas Avenue crossing was analyzed in both Milestone 1 and Milestone 2 analyses and at-grade operations were deemed possible at this location (Table 2-31 in the Draft EIR). The 30-foot separation between the freight and LRT tracks was part of queuing length calculations in the Milestone 2 analysis for the San Dimas Avenue crossing. The proposed 30-foot separation between the freight and LRT tracks is expected to affect the clearance time of the traffic through the wider crossing section and reduce the queuing storage between the rail crossing and the adjacent intersections. The Draft EIR has included recommendations for provision of roadway and safety measures to address the operation of the wider crossing locations, such as provision of four quadrant gates and pedestrian gates, implementation of grade crossing safety education programs for local schools, and installation of potential anti-queuing controls for the adjacent signalized intersection (Table 2-32 in the Draft EIR). One of these recommendations will be implemented as agreed upon by the City of San Dimas and the Construction Authority. Specific design treatments for the proposed wider crossing section at Monte Vista Avenue, Walnut Avenue and San Dimas Avenue would be developed and evaluated as the project's design is refined as part of preliminary engineering for the project.

Response 22-10

Because the Draft EIR identified a significant traffic impact at the San Dimas Avenue and Second Street intersection, and therefore a mitigation measure to signalize this intersection (Mitigation Measure LTR-2) was recommended. As requested by the City, an additional signal warrant analysis will be conducted during the preliminary engineering phase of the project to determine whether the identified signalization is still warranted. To clarify, the statement "when warranted" was added to this measure in the Final EIR. The Construction Authority will work cooperatively with the City of San Dimas to best mitigate the identified traffic impact as the design of the project is being refined.

Response 22-11

The residences on the northwest side of Gladstone Street were included in the noise analysis in Section 3.11 of the Draft EIR. The boundary between the cities of Glendora and San Dimas was considered to be Gladstone Street. Those residences were labeled as Glendora cluster EB12 in Figure 3.11-15 of the Draft EIR. No noise impact was predicted at those residences as shown in Table 3.11-10 of the Draft EIR and therefore no mitigation is necessary.

Response 22-12

The noise and vibration impact analysis is based on existing land uses at the time that the environmental assessment for the project was initiated, and thus impacts are not assessed for any new development whose planning began after the initiation of the environmental assessment.

In addition, a "quiet zone," in which train horns are not sounded except in emergencies, could be implemented even if it was not recommended as a noise mitigation measure. Implementing a quiet zone requires cooperation by all jurisdictions involved with the grade crossing and is contingent on approval by the Federal Railroad Administration (FRA). The Construction Authority does not have the authority to declare a quiet zone but will cooperate in preparing petitions to FRA for quiet zone designations. Standard grade crossing safety equipment for the Metro Gold Line Foothill Extension should be sufficient to meet FRA's supplemental safety measures requirement for designation of a quiet zone. The Construction Authority will work with local jurisdictions to try to secure quiet zones where appropriate. During that collaboration, the Cities can identify the grade crossings where quiet zones would be beneficial to the City.

Response 22-13

Section 1.3.3.1 of the Draft EIR states that TPSS facilities would be located in approximately 1.0 to 1.5 mile intervals. In order to space the TPSS in appropriate intervals to properly power the catenary (overhead wires), two TPSSs must be located within the City of San Dimas. The TPSS locations in the City of San Dimas are located as unobtrusively as possible, requiring minimal property acquisition for one of TPSS facilities and resulting in minimal environmental impacts. TPSS 4 is adjacent to the SR-57 freeway and TPSS 5 is located within Metro-owned right of way.

Response 22-14

TPSS B-4 is proposed in the Draft EIR as being located directly south of the Metro-owned right of way on a small, undeveloped parcel just east of, and directly adjacent to, the Route 57 freeway. As identified in Appendix C of the Draft EIR, a partial acquisition of 3,200-3,800 square feet is proposed for TPSS B-4. This acquisition is approximately 14.5 - 17.2% of the 22,060 square foot parcel. The Construction Authority disagrees that the partial acquisition and installation of a TPSS facility substantially negates the viability of this parcel. As referenced in Response 22-13, the spacing of TPSS facilities is driven by power distribution requirements, and the Construction Authority believes the placement of B-4 at the current proposed location is the most unobtrusive placement possible.

Response 22-15

Section 3.6, Cultural Resources, of the Draft EIR included an evaluation of the project's effects on the historic Train Depot. As stated in Section 3.6.3.4 of the Draft EIR, "given the small size of the TPSS and intervening distance from the depot and the fact that no freight or passenger openings would face the TPSS, its installation would not change, alter, or directly or indirectly affect the San Dimas Railroad Depot in any manner. Therefore, the proposed project does not have the potential to cause a substantial change in the significance of the historical resource." Accordingly, the Draft EIR found that no significant impact would result at the Atchison, Topeka & Santa Fe Railway Depot—San Dimas Railroad Depot as a result of the TPSS B-5 facility, or any other elements of the proposed project.

Section 3.13, Visual Impacts, also addressed visual impacts of TPSS B-5 on the historic Train Depot and concluded that these impacts would not be significant. This information has been updated in the Final EIR to include an updated description of the location of the station, as follows:

> Although visual resources are present in this setting, including far-off views to mountain and local foothill ridgelines, no siting or construction-related effects on visual resources are anticipated due to the small size of the TPSS, its construction and placement on the south side of the railroad alignment, and the intervening distances from the depot and the buildings in old San Dimas' downtown area. These factors place it outside of key sight lines along Bonita Avenue near Monte Vista Avenue to and from the depot and the buildings in old San Dimas' downtown. The key visual resources in this setting (e.g., views of local ridgelines, and the presence of historic buildings), would remain unaffected because the building would be only one-story in height. Hence, the visual impacts of the TPSS building would not be significant.

Response 22-16

Noise impacts from TPSS units were assessed and predictions are presented in Table 3.11-24 of the Draft EIR. No noise impact was identified for the TPSS units located in San Dimas.

Response 22-17

During final design, all TPSS sites will be submitted for plan check to the appropriate jurisdictional agency for their approval. Please see the Response 22-6 regarding landscaping.

Response 22-18

The removal of the spur at Bonita Avenue and Cataract Avenue is not part of the project definition. Since this spur is not needed to operate the project, it could be removed in the future.

Response 22-19

As discussed on page 3.14-15 of the Draft EIR, the replacement of the existing culvert with a new culvert at Walnut Creek and improvements to the existing culverts or storm drains is part of the project definition. The exact specifications for these improvements, including drainage capacities and other characteristics, will be refined as part of the preliminary engineering work. The Construction Authority will work with the City of San Dimas and will comply with Los Angeles County Standards.

Response 22-20

Audible warnings are required by the California Public Utilities Commission at all gate-protected at-grade LRT/roadway crossings. The required audible warnings are ringing bells that are located on the masts of the crossing gates and the sounding of horns located on the lead vehicle of the trains. The requirements and general Metro practices for sounding LRV horns are:

- Every light-rail vehicle must be equipped with a bell or horn that generates a sound level of 85 dBA at a distance of 100 feet from the vehicle (CPUC General Order 143B). Most automobile horns generate a sound level of 80 to 85 dBA at a distance of 100 feet, so the LRV horn is slightly higher than most automobile horns.

- The light-rail vehicles are also equipped with a low-volume horn with a sound level of 75 dBA at 100 feet from the vehicle.
- The light-rail vehicle operator must sound an audible warning when approaching at-grade crossings protected by automatic crossing signals. The standard operating procedure on Phase 1 of the Metro Gold Line is to sound the low-volume horn (75 dBA at 100 feet) before at-grade crossings.
- The louder horn is used in case of emergency and at the discretion of the train operator.

Metro's operating procedure calls for train operators to sound the 75 dBA warning horn prior to all gate-protected crossings starting approximately 300 feet prior to the crossing. At speeds greater than 35 mph, the noise from the horn adds less than 1 dB to the noise exposure caused by the light-rail trains. In other words, the train noise combined with the horn noise is not significantly greater than the train noise alone. The regulations governing the LRT horns are much different than the regulations governing the freight horns. LRT horns are much quieter and are sounded for a shorter duration at each intersection.

In addition, it may be possible for the City to have this area designated as a "quiet zone" in which train horns are not sounded except in emergencies (please see Response 22-12),

Response 22-21

According to the San Dimas Town Core Design Guidelines, "recommended public improvements" include locating overhead power and telephone lines underground or along alleys. The Metro Rail Design Criteria require that the Construction Authority work with the City of San Dimas and the other local jurisdictions and stakeholder groups to achieve design approvals for project visual elements such as landscaping, retaining walls, pole locations, and overhead wire placement. By complying with Metro Rail Design Criteria, no visual impacts to historic downtown San Dimas are anticipated as a result of the project.

Response 22-22

The construction, operation, and maintenance of the project facilities, including the station, will be financed by the Construction Authority and Metro and will not require funding from the City of San Dimas. Any potential betterments/enhancements over and above the baseline design will be discussed and paid for by the City.

Response 22-23

As stated in Section 3.15 of the Draft EIR, p. 3.15-1, the CEQA Guidelines (Section 15126[d]) require a discussion of "…ways in which the project could foster economic or population growth, either directly or indirectly, in the surrounding environment…", including the project's potential to remove obstacles to population growth. The Draft EIR evaluation provides information that the project does not include and would not result in any substantial modifications to existing roadways, or other infrastructure facilities or service systems that could induce growth beyond that already envisioned for the region or by each corridor City. It further concludes that the proposed project is not anticipated to attract growth beyond that already envisioned in SCAG's 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Therefore, no significant impact would result. The Draft EIR provides an analysis that conforms to the requirements of the CEQA guidelines.

From:	Lisa Levy Buch
To:	Laura Langford
Subject:	FW: Metro Gold Line Extension - Claremont...
Date:	Thursday, October 04, 2012 12:47:03 PM

From: Del Caldwell [mailto:del.caldwell@verizon.net]
Sent: Thursday, October 04, 2012 12:28 PM
To: Lisa Levy Buch
Subject: Metro Gold Line Extension - Claremont...

Dear Ms Buch,
I would like to register my opposition to the Metro Gold Line extension through Claremont. The principal reasons for this position are: 23-1

1. The number of trains passing through Claremont now causes significant traffic back up on Indian Hill Boulevard and College Avenue making for unsafe driving conditions as is. I understand that the Metro Gold line would increase the number of trains by 10 per hour and therefore increase the number of stoppages accordingly. For the Village area this is unacceptable as the number of stoppages and waiting periods make this unsafe and not practicable for automobile traffic and busses on a single lane road near the crossing. 23-2

2. A Metro Gold line station and parking structure would result in significant increased traffic in the Village area especially on College Avenue, First Street, and Indian Hill Boulevard. There is considerable traffic already in the area for the commercial businesses, colleges, and elementary school and the latter two have significant pedestrian and bicycle traffic. There is also the existing transportation center with its attendant bus traffic. A parking structure and station in the area would make this an unsafe area and not practicable for bicycle, bus, and automobile use. 23-3

While I understand the interest in increased access east-west, the frequency of expected closures of north-south roads and the attendant traffic and safety problems make the Gold Line in Claremont a non-viable approach.

Respectfully,
D. H. Caldwell

Claremont resident,
906 Pomona Court
Claremont, CA

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23. Caldwell, D.H., October 4, 2012.

Response 23-1

Your comment in opposition of the project through Claremont is acknowledged.

Response 23-2

The traffic study evaluated the intersections of Indian Hill Boulevard/First Street, Indian Hill Boulevard/Santa Fe Street, and College Avenue/First Street. These three intersections are in close proximity to the grade crossings on Indian Hill Boulevard and College Avenue, respectively, and the traffic analysis took into consideration train operations and the increase in the number of trains per hour due to the project. The results of the analysis showed that the intersection of College Avenue/First Street will be impacted during the PM peak hour. Signalization of the intersection was proposed as a mitigation measure to alleviate this impact, in Section 2.8.2 of the Draft EIR (Mitigation Measure LTR-5).

Response 23-3

Traffic counts were conducted along College Avenue, First Street and Indian Hill Boulevard. The collected data were used to perform an existing conditions traffic analysis and the results showed the study intersections and roadway segments operating at good levels of service. Future traffic conditions were analyzed for the horizon year of 2035, which took into consideration increased traffic circulation in the vicinity of the train station and access to and from the proposed parking structure. The results showed the study intersections and roadway segments operating at acceptable levels of service except for the intersection of College Avenue/First Street, which will be impacted during the PM peak hour. Signalization of the intersection was proposed as a mitigation measure, as referenced in Response 23-2.

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MONTCLAIR

October 4, 2012

Lisa Levy Buch, Public Affairs Director
Metro Gold Line Foothill Extension Construction Authority
406 E. Huntington Drive, Suite 202
Monrovia, CA 91016

Dear Lisa:

Re: Metro Gold Line Foothill Extension DEIR

Thank you for the opportunity to review the above-referenced document. The City of Montclair's comments on the project follow. Recommended corrections and changes are shown in ***bold italics***.

- ❑ Page 1-30 – Under "Route Description," the sentence should be clarified to say that the "...0.7-mile segment in the City of Montclair would be north of Metrolink's San Bernardino Line and would abut a ***residential, commercial, and industrial*** area and ***the Montclair Transcenter, a park-and-ride facility owned by Caltrans.***" 24-1

- ❑ Page 2-103 – Under "2.6.4.6 Montclair Station," the last sentence should read, "***Future parking lots*** could be located ***north and*** south of the Build Alternative and Metrolink tracks; however, ***they*** would be constructed only if the surface lots were displaced by future development." 24-2

- ❑ Page 3.5-16 – In Table 3.5-1, "Police Stations Serving the Study Area," the correct address of the Montclair Police Department is ***4870 Arrow Highway***, which is ***0.2 mile*** from the proposed Montclair Station. 24-3

- ❑ Page 3.5-17 – Under "City of Montclair," the last sentence should read, "The police station is located at ***4870 Arrow Highway*** in Montclair, approximately ***0.2 mile southwest*** of the project." 24-4

- ❑ Page 3.5-26 – The description for parks proximate to the project within the City of Montclair should read, "***Sycamore Park, a 0.7-acre passive public park, is under construction within The Paseos community approximately 0.2 mile south of the project. The park will be separated from the alignment by several multi-story residential buildings within The Paseos project and other multi-story residential buildings on the north side of Arrow Highway*** 24-5

CITY OF MONTCLAIR
5111 Benito Street, P.O. Box 2308, Montclair, CA 91763 (909) 626-8571 FAX (909) 621-1584
Mayor Paul M. Eaton • Mayor Pro Tem Carolyn Raft • Council Members: Leonard Paulitz, J. John Dutrey, Bill Ruh • City Manager Edward C. Starr

that will comprise the approved Arrow Station residential project. Accordingly, potential noise impacts from project construction would be unlikely to affect park patrons." 24-5

- ❑ Page 3.6-52 – In Table 3.6-1, the correct address for the property listed under "Montclair Station" should be "5040-5050 Arrow Highway, ***Montclair.***" 24-6

- ❑ Pages 3.10-5 and 3.10-6 – Under "City of Montclair General Plan," the paragraph should read, "The *City of Montclair General Plan* underwent a comprehensive update in 1999, ***and the General Plan Housing Element was updated and certified by the State of California Department of Housing and Community Development (HCD) in 2011.*** The General Plan provides direction for future development in the *City* and its sphere of influence. It represents a formal expression of community goals and desires, and provides guidelines for decision-making regarding City development. The General Plan encompasses the 5.4 square-mile area located within Montclair's corporate boundary, as well as the 1.1 square-mile area of unincorporated San Bernardino County within Montclair's sphere of influence, ***which consists of three distinct areas. The West Island is an irregularly shaped area generally north of Phillips Boulevard, east of the Los Angeles County line, south of Mission Boulevard, and west of Ramona Avenue. The South Island is located north of Phillips Boulevard, east of Carriage Avenue, south of Howard Street, and west of Monte Vista Avenue. The East Island is north of Phillips Boulevard, east of Central Avenue and Ada Avenue, south of State Street, and west of Benson Avenue.***" 24-7

  Under "Specific Plan," the first sentence should read, "The *North Montclair Downtown Specific Plan* ***(2006)*** is a land use policy guidance document that includes transit-related uses within and adjacent to the Montclair Transcenter and a pedestrian connection along Fremont ***Avenue*** between the Transcenter and Montclair Plaza." 24-8

- ❑ Page 3.12-9 – Under "City of Montclair," the second sentence of the first paragraph should read, "Throughout Montclair, the Metro right-of-way abuts ***residential, commercial, and industrial*** uses." The second paragraph should read, "Police protection services in the City of Montclair are provided by the Montclair Police Department. The police station ***abuts*** the project alignment ***at 4870 Arrow Highway.*** Fire protection services are provided by the Montclair Fire Department. The closest station is located 0.2 miles ***south of the*** alignment ***at 8901 Monte Vista Avenue.***" 24-9

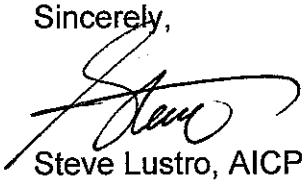
- ❑ Page 3.13-7 – Under "City of Montclair," in the third sentence of the second paragraph, the reference to "***unincorporated Los Angeles County***" should be deleted. (A portion of Foothill Boulevard (Route 66) east of the Los Angeles County line remained in unincorporated *San Bernardino County* until a few years ago when it was annexed by the City of Upland.) 24-10

- ❑ Page 3.13-36 – Under "City of Montclair" (starting on Page 3.13-35), the first sentence of the second paragraph should read, "Other construction activities would include rebuilding the bus transfer facility at the Transcenter site, and building a traction power supply substation (TPSS) in the railroad right-of-way, approximately 700 feet east of Claremont ***Boulevard*** in the City of ***Montclair.***" 24-11

- ❑ Page 5-1 – Under "5.1.4 City of Montclair," it should read: 24-12
  Edward C. Starr, City Manager
  Michael C. Hudson***, P.E.***, City Engineer
  Steve Lustro***, AICP***, Community Development Director
  Michael Diaz***, City Planner***

If you have any questions regarding the recommended corrections and changes, please feel free to contact me at 909/625-9431 or *slustro@cityofmontclair.org.*

Sincerely,



Steve Lustro, AICP
Community Development Director

c: Edward C. Starr, City Manager
Marilyn J. Staats, Deputy City Manager/Director, Office of Economic Development
Michael C. Hudson, P.E. City Engineer
Michael Diaz, City Planner

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24. Lustro, Steve, Community Development Director, City of Montclair, October 4, 2012.

Response 24-1

A more detailed description of the area of Montclair adjacent to the project has been added to the EIR, as suggested.

Response 24-2

The description of the potential future parking lots in the City Montclair on has been added, as suggested, to Section 2.6.4.6 of the EIR.

Response 24-3

The address for the station has been corrected in the Final EIR. The change in address does not change the findings presented in the EIR that no impact to the Montclair Police Department service ratios or response times would result from the proposed project.

Response 24-4

Please see response to comment 24-3 above.

Response 24-5

The information provided has been included in Section 3.5.5.3 of the Final EIR. As stated in the comment, potential impacts from project construction would be unlikely to affect park patrons.

Response 24-6

Table 3.6-1 has been corrected in the Final EIR to indicate "5040-5050 Arrow Highway, Montclair."

Response 24-7

The description of the City of Montclair General Plan has been revised as suggested.

Response 24-8

The description of the Specific Plan has been revised as suggested.

Response 24-9

The information has been updated accordingly in the Final EIR.

Response 24-10

The information has been updated accordingly in the Final EIR.

Response 24-11

The information has been updated accordingly in the Final EIR.

Response 24-12

This information has been updated accordingly in the Final EIR.

COUNTY SANITATION DISTRICTS
OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

GRACE ROBINSON CHAN
Chief Engineer and General Manager

October 4, 2012

Ref. File No: 2338552

Ms. Lisa Levy Buch
Director of Public Affairs
Metro Gold Line Foothill Extension
Construction Authority
406 E. Huntington Drive, Suite 202
Monrovia, CA 91016-3633

Dear Ms. Levy Buch:

The Metro Gold Line Foothill Extension

The County Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Report for the subject project on August 23, 2012. The proposed development is located within the jurisdictional boundaries of Districts Nos. 21 and 22. We offer the following comments and updates:

1. Previous comments submitted by the Districts in correspondence dated January 27, 2011 (copy enclosed) still apply to the subject project with the following updated information.
2. The San Jose Creek Water Reclamation Plant currently processes an average flow of 77.0 million gallons per day. 25-1
3. All other information concerning Districts' facilities and sewerage service contained in the document is current.

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Grace Robinson Chan

Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR: ar

Enclosure

c: J. Ganz

Doc #: 2374743.D21&22

COUNTY SANITATION DISTRICTS
OF LOS ANGELES COUNTY

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GRACE ROBINSON CHAN
Chief Engineer and General Manager

January 27, 2011

File No: 21-00.04-00
22-00.04-00

Ms. Lisa Levy Buch
Director of Public Affairs
Metro Gold Line Foothill Extension
Construction Authority
406 E. Huntington Drive, Suite 202
Monrovia, CA 91016-3633

Dear Ms Buch:

The Metro Gold Line Foothill Extension

The County Sanitation Districts of Los Angeles County (Districts) received a Notice of Preparation of a Draft Environmental Impact Report for the subject project on January 10, 2011. The proposed development is located within the jurisdictional boundaries of Districts Nos. 21 and 22. We offer the following comments regarding sewerage service:

1. The proposed project may impact existing and/or proposed Districts' trunk sewers over which it will be constructed. Existing and proposed Districts' trunk sewers are located directly under and/or cross directly beneath the proposed project alignment. The Districts cannot issue a detailed response to or permit construction of the proposed project until project plans and specifications that incorporate Districts' sewer lines are submitted. In order to prepare these plans, you will need to submit a map of the proposed project alignment, when available, to the attention of Ms. Martha Tremblay of the Districts' Sewer Design Section at the address shown above. The Districts will then provide you with the plans for all Districts' facilities that will be impacted by the proposed project. Then, when revised plans that incorporate our sewers have been prepared, please submit copies of the same for our review and comment. 25-2

2. The wastewater generated by the proposed project will be treated at the San Jose Creek Water Reclamation Plant (WRP) located adjacent to the City of Industry, which has a design capacity of 100 million gallons per day (mgd) and currently processes an average flow of 76.3 mgd, or the Pomona WRP, which has a design capacity of 15 mgd and currently processes an average flow of 8.6 mgd. 25-3

3. In order to estimate the volume of wastewater the project will generate, a copy of the Districts' average wastewater generation factors is available on line. Go to www.lacsd.org, Information Center, Will Serve Program, Obtain Will Serve Letter, and click on the appropriate link on page 2. 25-4

4. The Districts are authorized by the California Health and Safety Code to charge a fee for the privilege of connecting (directly or indirectly) to the Districts' Sewerage System or increasing the strength or quantity of wastewater attributable to a particular parcel or operation already connected. This connection fee is a capital facilities fee that is imposed in an amount sufficient to construct an incremental expansion of the Sewerage System to accommodate the proposed project. Payment of a connection fee will be required before a permit to connect to the sewer is issued. For a copy of the Connection Fee Information Sheet, go to www.lacsd.org, Information Center, Will Serve Program, Obtain Will Serve Letter, and click on the appropriate link on page 2. For more specific information regarding the connection fee application procedure and fees, please contact the Connection Fee Counter at extension 2727. 25-5

5. In order for the Districts to conform to the requirements of the Federal Clean Air Act (CAA), the design capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). Specific policies included in the development of the SCAG regional growth forecast are incorporated into clean air plans, which are prepared by the South Coast and Antelope Valley Air Quality Management Districts in order to improve air quality in the South Coast and Mojave Desert Air Basins as mandated by the CAA. All expansions of Districts' facilities must be sized and service phased in a manner that will be consistent with the SCAG regional growth forecast for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The available capacity of the Districts' treatment facilities will, therefore, be limited to levels associated with the approved growth identified by SCAG. As such, this letter does not constitute a guarantee of wastewater service, but is to advise you that the Districts intend to provide this service up to the levels that are legally permitted and to inform you of the currently existing capacity and any proposed expansion of the Districts' facilities. 25-6

If you have any questions, please contact the undersigned at (562) 908-4288, extension 2717.

Very truly yours,

Stephen R. Maguin

E-Signed by Adriana Raz
VERIFY authenticity with Approve

Adriana Raza
Customer Service Specialist
Facilities Planning Department

AR:ar

c: M. Tremblay

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25. Raza, Adriana, Customer Service Specialist, Facilities Planning Department, County Sanitation Districts of Los Angeles County, October 4, 2012.

Response 25-1

The comment regarding the most current information about an average flow processed at the San Jose Creek Water Reclamation Plant is acknowledged.

Response 25-2

The information about the District's requirements is acknowledged. The project plans will continue to be refined during the preliminary engineering and these plans will be submitted to the District.

Response 25-3

The comment regarding the most current information about an average flow processed at the San Jose Creek Water Reclamation Plant is acknowledged.

Response 25-4

The information that the copy of the District's average wastewater generation factors is available on line is acknowledged.

Response 25-5

In compliance with the existing requirements, the Construction Authority will pay all required fees to connect to the District's facilities or increase the strength or quantity of wastewater as applicable to project.

Response 25-6

The comment that the District's letter does not constitute a guarantee of wastewater service is acknowledged.

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CITY OF GLENDORA CITY HALL (626) 914-8200
116 East Foothill Blvd., Glendora, California 91741
www.ci.glendora.ca.us

October 5, 2012

Lisa Levy Buch, Director of Public Affairs
Metro Gold Line Foothill Extension Construction Authority
405 East Huntington Drive
Suite 202
Monrovia, CA 91016

Subject: Gold Line Draft EIR Comments

Dear Ms. Buch,

As you may know, the City of Glendora has and remains a strong supporter of completion of the Gold Line. This is a very important project for not only our city but the region in our hopes of assisting with the movement of our residents throughout the County and beyond. We look forward to the near future when this vital project is linked between Los Angeles and the Ontario Airport. 26-1

As requested, the City of Glendora has reviewed the Draft EIR in its fiduciary role of representing the community. The following are our comments along with attached exhibits related to our comments on the Draft EIR to date.

PARKING STRUCTURE

The Draft EIR does not provide substantial detail for many parts of the proposed project, including but not limited to the Station in Glendora. The project description is incomplete. For example, without the details for items like the parking structure - such as its physical layout, spacing of tracks and pedestrian pathways, etc., the City had to engage the services of an outside consultant to pull together the best likely answers to those questions. To assist in understanding the parking structure proposed in the Draft EIR, in 2011 the City had the traffic engineering firm of Rick Engineering, Inc. prepare a functionality evaluation of the parking structure. Attached hereto and incorporated by reference is that report as well as a letter of update based on the 2012 draft EIR. Based on the limited information and data provided in the Draft EIR, and the expertise of our outside consultants, it appears that the parking structure as proposed in the Draft EIR is not feasible and cannot be built. 26-2

The City of Glendora and the Authority entered into a MOU dated November 29, 2007, wherein it was expressly agreed that "The location and design of the parking including any proposed parking structures shall be reviewed and approved by the City, which approval shall not be unreasonably withheld or delayed."

PARKING STRUCTURE (cont'd)

THE CITY OF GLENDORA EXPRESSLY RESERVES ITS RIGHTS UNDER THE MOU TO REVIEW AND APPROVE, OR DISAPPROVE, THE PROPOSED PARKING STRUCTURE(S) AT A FUTURE DATE. THE CITY'S ACTIONS OR INACTIONS REGARDING THIS EIR SHALL NOT CONSTITUTE A WAIVER OF THE CITY'S RIGHTS AND OBLIGATIONS UNDER THE MOU. THE CITY IS NOT MAKING A FORMAL DECISION ON THE PROPOSED PARKING STRUCTURE AT THIS TIME PARKING STRUCTURE SINCE THE DESIGN AS PROPOSED IS INCOMPLETE. CITY STAFF URGES THE AUTHORITY TO CONSIDER THE COMMENTS SUBMITTED HEREIN TO GUIDE THE AUTHORITY'S FUTURE DESIGN OF THE PARKING STRUCTURE BEFORE THE FINAL DESIGN IS SUBMITTED TO THE CITY FOR REVIEW AND APPROVAL. 26-2

In light of the above, City staff prepared more detailed exhibits (see attachments A, B & C) following the adopted Metrolink standards. Comparing these exhibits to the Draft EIR we found that the Gold Line provided substandard minimum clearances at the Glendora Station. We are concerned that the Gold Line did not follow Metrolink's standards. Metrolink standard 2101 requires a minimum 8.5 feet separation between structures and freight tracks. Also, Metrolink standard 3202 requires a minimum 30 foot wide passenger loading platform. We could find no justification describing the deviation from the adopted standards. The details of this justification must be made a part of the Draft EIR in order for the City to evaluate the consequences and impacts to the Glendora Station. The following comments are provided to further support our statements at this time.

Page S-12 SS-3 states "Lighting at all stations shall be to standards…..", this is unacceptably vague. State what standards will be followed. Glendora follows the Illuminating Engineering Society of North America's standards. Specifically RP-8-00 "Roadway Lighting" and IESNA G-1-03 "Guideline for Security Lighting for People, Property and Public Spaces." 26-3

Page S-20 S.10 "Areas of Controversy and Issues to be Resolved" The City of Glendora's concerns with the layout of the parking structure linearly along the south side of the proposed Glendora Station site are not mentioned. This was and is a significant issue which Glendora made known to the Gold Line far in advance of the release of the Draft EIR. Add a comment indicating so to this section. 26-4

Page I-10 and S-5 The project estimates 1,850 daily boarding out of Glendora Station by the year 2035. A 400 space parking structure is proposed to meet this demand. In La Verne, the project estimates the same number of daily boardings by 2035, but a 600 space structure is provided. If La Verne accurately represents the parking demand for 1,850 boardings, it appears that the Glendora structure is deficient by 200 spaces. How will this deficiency be addressed? 26-5

Page 1-18 The parking structure as depicted at the top of page 1-19 cannot be constructed within the existing Gold Line right of way nor will it be able to accommodate 400 parking stalls as a 2 story structure. See Exhibits A, B, C and the functionality exhibit prepared by Rick 26-6

PARKING STRUCTURE (cont'd)

Engineering, Inc. The Draft EIR must be revised to state that parking structure alternatives 2 and 2B will be considered/used. 26-6

Page 1-18 There is a potential sight distance issue for traffic entering/exiting the parking structure on Glendora Avenue. Draft EIR must state that a sight distance study will be required to demonstrate the Glendora Avenue entrance/exit meets Caltrans sight distance standards or the elevation of the existing railroad tracks will be lowered. 26-7

Page 1-18 The City is working with a developer on a 260 unit apartment complex which will be required to constructed a raised median south of the railroad tracks to prevent left turns from southbound Glendora Avenue into the new development. This raised median will prevent northbound traffic on Glendora Avenue from making a left into the Gold Line parking structure. 26-8

Page 2-18 Glendora agrees that technically there is "...on street parking is available near the proposed station....". However, the reality is it is very limited due to the fact that Vermont Avenue is commercially zoned and existing on street parking is heavily utilized. Similarly, Vermont Avenue is heavily parked due to the Hospital and preferential parking district. Parking on Ada Avenue is limited to 20 minutes only due to the Post Office. This statement should be removed. 26-9

Page 2-101 Table 2-30 lists no impact to the proposed parking structure off of Glendora Avenue. Glendora disagrees with this statement due to potential queuing issues on Glendora Avenue and sight distance issues for vehicles exiting the proposed parking structure due to the elevated railroad tracks. Revise the Draft EIR to show the methodology Gold Line followed to review impacts. 26-10

Page 2-102 The proposed parking structure as laid out in the Draft EIR will not fit within the existing Gold Line right of way nor will it accommodate 400 parking spaces without going to a third level (see attached study by Rick Engineering). Revise parking structure layout or provide more specific design information demonstrating how the parking structure will fit within existing Gold Line right of way. 26-11

Page 3.10-35 Table 10.3-1 as stated earlier and indicated in the attached exhibits, the parking structure as proposed will not fit within the Gold Line existing right of way. 26-12

Page 3.13-32 The Gold Line's right of way is not 200 to 300 feet wide as indicated in the fourth paragraph on this page. The parking structure as depicted will not fit within the existing Gold Line right of way, see attached Exhibits A, B & C. 26-13

Page 3.5-1 This page has a paragraph indicating that the California Building Code and Uniform Fire Code must be complied with during this project. As previous stated as well as shown in Exhibits A B & C, when following these codes, there is not enough space available to construct the parking structure in Glendora as depicted in Figure 1-11. 26-14

PARKING STRUCTURE (cont'd)

Page 4-8 Table 4-2 Glendora Workshop: No mention of consideration of a Kiss-n-Ride on the north side of the tracks in the right of way between the private development and the railroad tracks. The concept was brought up at the scoping meetings and the Gold Line Authority stated it would be considered. Please add to Table 4-2 as well as the results of the analysis to determine the viability of a kiss-n-ride on the north side of the station within Gold Line right of way. 26-15

There is no discussion or illustration of working with the public pedestrian paseo through the residential development currently under construction just north of the project. The City specifically required the Developer to dedicate the paseo to encourage pedestrian access to the station. City staff have been in numerous meeting over the years with the Gold Line staff making them aware of the paseo but it is not represented on the conceptual parking plan or discussed in the draft EIR. Modify the layout of the station to account for pedestrian access via the paseo and describe it in the document. 26-16

The Draft EIR is inadequate in that it does not adequately identify or analyze feasible alternatives for the parking structure, as required by Public Resources Code Sections 21002, 21002.1(a),

21100(b)(4), 21150. The parking structure proposed in the Draft EIR is not adequately designed to allow a determination that the parking structure is feasible. The evidence submitted herein demonstrates that the proposed parking structure is not feasible and cannot be built. The City of Glendora has submitted herewith alternatives to the proposed parking structure, together with evidence that the City's proposed alternatives are environmentally superior. The failure of the Draft EIR to analyze alternative sites for the parking structure renders the Draft EIR inadequate. An evaluation of alternative sites on public agency projects such as this project is a necessary component of an adequate environmental analysis. Laurel Heights Improvement Ass'n v Regents of Univ. of Cal (1985) 47 Cal 3d 376. 26-17

The City's proposed alternatives can substantially reduce environmental impacts, can attain the basic project objectives, are feasible, and are reasonable and realistic. Compared to the parking structure proposed in the Draft EIR, the City's proposed alternatives are environmentally superior, are more feasible, better attain the basic project objectives, are more reasonable and realistic, and are probably cheaper to build. (Economic viability is a factor that may be considered when assessing the feasibility of alternatives). 14 Cal Code Regs Section 15126(f)(1).

The Draft EIR is inadequate in that the parking structure proposed in the Draft EIR does not include concrete information sufficient to allow a fact based comparison of alternatives for the project. 14 Cal Code Regs Section 15126(d).

Based on the evidence submitted herein it is clear that the parking structure proposed in the Draft EIR is NOT the environmentally superior alternative. Moreover, it is clear that the Draft EIR does not consider a reasonable range of alternatives, as mandated by 14 Cal Code Regs Section 15126(a).

Traffic

Page S-10 LTR1 states Gold Line shall cooperatively work with Glendora to contribute to the funding of the signalized intersection at Glenwood/Route 66. This intersection was signalized 3 years ago, remove this statement. 26-18

Page S-12 SS-8 states that traffic warning measures,....shall be provided..... but does not state the standard. Insert statement that traffic/pedestrian warning measures will be per the California Manual of Uniform Traffic Control Devices (MUTCD) specifically Part 10 'Traffic Controls for Highway-Light Rail Transit Grade Crossing." 26-19

Page 1-5 Table 1-1 does not quantify how the percentage growth in daily trips was prepared. Provide a more detailed table which indicates how this percentage growth and specific estimated number of trips was calculated. 26-20

Page 1-10 Glendora projected daily boardings were listed with no explanation how this number was calculated. Add detail regarding the methodology used arrived at this number. 26-21

Page 2-2 The text references the 1980 TRB Level of Service circular, isn't the methodology followed in the MTA's Congestion Mitigation Policy? 26-22

Page 2-4 Eleven of the intersections in Figure 2-2 are diagrammed incorrectly. Each must be updated per below as well as all of the data tables/figures following which used the incorrectly drawn diagrams. 26-23

Page 2-4 Figure 2-2 Intersection 5 – Vermont Ave./Route 66
The intersection is shown as having one northbound shared left turn/through lane and a dedicated northbound right turn lane. This is incorrect. Edit the intersection to show one northbound shared left, through and right turn lane. The intersection is also shown as having one dedicated southbound right turn lane and a separate southbound through/left turn lane. This is incorrect. Edit the intersection to show one southbound shared left, through and right turn lane. Recalculate the LOS and update the tables where appropriate.

Page 2-4 Figure 2-2 Intersection 6 – Vermont Ave./Foothill Blvd.
The intersection is shown as having a dedicated northbound left turn lane and a separate through/right turn lane. This is incorrect. Edit the intersection to show one shared northbound left turn, right turn and through lane. Recalculate the LOS and update the tables where appropriate. 26-24

Page 2-4 Figure 2-2 Intersection 7 - Vermont Ave. W/Ada Ave.
The intersection is shown as a dedicated southbound right turn lane and a separate southbound through lane. This is incorrect. Edit the intersection to show one southbound right turn, through and left turn lane. Recalculate the LOS and update the tables where appropriate.

Traffic (cont'd)

Page 2-4 Figure 2-2 Intersection 9 - Glendora Ave./Ada Ave.
The intersection is shown as having a dedicated southbound right turn lane and one southbound through/right turn lane. This is incorrect. Edit the intersection to show the one southbound right turn, through and left turn lane. Recalculate the LOS and update the tables where appropriate.

Page 2-4 Figure 2-2 Intersection 10 - Glendora Ave./Route 66
The intersection is shown as having dedicated west and east bound right turn lanes. This is incorrect. Edit the intersection to show these lanes as shared right turn/through lanes. Recalculate the LOS and update the tables where appropriate.

Page 2-4 Figure 2-2 Intersection 12 Pasadena Ave./Route 66
The intersection is shown as having dedicated west and eastbound right turn lanes. This is incorrect. Edit the intersection to show these lanes as shared right turn/through lanes. Recalculate the LOS and update the tables where appropriate.

Page 2-4 Figure 2-2 Intersection 14 Glenwood Ave./Route 66
The intersection is shown as two way stop. This is incorrect. Edit the intersection to show as signalized. The intersection is also shown as having dedicated west and east bound right turn lanes. This is incorrect. Edit the intersection to show these lanes as shared right turn/through lanes. Recalculate the LOS and update the tables where appropriate. 26-24

Page 2-4 Figure 2-2 Intersection 16 Elwood Ave./Route 66
The intersection is shown as having a dedicated right turn lane both north and south bound. This is incorrect. Edit the intersection to show a shared right turn, through and left turn lane. The intersection is also shown as having a dedicated westbound right turn lane and a dedicated eastbound right turn lane. This is incorrect. Edit the intersection to show these lanes as shared right turn/through lanes. Recalculate the LOS and update the tables where appropriate.

Page 2-4 Figure 2-2 Intersection 18 Loraine Ave./Route 66
The intersection is shown as having a dedicated right turn lane westbound. This is incorrect. Edit the intersection to show one westbound shared right turn and through lane. Recalculate the LOS and update the tables where appropriate.

Page 2-4 Figure 2-2 Intersection 20 Sierra Barranca Ave./Madre Ave.
The intersection is shown as having a dedicated westbound left turn lane and a westbound through lane. This is incorrect. Edit the intersection to show one westbound shared left turn and through lane. Recalculate the LOS and update the tables where appropriate.

Page 2-4 Figure 2-2 Intersection 21 Glendora Ave./Sierra Madre Ave.
The intersection is shown as having a southbound dedicated right turn lane. This is incorrect. Edit the intersection to show one southbound shared right turn and through lane. Recalculate the LOS and update the tables where appropriate.

Traffic (cont'd)

Page 2-19 The intersections of Grand/Route 66, Grand/Baseline and Baseline/Glendora were not included in the traffic impact analysis yet each are as much are more interconnected. We request counts be included in the consideration of the traffic impacts. 26-25

Page 2-19 Figure 2-8, see first comment 2-4. 26-26

Page 2-28 Table 2-10 Existing Intersection LOS Analysis: Row 14 incorrectly defines the intersection of Glenwood Avenue/Route 66 has a 2 way stop functioning at a LOS F. This intersection has been signalized since October, 2009. Please correct the information in this table. 26-27

Page 2-42 As stated earlier, the level of service for intersection #14, Glenwood Avenue/Route 66, is inaccurate since the intersection is now signalized. Edit Table 2-13 accordingly. 26-28

Page 2-46 Table 2-14 lists a few street segments and V/C, LOS analysis but there is no discussion/explanation leading up to why only these segments were analyzed. 26-29

Page 2-58 As stated earlier, the level of service for intersection #14, Glenwood Avenue/Route 66, is inaccurate since the intersection is now signalized. Edit Table 2-17 accordingly.

Page 2-62 As stated earlier, the level of service for intersection #14, Glenwood Avenue/Route 66, is inaccurate since the intersection is now signalized. Edit Table 2-18 accordingly. 26-30

Page 2-66 As stated earlier, the level of service for intersection #14, Glenwood Avenue/Route 66, is inaccurate since the intersection is now signalized. Edit Table 2-19 accordingly.

Page 2-76 Table 2-23 as stated earlier, explain how the Glendora daily ridership of 1,860 was computed. 26-31

Page 2-79 Figure 2-26, see first comment 2-4. 26-32

Page 2-91 As stated earlier, the level of service for intersection #14, Glenwood Avenue/Route 66, is inaccurate since the intersection is now signalized. Edit Table 2-27 accordingly.

Page 2-95 As stated earlier, the level of service for intersection #14, Glenwood Avenue/Route 66, is inaccurate since the intersection is now signalized. Edit Table 2-28 accordingly. 26-33

Page 2-107 The recommendation to ban right-turn-on-red is at Grand/Foothill is not acceptable. It would create a negative impact to flow of existing traffic. If there is an issue with 26-34

Traffic (cont'd)

right turns then the Gold Line shall study the intersection to determine the mitigation and install what is necessary i.e. right turn overlap or some other method. 26-34

Page 2-107 Narrowing the median in Foothill is not acceptable. Remove this statement. 26-35

Page 2-109 Remove LTR-1 mitigation measure to signalize Glenwood/Route 66. As previously mentioned since this intersection was signalized in October 2009. 26-36

Page 2-110 Remove Glenwood/Route 66 from this table. As previously mentioned since this intersection was signalized in October 2009.

GENERAL COMMENTS

The City is concerned over impact to aesthetics, and based on the limited information regarding design of new structures and facilities, it is not possible to fully evaluate these impacts. To ensure that impacts to aesthetics remain less than significant, the City requests to review design and provide input on new facilities including signage, parking facilities, the station platform, the Rte. 66 bridge, and the Lone Hill fly-over. 26-37

Page 3.8-21 Reference is made to Geologic Hazards as described in Glendora's 1990 general plan. Our general plan was updated between 2006 and 2008. We don't understand why the 1990 general plan was used. 26-38

Page 3.8-22 The discussion of inundation due to dam failure only mentions Big Dalton Dam. Our copy of the San Dimas Dam inundation map indicates a portion of the tracks in Glendora would be inundated within 15 minutes of San Dimas Dam failure. 26-39

Page 3.9-5 The EIR states there was a release of aviation fuel at 505 Foothill Boulevard in Glendora. We have no record of a 505 W. or 505 E. Foothill Boulevard address in Glendora and beyond that no facility that would store aviation fuel. Either remove this statement as in error or show the City where this facility is. 26-40

Page 3.11-68 According to the report, one single family residence in cluster WB6 will have affected by vibrations and the impact is listed as significant and unavoidable. Insert statement that Gold Line will contact this property owner and inform them of their findings. 26-41

Page S-6 There is one un-mitigated vibration impact in WB6 cluster. The address of the affected homes is not identified. Insert language stating Gold Line will contact those residents who will experience unmitigated issues from this project and inform them of their findings.

Grading

The Draft EIR does not adequately describe the proposed grading, the volumes of earthwork, import or export quantities, the air and noise impacts, the impacts on local streets during grading operations, etc. Our review of the preliminary plan and profiles in Appendix A revealed that retaining walls must be constructed in a variety of locations along the project. Specifically on sheets C101 thru C103 and C114 thru C118 it appears the nature of grading at these locations will involve work on private property. Construction of retaining walls may require sheet piling or shoring. Any pile driving or shoring work on private property must be submitted to our Building & Safety Division for review and approval. In any area where grading must occur on private property, the Gold Line must first obtain grading permits and temporary construction easements. These temporary construction easements must be signed and notarized by the property owners prior to beginning the work. All of this work will require a large amount of truck traffic which was not discussed in the Draft EIR. The Draft EIR is inadequate since it does not address these issues. 26-42

The Draft EIR does not make any statements related to existing soil contamination from years of freight railroad use and an contaminates that may have leeched from the railroad ties, tracks, cars, etc. into the soil. An initial investigation to preliminarily determine and soils impacts must be done for the Draft EIR to be considered complete. 26-43

Additionally, any grading which occurs must be consistent with the City's general plan and zoning codes. This includes any retaining walls planned for construction which, must be reviewed and approved by the Planning Commission. During our review of the information provided we did not find information regarding retaining wall height, finished slope, material or aesthetics of proposed walls. 26-44

Page 3.8-2 Grading was only briefly referred to under Section 3.8 Geologic Hazards. A review of the conceptual plans indicates there will be significant grading along the entire length of the Gold Line right of way which will affect residents/businesses throughout the City. So much so, that the City will most likely hire a full time construction inspector to monitor the construction within Glendora. The Draft EIR is inadequate in its discussion of the grading required. This section must be expanded so that reviewers understand the magnitude of the project. 26-45

Summary

While our review and comments are presented in our fiduciary role of representing the community of Glendora and our obligation to present them so that the lead agency can address them, our enthusiasm and support of the Gold Line should not be in doubt by the reader of this response to the Draft EIR. The City staff appreciates the opportunity to present the City's comments to the Draft EIR, and looks forward to the Authority adequately addressing these concerns prior to certifying the Draft EIR. We continue to look forward to the completion of phase 2B in the near future.

Should you have any questions, please feel free to contact me at (626) 914-8246.

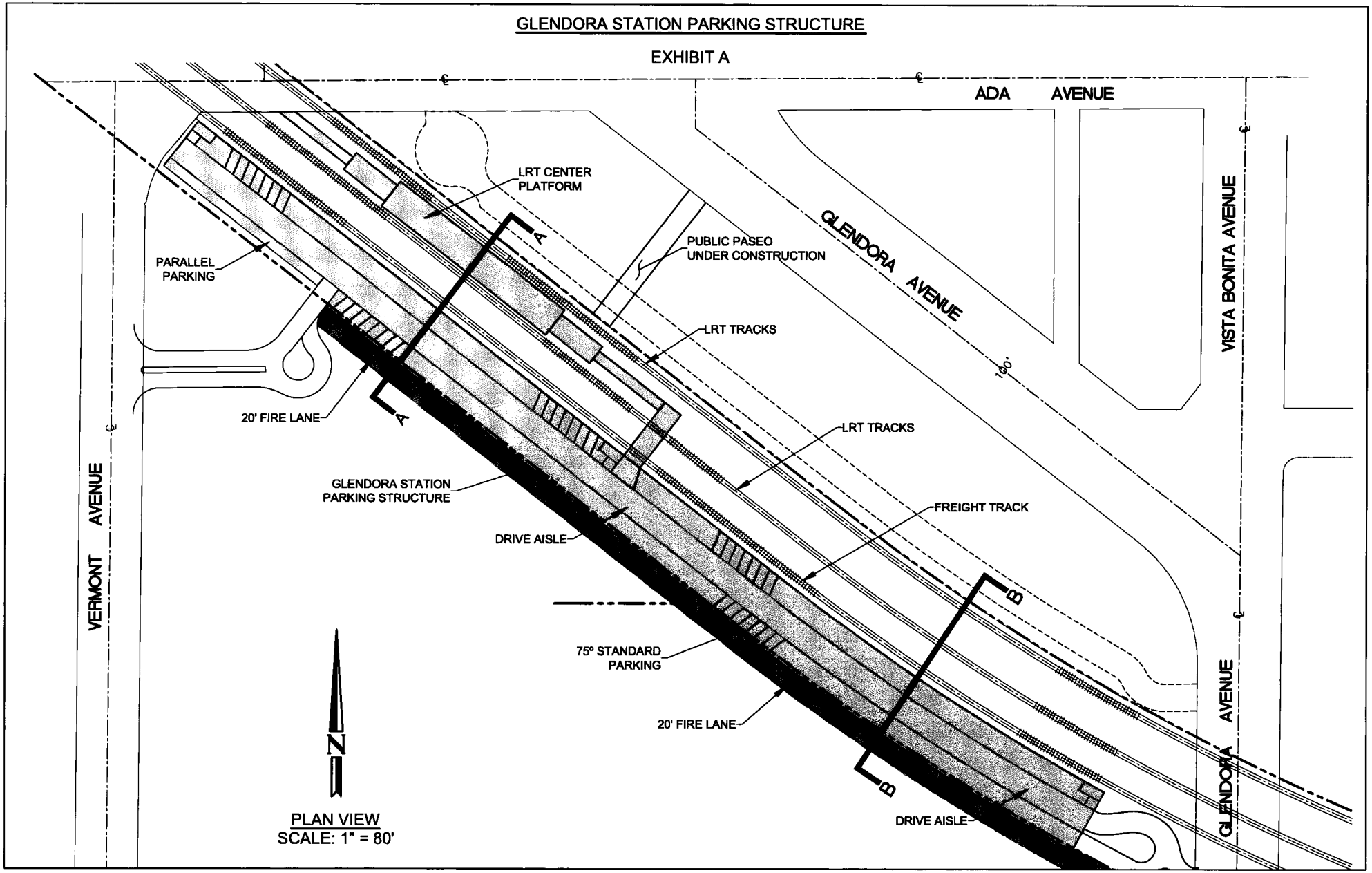
Sincerely,

David A. Davies, C.B.O.
Director of Public Works

Attachments: Exhibit A – Gold Line Station Layout
Exhibit B – Cross Section East End
Exhibit C – Cross Section West End
Alternative 2
Alternative 2B
Rick Engineering Functional Evaluation November 2011
Rick Engineering Letter of update September 2012 based on the DEIR

26-46

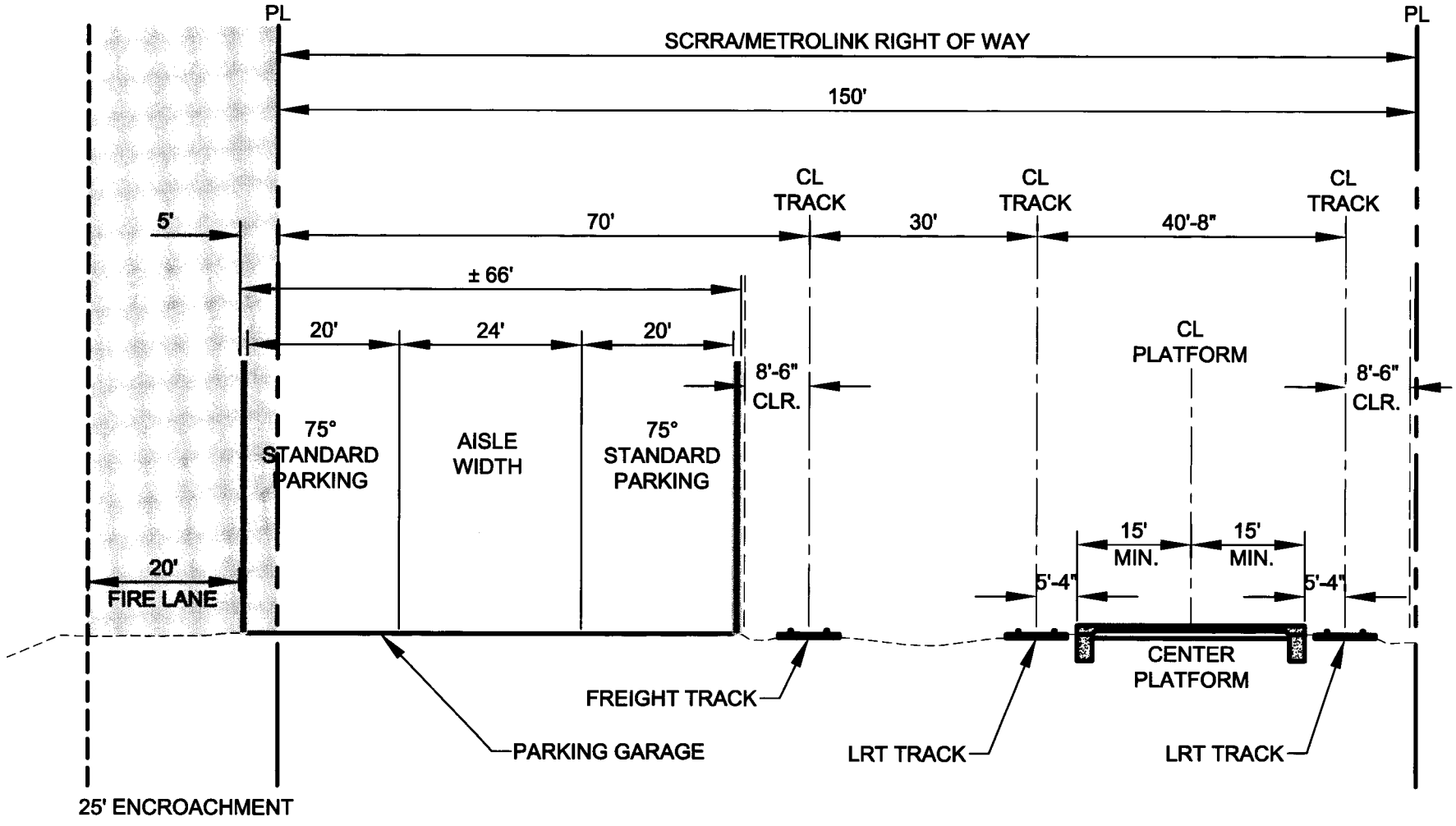
Cc: City Manager
City Attorney
Director of Planning
Assistant Director of Public Works/City Engineer
File


GLENDORA STATION PARKING STRUCTURE
EXHIBIT A
ADA AVENUE
LRT CENTER PLATFORM
PARALLEL PARKING
PUBLIC PASEO UNDER CONSTRUCTION
GLENDORA AVENUE
VISTA BONITA AVENUE
LRT TRACKS
160'
20' FIRE LANE
LRT TRACKS
GLENDORA STATION PARKING STRUCTURE
FREIGHT TRACK
DRIVE AISLE
VERMONT AVENUE
75° STANDARD PARKING
20' FIRE LANE
DRIVE AISLE
GLENDORA AVENUE
N
PLAN VIEW
SCALE: 1" = 80'

GLENDORA STATION PARKING STRUCTURE

EXHIBIT B

WEST END NEAR VERMONT AVENUE - 30' TRACK SEPARATION

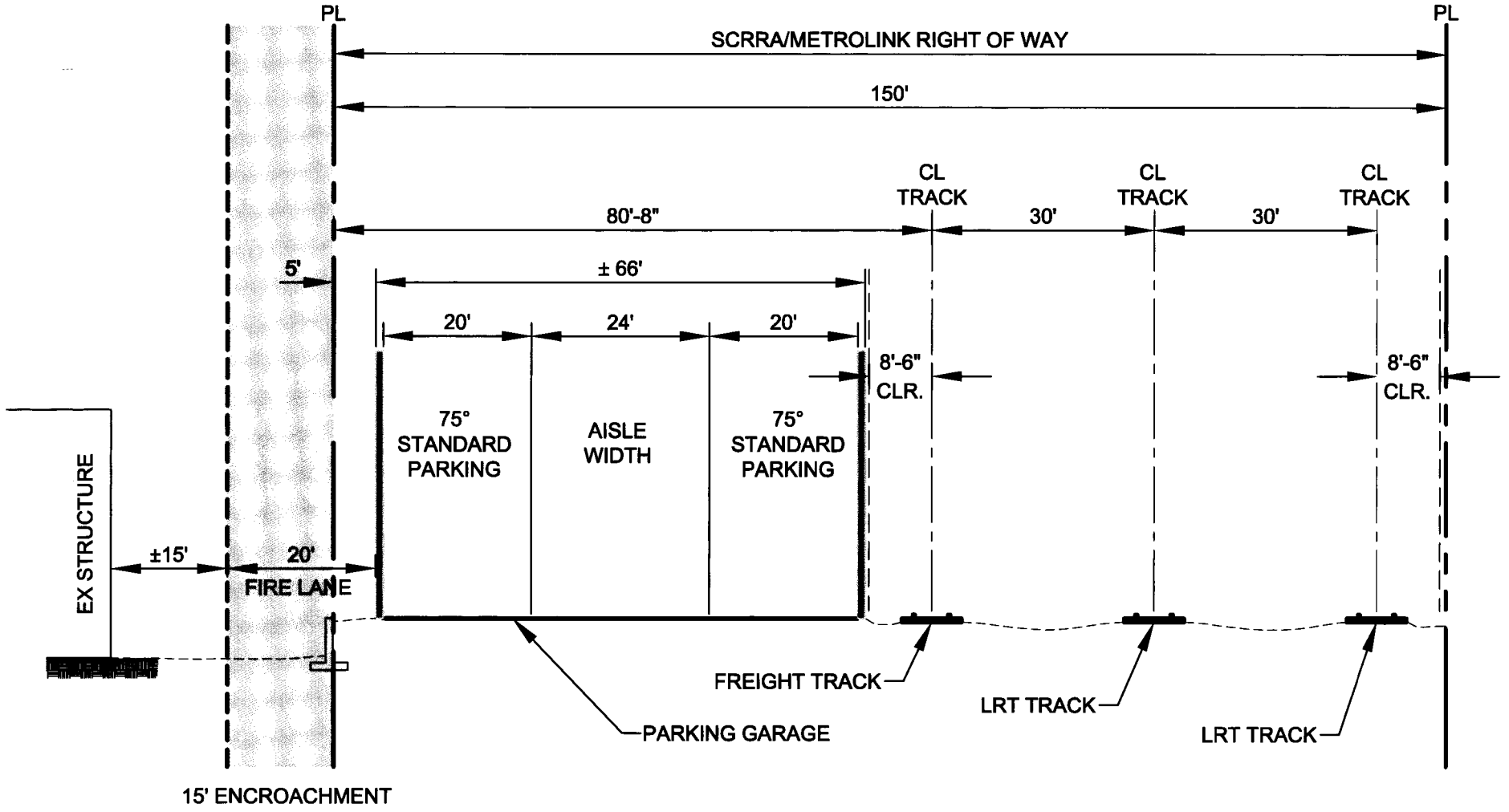


SECTION A-A
SCALE: 1" = 20'

GLENDORA STATION PARKING STRUCTURE

EXHIBIT C

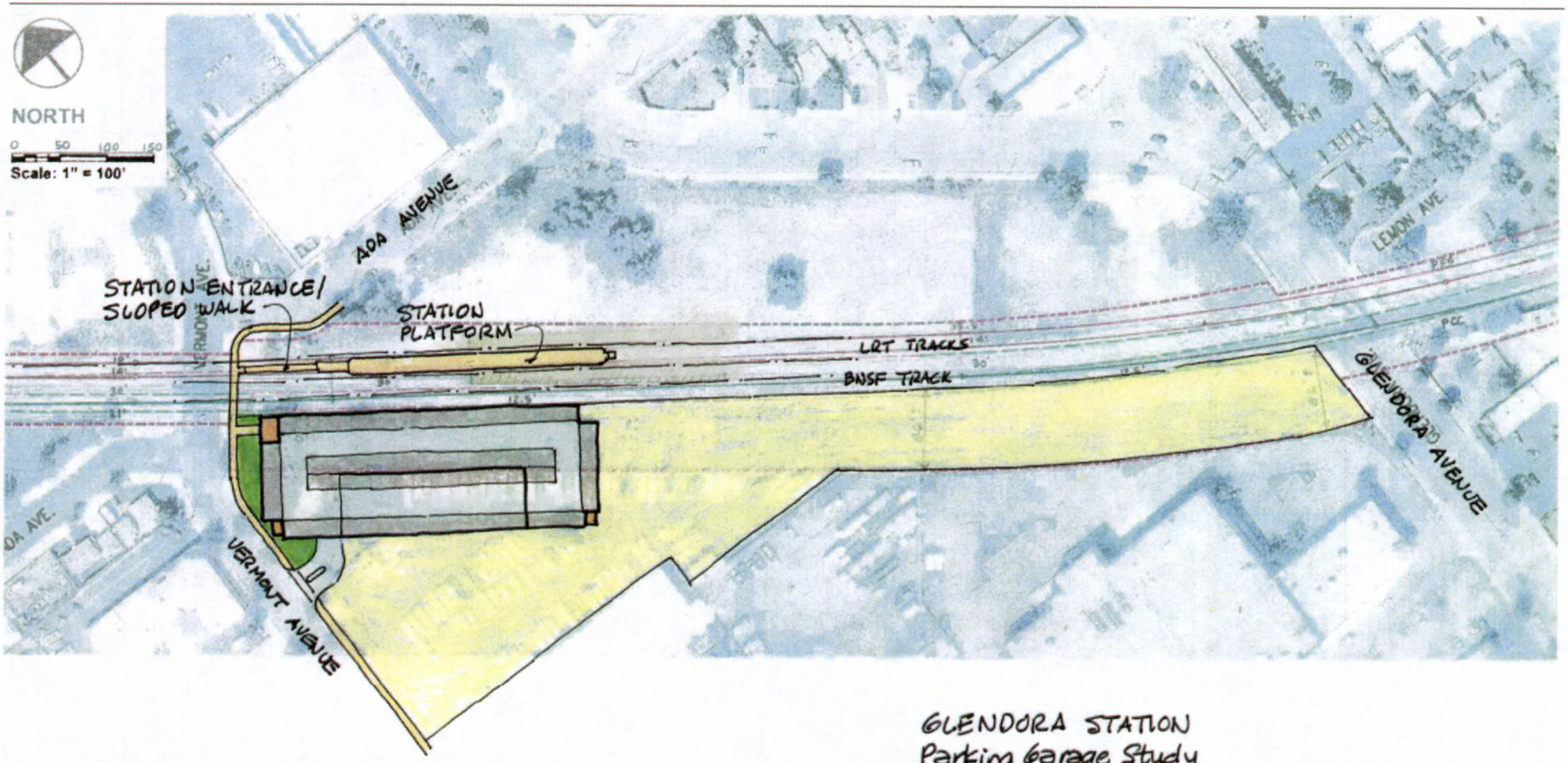
EAST END NEAR GLENDORA AVENUE



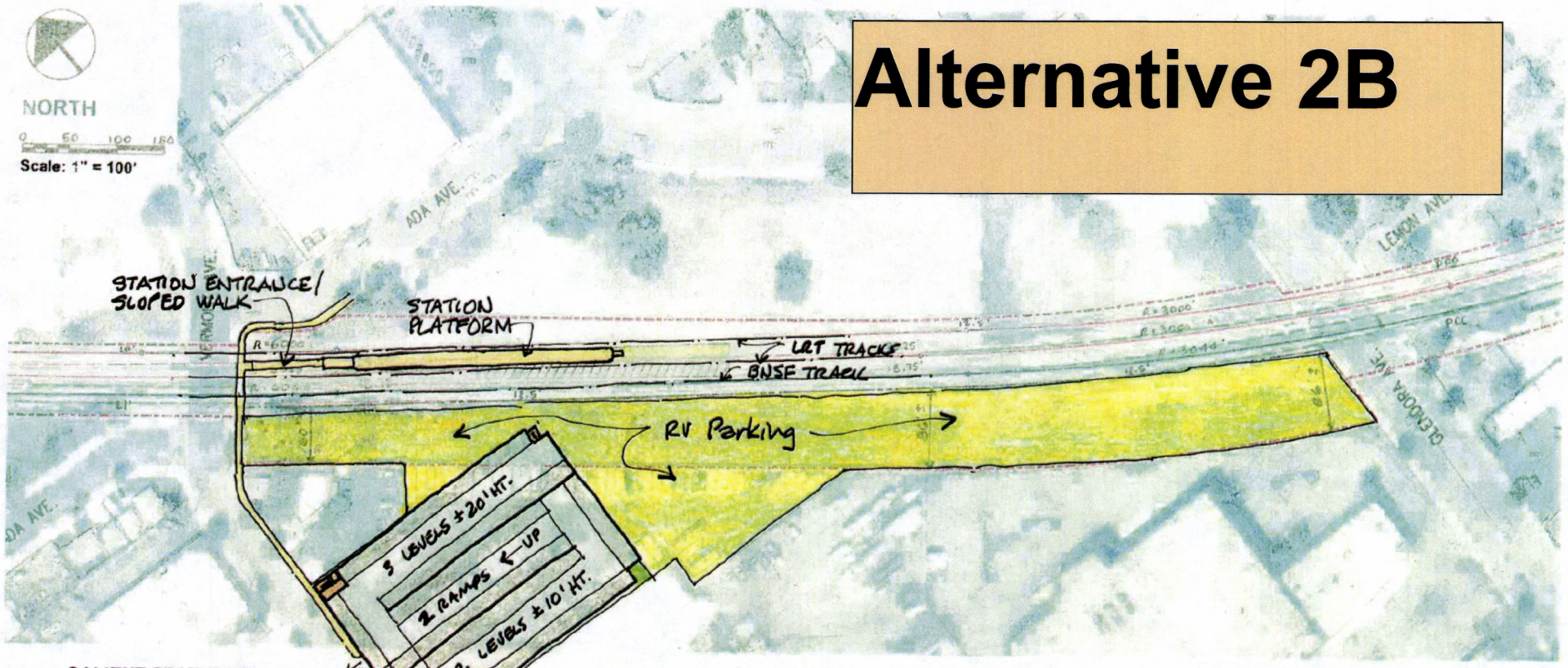
SECTION B-B
SCALE: 1" = 20'

Alternative 2

Alternative Parking Concept



Alternative 2B



SALIENT FEATURES:

- Maximizes parking capacity south of tracks
- Restricts BNSF/LRT track separation to 15' at platform area
- Minimizes Glendora Avenue street reconstruction
- Minimizes Vermont Avenue street reconstruction
- Will not impact existing leases/encroachments southeast of Glendora Avenue
- Minimal impact to residential encroachments northeast of Glendora Avenue
- Does not require an additional station platform
- NOTE: In both Figure 1 and Figure 2 the WB LRT and BNSF tracks are in identical positions

FIGURE 2: Glendora Station with Center Platform

PARKING GARAGE STUDY

Land Exchange - Parking Garage / RV Parking

Two-Way 90° Parking

± 420 Spaces

PARSONS BRINCKERHOFF

9/7/10

RICK™
ENGINEERING COMPANY

September 18, 2012

Jerry L. Burke, P.E.
City of Glendora, Public Works Department
116 East Foothill Boulevard
Glendora, CA 91741

SUBJECT: GOLD LINE STATION PARKING STRUCTURE; CITY OF GLENDORA, CA
METRO GOLD LINE FOOTHILL EXTENSION - DRAFT EIR PEER REVIEW

Dear Mr. Burke,

Rick Engineering Company (RICK) is pleased to submit the following comments on the Metro Gold Line Foothill Extension Project (Azusa to Montclair) Draft Environmental Impact Report (EIR) dated August 2012. The Peer Review includes an evaluation of the following:

(1) EIR Traffic Impact Analysis Scope
(2) Operational Analysis of Existing Traffic Conditions
(3) Project Trip Generation Estimates
(4) Impact Analysis of Future Traffic Conditions
(5) Project Mitigation Measures
(6) Analysis of Construction Impacts
(7) Functionality of Parking Structure

The Peer Review focuses on the roadway network within and adjacent to the City of Glendora.

1.0 EIR Traffic Impact Analysis Scope

The evaluation of the traffic analysis scope includes a review of existing and future traffic operations presented in the following public documents:

- City of Glendora Circulation Element (June 2007)
- Metro Gold Line Parking Structure Project - Traffic Impact and Functionality Evaluation (Rick Engineering Company - December 22, 2011)

The City's Circulation Element provides an evaluation of 9 key intersections in the general vicinity of the proposed Metro Gold Line Station. The City's General Plan Circulation Element defines "LOS D" as the lower limit for acceptable traffic operations. The analysis of existing conditions identified that 3 of these intersections currently operate within the LOS D range during the PM peak hour. The analysis of buildout conditions identified 4 local intersections that are projected to operate within the LOS E or F range, assuming the existing intersection geometrics (no improvements). The following intersections could potentially be impacted by the Metro Gold Line Extension project:

1) Grand Avenue / Foothill Boulevard
2) Route 66 / Grand Avenue
3) Route 66 / Glendora Avenue
4) Grand Avenue / Baseline Road

The Traffic Impact and Functionality Evaluation prepared by Rick Engineering Company evaluated 12 local intersections that could potentially be impacted by the Metro Gold Line Extension project. The analysis of existing conditions identified 1 intersection that currently operates within the LOS D range during the PM peak hour (Route 66 / Glendora Avenue). Under cumulative conditions with the proposed Metro Gold Line Extension project this intersection is projected to continue operating within the LOS D range.

The traffic analysis in Chapter 2 (Transportation) of the Metro Gold Line Foothill Extension Project EIR evaluates the potential impacts at 22 intersections within the City of Glendora. The existing conditions analysis only identified 1 intersection that currently operates in the LOS E or F range during a typical weekday peak commuter period (Route 66 / Glenwood Avenue). This intersection was evaluated using "two-way" stop sign control. However, this intersection is currently signalized. The EIR traffic analysis did not include an evaluation of the Route 66 / Grand Avenue intersections or the project driveways on Glendora Avenue or Vermont Avenue.

Comment #1
The project EIR traffic analysis scope should be expanded to include an evaluation of the following key intersections:

- *Route 66 / Grand Avenue*
- *Glendora Avenue / Project Parking Structure Driveway*
- *Vermont Avenue / Project Parking Structure Driveway*

The evaluation of additional intersections is required to accurately analyze the potential project impacts within the City of Glendora.

Comment #2
The project EIR traffic analysis should be revised to include the current traffic control at the Route 66 / Glenwood Avenue intersection.

2.0 Operational Analysis of Existing Traffic Conditions

2.1 Traffic Volumes

The analysis of existing conditions in the City's Circulation Element is based on intersection traffic count data collected in March 2006. The evaluation of existing conditions in the Rick Engineering analysis is based on intersection turning movement count data collected in June and July 2011. The existing conditions analysis in the Metro Gold Line Extension Project EIR traffic analysis is based on new turning movement traffic count data collected in 2010. A review of this data demonstrates that the count data used in the Metro Gold Line Extension Project EIR traffic analysis is acceptable.

2.2 Intersection Geometrics

The evaluation of existing conditions in the Metro Gold Line Extension Project EIR traffic analysis is based on intersection geometrics illustrated of Figure 2-2. The majority of lane geometrics at the key local intersections are consistent with the existing conditions, except at the following locations:

- Route 66 / Vermont Avenue - The EIR traffic analysis treated the north and southbound approaches as having a separate right turn only lane. These approaches are not striped for a shared left-through lane and a right turn only lane.

- Vermont Avenue / W. Ada Avenue - The EIR traffic analysis treated the southbound approach as having a separate right turn only lane. This approach is not striped for a through lane and a right turn only lane.

- Foothill Boulevard / Vermont Avenue - The EIR traffic analysis treated the northbound approach as having a left turn only lane and a shared through-right lane, and southbound approach as having a shared left-through-right lane. The Rick Engineering analysis analyzed both the north and southbound approaches as having a shared left-through lane and a right turn only lane.

2.3 Intersection LOS Analysis

As previously stated, the City's Circulation Element, Rick Engineering traffic analysis, and Metro Gold Line Extension project EIR traffic analysis includes an evaluation of key intersections. A summary of the existing peak hour LOS data at key intersections within the immediate vicinity of the Metro Gold Line station is provided in Table 1.

Table 1 - Summary of Existing Peak Hour LOS Analysis

Study Intersection	City's Circulation Element	Metro Gold Line EIR Project TIA	Rick Engineering TIA
	AM/PM	AM/PM	AM/PM
Route 66 / Grand Ave.	C/C	-	A/C
Foothill Blvd. / Grand Ave.	B/D	C/C	A/A
Foothill Blvd. / Loraine Ave.	C/A	-	-
Route 66 / Glendora Ave.	C/D	B/C	B/D
Route 66 / Loraine Ave.	C/A	B/B	-
Vermont Ave. / Foothill Blvd.	-	A/A	A/A
Glendora Ave. / Foothill Blvd.	-	C/C	A/A
Vermont Ave. / E. Ada Ave.	-	B/B	A/A
Glendora Ave. / Ada Ave.	-	B/B	B/B
Vermont Ave. / W. Ada Ave.	-	B/B	A/A
Vermont Ave. / Route 66	-	A/A	A/B
Glenwood Ave. / Route 66	-	D/B	-
Grand Ave. / Ada Ave.	-	-	A/A
Vermont Ave. / Carroll Ave.	-	-	A/A
Glendora Ave. / Walnut Ave.	-	-	A/A

The LOS data in Table 1 demonstrates that the existing peak hour operations analyzed in the Metro Gold Line Extension project traffic analysis is fairly consistent with the City's Circulation Element and the Rick Engineering traffic analysis. However, as discussed in Section 1.0 (EIR Traffic Impact Analysis Scope) the Metro Gold Line Extension project analysis does not include an evaluation of the (1) Route 66 / Grand Avenue, (2) Glendora Avenue / Project Parking Structure Driveway or (3) Vermont Avenue / Project Parking Structure Driveway intersections.

Comment #3
The project EIR traffic analysis should provide an evaluation of the following intersections:

- *Route 66 / Grand Avenue*
- *Glendora Avenue / Project Parking Structure Driveway*
- *Vermont Avenue / Project Parking Structure Driveway*

3.0 Project Trip Generation Estimates

This section provides a review of the project trip generation estimates included in the Traffic Impact and Functionality Evaluation prepared by Rick Engineering and Metro Gold Line Extension project EIR traffic analysis.

3.1 Rick Engineering Traffic Impact and Functionality Evaluation

The analysis prepared by Rick Engineering evaluated to potential impacts associated with the following 3 parking structure alternatives:

- Parking Structure Option 1 - The structure would be 2 levels, with a one-way circulation pattern and 60 degree angled parking stall layout, and accommodate about 330 vehicles. Access would be provided via a driveway on Vermont Avenue and Glendora Avenue.
- Parking Structure Option 2 - The parking structure would be 3 levels, with a two-way circulation and 90 degree parking stall layout, and accommodate about 420 vehicles.
- Parking Structure Option 2B - The parking structure would be 3 levels, with a two-way circulation and 90 degree parking stall layout, and accommodate about 400 vehicles.

The trip generation rates used to estimate the Metro Gold Line station project trips were based on a study completed at the Metro Link Station in the City of Industry. These rates demonstrate that the Metro station in the City of Industry generates approximately 1.92 daily vehicle trips per parking stall. This indicates that a 400 parking stall structure could generate about 768 ADT.

3.2 Metro Gold Line Extension Project EIR Traffic Analysis

The evaluation presented in the EIR traffic analysis is based on a 400 parking stall structure, similar to Option 1 evaluated in the Rick Engineering analysis. It is estimated that the new Gold Line station will have a daily ridership of approximately 1,860. The project trip generation in the EIR traffic analysis does not clearly state the number of local trips that will be attracted to the Metro Gold Line Extension project site. The analysis of project impacts was completed using projections from a transportation model developed for the project. The model demonstrated that the project would reduce local traffic demands by approximately 1.763%, as compared to 2035 No-Build alternative.

Comment #4
The project EIR traffic analysis should provide a table quantifying the project trip generation.

4.0 Impact Analysis of Future Conditions

The analyses of environmental impacts presented in the EIR includes an evaluation of horizon Year 2035 conditions associated with the "no-build" and "build" scenarios.

4.1 Future Traffic Volume Forecasts

The evaluation of future conditions in the City's Circulation Element is based on traffic model projection data developed for buildout (2025). Information provided by City staff indicates that the future traffic model projections are based on an annual growth rate of 1.0%. The evaluation of future conditions in the Rick Engineering analysis included an evaluation of the background (approved projects) and cumulative (approved and pending projects) scenarios. The traffic volume forecasts for each scenario were based on actual project information provided by the City's Planning Department.

The future 2035 "no-build" traffic volume forecasts in the EIR traffic analysis were derived using a 0.7% annual growth rate between 2010 and 2035 (total 16.1%). The growth factor was then applied to each of the study intersections. The 2035 traffic volume forecasts for the "no-build" scenario were then reduced by 1.763% to represent the project "build" alternative. A detailed review of the traffic model forecasts for the 2035 conditions is beyond the scope defined for this peer review.

Comment #5
The project EIR traffic analysis should be based on an annual growth rate of 1.0% to be consistent with the City's Circulation Element.

4.2 Intersection LOS Analysis

As previously stated, the City's Circulation Element, Rick Engineering traffic analysis, and Metro Gold Line Extension project EIR traffic analysis includes an evaluation of key intersections. A summary of the future conditions peak hour LOS data at key intersections within the immediate vicinity of the Metro Gold Line station is provided in Table 2. It should be noted that the LOS data presented for the City's Circulation Element reflects the implementation of mitigation measures.

Table 2 - Summary of Future Conditions Peak Hour LOS Analysis

Study Intersection	City's Circulation Element - 2025 -	Metro Gold Line EIR Project TIA - 2035 -	Rick Eng. TIA - Cumulative -		
	AM/PM	AM/PM	Opt. 1	Opt. 2	Opt. 2B
Route 66 / Grand Ave.	C/D	-	A/C	A/C	A/C
Foothill Blvd. / Grand Ave.	A/C	C/C	A/A	A/A	A/A
Foothill Blvd. / Loraine Ave.	C/A	-	-	-	-
Route 66 / Glendora Ave.	D/D	C/C	B/D	B/D	B/D
Route 66 / Loraine Ave.	D/B	B/B	-	-	-
Vermont Ave. / Foothill Blvd.	-	A/A	A/A	A/A	A/A
Glendora Ave. / Foothill Blvd.	-	C/C	A/A	A/A	A/A
Vermont Ave. / E. Ada Ave.	-	B/C	A/A	A/A	A/A
Glendora Ave. / Ada Ave.	-	B/C	B/B	B/B	B/B
Vermont Ave. / W. Ada Ave.	-	B/B	A/A	A/A	A/A
Vermont Ave. / Route 66	-	A/A	A/B	A/B	A/B
Glenwood Ave. / Route 66	-	F/F	-	-	-
Grand Ave. / Ada Ave.	-	-	A/A	A/A	A/A
Vermont Ave. / Carroll Ave.	-	-	A/A	A/A	A/A
Glendora Ave. / Walnut Ave.	-	-	A/A	A/A	A/A

As previously stated, the analysis of 2025 buildout conditions in the City's Circulation Elements identified 4 local intersections that are projected to operate within the LOS E or F range. However, with the implementation of recommended mitigation measures these intersections would operate at LOS D or better during both peak hour periods. A majority of the LOS values for the "build" scenario in the EIR traffic analysis are consistent with the data contained in the City's Circulation Element and Rick Engineering traffic analysis. However, as discussed in Section 1.0 (EIR Traffic Impact Analysis Scope) the evaluation of the Route 66 / Glenwood Avenue intersection is based on "two-way" stop sign control. This intersection is currently signalized.

Comment #6
The project EIR traffic analysis should provide an evaluation of the following intersections:

- *Route 66 / Grand Avenue*
- *Glendora Avenue / Project Parking Structure Driveway*
- *Vermont Avenue / Project Parking Structure Driveway*

Comment #7
The project EIR traffic analysis should be revised to include the current traffic control at the Route 66 / Glenwood Avenue intersection.

5.0 Project Mitigation Measures

An evaluation of the 2035 "build" scenario in the EIR traffic analysis only identified a mitigation measure at the Route 66 / Glenwood Avenue intersection. The recommended mitigation measure is to signalize the intersection. As previously stated, this intersection is currently signalized (see Comments #2 and #7)

6.0 Analysis of Construction Impacts

The Metro Gold Line Extension project EIR contains limited information regarding the construction and potential impacts. The EIR does provide a brief overview of engineering considerations and construction methods.

Comment #8
The project EIR traffic analysis should include a discussion of potential construction impacts at key intersections in the City of Glendora.

7.0 Functionality of Parking Structure

7.1 Metro Gold Line Extension Project EIR Traffic Analysis

The project EIR contains a brief overview of engineering considerations, but no detailed analysis of the parking structure functionality or access. As previously stated, the parking structure would accommodate 400 vehicles (one-way circulation) with access on Glendora Avenue and Vermont Avenue. The parking structure would be located on a narrow parcel of land south of the existing railroad tracks (currently owned by Metro). The only major engineering consideration in the EIR traffic analysis is the construction of bridges over Route 66, which is located approximately 1.60 miles east of Glendora Avenue.

Comment #9
The project EIR should include additional details regarding the proposed parking structure, including but not limited to, design geometric features, functionality and access. The EIR does not demonstrate how adjacent properties could be impacted or the viability of purchasing the required property to accommodate the currently proposed parking structure. In addition, the project EIR traffic analysis should provide an evaluation of the potential access impacts on Glendora Avenue and Vermont Avenue (see Comments #1, #3 and #6). The additional analysis is required to adequately evaluate the potential impacts to the local street system in the City of Glendora.

7.2 Rick Engineering Evaluation of Parking Structure Functionality

The analysis prepared by Rick Engineering included a detailed evaluation of the parking structure functionality. The evaluation was conducted by Parking Design Associates (PDA) and performed for 3 parking structure alternatives (Option 1, 2 and 2B). A detailed layout of each parking structure alternative was prepared to identify the potential issues (copy is attached). Since the parking structure presented in the project EIR is similar to Option 1 analyzed in the Rick Engineering analysis, our review focuses on the design related aspects of Option 1.

7.2.1 Preliminary Geometric Design Features

The following is a summary of the preliminary geometric design features associated with Option 1 as provided by City staff:

- The parking structure has approximately 330 stalls, two levels with 60 degree parking on each side of a one way aisle, two ingress-egress points from two separate streets, one elevator and three sets of stairs. At the center of the structure is a crossover to the station platform at street level crossing all three train tracks. Vehicular access from one level to the next is by an exterior ramp.

To evaluate the parking structure functionality a layout of parking structure Option 1 was prepared by PDA using the following City's Planning and Zoning Codes:

Standard stall size: 9'-0" wide x 20'-0" long
Compact stall size: 8'-0" wide x 17'-0" long (allowed up to 25% of capacity)
Drive aisle width: 18'-0", 60 degree angle parking, one way

7.2.2 Functionality Evaluation Conclusions

The functionality evaluation of Option 1 concluded the following:

- A partial third level would be required to accommodate 400 parking stalls.
- The parking structure parcel has a width of approximately 60'.
- Based on City codes the overall width of the parking structure would need to 65'-8".
- For a naturally ventilated parking structure a 10' setback from the property line would be required per the 2010 California Building code. Another 10' setback on the opposite side of the structure is recommended to maintain a fully open parking structure to prevent crime and to reduce lighting requirements.
- This would result in an overall width of 85'-8", which would be a 25'-8" encroachment on to the adjacent property.
- The west side ingress-egress driveway on Vermont Avenue would encroachment further into the adjacent property.

- A 26' wide fire truck access roadway would be required along one side of the parking structure necessitating an overall width of approximately 101'-8". This would be a 41'-8" encroachment into the adjacent properties.
- Vehicular Circulation Issues:
  - Drivers in search of an open parking space may be forced to use the exterior ramp to get to the next level in search of an empty space. A conflict with incoming traffic from both streets (Vermont Avenue and Glendora Avenue) can be foreseen causing a traffic backup.
  - The possibility of a driver stopping the vehicle waiting until a parking space opens up will cause a traffic backup in a narrow one way drive aisle. There is no space to bypass a stopped vehicle.
  - In addition, a 3rd level would be required to provide the 400 parking stalls. This results in the provision of exterior circular ramps at each end of the structure requiring more space.
  - The inconvenience of such a parking layout will result in the people opting to park on the streets, at Albertsons and other public/private parking areas instead of in the parking structure causing congestion.
- Pedestrian Inconvenience Issues: The only crossover to the station is located at the center of the structure requiring the pedestrians to walk approximately 600 feet from the west end and 430 feet from the east end of the structure. The industry standard is to limit the maximum walking distance to approximately 300 feet.
- Pedestrian Safety Issue: Walking the long distances at a time when there are no other people around can cause a safety issue.
- Pedestrian Hazard Issue: Only walking travel path to the central crossover is within the one way narrow drive aisle. This is a hazardous condition especially for people with children and luggage.
- Pedestrian Accessibility Issues: Path from accessible parking to the station cannot cross railroad tracks per ADA and CA Title 24. Location of the station & accessible parking in relation to tracks need to be considered. Receiving a variance is highly unlikely.
- Design Related Issues: The variation of grade at the east end (Glendora Avenue) of the structure would require considerable excavation, retaining walls, waterproofing and backfill. The partial basement will require mechanical ventilation. All this would also drive up the cost (+5-10%).
- Construction Related Issues: Option 1 design/construction cost would be approximately 20% more per stall than Option 2B ($18,000 per stall). The parking structure construction costs could be $5,940,000; which does not include the acquisition of any property. Protection/maintenance of the southernmost track alignment would need to be considered during construction thus adding to the cost (+5-10%).

7.2.3 Project Structure Option1 (EIR) Problems Foreseen

The functionality evaluation of Option 1 identified the following potential problems:

- Vehicles accessing the next level in search of vacant parking spaces exit the structure and have to share the entry/exit driveways with incoming traffic thereby creating a potential conflict.
- Ingress and egress traffic queuing can be reduced with the addition of additional entry/exit lanes at the driveways.
- The path of travel from accessible parking stalls to the station cannot cross railroad tracks. Receiving a variance is highly unlikely. The location of the station and accessible parking stalls in relation to the rail tracks need to be considered.
- Pedestrians parked furthest away from the central cross over to the station need to walk approximately 600' (with luggage) in the drive aisle to reach the crossover or elevator. This is a

hazardous condition. Their access to the station is also disrupted when a train is stopped at the station.

- The 60' width of the existing parcel is too narrow to design an entrance from northbound Glendora Avenue which allows traffic to enter and make grade to the second floor within the minimum lane widths and maximum slopes.

7.2.4 Functionality Evaluation Recommendation

The functionality evaluation of Option 1 presented the following recommendation:

- Add another elevator at the west end and a continuous walkway along the south side of the structure with direct access to Vermont Avenue and Glendora Avenue. In an emergency, pedestrian egress traffic from the central exit stair to the public way is through rail tracks. This will not be permitted by code.

Comment #10

The project EIR should include sufficient detail to demonstrate how the parking structure could be built on the existing Metro parcel south of the existing railroad tracks and provide an evaluation demonstrating the Option 1 is the best layout for the City of Glendora.

7.3 Rick Engineering Evaluation of Parking Structure Access

The analysis prepared by Rick Engineering included a detailed evaluation of access. The evaluation of access was conducted for 3 parking structure alternatives (Option 1, 2 and 2B). Since the parking structure presented in the project EIR is similar to Option 1 analyzed in the Rick Engineering analysis, our review focuses on the access related issues for Option 1.

7.3.1 Existing Roadway Conditions Description

The Glendora Avenue driveway for Option 1 would be located approximately 55' south of the railroad tracks. This driveway would be restricted to northbound left turns for ingress traffic and right turns only for egress traffic. The controlling line-of-sight factor for vehicles exiting the Glendora Avenue driveway and looking north will be the horizontal curve north of the railroad tracks and future development of the City Ventures project. In addition, there is also a "crest" vertical curve on Glendora Avenue between the railroad tracks and driveway location. It should be noted that the project driveway surface is anticipated to be at least 1-2' lower than the railroad tracks and "crest" vertical curve, which would limit the visibility for smaller vehicles exiting the parking structure.

The Vermont Avenue driveway for Option 1 would be located about 215' south of the railroad tracks. South of the railroad tracks, Vermont Avenue has a horizontal curve. An existing office building on the east side of Vermont Avenue (south of tracks) is currently the controlling line-of-sight factor along this horizontal curve. South of the horizontal curve Vermont Avenue continues on a straight horizontal alignment towards Route 66.

7.3.2 Existing Traffic Volumes and Vehicle Speeds

Average daily traffic (ADT) along Glendora Avenue is 18,000 ADT and on Vermont Avenue is 3,800 ADT. Spot speed surveys have documented 85th percentile speeds of 25-30 mph on Vermont Avenue and 35-40 mph on Glendora Avenue.

7.3.3 Adequacy of Sight Distance

The Rick Engineering analysis included an evaluation of sight distance adequacy. The analysis demonstrates that vehicles exiting the parking structure will not have adequate corner sight distance of southbound vehicles on Glendora Avenue. Future development of private property north of the railroad tracks and the existing vertical curve "crest" on Glendora Avenue (near railroad tracks) restricts visibility looking north from the proposed parking structure driveway. The Metro Gold Line Authority has indicated that the existing tracks will eventually be lowered. Due to the lack of specific details in the project EIR it is anticipated that vehicles exiting the project driveway will still have inadequate corner sight distance of southbound vehicles. The project driveway would need to be moved further south in order to achieve adequate corner sight distance for exiting vehicles, which would encroach on the Albertson's property and parking lot.

The analysis also indicates that vehicles exiting the project driveway will have a limited view looking north at southbound vehicles on South Vermont Avenue. Development of parking structure Options 1 would somewhat limit the view of southbound vehicles due to the corner of the parking structure.

Comment #11
The project EIR should include specific information regarding project access and provide an evaluation to demonstrate that all potential impacts can be mitigation.

7.3.4 Turn Lane Channelization Warrants

An evaluation of turn lane channelization warrants concluded the cumulative plus project peak hour demands would not warrant a separate left or right turn lane on Vermont Avenue.

7.3.5 Vehicle Queue Analysis

The queue analysis of the ingress northbound left turn movement on Glendora Avenue concluded that if traffic during the AM peak hour arrived at the parking structure near the same time, vehicles entering the parking structure could potentially impact access at the Albertson's driveway, as well as at the existing and future driveways (east side of Glendora Avenue).

Comment #12
The project EIR should include an analysis of the project driveway intersections on Glendora Avenue and Vermont Avenue (see Comments #1, #3, #6 and #9). The analysis should include an evaluation of the northbound left turn queue on Glendora Avenue.

7.3.6 Pedestrian Traffic

Data in the Gold Line Foothill Expansion Ridership report indicates that the modeling used for the parking assumed a vehicle occupancy rate of 1.05 people per vehicle with no turnover (a parking stall only gets used by 1 vehicle per day). This would equate to about 400 people per day, with approximately 800 pedestrian crossings per day Monday through Friday. Pedestrian access to and from the station platform would be provided via an "at-grade" track crossing about halfway between Vermont Avenue and Glendora Avenue. A pedestrian crossing at this location would be inefficient and unsafe due to the potential for stopped trains to block access and visibility. A pedestrian crossing at this location would need to be protected and adhere to standard ADA accessibility requirements.

Comment #13
The project EIR should include specific information regarding pedestrian access to and from the station, and demonstrate how pedestrian traffic will be handled in a safe manner.

7.4 Rick Engineering Traffic Impact and Functionality Evaluation Conclusions

The evaluation of potential traffic impacts associated with the parking structure alternatives (Option 1, 2 and 2B) includes an analysis of existing, background and cumulative conditions. The evaluation of background and cumulative "plus project" conditions concluded that the development of the Metro Gold Line parking structure will not significantly impact peak hour operations.

The evaluation of Option 1 (similar to that presented in the project EIR) concluded that a third level would be required to accommodate 400 stalls and the structure would not fit within the project site width. Setbacks would be required per the 2010 California Building code and a fire truck access road would be needed along at least one side of the structure, which would result in encroachment on to the adjacent property south of the project site. A review of vehicular and pedestrian circulation associated with Option 1 identified numerous efficiency and safety issues.

The potential project access impacts associated with Option 1 may not be able to be feasibly mitigated. Based on the evaluation of potential impacts the preferred alternative for the Glendora Gold Line parking structure would be Option 2 or 2B, not the alternative presented in the project EIR.

Comment #14
The project EIR should include an evaluation of additional parking structure alternatives (i.e., Option 2 or 2 B) that would fit better of the Metro parcel, minimize impacts to adjacent parcels and mitigate the potential project access impacts.

If you have any questions or need additional information, please contact me at your earliest possible opportunity. Thank you again for your support and having Rick Engineering Company help the City of this project.

RICK ENGINEERING COMPANY

Larry D. Hail, PE, TE, PTOE
Principal Traffic Engineer

LDH:ms

26. Davies, David A., Director of Public Works, City of Glendora, October 5, 2012.

Response 26-1

The City's support of the project is acknowledged.

Response 26-2

The physical layout of the parking structure at Glendora Station is depicted in Figure 1-11 of the Draft EIR. Track spacing is depicted in Appendix A of the Draft EIR.

The Construction Authority has reviewed a functionality evaluation prepared by Rick Engineering and disagrees with the conclusions for the following reasons.

The evaluation is based on Metrolink standards, which the Metro Gold Line does not employ. The Gold Line is to be designed and constructed using not Metrolink standards but the Los Angeles County Metropolitan Transportation Authority's (Metro) Metro Rail Design Criteria and Standards.

Metrolink standards do not apply to this project or area. Metrolink, the service name for the Southern California Regional Rail Authority (SCRRA), is a separate agency that does not operate trains in Glendora and is unaffiliated with the Gold Line project.

The applicable Metro standards specify a platform width of 16' 2", not the referenced 30' Metrolink standard. Under the Metro standards, required clearances are met by the current project design.

Rick Engineering's Exhibit C shows the overall ROW distance as being 60' from track centerline to track centerline. Employing the Metro standard, the distance is 43'-3 1/2". Instead of the 80.6' shown in Exhibit C, this allows approximately 92'-2 ½' from north side of the parking structure to the south property line, and provides sufficient space for a 26' wide fire lane.

The Right of Way (ROW) shown in Rick Engineering's Exhibit B and Exhibit C is not the property of SCRRA / Metrolink, as shown, but of BNSF and LACMTA (Metro).

Response 26-3

As required, station lighting will follow Metro standards. Mitigation Measure SS-3 has been revised to reflect this.

Response 26-4

The station parking at the City of Glendora has been added to the list of Areas of Controversy and Issues to be Resolved in the Summary in the Final EIR.

Response 26-5

The comment is correct: both Glendora Station and La Verne Station are anticipated to have approximately 1,850 daily boardings by 2035. Although the number of passengers is forecasted to be similar between the stations, the passengers' mode of accessing each station differs.

The smaller size of the Glendora parking structure accounts for the fact that a larger percentage of trips to the station are expected to be via bus in Glendora (14%) than in La Verne (1%).

Response 26-6

The comment refers to an analysis prepared by Rick Engineering, which used Metrolink standards that do not apply to this Metro project, as explained in Response 26-2. Using applicable Metro, not Metrolink, criteria, the clearances are sufficient for a 400-stall, two-story parking structure.

Response 26-7

The Construction Authority will ensure that sight distance issues are addressed as the design is being refined during the preliminary engineering and final design phases of the project.

Response 26-8

The configuration of the raised median can be designed such that a northbound left turn opening is provided for access into the parking structure and at the same time prohibit southbound left turn access into the new development.

Response 26-9

The statement has been removed.

Response 26-10

The City's concern about queuing issues on Glendora Avenue is addressed under the section "Additional Traffic Issues at Specific Locations" on page 2-90 of the Draft EIR:

> "The City of Glendora raised concerns about a potential traffic impact near the proposed parking structure for the LRT station located along Glendora Avenue north of Route 66. Currently, the Albertsons shopping plaza is accessed through an existing driveway situated between Route 66 and the proposed parking structure access. The City is concerned that the additional traffic generated by the future LRT parking structure would compromise the gaps available for vehicles exiting and entering the Albertsons driveway to maneuver safely in and out of the site. A traffic count was conducted at the Albertsons driveway, and existing and future operating conditions were analyzed to determine if any significant impacts would occur as a result of the traffic generated by the project. The analysis showed that no queuing issues would affect vehicles entering or exiting the shopping plaza. In addition, programming of the signal at the intersection of Glendora Avenue and Route 66 would create adequate gaps for vehicles to complete their turn movements."

The methodology for determining impacts is discussed in Section 2.3 of the Draft EIR and in greater detail in Chapter 3 of the Transportation Technical Report, which is available on the Construction Authority's website:
http://www.foothillextension.org/images/uploads/FT_Draft_Report_2012-07-17_updated.pdf

The Construction Authority will ensure that sight distance issues are addressed as the design is being refined during the preliminary engineering and final design phases of the project.

Response 26-11

As explained in Response 26-2, the analysis performed by Rick Engineering used Metrolink standards that do not apply to Metro rail projects. Using the applicable Metro design standards and criteria, clearances are sufficient to accommodate a two-level, 400-space parking structure.

Response 26-12

Please see Response 26-11.

Response 26-13

The description of the right of way in the City of Glendora in Section 3.13 has been updated to reflect the recent reduction in the width of the right of way. The proposed parking structure at the Glendora Station would still fit within the existing right of way.

Response 26-14

Please see Response 26-11.

Response 26-15

Table 4-2 in the Draft EIR references points shared by the City of Glendora at the station planning workshop held on May 4, 2011, and does not include comments received during the official scoping period. Locating a kiss-n-ride on the north side of the tracks is infeasible due to traffic circulation and station access issues. Furthermore, a kiss-n-ride in this location would require property acquisition due to the small width of the right-of-way north of the station.

Response 26-16

As with station concepts drawn for all other Cities served by the project, the Glendora station concept does not illustrate the specifics of future or planned development. Pedestrian access to the paseo would likely require an overpass to comply with state regulatory requirements. The Construction Authority is willing to work with the City and the developer to facilitate an overpass to the station platform, but not to incur the cost of the overpass and/or connection to the private development.

Response 26-17

The City requests an analysis of a revision to a single project component (the parking structure for the Glendora station) as an "alternative," however, CEQA does not require consideration of alternatives to components of a project. Further, as explained in Response 26-2, the analysis performed by Rick Engineering used Metrolink standards that do not apply to Metro rail projects to conclude that the proposed parking structure is infeasible due to constrained clearances. Using the applicable Metro design standards and criteria, clearances are sufficient to accommodate a two-level, 400-space parking structure.

Nonetheless, the Construction Authority, in response to the issues raised by the City of Glendora, has considered a redesigned parking structure that is similar in design and location as shown in Exhibit 2B of the comment letter. This redesigned structure has been included in the Final EIR as "Option 2."

The Option 2 structure is designed to have 420 spaces (versus 410 in the structure considered in the Draft EIR or Option 1). As a 3-level structure, it has a more compact footprint. As Option 2 is located close to Option 1 and is within the same commercial area, it has no new environmental impacts except for the acquisition of the RV property. Option 2 is accessed from Vermont Avenue only, avoiding the "sightline" concern at the Glendora Avenue railroad crossing associated with Option 1. It is noted in the Final EIR that Option 2 is the preferred City of Glendora option.

Table 1 below indicates the results of the traffic analysis conducted for Option 2. This information has been added to Table 2-26 in the Final EIR.

Table 1: Build (2035) Study Intersections Peak Hour LOS

ID	Intersection	Jurisdiction	Control Type	AM		PM	
				LOS	Delay[1]	LOS	Delay[1]
Option 1: Access on both Glendora Avenue and Vermont Avenue							
5	Vermont Avenue/Route 66	Glendora	Signalized	A	7.5	A	9.1
7	Vermont Avenue West/Ada Avenue	Glendora	Unsignalized	B	12.3	B	13.2
9	Glendora Avenue/Ada Avenue	Glendora	Unsignalized	B	12.3	C	15.3
10	Glendora Avenue/Route 66	Glendora	Signalized	C	22.8	C	32.4
Option 2: Access on Vermont Avenue							
5	Vermont Avenue/Route 66	Glendora	Signalized	A	9.8	B	13.9
7	Vermont Avenue West/Ada Avenue	Glendora	Unsignalized	B	12.3	B	13.2
9	Glendora Avenue/Ada Avenue	Glendora	Unsignalized	B	13.3	C	17.1
10	Glendora Avenue/Route 66	Glendora	Signalized	C	21.1	C	28.6

[1]Average vehicle delay in seconds

Peak hour volumes for forecast year 2035 were diagrammed for Option 2 and included in Section 2.6.3.3 of the Final EIR.

Response 26-18

The statement has been removed.

Response 26-19

The statement concerning traffic/pedestrian warning measures has been incorporated.

Response 26-20

The percentage growth in Table 1-1 of the EIR is calculated based on 2010 vehicle trip tables and 2035 vehicle trip tables developed from person-trip tables developed by the Southern California Association of Governments (SCAG), the federally mandated metropolitan planning organization (MPO) of Southern California.

2010 Daily Vehicle Trips

	San Dimas	La Verne	Pomona	Claremont	Montclair
Glendora	7,395	2,971	1,285	1,641	580
San Dimas		4,206	2,151	1,367	684
La Verne			3,201	2,287	729
Pomona				4,406	1,149
Claremont					3,303

2035 Daily Vehicle Trips

	San Dimas	La Verne	Pomona	Claremont	Montclair
Glendora	8,208	3,268	1,478	1,854	731
San Dimas		5,173	2,775	1,709	1,067
La Verne			3,745	2,607	919
Pomona				5,419	1,597
Claremont					3,798

Response 26-21

Daily boardings are projected by the Corridor Base Model-2009 which is developed and maintained by LACMTA (Metro) and approved by Federal Transit Administration (FTA). The inputs of the model include transportation supply (highway network and transit network) and demand (person trips, socioeconomic data, etc). Glendora Station is an urban rail station within the transit network. Boardings at the station are estimated as part of the ridership forecasting of the entire transit system. Boardings are not estimated individually or based solely on features and socioeconomics specific to its surrounding area.

The Corridor Base Model-2009 is a four-step travel forecasting model, which is comprised of four procedures: trip generation, trip distribution, mode choice, and route assignment. A procedure of land-use forecasting starts before the four-steps model and provides some of the inputs into the model. The land-use forecasting is conducted by SCAG, the MPO of Southern California.

For more details about four-step travel forecasting model, please refer to this source:
http://www.siliconcreek.net/transportation/introduction-to-the-four-step-travel-demand-model

Response 26-22

The Los Angeles County 2010 Congestion Management Program does reference the Circular 212 method (page D-4) as one of the methods for intersection LOS calculations.

Response 26-23

Responses for the eleven intersections in question are provided in "Response 26-24" below.

Response 26-24

For Intersection 6 (Vermont Avenue/Foothill Boulevard), the northbound approach curb lane is wide enough for left turn traffic to operate simultaneously alongside the shared through/right turn movement.

For Intersection 20, through and right turn traffic waiting behind a left turning vehicle, which is waiting for a gap in the opposing traffic stream, will opt to use the available wide lane width to bypass a waiting left turn vehicle and cross the intersection.

As noted in the comment, the intersection of Glenwood Avenue/Route 66 (Intersection 14) was revised and changed from unsignalized to a signalized condition and the functional eastbound and westbound right turn lanes were removed. The LOS was recalculated and the tables were updated accordingly.

The traffic study in the Draft EIR was prepared by professional traffic engineers. In this study, all the intersection approaches that show a dedicated right turn lane (Intersections 5, 6, 7, 9, 10, 12, 16, 18, and 21) were analyzed as having dedicated right turn lanes, even though they are not striped as such, because the curb lane is wide enough such that both the through and right turn traffic can operate simultaneously. The Construction Authority acknowledges that multiple approaches to this analysis are valid, and that a difference of professional opinion exists among experts as to which approach is most appropriate. The Construction Authority believes the approach of considering these intersections unstriped functional right turns is most appropriate, as it reflects real world existing traffic operating conditions.

However, in response to the City of Glendora's concerns, an additional analysis was conducted without functional dedicated right turn lanes assumed at these intersections. The results of the analysis are presented in Table 2 below, and show that the level of service (LOS) at 7 of the 9 intersections would remain the same in both AM and PM peak hours. At Lorraine Avenue/Route 66, the LOS would not change in the PM peak hour; in the AM peak hour, the LOS would be C (rather than LOS B). At the intersection of Vermont Avenue/ Route 66, the LOS would remain the same in the AM peak hour; in the PM peak hour, the LOS would be B (rather than LOS A). As shown, all these intersections operate at acceptable LOS both with and without a functional striped right turn lane assumed in the analysis.

Table 2. Build Alternative Intersection Level of Service (2035)

#	Intersection	Jurisdiction	Control Type	AM		PM	
				LOS	Delay[1]	LOS	Delay[1]
				A	4.7	A	4.9
5	Vermont Avenue/Route 66	Glendora	Signalized	A	8.6	B	12.5
6	Vermont Avenue/Foothill Boulevard	Glendora	Signalized	A	7.5	A	7.7
7	Vermont Avenue West/Ada Avenue	Glendora	1-Way Stop	B	12.9	B	13.6
				A	2.34	A	2.0
9	Glendora Avenue/Ada Avenue	Glendora	All-Way Stop	B	12.3	C	15.3
10	Glendora Avenue/Route 66	Glendora	Signalized	C	23.0	C	32.4
12	Pasadena Avenue/Route 66	Glendora	Signalized	B	13.7	B	11.9
16	Elwood Avenue/Route 66	Glendora	Signalized	B	16.3	B	18.9
18	Loraine Avenue/Route 66	Glendora	Signalized	C	20.1	B	12.7
21	Glendora Avenue/Sierra Madre Avenue	Glendora	All-Way Stop	E	44.8	B	14.4

Response 26-25

The intersections analyzed in the traffic study are the intersections selected and analyzed in the Gold Line Phase II Pasadena to Montclair – Foothill Extension Final Environmental Impact Report, February 2007. In the Draft EIR, a total of 90 intersections and 35 roadway segments were studied within the project corridor, including 22 intersections and 10 segments located in the City of Glendora.

Response 26-26

Please see response to comment 26-24.

Response 26-27

Table 2-10 has been updated accordingly.

Response 26-28

Table 2-13 has been updated accordingly.

Response 26-29

The roadway segments selected for inclusion in the traffic study were adjacent to the proposed railroad alignment and the at-grade crossings. In addition, they are consistent with the locations evaluated in the Gold Line Phase II Pasadena to Montclair – Foothill Extension Final Environmental Impact Report, February 2007.

Response 26-30

Tables 2-17, 2-18, and 2-19 were updated accordingly.

Response 26-31

Please see Response 26-21.

Response 26-32

Please see Response 26-24.

Response 26-33

Tables 2-27 and 2-28 have been updated accordingly.

Response 26-34

The proposed right-turn-on-red ban is one of the recommended treatments to improve at-grade crossing operations and safety. The intent of the recommended treatments listed in Table 2-30 of the Draft EIR is to provide a set of potential steps, some or all of which could be taken, as necessary. The City's objection to the right-turn treatment at the Grand Avenue/Foothill Boulevard is noted and specific project intersection control and design treatments, including right-turn overlap, will be refined during the

preliminary engineering phase of the project. The text has been revised to "Incorporate provisions to ban right turn on red or provide right turn overlap."

Response 26-35

The proposed modification of the median on Foothill Boulevard is one of the recommended treatments to improve at-grade crossing operations and safety. The City's comment is acknowledged, and prior to selection of specific treatment(s), specific project intersection control and design treatments will be evaluated further as part of the preliminary engineering of the project.

Response 26-36

Section 2.8.2 and Table 2-33 were revised accordingly.

Response 26-37

A visual example of the project elements (including a photograph of a representative station platform) is presented in Table 1-3, and a visual rendering of the flyover structure is presented in Figure 1-8 in Chapter 1 of the Draft EIR. Chapter 1 also contains figures that illustrate the footprints of the proposed parking structures.

Visual impacts of project elements are analyzed in Section 3.13 of the Draft EIR.

The Construction Authority will continue to coordinate with local cities including the City of Glendora in the development of plans for project facilities.

Response 26-38

The information has been updated accordingly; and the conclusions of the analysis were not affected.

Response 26-39

Dam inundation area due to San Dimas Dam failure is not shown on Exhibit SAF-5 Dam Inundation Areas in the Safety Element of the City's Community Plan 2025. Dam inundation due to San Dimas Dam failure is discussed in Section 4.8.3.4 of the Draft EIR.

Response 26-40

The State Water Resources Control Board geotracker website lists a release of aviation fuel on soil located at N & G Business Park, 505 West Foothill Boulevard, Glendora, CA 91741 (NW corner of Foothill & Grand, south of tracks). The building appears to be currently addressed as 507 W. Foothill Blvd through 517 W. Foothill Blvd. This listing can be viewed online at the following link: http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0603703562

Response 26-41

A mitigation measure (N-5) that the Construction Authority will contact property owners of residences identified as having vibration impacts listed as significant and unavoidable has been included in Section 3.11 of the Final EIR.

Response 26-42

It is anticipated that retaining walls, sound walls and other project infrastructure can be constructed within the right of way and the parcels identified in Appendix C of the Draft EIR.

It is anticipated that grading will be contained within the right of way (including parcels that will be acquired for that purpose). Nonetheless, the Construction Authority will ensure the construction contractor's for any grading plan outside the right of way meets all City requirements and that all necessary permits are obtained.

Response 26-43

A Phase II ESA was conducted between June 6 and June 27, 2005 to address contamination from railroad use and/or adjacent properties. Twenty-five borings (E60 – E84) were advanced along the railroad right-of-way in the City of Glendora. Selected soil samples were analyzed for pH, total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), organochlorine pesticides (OCPs), and Title 22 metals. The results of the investigation are summarized in the Draft EIR (Section 3.9.2.1). Soils that can be classified as potential hazardous waste because of the detected concentrations of arsenic and lead were identified within surface soil samples. Petroleum hydrocarbon concentrations varied throughout the railroad right-of-way; and potentially significant levels were identified within three feet of the ground surface. Mitigation measures were identified in Section 3.9.4 of the Draft EIR to mitigate contaminants detected in the soil, and with implementation of these mitigation measures impact would be less than significant.

Response 26-44

At this time it is anticipated that no retaining walls outside the project's right of way area, which would include the identified acquisitions, would be needed. As further project engineering progresses, additional refinements would be incorporated into the project design. The Construction Authority will communicate with the City about those refinements, and if the further engineering includes a possibility of retaining walls, the Construction Authority will work with the City to ensure that construction of any walls outside the project's right of way area will be consistent with the City's general plan and zoning codes.

Response 26-45

It is anticipated that grading will be contained within the right of way (including parcels that will be acquired for that purpose). Nonetheless, the Construction Authority will ensure the construction contractor's for any grading plan outside the right of way meets all City requirements and that all necessary permits are obtained.

Response 26-46 [Rick Engineering Attachment]As noted in Response 26-2, the City's analysis of the Glendora Station parking structure proposed in the Draft EIR (labeled "Option 1" in the Final EIR), was based on Metrolink (commuter rail) standards which do not apply to Metro (light rail transit) projects. Based on the correct Metro clearance and platform standards, the "Option 1" parking structure is feasible.

As noted in Response 26-17, the Construction Authority has nonetheless opted to study a second "Option 2" structure similar to the "2B" concept suggested in the City's letter. Both Option 1 and Option 2 are included in the Final EIR.

In response to the City and Rick Engineering's comment concerning pedestrian traffic and safety, a pedestrian bridge has been added to both Option 1 and Option 2 to prevent passengers from having to walk over the two tracks (one freight, one LRT) between the parking structure and the platform.

THE SILVERSTEIN LAW FIRM
A Professional Corporation

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FACSIMILE TRANSMITTAL SHEET

DATE:	October 4, 2012	***NUMBER OF PAGES:***	6
FROM:	Robert P. Silverstein, Esq.	***CLIENT/MATTER NO.:***	S7650-001

NAME	***FAX NO.***	***PHONE NO.***
Metro Gold Line Foothill Extension Construction Authority Lisa Levy Buch, Director of Public Affairs Hon. Doug Tessitor, Metro Gold Line Chair Hon. Sam Pedroza, Metro Gold Line 1st Vice Chair Hon. Ed Reyes Hon. Keith Hanks Hon. John Fasana Hon. Bill Bogaard Hon. Lara Larramendi Hon. Daniel M. Evans Habib F. Balian, Metro Gold Line CEO	(626) 471-9049	
City of San Dimas Hon. Curtis W. Morris Hon. Emmett Badar Hon. Denis Bertone Hon. John Ebiner Hon. Jeff Templeman Blaine Michaelis, City Manager	(909) 394-6209	

MESSAGE:

Please see attached. Thank you.

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October 5, 2012

**VIA FACSIMILE(626) 471-9049,
EMAIL AND U.S. MAIL**

Lisa Levy Buch, Director of Public Affairs
Metro Gold Line Foothill Extension Construction Authority
406 East Huntington Drive, Suite 202
Monrovia, California 91016

Re: Objections to Gold Line Draft Environmental Impact Report for Proposed Light Rail Extension from Azusa to Montclair Project, Phase 2B; SCH No. 2010121069

Dear Ms. Buch:

This firm and the undersigned represent Storage Centers, LP, owner of the Storage Centers self-storage facility at 195 East Arrow Highway, San Dimas. We submit these preliminary comments on its behalf.

Please ensure that all communications from the Authority to our client regarding the Project are also promptly copied to our office. Please also ensure that notices of all hearings, actions, events, votes and decisions related to the Metro Gold Line Foothill Extension - Azusa to Montclair ("Project") are timely provided to this office. We reserve the right to provide further comment.

Although Storage Centers has concerns about the Project, Storage Centers supports the Authority's choice of the San Dimas City Yard as the site for the Project's San Dimas parking facility. 27-1

Storage Centers further supports the deletion of the Storage Centers self-storage facility at 195 East Arrow Highway from consideration and analysis as a potential alternative to the City Yard. While it is not a listed objective, the Authority's decision comports with what should be a stated consideration to avoid or minimize impacts to existing businesses to the maximum extent feasible. This was one of the criteria by which the Mt. Olive self-storage facility site in Duarte was rejected for consideration for the Maintenance & Operations Facility site in the Authority's Final Supplemental EIR for 27-2

the Pasadena to Azusa portion of the Gold Line Foothill Extension. (Exhibit A [Phase 2A FSEIR, Volume 4, p. 155].)

Storage Centers has been in business for more than 34 years, serving thousands of residents and businesses in San Dimas and the surrounding communities. There are currently about 300 tenants at the facility, some whom have been tenants since the facility opened. Condemning the Storage Centers property for a parking facility or any other use would cause severe disruption and hardship to Storage Centers, its tenants, and other local stakeholders, and would prove very costly for the Authority. It would also ruin the substantial goodwill the Storage Centers business has built in the community over the last 34 year and, given the competition in the industry and difficulties in relocating a self-storage facility, would most likely result in a complete loss of business goodwill that would be attributable to the Authority's actions. Those actions could be either direct or, in the event of a disguised condemnation via the City, indirect. In either scenario, Storage Centers would look to the Authority and/or the City for damages and other relief. 27-2

In the unlikely event that the Storage Centers site may yet be considered for the Authority's San Dimas parking facility – or be considered as a replacement site for the loss of the City's lot – either the Draft EIR would need to be recirculated, including pursuant to CEQA Guidelines Section 15088.5, or a Supplement to the EIR would be required pursuant to Guidelines Section 15163 because the Draft EIR does not analyze the Storage Centers site. If this event occurs, or if it is currently being considered or contemplated yet has been concealed by the Authority from public disclosure, Storage Centers will not only vigorously oppose consideration of its property, but will oppose the Project as a whole.

Thank you for your consideration of this correspondence and inclusion of it in the administrative record for this matter.

Very truly yours,

ROBERT P. SILVERSTEIN
FOR
THE SILVERSTEIN LAW FIRM

RPS:jmr
Encl.
cc: Hon. Doug Tessitor, Metro Gold Line Chair
Hon. Sam Pedroza, Metro Gold Line First Vice Chair

Hon. Ed Reyes
Hon. Keith Hanks
Hon. John Fasana
Hon. Bill Bogaard
Hon. Lara Larramendi
Hon. Daniel M. Evans
Habib F. Balian, Metro Gold Line Chief Executive Officer
(All via email and facsimile)
Hon. Michael D. Antonovich, Metro Chair
Hon. Diane DuBois, Metro First Vice Chair
Hon. Richard Katz, Metro Second Vice Chair
Hon. Don Knabe
Hon. Antonio R. Villaraigosa
Hon. José Huizar
Hon. Gloria Molina
Hon. Ara Najarian
Hon. Pam O'Connor
Hon. Mark Ridley-Thomas
Hon. Zev Yaroslavsky
Hon. Mel Wilson
Hon. Michael Miles
Arthur T. Leahy, Metro Chief Executive Officer
Ronald Stamm, Esq.
(All via email)
Hon. Curtis W. Morris
Hon. Emmett Badar
Hon. Denis Bertone
Hon. John Ebiner
Hon. Jeff Templeman
Blaine Michaelis, City Manager, City of San Dimas
(All via email and facsimile)

EXHIBIT A

With the Foothill Extension Phase 2A, the Gold Line will be approximately 32 miles long. The deadhead miles can have a significant impact on the operations and the operational costs because it involves running the cars without passengers.

3) The Union Pacific site would not avoid any significant and unmitigable impacts, and thus is not an appropriate site for consideration per CEQA Guidelines Section 15126.6(f)(2).

I) The commenter states that there are other alternate sites that should be considered as alternatives to the Monrovia site. The first, 2500 E. Central (also referred to as the Mt. Olive site), which is discussed in Comment I and in exhibits 4 and 5 of the comment letter, was deemed infeasible at this time because:

1) The property owner is not interested in selling, calling into question availability of the site. See comment letter exhibit 5, Michael Brandman letter dated September 4, 2009, which states the owner "is on record as opposed to any attempt by MTA and/or the Metro Gold Line Foothill Extension Construction Authority (MGLFCA) to acquire and develop the Mt. Olive site as a LRT maintenance and operation facility."
2) There are approximately 1,860 tenants at the Mt. Olive Storage site and each would be impacted by such an acquisition.
3) The cost of constructing an appropriate rail line connection across the Interstate 210 (whether underground or over head) would greatly exceed the costs that might be incurred to create an appropriate connection on other sites. Further, although there currently is a tunnel under Interstate 210, that tunnel is not of sufficient width to be used as an access point to the site. As noted in the Michael Brandman report (exhibit 5 and page 2 of comment letter), "An existing track was identified in the Consolidated Rail Yard Analysis Report; however, contrary to that Report, the trackage had actually been removed sometime before 1993." Furthermore, the existing tunnel does not have sufficient space to accommodate the number of track leads required to make a functional maintenance and operation facility, and another tunnel or overcrossing would be necessary to achieve suitable access. Therefore, the site is not readily accessible and the construction costs would be exorbitantly high.
4) CEQA does not require analysis of infeasible alternatives.
5) The Michael Brandman study submitted on behalf of the owners of the 2500 E. Central site provides evidence that development of an M&O Facility on that site would likely have significant environmental impacts unlike the Monrovia site,

27. Silverstein, Robert, Silverstein Law Firm on behalf of the Storage Centers LP, October 5, 2012.

Response 27-1

Your support for the proposed site of the San Dimas Station parking facility at the San Dimas City Yard is acknowledged.

Response 27-2

The Storage Centers' facility at 195 East Arrow Highway is no longer being considered as a site for the San Dimas Station parking facility.

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Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

Metro

December 19, 2012

Ms. Lisa Levy Buch
Director of Public Affairs
Metro Gold Line Foothill Extension Construction Authority
406 East Huntington Drive, Suite 202
Monrovia, CA 91016-3633

RE: Azusa to Montclair Draft Environmental Impact Report

Dear Ms. Buch:

Thank you for providing the Los Angeles County Metropolitan Transportation Authority (Metro) with the opportunity to review and comment on the Metro Gold Line Foothill Extension Phase 2B Azusa to Montclair Draft Environmental Impact Report (DEIR).

Based on conversations with Foothill Extension Construction Authority staff, we are providing this letter that supersedes our October 5, 2012 DEIR comment letter. We now distinguish between those comments that are to be treated as DEIR comments and comments that will be addressed by the Authority separately through the later design stages of the project. Metro understands that the Authority will provide responses to our DEIR comments as part of the Final Environmental Impact Report.

Metro's DEIR comments can be found on the attached spreadsheet and cover a range of disciplines including planning, systems, construction, rail operations, environmental, safety and security, and creative services. In particular, we would like to highlight two comments:

- Metro will be operating and maintaining the Azusa to Montclair extension after it is completed. For this reason, the project will be constructed to conform to Metro design standards and criteria. Although the DEIR references Metro design criteria, it should clearly state that the Project will be built to comply with Metro's most recent design standards and criteria in effect at the time the design-build contract is awarded. For example, special track work related to turnouts and crossovers shall not be located on vertical curves. 28-A
- Per Section 10 of the Metro Rail Design Criteria, "The Light-Rail Operational Headway shall be as defined by Operations and Maintenance Plan and consist of not greater than 5-minute interval of time between trains for single-line normal operations". Metro's understanding is that as proposed, the project's operational systems including trackwork, 28-B

crossings, Automatic Train Control system, Traction Power Substation systems, etc. are capable of supporting a scheduled five minute headway in compliance with Metro Design Rail Criteria.

28-B

In addition to these comments, Metro is providing separate comments specific to project design elements including station design, operations, and headways, which we trust you will consider in the next phase of project development. In fact, we encourage the Construction Authority to proceed with the preparation of the DEIS to enable the project to seek federal funding.

We hope that these comments assist the Construction Authority in preparing an EIR that addresses project impacts and stakeholder concerns, which will enable the project to continue to move forward. Again, Metro appreciates the opportunity to comment on this DEIR and we hope to continue the progress made to date on the Gold Line.

Sincerely,

Paul C. Taylor
Deputy Chief Executive Officer

Enclosure

METRO GOLD LINE FOOTHILL EXTENSION - PHASE 2B DEIR COMMENTS

PROJECT / CONTRACT NO. Gold Line Foothill Extension Phase 2B Azusa to Montclair

REVIEWER: ***As noted***

DATE: December 19, 2012

TECHNICAL DISCIPLINE:

SUBMITTAL PACKAGE: Draft Environmental Impact Report

% DESIGN STAGE: XX***% In-Progress***

Response Code: 1-Incorporatation Planned; 2-Discussion/Clarification Required; 3- Not Applicable; 4-Not Due for this Submittal; 5-Authority Direction Required
Status Code: R - Resolved, U - Unresolved, C - Completed

SEGMENT

No.	Reviewer	City / Agency	Doc Type (Dwg./ Spec/ Report)	Page No. / DWG No.	Discipline	Comment	Response Code	Responder	Actions	Status Code	Status Date	Initial
1	Amiri/Wong	Metro	Report	General	Planning	Will this CEQA document be followed by a NEPA document to enable the project to seek federal funding?						
2	Amiri/Wong	Metro	Report	General	Planning	Authority should work with cities and Metro to look at creating and improving pedestrian connections between the cities and stations in the next phases of project development.						
3	Amiri/Wong	Metro	Report	1-10	Planning	DEIR should include a paragraph stating the relationship between the Construction Authority and Metro. Specifically, the Construction Authority is responsible for managing the design and construction of the project while the Los Angeles County Metropolitan Transportation Authority's (Metro) role is to fund, oversee design and construction in coordination with the Construction Authority, and operate project when completed. Suggest adding in Sections S.1 and 1.1.						

PROJECT / CONTRACT NO. Gold Line Foothill Extension Phase 2B Azusa to Montclair

REVIEWER: ***As noted***

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4	Amiri/Wong	Metro	Report	S-6 and 3.4-8	Planning/Real Estate	In Section S.4.1.2 and on page 3.4-8, although Metro funded the property acquisitions, relocation assistance, and compenstation for Phase 2A through project funds, the Authority was the entity responsible for conducting all real estate negotiations, offers, and legal matters. This sentence should be rephrased to read "Similar to Phase 2A, all property acquisitions, relocation assistance, and compensation would be handled and negotiated by the Construction Authority as required by the California Relocation Assistance Act."						
5	Amiri/Wong	Metro	Report	1-10	Planning	While the DEIR references Metro design criteria throughout the document, the DEIR should include an overarching sentence stating that the Project will be built to comply with Metro design standards and criteria and approved deviations. Suggest adding language in sections S.3 and 1.3.3.						
6	Amiri/Wong	Metro	Report	1-13	Planning	We recommend adding in a sentence in Section 1.3.3.1 stating that trains running on Phase 2B will be stored and maintained at the new maintenance facility currently under construction in Monrovia.						

PROJECT / CONTRACT NO. Gold Line Foothill Extension Phase 2B Azusa to Montclair

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7	Amiri/Wong	Metro	Report	3.1-2	Planning	In Section 3.1.1.3, SCAG prepares a Regional Transportation Plan and not a Long Range Transportation Plan, which is prepared by Metro. DEIR should remove reference to the Long Range Transportation plan because 1) it is not prepared by SCAG; and 2)it does not satisfy any federal air quality requirements.						
8	Amiri/Wong	Metro	Report	3.4-3	Planning	In Section 3.4.2.3, the right-of-way is guided by the terms of the Property Trust Agreement and not the Master Cooperative Agreement. Please revise accordingly.						
9	M. Harris-Gifford	Metro	Report	3.11-63	Systems	Pls delete all referecne to flange-bearing frogs. Experience in other properties (e.g. Pittsburgh) suggests these cause severe LRV wheel damage.						
10	M. Harris-Gifford	Metro	Report	3.11-63	Systems	The need for spring or moveable-point frogs should be avoided where possible by crossover location or use of soundwalls.						
11	M. Harris-Gifford	Metro	Report	Table 3.11-31	Systems	Reducing train speed, unless necessary for safety-related issues, or occuring naturally due to alignment speed and/or proximity to a station should be avoided.						

PROJECT / CONTRACT NO. Gold Line Foothill Extension Phase 2B Azusa to Montclair

REVIEWER: ***As noted***

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12	M. Harris-Gifford	Metro	Dwg	General	Systems	Presumably crossovers will be added later.						
13	CL/ME	Metro	Report	3.1-18	Environmental	Air Quality section's mitigation monitoring (3.1.5.1) AQ-1 - Add a qualifier that Metro may limit the use of water as a dust mitigator in the event of water shortages or drought or in some way address how operations regarding watering down dust will change if such an event were to occur.						
14	CL/ME	Metro	Report	3.3-8	Environmental	Climate Change section's mitigation monitoring (3.3.5.1) should include using LED lighting to the extent possible for construction activities taking place at night. This comment also applies to the Energy section.						
15	CL/ME	Metro	Report	3.8-29	Environmental	Geologic Hazards section, the mitigation measures should be indicated in detail, not simply refer to following the "Regulatory Setting" section. For example, it should specifically state the required actions that apply to the project from the Seismic Hazards and Mapping Act - this simplifies monitoring and enforcement of the mitigation measures during and after construction.						

PROJECT / CONTRACT NO. Gold Line Foothill Extension Phase 2B Azusa to Montclair

REVIEWER: ***As noted***

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SEGMENT

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16	CL/ME	Metro	Report	General	Environmental	Noise section Section 3.11 – The DEIR appears to commit Metro to indefinitely providing sound/noise barrier enhancements (soundwalls and building improvements) for the project. However, the FTA Guidance Manual on Noise and Vibration indicates that mitigation is required at levels determined to be "Severe", but only need be considered when reasonable at "Moderate" levels. Therefore, additional mitigation measures that are proposed after construction and/or during operation will only be implemented if necessary or found to be required. The section also mentions transparent panels for soundwalls used in Expo Phase I - were these effective?						
17	CL	Metro	Report	General	Environmental	Air Quality section, 3.1 and Energy Section 3.7: A number of these mitigation measures are already included in Metro's Green Construction Policy. Consider Metro's Green Construction Policy or mention in document.						
18	CL	Metro	Report	General	Environmental	Climate Change section, 3.3: A number of these mitigation measures are already included in Metro's Green Construction Policy. Consider incorporating Metro's Green Construction Policy or mention in document.						

PROJECT / CONTRACT NO. Gold Line Foothill Extension Phase 2B Azusa to Montclair

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19	CL	Metro	Report	General	Environmental	Climate Change section, 3.3: Metro has climate change mitigation and adaptation requirements for its infrastructure projects that should be incorporated into this project.						
20	CL	Metro	Report	3.11-56	Environmental	Noise and Vibration, Section 3.11, p. 3.11-56. "Table 3.11-26 indicates the locations for sound insulation for second stories; sound insulation is considered for all second-story windows facing the tracks within the identified clusters." This is precedent setting. Is this required and how do you measure significant impacts under FTA guidelines?						
21	CL	Metro	Report	3.9-9	Environmental	Hazardous Materials Section 3.9, p 3.9-9: "HW-2—During project final design, specific soil testing shall be conducted and necessary and appropriate specific means for remediation shall be selected and incorporated into construction or contract documents, such as excavation with offsite disposal or onsite reuse in low risk areas, vapor extraction, or in-situ remediation." Defering testing up to "project final design" may result in delay to project. Consider testing at earlier timeframe.						

PROJECT / CONTRACT NO. Gold Line Foothill Extension Phase 2B Azusa to Montclair

REVIEWER: ***As noted***

DATE: December 19, 2012

TECHNICAL DISCIPLINE:

SUBMITTAL PACKAGE: Draft Environmental Impact Report

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22	CL	Metro	Report	3.9-9	Environmental	Hazardous Materials Section 3.9, p 3.9-9: "• HW-3—Soil that contains soluble concentrations of metals in excess of the Soluble Threshold Limit Concentration (STLC) is considered a California hazardous waste and shall be removed from the site and disposed of in accordance with federal and state regulations." How does this MM relate to HW-1? Are haz waste determined beforehand? Why specifically call it out.						
23	CL	Metro	Report	General	Environmental	Water Quality Section 3.14: Consider mention of Low Impact Development strategies such as the County of Los Angeles Low Impact Development Standards Manual, January 2009 and City of Los Angeles Low Impact Development (LID) Ordinance. Each city in study area may also have such guidelines or requirements.						
24	CL	Metro	Report	3.17-1	Environmental	Permits Section 3.17: Are any LA and San Bernardino County permits and approvals needed?						

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25	J. Pardo	Metro	Report	Section 3.13.4.2 Mitigation Measures	Creative Services	Please revise VIS-5 to state: All walls structures and fences shall be properly screened or incorporate design features to improve appearance and reduce visual intrusion. Such features will be designed by the Design Team that includes architects, landscape architects and lighting experts. Station design shall feature materials, landscaping, and other elements developed by the Design Team and in keeping with Metro Rail Design Criteria. Surface treatments shall be provided the face of safety walls and at roadway/ pedestrian portals, and landscaping along safety walls outside of the LRT portal shall be provided where feasible to provide wall screening. Per Metro Rail Design Criteria, artwork will be provided at each station and will be designed by professional artists.						
26	Anthony Jusay	Metro	Report	S-20	Bike Program	Change text in "Bicycle and pedestrian facilities and access-" to: Comments typically concerned requests for bicycle storage and bikeway facilities, ~~and bicycle~~ and pedestrian paths at and to stations.						
27	Amiri	Metro	Report		Bike Program	Per Metro's bicycle directive, DEIR should incorporate robust bicycle facilities and bicycle parking spaces provided at a rate of 2.5% of daily bordings per station. We also recommend that the Authority, Metro, and cities work together to develop bike lanes and paths that facilitate first/last mile access to the station.						

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28	Anthony Jusay	Metro	Report	2-34	Bike Program	In section 2.6.1.4- City of Pomona is currently developing a bike masterplan. Document should note current and future plans for bicycle facilities developed by Pomona as it does for the cities of Glendora, San Dimas, Claremont, and Montclair.						
29	Anthony Jusay	Metro	Report	2-34	Bike Program	Where roadways are impacted during construction including sidewalk closures or pinch points on travel lanes, ensure temporary signage warning motorists of pedestrian and bicycle movement where appropriate and/or provide detours for bicycle and pedestrians.						
30	George Grein	Metro	Report	3.12-4	Safety and Security	In the section beginning with "Over the last 10 years, Metro has established several transit-specific projects and programs", please add the following: 1)The “See Something Say Something” program has been adopted by LASD and Metro as part of a national approach to encouraging our patrons to participate in the security process by reporting something that is occurring or does not look right so that the matter can be investigated further; and 2)Metro’s Community Relations Rail Safety Education programs that engage all nearby schools and other public groups who may be impacted by the operation of a rail transit line in their community						

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31	George Grein	Metro	Report	3.12-5	Safety and Security	In Section 3.12.2.1, please replace "LASD Transit Police Services Bureau" with "LASD Transit Services Bureau (TSB)"						
32	George Grein	Metro	Report	3.12-5	Safety and Security	In Section 13.12.2.1, text should be added to fully describe the role of the TSB. TSB plays a direct role with Metro in the review of Design Criteria and in all phases of the design and construction process as it relates to security and law enforcement. TSB acts as a liaison to all local law enforcement agencies and encourages their participation in the review process, especially related to Fire Life Safety and Security (FLSSC) topics. TSB participates in all FLSS meetings, the Threat and Vulnerability Assessment (TVA) process and in Hazard Analysis. In the future, TSB will also plan and evaluate Pre-Revenue drills and its patrol force members will participate in these events.						
33	George Grein	Metro	Report	3.12-17	Safety and Security	In section 3.12.4.2, SS-1 and SS-2 should be changed from "Gold Line security personnel" to "Metro Rail Operations Center staff/LASD TSB Desk Operations"						
34	George Grein	Metro	Report	3.12-17	Safety and Security	In section 3.12.4.2, SS-4 and SS-6 should be changed from "Gold Line security personnel" to "Metro/TSB"						

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35	Farley/Wong	Metro	Report	Multiple sections	Rail Ops Planning & Serv Dev	Per Section 10 of the Metro Rail Design Criteria, "The Light-Rail Operational Headway shall be as defined by Operations and Maintenance Plan and consist of not greater than 5-minute interval of time between trains for single-line normal operations". Therefore, for consistency with the Metro Design Criteria the project's operational systems including trackwork, crossings, Automatic Train Control system, Traction Power Substation systems, etc. must be capable of supporting a scheduled five minute headway.						
36	Brandon Farley	Metro	Report	Chptr 1; 1.3.3.6	Rail Ops Planning & Serv Dev	Claremont Station proposal includes 1,120-space Parking Structure and references that it is related to Gold Line and Metrolink demand. The DEIR should evaluate and identify split between the two in the build-out year (2035) for cost assignment purposes.						
37	Brandon Farley	Metro	Report	Chptr 1; 1.3.3.6	Rail Ops Planning & Serv Dev	Claremont Station proposal cites pedestrian overpass to connect with EB Metrolink platform. DEIR should examine and provide detail to support the overpass. Should additionally examine relocating the overpass to the west end of the parking structure to leverage possible benefits with the LRT Station. Including an overpass of College Avenue to provide better connectivety to the LRT Station.						

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38	Brandon Farley	Metro	Report	Chptr 1; 1.3.3.6	Rail Ops Planning & Serv Dev	Claremont Station proposal cites possible extension of pedestrian overpass to connect with a park on the south side of the Metrolink ROW, pending funding from the City of Claremont. DEIR should examine impacts to parking demand as a result of connection to ball fields, including relative cost to maintain structure supposing their would be increased usage.						
39	Brandon Farley	Metro	Report	Chptr 1; 1.3.3.7	Rail Ops Planning & Serv Dev	Montclair Station, as depicted in on Page 1-30, is inconsistent with Metro Design Criteria Section 10. It currently lacks crossovers east of the platform.						
40	Brandon Farley	Metro	Report	Chptr 1	Rail Ops Planning & Serv Dev	Chapter 1 is silent concerning Special Trackwork, except in 1 map illustration for the proposed Montclair Station. It does discuss TPSS's.						
41	Brandon Farley	Metro	Report	Appendices Plan & Profiles	Rail Ops Planning & Serv Dev	Observe only 2 sets of crossovers (near Loraine in Glendora and at Montclair). Given distance involved, should see upwards of 5 sets before Monclair area, then, 2 at Montclair (before & after station platforms). Please include or cite where these are located. Crossover locations need to be supported by an Operational Analysis and supporitng 10-minute single track operations. See Metro Design Criteria Section 10 for more information.						

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42	Michael Ratnasingham	Metro	DWG	C-105	Systems Engineering	Grade separation should be considered for the main junction between Foothills Blvd and Grand Ave. Pre-emption time needed to clear the crossing from the city for train control will affect train headways throughout the alignment.						
43	Michael Ratnasingham	Metro	Report	1-12	Systems Engineering	Past experience has shown that substations should be ideally about a mile apart to meet contingency requirements (1 substation out service). The substation locations are sometime fixed due to extra power demands such as uphill grades etc. Given this, 12 substations will be required to avoid voltage drop due to train meets, contingency situations and alignment power demands. Typically the first step would be to place 6 substations in the vicinity of passenger stations (train starts/meets etc). The next step would be to place 2 substations close to the two grade separations (uphill power demand). The current locations of TPSS B3 and B8 meet this requirement. The final step would be, based on available real estate to place the remainder of the substations to meet the 5000 to 6000 feet requirement between all substations (contingency). Given the above in our opinion an additional substation will be required.						

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44	Michael Ratnasingham	Metro	DWG	C-151	Systems Engineering	At the end of the line the OCS or Catenary need to be terminated. From a safety point of view the distance between the bumper post and termination pole should be a minimum of 20 feet. Is there sufficent real estate to place termination poles at the end of the line?						
45	Zoric Sheynman	Metro	Dwg	C-105 and other applicable plans with grade crossings	Guideway and Trackwork	Along certain parts of the alignment, four tracks (two for Gold Line, two for freight and Metrolink) would run adjacent to each other. Given the projected vehicular and train volume from four tracks, would those intersections with four track grade crossings require grade separation per the Metro Policy for Grade Crossing for Light Rail Transit?						
46	David Chong	Metro	Vol 1 Draft EIR	Page S-1	Facilities Engineering	Specify the average design speed for the LRT track system.						
47	David Chong	Metro	Vol 1 Draft EIR	Page S-12, S.6.1.4	Facilities Engineering	Add statement after the VIS-4 paragraph as follow: All lighting should conform to standard practice as defined by ANSI-IESNA guidelines.						

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48	David Chong	Metro	Vol 1 Draft EIR	Page S-12, S.6.1.4	Facilities Engineering	Add stormwater mitigation requirements under section S.6.2 per NPDES General Permit requirements for stormwater discharge during construction.						
49	David Chong	Metro	Dwg.	C-111	Facilities Engineering	TPSS as shown on plan is out of Metro ROW, property acquisition is required.						
50	David Chong	Metro	Dwg.	C-121	Facilities Engineering	TPSS as shown on plan is out of Metro ROW, property acquisition is required.						
51	David Chong	Metro	Dwg.	C-130	Facilities Engineering	Property acquisition required for TPSS B-6 site.						
52	David Chong	Metro	Dwg.	C-134	Facilities Engineering	Property acquisition required for TPSS B-7 site.						
53	David Chong	Metro	Dwg.	C-140	Facilities Engineering	Property acquisition required for TPSS B-8 site.						
54	David Chong	Metro	Dwg.	C-143	Facilities Engineering	Property acquisition required for TPSS B-9 site.						

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28. Taylor, Paul C., Deputy Chief Executive Officer, Los Angeles County Metropolitan Transportation Authority (Metro). December 19, 2012.

Response 28-A

Please see Response 28-5.

Response 28-B

Please see Response 28-35

Response 28-1

The Construction Authority anticipates that a NEPA document will be prepared for the project in the future, at a time that has yet to be determined.

Response 28-2

The Construction Authority will work with the Cities and Metro to develop pedestrian connections as appropriate and feasible as part of the project final design.

Response 28-3

The following statement clarifying the relationship between the Construction Authority and Metro has been added to Sections S.1 and 1.1 of the Final EIR:

> "The Construction Authority is responsible for managing the design and construction of the project. The Los Angeles County Metropolitan Transportation Authority (Metro) will fund, oversee design and construction in coordination with the Construction Authority, and operate the Gold Line from Azusa to Montclair service."

Response 28-4

The sentence appearing in Sections S.4.1.2 and 3.4 has been clarified accordingly.

Response 28-5

As suggested in the comment, a sentence stating the project will be built to comply with Metro design standards and criteria and approved deviations has been added to Sections S.3 and 1.3.3.

Response 28-6

As suggested in the comment, a statement clarifying that trains operating on the Azusa to Montclair alignment will be stored and maintained at the Division 21 rail yard near downtown Los Angeles as well as at the new maintenance facility currently under construction in Monrovia, has been added to Section 1.3.3.1.

Response 28-7

The reference to the Long Range Transportation Plan (LRTP) has been removed from Section 3.1.1.3.

Response 28-8

The statement in Section 3.4.2.3 has been updated accordingly.

Response 28-9

The reference to flange-bearing frogs has been removed from Section 3.11-63.

Response 28-10

The moveable-point and spring frogs are listed in Section 3.11.9.2 as mitigation measures for vibration, not for noise. Soundwalls are not an effective alternative mitigation measures for vibration.

Crossovers are identified in the plan and profile drawings that appear in Appendix A of the Draft EIR. The Draft EIR environmental analyses were based on these proposed crossover locations as illustrated in Appendix A.

Response 28-11

Metro's preference for minimizing train speed reductions is acknowledged; however, train speed reduction is a necessary mitigation measure to avoid significant impacts at the locations identified in Table 3.11-31.

Response 28-12

Crossovers are identified in the plan and profile drawings that appear in Appendix A of the Draft EIR. The Draft EIR environmental analyses were based on these proposed crossover locations as illustrated in Appendix A.

Response 28-13

Mitigation Measure CON-1 in Section 3.1 of the Draft EIR is consistent with South Coast Air Quality Management District (AQMD) regulation, and states: "Water or a stabilizing agent shall be applied to exposed surfaces in sufficient quantity to prevent generation of dust plumes." Therefore, in the event of drought or water shortage, the Mitigation Measure (as written) allows for the use of an alternative stabilizing agent.

Response 28-14

Mitigation Measure CON-19 has been added to Section 3.3.5.1 (Climate Change) and Section 3.7.6.1 (Energy), as follows:

> <u>CON-19—LED lighting shall be used for construction activities taking place at night, to the extent feasible.</u>

Response 28-15

As discussed in the Draft EIR, no mitigation measures for geologic hazards are required for the project. Existing regulations are described in Section 3.8.1 of the Draft EIR because these regulations are part of the existing regulatory setting. i.e., existing regulatory conditions.

Response 28-16

In the Draft EIR, noise mitigation measures were recommended only for locations where the predicted noise levels *exceeded* the "Moderate" impact threshold. In addition, the mitigation measures recommended were designed such that the predicted noise levels were below the "Moderate" impact threshold. This is a conservative approach to mitigating noise to ensure that noise levels are acceptable to most of the community. This is the approach that has been used on recent Metro projects including the Gold Line Phase I, Expo Phase I, and Expo Phase II. The FTA Guidance Manual indicates that when the predicted noise levels exceed the FTA "Severe" impact threshold, "there is a presumption by FTA that mitigation will be incorporated in the project unless there are truly extenuating circumstances which prevent it."

Noise mitigation measures other than sound walls that are proposed in the DEIR include sound insulation and quiet zones for existing freight and Metrolink operations. It is reasonable to implement these measures after the system is operational and measurements demonstrate that the LRT associated noise exceeds the applicable impact threshold. This approach for implementing these types of mitigation measures was used for Expo Phase I (currently under construction), and the Gold Line Phase I (opened in 2004) used this approach to identify noise mitigation requirements near at-grade crossings with audible warnings.

Transparent panels were used on the Expo Phase I project to provide noise mitigation at intersections and other locations where visibility was an issue. These panels were installed and are effective. The panels were removed from one location at the La Brea Station due to concerns about fire safety. According to the supplier of the transparent panels, the material has passed appropriate fire safety tests.

Response 28-17, 28-18, 28-19

References to Metro's Green Construction Policy have been added in Sections 3.1, 3.3, and 3.7.

Response 28-20

The noise analysis in the Draft EIR considered a "worst-case" scenario with LRT trains traveling at 65 miles per hour. For this scenario, in addition to identifying locations for sound walls, certain locations were identified for additional noise mitigation because the heights for the sound barriers assume that, if a noise impact is predicted and if the source height of BNSF horn noise is 10 feet, building insulation would be considered for residential second-story windows. However, as the project design progresses further noise investigations will be part of the preliminary engineering phase.

Response 28-21

In accordance with existing requirements any environmental investigation, sampling, and/or remediation would be conducted under a Work plan that would be submitted to the appropriate regulatory agency for

approval. The findings of any investigations, including any sampling, would be clearly summarized. The project is currently in the conceptual engineering phase, and any additional investigations and remedial activities, if needed, would occur following final design and engineering, at the time the property acquisition process is being undertaken.

Response 28-22

The Mitigation Measure HW-3 has been replaced with a requirement to establish a risk-based cleanup levels in the Soil Mitigation Plan that has been included in the Mitigation Measure HW-1. The Plan will be reviewed and approved by the oversight agency. If excavated soil contains metals above the soluble thresholds limit concentration (STLC), in compliance with existing regulations the soil would be disposed of as a California Hazardous Waste.

Response 28-23

Future development around the stations or along the project corridor is within jurisdiction of local governments. The project does not involve any residential, commercial, industrial, or other development that would be subject to low impact development standards or strategies.

Response 28-24

Anticipated major permits were listed in Section 3.17 of the Draft EIR.

Response 28-25

Mitigation Measure VIS-5 has been updated to include the suggested references to Metro Rail Design Criteria as follows:

> **VIS-5**—All walls, structures and fences shall be properly screened or incorporate design features to improve appearance and reduce visual intrusion pursuant to the standards established in the Metro Rail Design Criteria. The goal of the Criteria is to create site-adapted designs that reflect the specific urban context of each station and that enhance the neighborhood context in which the project is proposed. The Criteria include artwork, signage, advertising, landscaping, and guidelines for the selection of materials and finishes. Station design shall feature materials, landscaping, art, and other ~~Metro Gold Line Foothill Extension~~ elements consistent with Metro Rail Design Criteria, and developed by the station design team that includes architects, landscape architects, and lighting experts. Surface treatments shall be provided at the face of safety walls and at roadway/pedestrian portals, and landscaping along safety walls outside of the LRT portal shall be provided where feasible to provide wall screening. Per Metro Rail Design Criteria, artwork will be provided at each station and will be designed by professional artists. According to the Criteria, careful consideration must be given to station compatibility with proposed future development in the neighborhood of each station, and where applicable, future extensions and/or connecting line transfers. Neighborhood culture and character shall be emphasized through artwork. The Designer should become familiar with the general aspects of the entire system in order to determine how his individual project relates to the whole. The Landscape Architect shall coordinate design and production of construction drawings with Designers and Metro Art to ensure that landscaping, facilities architecture, site engineering and station art are visually and functionally compatible. Coordination is particularly important with regard to the design of lighting, paved surfaces, walls and site furnishings. The Authority shall coordinate with Metro

Facilities Maintenance group in the review and comment stage of landscape design review submittals.

Response 28-26

The text has been amended, as suggested, to delete the reference to bicycle paths.

Response 28-27

Bicycle parking at project stations has been added as a project element in Section 1.3.3.1 of the Final EIR. The Construction Authority will work with Metro and the Cities to facilitate bicycle access and parking.

Response 28-28

Section 2.5.4 of the EIR references existing bike facilities within the corridor cities. The EIR does not reference or analyze future bike facilities in any of the cities.

Response 28-29

The following additions have been made to Mitigation Measure CTR-3 in Section 2.8.1 of the Final EIR:

- Posting signage indicating detours for bicycles and pedestrians where roadways and/or sidewalks are closed during construction
- Posting temporary signage warning motorists of pedestrians and bicycles where roadway and/or sidewalk closures create "pinch points" on travel lanes.

Response 28-30

References to Metro's "See Something Say Something" and Community Relations Rail Safety Education programs have been included in Section 3.12.1.2 of the Final EIR.

Response 28-31

References to "LASD Transit Police Services Bureau" have been changed to "LASD Transit Services Bureau (TSB)" in Section 3.12 of the Final EIR.

Response 28-32

Information in Section 3.12.2.1 has been clarified as follows:

The LASD Transit ~~Police~~ Services Bureau (TSB) provides security services for Metro patrons, employees, and facilities. In addition, the TSB is responsible for reviewing the security and law enforcement aspects of the Metro Design Criteria and the design and construction of new projects. Both special officers and deputies are assigned to Metro to provide law enforcement services, including field response at minor incidents involving Metro vehicles, as well as regular patrols of Metro property. ~~LASD~~ The TSB also provides special enforcement deputies who work both in uniform and plain clothes, depending on the type of enforcement conducted. Sheriff's are on duty during system hours of operation, with detective support 10 hours per day, Monday through Friday. ~~LASD~~ The TSB also oversees the Metro security force, which patrols Metro

headquarters and Metro bus and rail yards, as well as a Metro counterterrorism and threat assessment team.

Response 28-33 and Response 28-34

References to "Gold Line security personnel" have been changed to "Metro Rail Operations Center staff/LASD TSB Desk Operations personnel."

Response 28-35

The proposed project evaluated in this EIR is defined as operating on 10-minute headways in the peak period and 20-minute headways in the off-peak period, consistent with the Project Definition Report (March 2005), and the 2011 Metro Transit Service Policy. The system elements and track will be designed in full compliance with Metro Design Criteria Section 10 for both normal and single-track emergency operations.

Response 28-36

The travel demand forecasts prepared for the purposes of determining ridership estimated that average daily parking demand at Claremont Station in year 2035 will be 1,049 spaces. Metro Gold Line passengers are estimated to use, on average, 732 spaces; Metrolink passengers are estimated to use, on average, 317 spaces.

The analysis of cost and cost contributions to the Claremont Station parking structure is not part of the Environmental Impact Report analysis. The Construction Authority will work with the City, Metro, and the SCRRA (Metrolink) to develop a MOU or similar agreement for funding and maintaining the parking structure.

Response 28-37

Section 1.3.3.6 of the Draft EIR states "A pedestrian bridge would be built to connect the parking structure with the Metrolink platform. The City of Claremont has indicated its willingness to pay for an extension of the pedestrian bridge to link the parking structure with the Little League fields to the south of the rail right-of-way."

As stated, the pedestrian bridge would be built to connect the parking structure with the Metrolink platform. Relocating the pedestrian bridge to the west end of the Metrolink platform, as suggested, would not provide any benefit to Metro Gold Line passengers.

As stated in the Draft EIR, the City has indicated a willingness to pay for an extension of its pedestrian bridge that would connect to the south of the rail right-of-way. This possible overpass extension is not part of the project and therefore, it is not analyzed in the EIR.

Response 28-38

The analysis of cost and cost contributions to the Claremont Station parking structure is beyond the scope of this Environmental Impact Report analysis. The Construction Authority will work with the City,

Metro, and the SCRRA (Metrolink) to develop a MOU or similar agreement for funding and maintaining the parking structure.

Response 28-39

A double crossover cannot be placed east of the platform without additional right-of-way acquisitions. The proposed design follows the current Gold Line end of track design, east of Sierra Madre Villa Station, where there is also no crossover east of the platform.

Response 28-40

Crossovers are identified in the plan and profile drawings that appear in Appendix A of the Draft EIR. The Draft EIR environmental analyses were based on these current, proposed crossover locations as illustrated in Appendix A.

Response 28-41

The plan and profile drawings that appear in Appendix A of the Draft EIR indicate crossovers at four locations: Loraine Ave (Glendora); Walnut Ave. (San Dimas); White Ave (La Verne); and west of the Montclair platform. The number and placement of these crossovers will support the 10-minute single-track emergency operations, as referenced in the comment, and as specified in Metro Design Criteria Section 10.

Response 28-42

The Milestone 1 analysis performed per Metro's Light Rail Grade Crossing Criteria concluded that grade separation is not warranted at Foothill Boulevard and Grand Avenue.

Regarding signal alternations, Page 2-77 of the Draft EIR included information that at the Foothill Boulevard and Grand Avenue intersection "an exclusive signal phase for the LRT would be provided, whereby all other traffic movements would be stopped."

Response 28-43

The TPSS locations presently indicated on the Drawings represent a practical and cost effective approach, and are sufficient for the operation plan proposed.

Response 28-44

There will be sufficient space for a 20-foot separation between the bumper post and the termination pole, as will be shown in more detailed preliminary engineering drawings.

Response 28-45

Metro's Milestone 1 Grade Crossing Analysis considered the combined train operations of Metro Gold Line, Metrolink, and BNSF in determining whether grade separations were required. As referenced in Chapter 2 of the Draft EIR, the Milestone 1 analysis concluded that no grade separations are warranted at any of the project crossings.

Response 28-46

The average train speed along the 12.6 mile alignment between Azusa-Citrus Station and Montclair Station (including 0.3 miles of track east of Azusa-Citrus Station that are part of the Pasadena to Azusa extension under construction, not part of the proposed project) is anticipated to be 42 mph, assuming a maximum operational speed of 55 mph. These distance and speed assumptions correspond with the anticipated travel time estimate between Azusa-Citrus Station and Montclair of approximately 18 minutes that is referenced in Section 1.3.3 (Project Description) of the Draft EIR.

Response 28-47

As suggested, the specific standards have been incorporated into Mitigation Measure VIS-4 as follows:

> **VIS-4**—All lighting at the parking facilities and station locations shall utilize best available technology to reduce spillover to adjacent land uses and shall be directed away from adjacent residences. In addition, landscaping, fences, or other measures to shield adjacent residences from light and glare shall be provided where applicable. <u>All lighting will conform to ANSI-IESNA standards.</u>

Response 28-48

The NPDES permit requirements are existing requirements requiring mandatory compliance. As discussed in Section 3.14.4 of the Draft EIR, no mitigation measures are required of the project. Pursuant to CEQA, compliance with existing regulations and requirements is not a mitigation measure.

Response 28-49

A full property acquisition (3,000-3,500 square feet) for the TPSS B-2 site was identified as being necessary in Appendix C of the Draft EIR.

Response 28-50

A partial property acquisition (3,200-3,800 square feet) for the TPSS B-4 site was identified in Appendix C of the Draft EIR.

Response 28-51

A full property acquisition (1,800-2,200 square feet) for the TPSS B-6 site was identified in Appendix C of the Draft EIR.

Response 28-52

A full property acquisition (3.3 acres) for the TPSS B-7 and the La Verne parking structure site was identified in Appendix C of the Draft EIR.

Response 28-53

Property acquisition for the TPSS B-8 site is not required. The engineering drawings (Appendix A) show only the right of way line, and not certain adjacent parcels which are owned by Metro and therefore do not require acquisition. TPSS B-8 straddles the right of way and a Metro-owned parcel.

Response 28-54

Property acquisition for the TPSS B-9 site is not required. The engineering drawings (Appendix A) show only the right of way line, and not certain adjacent parcels which are owned by Metro and therefore do not require acquisition. As illustrated, TPSS B-9 is located on a Metro-owned parcel.

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METROLINK®

Southern California Regional Rail Authority

October 5, 2012

File: G0000498

Ms. Lisa Levy Buch, Director of Public Affairs
Metro Gold Line Foothill Extension Construction Authority
406 East Huntington Drive, Suite 202
Monrovia, CA 91016

RE: Gold Line Extension (Azusa to Montclair) DEIR - SCRRA Comments

Dear Ms. Buch:

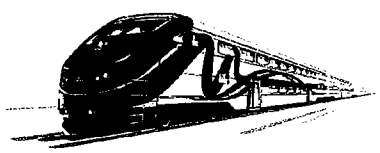
The Southern California Regional Rail Authority (SCRRA) has reviewed the DEIR issued for public comment on August 21, 2012, for Metro Gold Line Foothill Extension from Azusa to Montclair. During earlier reviews of the EIR, SCRRA recommended that grade separations be considered for several crossings. We have reviewed the response to this comment and don't accept the response provided in the DEIR, particularly for Garey Avenue in Pomona. Our comments are described in more detail below:

MAJOR ISSUES/CONCERNS

1. **Garey Avenue Crossing:**

   On June 21, 2004, SCRRA commented that a grade separation for Garey Avenue be considered, among other crossings. We have reviewed the analysis in the DEIR for identifying whether a crossing would be a candidate for a grade separation, or not, and find it flawed for the following reasons:

   - It is based on a LTR model that doesn't take into consideration a shared corridor with commuter and freight service on adjacent tracks to the LRT. 29-1
   - It doesn't appear to use the total number of trains (LRT, Metrolink, and BNSF Freight) that will be using the crossing during the peak period.
   - It doesn't use a vehicle traffic count taken during the peak period. If it had used a peak period traffic count the crossing would have been rated for a possible grade separation.



SCRRA Grade Crossing Guidelines published in 2009 recommend a grade separation if there are more than 3 tracks. With the addition of 2 LTR tracks to the existing 2 Metrolink mainline tracks and BNSF freight track there will be 5 tracks at the Garey Avenue crossing.

We believe the "gate down time" that the public will experience at this crossing will be extensive at times, particularly during commute hours. All railroad gates would operate simultaneously when any train movement enters the crossing from any track. During peak periods with numerous LTR and Metrolink trains crossing, the cumulative effect of gate down times could reach a cumulative total of 30 minutes of gates down during a peak hour. With traffic back-ups during gate down periods an unsafe condition will be created where impatient motorists may attempt movements around crossing gates. Garey Avenue is designated as a major north-south arterial for the City of Pomona that connects to I-210 and I-10. This amount of traffic interruption for a major artery is not recommended. SCRRA recommends a grade separation at Garey Avenue. 29-1

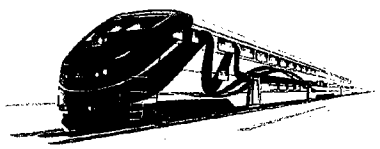
2. **Alignment and Right-of-Way:**

- As noted in Article 1.3.3.1 Project Elements, separation of LRT and Metrolink tracks is noted as little as 16 ft. between track centerlines of each mode. This does not provide any room for an inter-track fence to separate the heavy rail from the LRT tracks. A minimum of 18 ft. track spacing is needed. In a previous response to SCRRA comment letter dated June 21, 2004, the Authority responded that an inter-track fence would be provided to separate the modes. This is not possible with 16 ft. track clearance. 29-2

- In shared corridors where track centers between modes are less than 25 feet apart it is considered under the FRA as "Shared Right-of-Way" and defined as "adjacent tracks". As such, FRA would require certain roadway worker regulations to apply when working on or about the LRT and/or the Metrolink tracks. This will impact Metrolink and LRT operations as one railroad will have to shut down operations on their respective track when the other railroad works on the "adjacent track". 29-3

3. **Engineering Standards:**

- Consideration should be made to look at both LRT and SCRRA standards for Highway-Rail Grade Crossing safety improvements. Current SCRRA crossing standards incorporate a much higher level of pedestrian safety enhancements than in the past. SCRRA may have the maintenance responsibility for maintaining the automatic warning devices and pedestrian treatments adjacent to the Metrolink tracks in the shared corridor. SCRRA requires that our Grade Crossing Engineering Standards be used in 29-4



the freight and Metrolink portions of the joint corridor. SCRRA standards are available on the Metrolink website at http://www.metrolinktrains.com/pdfs/EngineeringConstruction/Grade_Cross_Stand_Guidelines_Manual_Jun29_09.pdf 29-4

4. **Glendora Station (Section 1.3.3.2):**

   - To access the station east end from the proposed parking garage south of the station passengers have to cross the freight track. SCRRA recommends that all access to the platform be from the existing crossing on the west side of the platform. 29-5

5. **Claremont Station (Section 1.3.3.6)**

   - New LRT south platform should have some form of protection on the platform or adjacent to it to prevent LRT passengers on the platforms from getting in the way of oncoming Metrolink trains that will operate on the track just south of the platform. 29-6
   - Fencing to prevent trespassing across the tracks must be provided. This includes the property line south of the Metrolink platform east of College Avenue. 29-7

6. **Montclair Station (Section 1.3.3.7)**

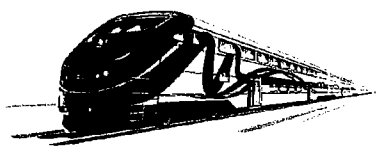
   - Must provide fencing to prevent unsafe conditions for passengers changing from Metrolink trains to LRT trains or vice versa. Passengers and pedestrians should be channelized to proper crossings of the tracks without the opportunity to trespass. 29-8

GENERAL COMMENTS

1. **Crossings:** SCRRA recommends crossing consolidations, closures, and grade separations to enhance safety for the system. 29-9

2. **Fencing**: Must install and maintain adequate fence to separate light rail tracks from heavy rail tracks. Also must maintain fencing around stations and all along the route to discourage and prevent trespassing across entire right-of-way. 29-10

3. **Working adjacent to Metrolink tracks**: For construction and maintenance activities on or adjacent to Metrolink tracks and right-of-way, contractors must follow SCRRA Right-of-Way Encroachment Procedures, including obtaining a Right of Entry Agreement (Form 6) and 29-11



obtain flagging protection. These procedures are available on the SCRRA website at http://www.metrolinktrains.com/pub_projects/?id=11. 29-11

4. **Relocation of Metrolink facilities:** Authority shall be responsible to pay and have relocated any and all facilities (Ticket vending machines, signage, signals, PIS, etc.) that must be relocated due to track shifts or station modifications. 29-12

5. **Requirements for PTC:** Authority shall be responsible for complying with federally mandated PTC requirements for any Metrolink relocations that impact the PTC System. 29-13

6. **Station Access /ADA Issues:** Any modifications to Metrolink station and platform access must adhere to all current ADA requirements and not impede our patrons from easy access to our platforms and parking. 29-14

7. **Construction of New Facilities:** Construction of new improvements and relocation of existing Metrolink facilities must be done and coordinated so as not to impact current or future Metrolink operations. 29-15

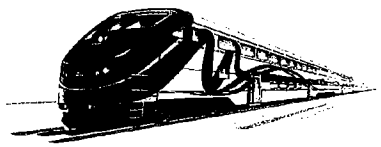
8. **Transit Oriented Developments (TOD):** SCRRA encourages the use of TOD's around the stations to enhance patronage for all modes of transportation. 29-16

Please note that these are initial comments to meet the public comment period. SCRRA may follow up with more specific comments for consideration if further analysis deems it necessary.

Sincerely,

William Doran
Director, Engineering & Construction

Cc: Dennis Marzec
Gray Crary
Patricia Watkins
Ron Mathieu



29. Doran, William, Director, Engineering and Construction, Metrolink, October 5, 2012.

Response 29-1

As stated in Section 2.5.5 of the Draft EIR, the grade crossing analysis for the Garey Avenue rail crossing intersection was evaluated using the Los Angeles County Metropolitan Transportation Authority's (Metro) Policy for Grade Crossing for Light Rail Transit (December 4, 2003). The grade crossing analysis for the Garey Avenue crossing intersection assumed 10-minute headways (6 trains per hour) for the proposed project LRT operations, consistent with the Gold Line Phase II - Foothill Extension Project Description Report, dated March 10, 2005 and the 2011 Metro Transit Service Policy. A portion of the project alignment between La Verne and Montclair would operate parallel to the existing San Bernardino-Los Angeles Metrolink commuter trains. This grade crossing analysis included in the Draft EIR has taken into consideration the future proposed headways for Metrolink trains in the shared corridor, operating at 15 minute headways during the peak (four trains per hour) and 60 minutes off-peak (one per hour). This translates into a maximum of five Metrolink trains per hour during the peak period. Research was conducted to ascertain the BNSF freight activity in the corridor, which was determined to be minimal during the typical weekday peak periods. Therefore, no freight activity was assumed during the peak hour in the grade crossing analysis. This segment, with the dual track alignment, accounts for a total of 11 trains (6 LRT trains and 5 Metrolink trains) in the peak hour at the Garey Avenue crossing intersection.

Regarding vehicle traffic counts in the peak period, the analysis reflects the highest AM and PM peak hour roadway segment traffic volumes (count data) collected on Garey Avenue between Arrow Highway and Bonita Avenue. The counts were conducted during a non-holiday week when schools were in session on a typical weekday in May 2010.

Regarding the comment on the SCRRA Grade Crossing Guidelines, the Draft EIR grade crossing analysis for the Garey Avenue location was thus conducted using the Metro Grade Crossing Policy and is consistent with the technical analysis approach for other Metro light rail lines in the Los Angeles area. The Draft EIR analysis indicated that the highest peak hour volumes at Garey Avenue crossing would not meet the criteria for grade-separation per the application of the Metro Grade Crossing Policy. Overall, the Metro methodology is more detailed for LRT operations given that it accounts for the number of trains in the peak hour, crossing vehicular traffic volumes, and, gate down delay, etc. In comparison, the SCRRA guidelines only account for total number of tracks to determine whether grade separation is recommended.

To fully evaluate the question of "gate down time" at the Garey Avenue crossing, an additional VISSIM analysis was performed subsequent to the Draft EIR. Please see Response 16-4 for detailed description of the methodology, and the model validation procedures, and results.

The analysis evaluated traffic and train operations and specifically looked at the following intersections:

- Garey Avenue and Bonita Avenue
- Garey Avenue and Santa Fe Street
- Garey Avenue and Arrow Highway

A field observation on November 27, 2012 indicated that the average gates-down time is 60 seconds, which was used in the model.

AVISSIM model was built for a one-hour period with gates down four times in the AM peak, and six times in the PM peak. The Metrolink schedule was modeled as follows:

AM Peak			
Inbound (Time)	Train Type	Outbound (Time)	Train Type
6:09	Express	6:52	Metrolink Regular
6:30	Metrolink Regular		
6:50	Metrolink Regular		
6:57	Gates down, no train		
PM Peak			
Outbound (Time)	Train Type	Inbound (Time)	Train Type
5:05	Metrolink Regular		
5:11	Gates down, no train		
5:23	Metrolink Regular		
5:28	Gates down, no train		
5:55	Express		
5:59	Metrolink Regular		

Operations for the proposed Metro Gold Line were assumed to include 12 trains—6 inbound and 6 outbound trains—during the peak hour, equating to 10 minutes headways during both the AM and PM peaks. The BNSF freight was assumed to be between 10-30 cars, up to approximately 2,000 feet long. The freight train is scheduled as one (1) train to Irwindale in the morning and one (1) train from Irwindale in the afternoon, for a total of two trains a day.

The VISSIM analysis concluded that one of the main issues for existing and future conditions is that gates go down when no train is present. Typically, the false "gate down" comes from a Metrolink 1 minute (60 seconds) to 1minute and 30 seconds (90 seconds) prior to the train arrival. This "bouncing gate" condition is the main issue in the Build scenario, as well. As a result, the following mitigation measures have been identified to provide for adequate levels of service:

1. The existing inaccurate Metrolink track circuitry needs to be recalibrated to eliminate false gate closures.

2. Preemption to adjacent signals. Preemption is justified when long queues would gridlock the intersection. In the preemption state, all vehicular phases not directing traffic toward the railroad

tracks would be allowed to be served. It is noted that only Bonita Avenue would actually experience queues that would reach all the way to the intersection. Therefore, the intersection of Garey Avenue and Bonita Avenue should have an interconnection with the railroad signaling and allow for preemption when trains are present.

3. Additionally, to ensure adequate levels of service, it is necessary to make Bonita Avenue protected/permitted in the east/west direction. Currently, the provision is for permitted turns only onto Garey Avenue.

Response 29-2

Although the distance between the two Metro Gold Line *LRT* tracks is typically 16 feet, the minimum track clearance between the LRT and Metrolink or BNSF tracks is never less than 18 feet. The statement in Section 1.3.3.1 Project Elements has been clarified accordingly.

Response 29-3

Major trackwork can be performed at night when neither Gold Line LRT nor Metrolink trains would operate. Concerning safety issues when trains are operating, a fence will separate the LRT from Metrolink trains and provide the minimum CPUC clearances for each mode. Such "adjacent track" operations, are already in place in California, including the Folsom corridor LRT in Sacramento and the Vasona corridor LRT in San Jose where in some locations the LRT track is separated from an active freight railroad by 18 feet, as proposed in the project.

Response 29-4

The Construction Authority will work with SCRRA to ensure that any existing SCRRA safety improvements at shared crossings that also meet LRT standards are retained, or re-installed if relocation becomes necessary, as part of the project's construction. If any future safety improvements are identified in preliminary or advanced engineering, the Construction Authority will work with SCRRA to ensure both SCRRA and Metro standards are met at shared crossings. The maintenance of safety improvements would be the responsibility of the operating agency.

Response 29-5

Metrolink does not operate in the area of Glendora Station, so SCRRA standards and policies would not apply at this location. Nevertheless, in response to Comment 39-5 from the California Public Utilities Commission, the Glendora Station concept has been refined to include a pedestrian bridge over the LRT and freight tracks between the platform and the parking structure on the south side of the right of way.

Response 29-6

Protection on the south side of the Claremont south side platform is possible with the proposed track clearances and platform dimensions. The Construction Authority will work with SCRRA and the City of Claremont as the station platform is refined in final design, at which point the specific type of protection would be selected.

Response 29-7

As stated in Section 3.12.3.4 of the Draft EIR, fencing will be provided along the alignment where LRTs travel at speeds in excess of 35 mph in adherence with CPUC guidelines. As more detailed design plans are completed, it is anticipated that fencing also will be specified at other locations. The Construction Authority will work with Metrolink and the City of Claremont to identify where these safety measures are needed and feasible.

Response 29-8

As stated in Section 3.12.3.4 of the Draft EIR, fencing will be provided along the alignment where LRTs travel at speeds in excess of 35 mph in adherence with CPUC guidelines. As more detailed design plans are completed, it is anticipated that fencing also will be specified at other locations. The Construction Authority will work with Metrolink and the City of Montclair to identify where these safety measures are needed and feasible.

Response 29-9

As stated in Section 3.12.1.1 of the Draft EIR, the Construction Authority has submitted a comprehensive set of plans for the CPUC's review. The CPUC's highway-rail crossing safety branch oversees the safety for all public and private highway-rail crossings in California.

Response 29-10

SCRRA's request for fencing to separate light-rail tracks from the Metrolink tracks is acknowledged. The Construction Authority will work with SCRRA and the Cities to provide fencing along the right-of-way where LRT speeds exceed 35 mph and where special conditions warrant.

Response 29-11

SCRRA's comment concerning the required adherence to SCRRA Right-of-Way Encroachment Procedures is acknowledged.

Response 29-12

The Construction Authority recognizes that any necessary relocation of Metrolink facilities is part of the project cost.

Response 29-13

The Construction Authority recognizes that compliance issues associated with PTC relocation due to the project are the responsibility of the Construction Authority.

Response 29-14

The Construction Authority will comply with all current ADA requirements, including any modifications to Metrolink stations and platforms. Modifications to Metrolink stations and platforms are not expected to impede Metrolink passengers, and the station refinements accomplished in final design will allow as much as possible for easy transfers between Metrolink and Gold Line.

Response 29-15

The Construction Authority will work cooperatively with Metrolink to minimize impacts to Metrolink operations throughout construction.

Response 29-16

SCRRA's encouragement of TOD in the station areas is acknowledged.

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THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

Office of the General Manager

October 5, 2012 **Via E-Mail and Regular Mail**

Ms. Lisa Levy Buch
Construction Authority, Director of Public Affairs
Metro Gold Line Foothill Extension Construction Authority
406 E. Huntington Drive, Suite 202
Monrovia, CA 91016

Dear Ms. Buch:

Notice of Availability of a Draft Environmental Impact Report
for the Metro Gold Line Foothill Extension From Azusa to Montclair Project

The Metropolitan Water District of Southern California (Metropolitan) reviewed the Draft Environmental Impact Report (Draft EIR) for the Metro Gold Line Foothill Extension, Azusa to Montclair (Project). The Construction Authority is the lead agency under the California Environmental Quality Act for the Project. The Project proposes to extend the existing Metro Gold Line utilizing light rail transit, from the city of Azusa, thru cities of Glendora, San Dimas, La Verne, Pomona, Claremont, and Montclair, within Los Angeles and San Bernardino Counties. This letter contains Metropolitan's response to the Draft EIR as a potentially-affected public agency.

The Construction Authority has contacted Metropolitan regarding this proposed Project, and we appreciate these efforts and look forward to continued coordination. Specific comments on potential environmental issues for consideration and incorporation into the Draft EIR are listed below. Metropolitan also encloses and incorporates by reference its prior comments, including those dated April 15, 2010 and January 19, 2011.

1) *Chapter 3.17- Anticipated Permits and Approvals.* The Draft EIR needs to identify Metropolitan as an agency whose approval is required. 30-1

2) *Chapter 1.0- Project Description and Other Areas.* Our review of the Draft EIR indicates that Metropolitan owns and operates the Orange County Feeder, Middle Feeder, Upper Feeder, Yorba Linda Feeder, and ancillary facilities within the proposed project location. The Orange County Feeder, which runs in a northerly to southerly direction along Wheeler Avenue, is within the street right-of-way; the Metro Gold Line Foothill Extension route would intersect the Orange County Feeder at Wheeler Avenue. The Middle Feeder runs in a south-westerly to easterly direction along Bonita Avenue; the Metro Gold Line Foothill Extension route would intersect the Middle Feeder at Bonita Avenue. The Upper Feeder runs in a north-westerly to south-easterly direction between Fulton Road and North Garey Avenue; the Metro Gold Line Foothill 30-2

Extension route would intersect the Upper Feeder at the Metrolink Pomona (North) Station. The Yorba Linda Feeder runs in a northerly to southerly direction along A Street; the Metro Gold Line Foothill Extension route would intersect the Yorba Linda Feeder at A Street.

The enclosed map shows these facilities in relation to the proposed project. It will be necessary for the applicant to consider these facilities in its project planning. We are concerned with both direct and indirect effects created during construction and post-construction uses that may result from implementation of the proposed Project. Development associated with the proposed Project must not restrict any of Metropolitan's day-to-day operations and/or access to its facilities. Metropolitan must be allowed to maintain its rights-of-way and requires unobstructed access to our facilities and properties at all times in order to repair and maintain our system. 30-2

In order to avoid potential conflicts with Metropolitan's rights-of-way, we require that any design plans for any activity in the area of Metropolitan's pipelines or facilities be submitted for our review and written approval. Approval of the Project where it could impact Metropolitan's property should be contingent on Metropolitan's approval of design plans for the Project. Detailed prints of drawings of Metropolitan's pipelines and rights-of-way may be obtained by calling Metropolitan's Substructures Team at (213) 217-7663. To assist in preparing plans that are compatible with Metropolitan's facilities, easements, and properties, we have enclosed a copy of the "Guidelines for Developments in the Area of Facilities, Fee Properties, and/or Easements of The Metropolitan Water District of Southern California." Please note that all submitted designs or plans must clearly identify Metropolitan's facilities and rights-of-way.

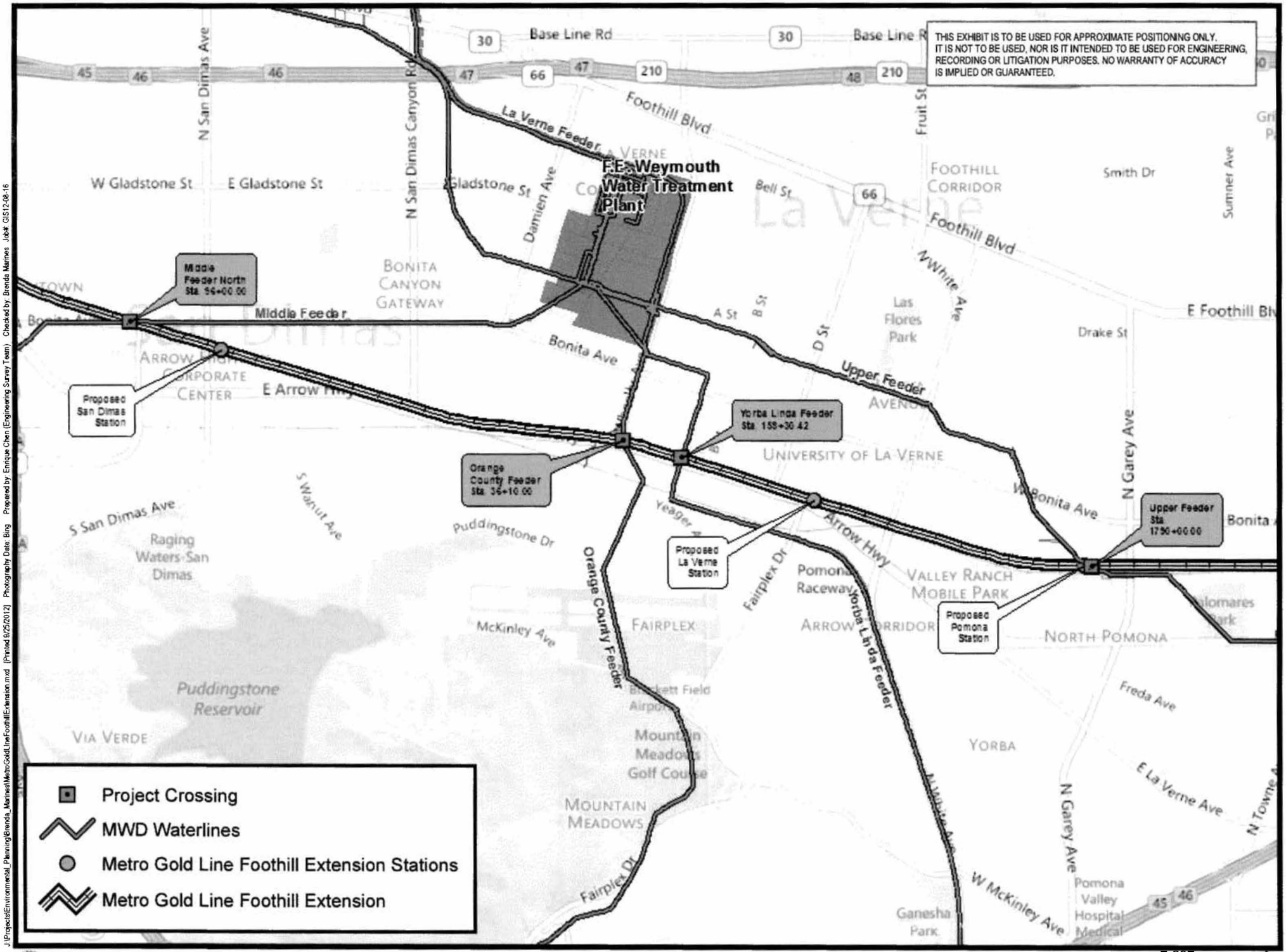
We appreciate the opportunity to provide input to your planning process and we look forward to receiving the Final EIR and future environmental documentation on this Project. If we can be of further assistance, please contact Ms. Brenda S. Marines at (213) 217-7902.

Very truly yours,

Deirdre West
Manager, Environmental Planning Team

BSM/bsm
(EPT Project No2012090706)

Enclosures: Letter dated January 19, 2011
Letter dated April 15, 2010
Map
Guidelines



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The Metropolitan Water District of Southern California
Engineering Services Group

Metro Gold Line Foothill Extension

Azusa to Montclair DEIR

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THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

Office of the General Manager

January 19, 2011 **Via E-Mail and Regular Mail**

Ms. Lisa Levy Buch
Director of Public Affairs
Metro Gold Line Foothill Extension
Construction Authority
406 E. Huntington Drive, Suite 202
Monrovia, CA 91016

Dear Ms. Buch:

Invitation to Become Participating Agency in the
Metro Gold Line Foothill Extension Azusa to Montclair EIS/EIR Project

The Metropolitan Water District of Southern California (Metropolitan) received an invitation to become a participating agency on the Metro Gold Line Foothill Extension Azusa to Montclair Environmental Impact Statement/Environmental Impact Report (EIS/EIR) (Project). The Federal Transit Administration and the Metro Gold Line Foothill Extension Construction Authority are the lead agencies under the National Environmental Policy Act (NEPA). The project proposes to extend the existing Metro Gold Line utilizing light rail transit, from the city of Azusa to the city of Montclair. The project will affect the cities of Azusa, Glendora, San Dimas, La Verne, Pomona, Claremont, and Montclair, within Los Angeles and western San Bernardino County. The following is Metropolitan's response to the Public Notice as a potentially-affected public agency.

While Metropolitan appreciates the invitation, we will respectfully decline the opportunity to become a participating agency in the Agencies' environmental review process. We will continue to review the Agencies' environmental documents during the formal public review process and provide comments as appropriate. From our preliminary review of the materials provided, we have identified several issues that we would like to see addressed in the draft EIS/EIR.

Metropolitan reviewed the project description of the proposed project, study area map, and the Federal Register Notice of Intent and have the following comments. The following Metropolitan facilities are within the proposed project areas:

- The Orange County Feeder is a 42-inch diameter precast concrete pipeline that runs in a northerly to southerly direction along Wheeler Avenue. The Metro Gold Line Foothill Extension route would intersect the Orange County Feeder at Wheeler Avenue.

- The Middle Feeder is a 72-inch diameter steel pipeline that runs in a south-westerly to easterly direction along Bonita Avenue. The Metro Gold Line Foothill Extension route would intersect the Middle Feeder at Bonita Avenue.

- The Upper Feeder is a 140-inch diameter precast concrete pipeline that runs in a north-westerly to south-easterly direction between Fulton Road and North Garey Avenue. The Metro Gold Line Foothill Extension route would intersect the Upper Feeder near North Garey Avenue.

- The Yorba Linda Feeder is a 102-inch diameter steel pipeline that runs in a northerly to southerly direction along A Street. The Metro Gold Line Foothill Extension route would intersect the Yorba Linda Feeder at A Street.

The enclosed map shows these facilities in relation to the proposed project. It will be necessary for the Agencies to consider these facilities in its project planning. We are concerned with potential impacts to these facilities associated with future excavation, construction, utilities or any redevelopment that may occur as a result of proposed activity under the proposed Project. Development and redevelopment associated with the proposed Project must not restrict any of Metropolitan's day-to-day operations and/or access to its facilities. Metropolitan must be allowed to maintain its rights-of-way and requires unobstructed access to our facilities and properties at all times in order to repair and maintain our system.

In order to avoid potential conflicts with Metropolitan's rights-of-way, we require that any design plans for any activity in the area of Metropolitan's pipelines or facilities be submitted for our review and written approval. Approval of the Project where it could impact Metropolitan's property should be contingent on Metropolitan's approval of design plans for the Project. Detailed prints of drawings of Metropolitan's pipelines and rights-of-way may be obtained by calling Metropolitan's Substructures Information Line at (213) 217-6564. To assist in preparing plans that are compatible with Metropolitan's facilities, easements, and properties, we have enclosed a copy of the "Guidelines for Developments in the Area of Facilities, Fee Properties, and/or Easements of The Metropolitan Water District of Southern California." Please note that all submitted designs or plans must clearly identify Metropolitan's facilities and rights-of-way.

Additionally, Metropolitan encourages projects within its service area to include water conservation measures. While Metropolitan continues to build new supplies and develop means for more efficient use of current resources, projected population and economic growth will increase demands on the current system. Water conservation, reclaimed water use, and groundwater recharge programs are integral components to regional water supply planning. Metropolitan supports mitigation measures such as using water efficient fixtures, drought-tolerant landscaping, and reclaimed water to offset any increase in water use associated with the proposed project.

We appreciate the opportunity to provide input to your planning process and we look forward to receiving the Draft EIS/EIR and future environmental documentation on this Project. If we can be of further assistance, please contact Ms. Brenda S. Marines at (213) 217-7902.

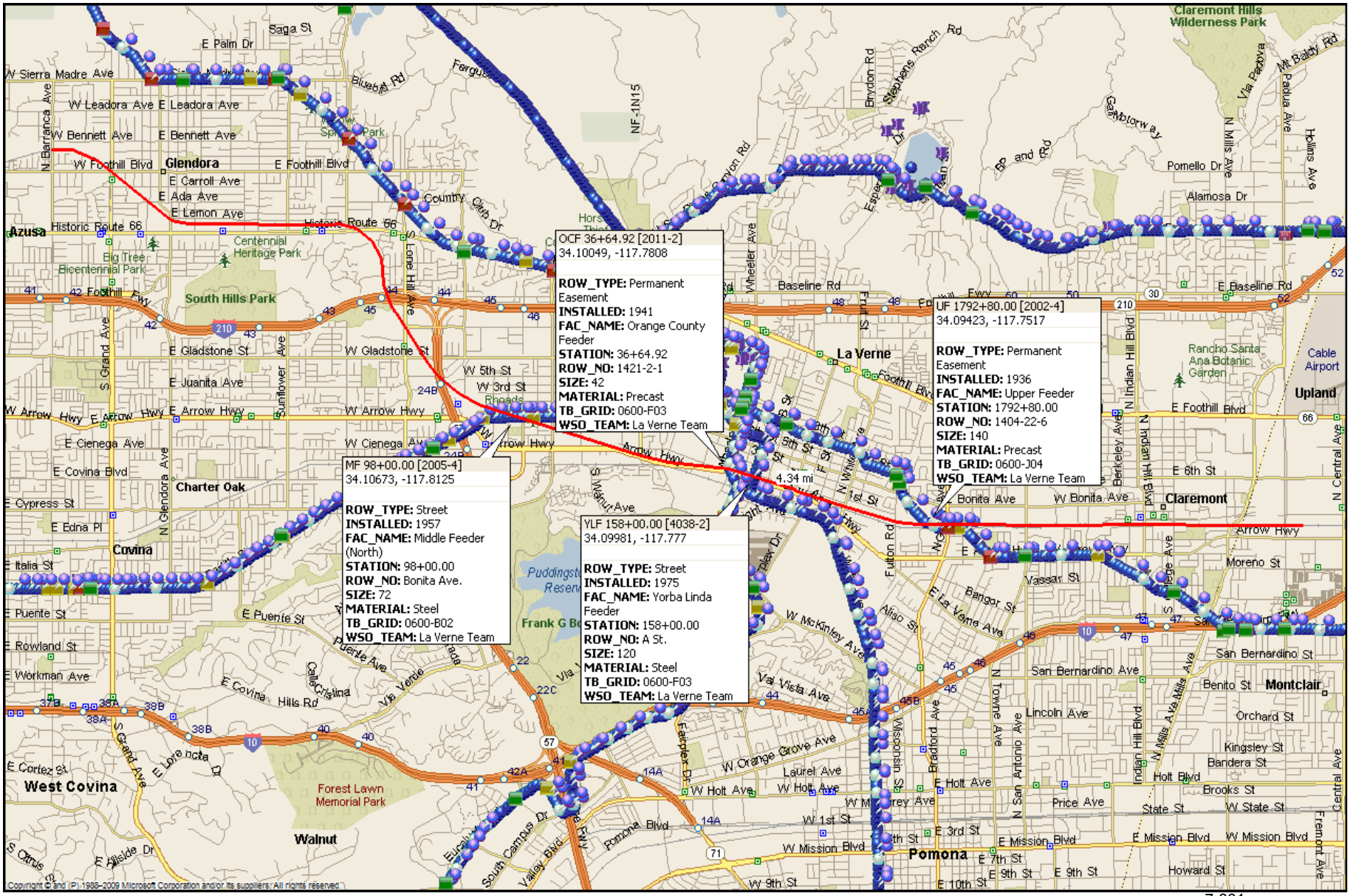
Very truly yours,

John Shamma

John Shamma
Manager, Environmental Planning Team

BSM/bsm
(EPT Task No.2011011208)

Enclosures: Map
Guidelines


OCF 36+64.92 [2011-2]
34.10049, -117.7808
ROW_TYPE: Permanent Easement
INSTALLED: 1941
FAC_NAME: Orange County Feeder
STATION: 36+64.92
ROW_NO: 1421-2-1
SIZE: 42
MATERIAL: Precast
TB_GRID: 0600-F03
WSO_TEAM: La Verne Team
UF 1792+80.00 [2002-4]
34.09423, -117.7517
ROW_TYPE: Permanent Easement
INSTALLED: 1936
FAC_NAME: Upper Feeder
STATION: 1792+80.00
ROW_NO: 1404-22-6
SIZE: 140
MATERIAL: Precast
TB_GRID: 0600-J04
WSO_TEAM: La Verne Team
MF 98+00.00 [2005-4]
34.10673, -117.8125
ROW_TYPE: Street
INSTALLED: 1957
FAC_NAME: Middle Feeder (North)
STATION: 98+00.00
ROW_NO: Bonita Ave.
SIZE: 72
MATERIAL: Steel
TB_GRID: 0600-B02
WSO_TEAM: La Verne Team
YLF 158+00.00 [4038-2]
34.09981, -117.777
ROW_TYPE: Street
INSTALLED: 1975
FAC_NAME: Yorba Linda Feeder
STATION: 158+00.00
ROW_NO: A St.
SIZE: 120
MATERIAL: Steel
TB_GRID: 0600-F03
WSO_TEAM: La Verne Team
Azusa
Glendora
Covina
West Covina
Charter Oak
La Verne
Claremont
Upland
Montclair
Pomona
Walnut
Baseline Rd
Foothill Blvd
Arrow Hwy
Bonita Ave
San Bernardino Ave
Claremont Hills Wilderness Park
Forest Lawn Memorial Park
South Hills Park
Frank G Bonelli Regional Park
Rancho Santa Ana Botanic Garden
Cable Airport
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THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Office of the General Manager

MWD Orange County Feeder
Sta. 36+00 to 37+00
MWD Middle Feeder
Sta. 93+00 to 97+00
MWD Upper Feeder
Sta. 1775+00 to 1794+00
MWD Yorba Linda Feeder
Sta. 158+50 to 159+50
Substr. Job No. 2011-10-012

April 15, 2010

Mr. Reky C. Hiramoto
Metro Gold Line
Foothill Extension Construction Authority
Suite 202
406 East Huntington Drive
Monrovia, CA 91016

Dear Mr. Hiramoto:

Metro Gold Line Foothill Extension — Phase II Segment A & B

Thank you for your email dated March 11, 2009, requesting information regarding Metropolitan's facilities located in the vicinity of your proposed Metro Gold Line Foothill Extension project, in various cities in the county of Los Angeles.

As shown on the enclosed maps, our 42-inch-inside-diameter precast concrete cylinder Orange County Feeder pipeline is located in and adjacent to Wheeler Avenue in the city of La Verne; our 73-inch-inside-diameter welded steel Middle

Feeder pipeline is located in Bonita Avenue/Arrow Highway in the city of San Dimas; our 140-inch-inside-diameter precast concrete cylinder Upper Feeder pipeline is located diagonally across the railroad tracks from north of Supply Street to Pine Street and parallel to the railroad tracks on the south side of the railroad tracks from Pine Street to Maple Avenue in the city of Pomona; and our 121½ -inch-inside-diameter welded steel Yorba Linda Feeder pipeline is located in "A" Street crossing Arrow Highway in the city of La Verne, in the vicinity of your proposed light rail project areas.

We are transmitting a copy of our "Guidelines for Development in the Area of Facilities, Fee Properties, and/or Easements of The Metropolitan Water District of Southern California and prints of our Drawings B-8557, B-21380 through B-21383, B-25483, and B-52548 and Right-of-Way Maps 1404-23, 1404-24, 1421-2, and 1425-3A, for your information and use.

For any further correspondence with Metropolitan relating to this project, please make reference to the Substructures Job Number shown in the upper right-hand corner of this letter. Should you require any additional information, please contact Francisco Flores at (213) 217-6679.

Very truly yours,

Kieran M. Callanan, P.E.
Manager, Substructures Team

FF/ly
DOC#: 2011-10-012

Enclosure

bcc: F. Flores
Substructures Book
Substructures File

Flores,Francisco

From: Callanan,Kieran M
Sent: Thursday, March 11, 2010 11:02 AM
To: Flores,Francisco
Subject: FW: Foothill Extension
Attachments: Alignmt Maps 080305.pdf

See what we have on this one

From: Reky Hiramoto [mailto:RHiramoto@foothillextension.org]
Sent: Thursday, March 11, 2010 7:46 AM
To: Callanan,Kieran M
Cc: Baynes,Curtis D
Subject: RE: Foothill Extension

Hi Kieran:

Thank you for the quick response. I have attached the alignment maps for the full Phase II Segment (A & B), for your information and reference.

Segment A (page 1 to 7) covers the connection to existing station at Pasadena to/thru Azusa. Segment B (page 7 to 14) takes it from Azusa border with Glendora to the Montclair. Segment B is a few years behind in timing from Segment A, therefore I am okay for now, but can file anything you provide me.

The portion west of our alignment/project was part of Phase I, which has been built/complete.

Appreciate you help. Thank you.

Reky C Hiramoto

From: Callanan,Kieran M [mailto:kcallanan@mwdh2o.com]
Sent: Thursday, March 11, 2010 7:33 AM
To: Reky Hiramoto
Cc: Baynes,Curtis D
Subject: FW: Foothill Extension

Hi Mr. Hiramoto
I was forwarded your email and attached alignment from Curtis and wanted to let you know that Metropolitan does not have any facilities within the limits of this alignment. We do however have facilities just west and east of this area that would likely cross the MTA's foothill extension under a different segment. If you need information on these facilities please forward me a map of the area of interest.
Regards
Kieran Callanan, P.E.
Manager, Substructures Team
Metropolitan Water District
of Southern California
(213) 217-7474

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30. West, Deidre, Manager, Environmental Planning Team, Metropolitan Water District of Southern California, October 5, 2012.

Response 30-1

The Metropolitan Water District of Southern California has been added to the list of agencies whose approval is required, in Section 3.17 of the Final EIR.

Response 30-2

The map showing the Metropolitan Water District of Southern California's facilities is acknowledged. As the proposed project is a light rail transit project operating at-grade, it is not anticipated that the project will affect the District's facilities or access to its facilities. Nevertheless, the final design plans will be submitted to the District, to ensure compatibility with the Metropolitan facilities and operations.

Metropolitan's "Guidelines for Developments in the Area of Facilities, Fee Properties, and/or Easements of The Metropolitan Water District of Southern California" were not received as an enclosure to the District's comment letter; the Construction Authority requests that a copy be sent for reference.

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SOUTHERN CALIFORNIA

ASSOCIATION of GOVERNMENTS

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818 West Seventh Street

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Los Angeles, California

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t (213) 236-1800

f (213) 236-1825

www.scag.ca.gov

October 5, 2012

Ms. Lisa Levy Buch
Director of Public Affairs
Gold Line Foothill Extension Construction Authority
406 E. Huntington Drive, Ste. 202
Monrovia, CA 91016
llevybuch@foothillextension.org

RE: Comments on the Draft Environmental Impact Report for the Gold Line Foothill Extension from Azusa to Montclair Project [SCAG No. I20120174]

Dear Ms. Buch:

Thank you for submitting the Draft Environmental Impact Report for the Metro Gold Line Foothill Extension from Azusa to Montclair Project to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12372. Additionally, SCAG reviews the Environmental Impact Reports of projects of regional significance for consistency with regional plans pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

SCAG is also the designated Regional Transportation Planning Agency under state law, and as such is responsible for preparation of the Regional Transportation Plan including its Sustainable Communities Strategy component pursuant to SB 375. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans.[1] Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of the regional goals and policies in the RTP/SCS.

SCAG staff has determined that the proposed project is regionally significant per CEQA Guidelines, Sections 15125 and 15206 and evaluated this project based on the goals of SCAG's 2012-2035 Regional Transportation Plan/Sustainable Community Strategy.

When available, please send a copy of the Final Environmental Impact Report to the attention of Pamela Lee at SCAG, 818 West 7th Street, 12th floor, Los Angeles, California, 90017. If you have any questions regarding the attached comments, please contact Pamela Lee at (213) 236-1895 or leep@scag.ca.gov. Thank you.

Sincerely,

Jonathan Nadler,
Manager, Compliance and Performance Assessment

[1] SB 375 amends CEQA to add Chapter 4.2 Implementation of the Sustainable Communities Strategy, which allows for certain CEQA streamlining for projects consistent with the RTP/SCS. Lead agencies (including local jurisdictions) maintain the discretion and will be solely responsible for determining "consistency" of any future project with the SCS. Any "consistency" finding by SCAG pursuant to the IGR process should not be construed as a finding of consistency under SB 375 for purposes of CEQA streamlining.

COMMENTS ON THE ENVIRONMENTAL IMPACT REPORT FOR THE METRO GOLD LINE FOOTHILL EXTENSION FROM AZUSA TO MONTCLAIR PROJECT [SCAG NO. I20120174]

SUMMARY

Based on SCAG staff review, the proposed project supports the SCAG 2012 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), where applicable.

2012-2035 RTP/SCS GOALS

The 2012-20135 RTP/SCS links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations (see http://rtpscs.scag.ca.gov). The goals included in the 2012 RTP/SCS, listed below, may be pertinent to the proposed project.

2012-2035 RTP/SCS GOALS	
RTP/SCS G1:	*Align the plan investments and policies with improving regional economic development and competitiveness*
RTP/SCS G2:	*Maximize mobility and accessibility for all people and goods in the region*
RTP/SCS G3:	*Ensure travel safety and reliability for all people and goods in the region*
RTP/SCS G4:	*Preserve and ensure a sustainable regional transportation system*
RTP/SCS G5:	*Maximize the productivity of our transportation system*
RTP/SCS G6:	*Protect the environment and health for our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking)*
RTP/SCS G7:	*Actively encourage and create incentives for energy efficiency, where possible*
RTP/SCS G8:	*Encourage land use and growth patterns that facilitate transit and non-motorized transportation*
RTP/SCS G9:	*Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies*

SCAG Staff Comments

As proposed, the Metro Gold Line Foothill Extension from Azusa to Montclair encourages regional connectivity, mobility and productivity by providing light rail transit service within the Glendora to Montclair corridor area (page 1-1). Each of the proposed stations included in the Gold Line Foothill Extension improve connectivity and accessibility to a variety of public transportation modes (page 2-13). 31-1

The proposed project would support the forecasted growth in employment and improve accessibility to jobs in the project area, thereby improving the overall regional economic development and competitiveness (pages 3.4-2, 3.4-6 - 3.4-7). 31-2

The proposed project provides an attractive public transit option for San Gabriel Valley patrons, which is expected to help alleviate traffic congestion, improve overall network speed within the study area, and maximize the productivity of the regional transportation system. Travel safety will be assessed and ensured for pedestrians, bicyclists and at-grade automobile crossings at each of the light rail stations. Assessment for safety treatments or grade separations will be made by employing Metro's Policy for Grade Crossing for Light Rail Transit (pages 2-32 and 3.1-16). 31-3

By providing additional public transit, the proposed project is expected to reduce emissions within the study area as well as on a regional basis, therefore improving air quality and protecting the environment (page 3.1-17). The proposed project will use new, energy-efficient construction equipment and minimize idle times, thus reducing emissions associated during the construction phase (page 3.7-5). 31-4

The proposed project provides a transit alternative to the automobile, thereby supporting a sustainable and productive regional transportation system (page 3.10-38). Additionally, the creation of new public transit will help facilitate the use of non-motorized transportation and increase opportunities for active transportation, which in turn can facilitate improvements in the health of residents within the region (page 3.10-38). 31-5

It is noted that the project as proposed is included in the adopted 2012-2035 RTP/SCS. Since changes to the project scope or schedule may necessitate an RTP/SCS amendment, SCAG encourages the project proponent to notify SCAG as early as possible in such a case to minimize potential project delay. 31-6

2012-2035 RTP/SCS REGIONAL GROWTH FORECASTS

The Draft EIR for the Metro Gold Line Foothill Extension from Azusa to Montclair Project should reflect the most recently adopted SCAG forecasts, which are the 2012-2035 RTP/SCS population, household and employment forecasts (adopted by the SCAG regional Council in April 2012). The forecasts for the region and jurisdiction are presented below.

Adopted SCAG Region Wide Forecasts			Adopted Los Angeles County Forecasts		
	Year 2020	Year 2035		Year 2020	Year 2035
Population	19,663,000	22,091,000	Population	10,404,000	11,353,000
Households	6,458,000	7,325,000	Households	3,513,000	3,852,000
Employment	8,414,000	9,441,000	Employment	4,558,000	4,827,000

SCAG Staff Comments
Pages 3.4-1 – 3.4-3 indicate that the Draft EIR population, household and employment analyses were based on the adopted SCAG 2012-2035 RTP/SCS Regional Growth Forecasts. 31-7

MITIGATION

SCAG Staff Comments
SCAG staff recommends that you review the SCAG 2012-2035 RTP/SCS Final Program EIR List of Mitigation Measures Appendix for additional guidance, as appropriate. The SCAG List of Mitigation Measures may be found here: http://scag.ca.gov/igr/pdf/SCAG_IGRMMRP_2012.pdf 31-8

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31. Nadler, Jonathan, Southern California Association of Governments, October 5, 2012.

Response 31-1

Your comment that the project is consistent with RTP/SCS Goal 2 of maximizing regional mobility is acknowledged.

Response 31-2

Your comment that the project is consistent with RTP/SCS Goal 1 of improving regional economic development is acknowledged.

Response 31-3

Your comment that the project is consistent with RTP/SCS Goal 5 of maximizing the transportation system's productivity, and with Goal 3 of ensuring travel safety, is acknowledged.

Response 31-4

Your comment that the project is consistent with RTP/SCS Goal 6 of protecting the environment by improving air quality is acknowledged.

Response 31-5

Your comment that the project is consistent with RTP/SCS Goal 4 of a sustainable regional transportation system, with Goal 6 of encouraging active transportation, and with Goal 8 of facilitating non-motorized transportation is acknowledged.

Response 31-6

Your comment that the project is included in the adopted 2012-2035 RTP/SCS is acknowledged. The Construction Authority will notify SCAG if the project scope or schedule changes in a way that may necessitate an RTP/SCS amendment.

Response 31-7

Your comment that SCAG 2012-2035 RTP/SCS Regional Growth Forecasts were used in the Draft EIR analysis is acknowledged.

Response 31-8

Your recommendation to review the SCAG 2012-2035 RTP/SCS Final Program EIR Mitigation Measures Appendix is acknowledged; the Mitigation Measures Appendix has been reviewed for guidance, as appropriate.

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From:	Lisa Levy Buch
To:	Laura Langford
Subject:	FW: Metro Gold Line Foothill Extension - Azusa to Montclair
Date:	Tuesday, October 09, 2012 11:50:41 AM

From: Clive Houston-Brown [mailto:chouston-brown@laverne.edu]
Sent: Friday, October 05, 2012 4:22 PM
To: Lisa Levy Buch
Cc: Chip West
Subject: Metro Gold Line Foothill Extension - Azusa to Montclair

The University of La Verne main campus is located on 38 acres just north of the proposed Metro Gold Line Foothill Extension between B and F Streets. In addition, we have a 4 acre facility just south of Arrow Highway between A Street and Park Avenue and a 55 acre facility just south of Arrow Highway between Carrion Road and Wheeler Avenue. We have reviewed the Draft EIR for the **Metro Gold Line Foothill Extension - Azusa to Montclair** and have the following comments/feedback:

1. The Draft EIR indicates the proposed parking structure at the La Verne station will have a right-hand turn only exit with buses and vehicles being directed to loop north on E Street, east on 1st Street, and south on White Street to Arrow Highway. This will result in heavy traffic flow on the streets on the east side of the University of La Verne campus, right next to some of our residence halls. We are concerned about this additional traffic flow and the impact it will have on our pedestrian and vehicular traffic. 32-1

2. The railroad crossings at D and E Streets are primary arterial routes into the University of La Verne. We are concerned about the additional delays in pedestrian and vehicular traffic using these intersections given the increased railroad activity. The University operates shuttles from its A Street facility (south of Arrow Highway) to its main campus Parking Lot D off D Street north of Arrow Highway. We are concerned the additional five commuter trains per hour will impact the primary arterial route of these shuttles. The Draft EIR states that the D Street/Arrow Highway intersection will experience "residual impact" even after mitigation. We are concerned that this will negatively impact University traffic traveling between its main campus and it's a Street facility. 32-2

3. The University is in the process of building an Athletics complex on land it owns on Wheeler Avenue south of Arrow Highway. Once this facility opens in 2013 the Wheeler Avenue/Arrow Highway crossing will become an important arterial route for University traffic moving between the main campus and the West Campus facility. The Draft EIR states that the Wheeler Avenue/Arrow Highway intersection will experience "residual impact" even after mitigation. We are concerned that this will negatively impact University traffic traveling between its main campus and its West Campus facility. 32-3

4. The Draft EIR states that "during *construction, it may be necessary for traffic lanes to be* 32-4

temporarily closed" and that "*generally, these lane closures would take place at night to minimize traffic disruptions*". The University of La Verne holds more classes in the 5-10pm hours than any other time of day. Road closures at night, especially at the D Street/Arrow Highway and E Street/Arrow Highway intersections, would seriously affect our access to and from campus. The University requests that work on these intersections be conducted between the hours of 10 pm-6am or on weekends to minimize impact to the University. The report also says that construction could "*require the temporary closure of lanes on roadways with at-grade crossings*". For the aforementioned reasons, the University requests that at no time the D Street/Arrow Highway and E Street/Arrow Highway intersections be closed to traffic simultaneously. 32-4

5. The University is concerned that the additional overall train traffic will pose a safety risk to its students, faculty, staff, and visitors during their commute to and from work and to and from its other facilities south of Arrow Highway. We are also concerned about the negative noise impact the additional train traffic (and whistles) will have on our residential students who live very close to the train tracks. The University would expect the project to take into consideration the need to mitigate the additional noise levels and frequencies caused by increased train traffic. 32-5

We look forward to further discussion about mitigation options to help offset these concerns. Please feel free to contact me to discuss further.

Clive K. Houston-Brown, Ed.D.
Associate Vice President for Facility & Technology Services
& Chief Information Officer
University of La Verne
(909) 593-3511 ext. 4122

32. Houston-Brown, Clive K., Associate Vice President for Facility & Technology Services & Chief Information Officer, University of La Verne, October 5, 2012.

Response 32-1

The Draft EIR traffic study evaluated the impacts of project-related traffic on intersections and roadways adjacent to the La Verne train station. Traffic circulation and vehicular access to and from the parking structure were also taken into consideration. Based on the results of the traffic analysis, several intersections in the City of La Verne were identified as being impacted by the proposed project. At these locations, mitigation measures were identified to alleviate the anticipated project impacts on vehicular traffic.

Response 32-2

The traffic analysis in the Draft EIR considered the increased railroad activity due to the proposed project along D and E Streets. The D Street/Arrow Highway intersection is impacted by the project because the change in delay and its associated level of service exceeds the significance levels set forth by the Los Angeles County Traffic Impact Analysis Study Guidelines. However, the resulting level of service (LOS) with the proposed project in the year 2035 is LOS C in both the AM and PM peak hours. LOS C and D are typically acceptable levels of service in urban areas where many streets operate at LOS E or F. It can be concluded that the intersection will continue to operate at an acceptable level of service and University traffic will not be adversely impacted.

Response 32-3

The Wheeler Avenue/Arrow Highway intersection is impacted by the project because the change in delay and its associated level of service exceeds the significance levels set forth by the Los Angeles County Traffic Impact Analysis Study Guidelines. However, since the resulting level of service with the proposed project in the year 2035, which is LOS D in both the AM and PM peak hours, it can be concluded that the intersection will continue to operate at an acceptable level of service. In summary, University traffic is not anticipated to be impacted.

Response 32-4

During the construction phase of the project, the Metro Gold Line Foothill Extension Construction Authority and the contractor will work with the University of La Verne to address construction related issues. In addition, a Construction Management Plan (CMP) will be implemented that identifies strategies that would help minimize and mitigate construction related impacts and ensure that traffic moves safely and efficiently. Continuous dialogue will be maintained between the University and the contractor so that issues such as the specific times for night closures and simultaneous construction on adjacent at-grade crossings can be addressed.

Response 32-5

The noise analysis for the Draft EIR assessed potential for noise impact at all residential land uses (which includes University dormitories or any place where people sleep) and institutional land uses (which includes University classrooms) following the Federal Transit Administration guidelines. The results of the noise analysis for residential land uses in the city of La Verne are shown in Table 3.11.14 on page 3.11-35 of the Draft EIR. The Oaks Residence Hall is labeled as cluster WB7 in the analysis. The results of the noise analysis for institutional land uses is shown in Table 3.11-21 on page 3.11-50 of the Draft EIR. The Arts and Communication building is labeled as cluster F in the analysis. Mitigation measures are recommended where predicted levels exceed the FTA impact thresholds. Figure 3.11-22 on page 3.11-38 of the Draft EIR shows a sound wall is recommended between D Street and E Street to mitigate potential noise impacts at the Oaks Residence Hall and the Arts and Communications building.

DEIR Comments, Foothill Gold Line Extension Glendora – Montclair – Ontario Airport

John Jay Ulloth
Post Office Box 7232
Van Nuys, California 91409
9-29-2012

James Henry Washington, Jr.
1439 Myrtle Avenue
Long Beach, California 90813

RECEIVED
OCT 5 2012
MGL FOOTHILL EXT.
CONST. AUTHORITY

To Whom It May Concern:

Thank you for the opportunity to comment on the DEIR. While the Foothill Gold Line is badly needed by Los Angeles Metropolitan Transportation Authority because it will be the first MetroRail Line to reach any edge of the County (eastern, 3 edges to go!) course-correcting is still needed; if these parts of the project are not changed- are built as-currently-designed-, they will prove to be mistakes:

1) DUMP ALL STATION PARKING STRUCTURES; INVEST THE SAVINGS IN "LAST-MILE" TRANSIT, BICYCLE, & PEDESTRIAN FACILITIES TO MAKE STATIONS COMMUNITY TRANSIT HUBS: Parking Garages are hideously expensive, never pay for themselves, sucking multi-millions out of transit capital budgets that could translate into more transit projects. Parking garages are transit suicide- "Once they pick up the keys, (drivers) are going to KEEP GOING..." said one attendee at MTA Orange Line meetings. GOING past the transit parking garage... GOING to the gas station for more fossil fuel to send up the tailpipe into the sky & our lungs... then GONE on to the region's roadways clogging them up! Parking Garages attract cars & their hazards to stations, not the pedestrians & bicycles and their benefits we want. Failing to get people on transit for the "1st & Last Mile" of their trips is counterproductive to ridership- therefore efficiency, of transit vehicles. Nothing enables the single-occupant auto to kill transit marketshare more than adding concentrated parking garages to plentiful surface parking! Unless buried, broken up into very small chunks, cleverly disguised, & thickly planted, Parking Garages & Lots are always eyesores & nuisances! Here are your capacity numbers, *& our recommendations in italics*: 33-1

Station location	Station-related Surface Parking Lots		Station-related Parking Structures
Glendora	-N-	*On-street only. Add local buses.*	~~400 spaces~~ *Eliminate, save $millions*
San Dimas	-N-	**none needed; see 3) below*	~~450 spaces, 30 feet tall~~ *Eliminate, save $millions*
La Verne	-N-	*On-street + northern Fairplex*	~~600 spaces, 55 feet tall~~ *Eliminate, save $millions*
Pomona	~~250~~	*On-street only. Add local buses.*	~~750 spaces, 45 feet tall~~ *Eliminate, save $millions*
Claremont	~~400~~	*On-street only. Add local buses.*	~~750 spaces~~ *Eliminate, save $millions*
Montclair	~~1,600~~	*Enough already; don't add more!*	-N-

However, sending 1,600 cars per day to the bottom of the quarry north of Morningside Drive (on MapSheet 28) would do wonders for traffic! Whether a parking lot or car crusher goes down there should be up to San Bernardino County to decide.

2) NO "CHINESE WALLS": We found two (like the Towne Avenue Flyover). MTA's practice is to build track ramps' sidewalls unnecessarily high before becoming bridges or Elevated. "Chinese Walls"+ flyovers are graffiti-magnets for all time. Worse, flyovers aren't even needed here, but MTA made up a little game with made-up critera, randomly setting car traffic count "cut-offs" to justify the waste of millions of dollars on needless overcrossings. No form of ground transportation is more efficient at moving crowds than rail-at-grade, & none less efficient than single-occupant cars! So why give ground to cars & send trains high into the air, forcing passengers to climb stairs or wait for elevators? There's nothing wrong with grade crossings! Want a roller coaster? try Magic Mountain, not the SGV! 33-2

*** 3) SWITCH SAN DIMAS' PASSENGER STATION LOCATION WITH SAN DIMAS' ELECTRICAL SUBSTATION LOCATION!:** What is this, some mad scheme to get MTA to pay a high price for San Dimas' Corporate yard? Move the *substation* west of Walnut: this location is an ARMPIT! Put the Light Rail Station back where it belongs- across the BNSF tracks from the historic Santa Fe station/ Pacific Railway Museum! It's wonderful San Dimas has a station when so many have been torn down; it's museum a cultural element in 33-3

the right place on Bonita Avenue we shouldn't run away from. It's THE gateway to San Dimas' walkable Old Town core, best served by putting the new train station near where the last one was & still is... an original that's got clean ADA bathrooms (open Saturday, 1 week day p.m., & for San Dimas' special events) the new MetroRail shelter is very never going to provide. Land parcels included in the right-of-way width widen it south (across the tracks) of existing BNSF tracks (where sidings & buildings were); just ideal in size & position for the light rail tracks, station, then bus bays for cross-platform transfers to buses entering from Cataract! Its station architecture could take cues from the existing station, other Santa Fe Stations, or recall the earlier "Mud Springs" Depot; "re-centering" the station in a now-larger transit center+ park, with common landscape elements framing & connecting both parts across the tracks... While we don't want any more parking (other than on-street parking), the Transit Center/ Park boundary could be expanded by terminating Cataract between the end of the bus bays & Bonita, connecting parkland to the vacant lot west of Cataract, and the sports fields south of that. **In unbelievable contrast, *the DEIR-chosen "Corporate Yard" site west of Walnut FAILS every transit-, features-, & historic character- comparison!*** If previously-proposed undistinguished condos go in there, their residents are NOT going to be interested in crowds of passengers discharging from trains in front of their doors at all hours- unlike the existing Bonita Avenue business owners who are! Businesses that provide amenities passengers need & want (food & drink, rest rooms, shopping, shade) that MTA won't/ can't afford. Conclusion: the "Corporate Yard" site is *perfectly suitable for a light rail ELECTRICAL SUBSTATION; NOT for PASSENGERS!* 33-3

4) MODIFY TRACKAGE AROUND LA VERNE FOR DIRECT RAIL SERVICE INSIDE TO LOS ANGELES COUNTY FAIRGROUNDS' INNER GATE: La Verne station area planning, right-of-way alterations & real estate buys are needed for Short-Term advance planning & modification RIGHT NOW (because this will not be done later!) to allow Foothill Gold Line 1) trainsets to become captive shuttle trains (trains running only between La Verne and the Fair & Racetrack's inner ticketing gates) to bridge the unwalkable distance through the Fair's north parking lot acreage between MetroLink's Fairplex station and the Fair's & Racetrack's inner gates whenever they are open 2) to make the Fair's & Racetrack's inner gates a Temporary MetroRail Hub (meaning all Light Rail trains go to/ from the Gold Line main line to stop or layover in there) during the weeks of the County Fair and large Racing weekends Research is needed to determine whether the historic rail spur that used to do this could be rebuilt, or a new alignment is needed 3) to avoid lengthening end-to-end trip times while adding this inner Fair gate stop: "governors" limiting the top speed of all railcars on this line should be set higher to allow Dispatch & Operators to distribute "make-up time" to the schedule between stations. Governors would be re-set at the end of the Fair when its Inner Gate station would shutter for the season. 33-4

5) BUILD INFRASTRUCTURE THAT REINFORCES SAN GABRIEL VALLEY HISTORY & RAIL HISTORY: Much of the San Gabriel Valley's appeal is historic; lots of its Chambers of Commerce & businesses are all over the cult of Route 66, and work hard to cash in on its appeal. Please take Next Steps to ensure the same synergistic effort is applied here to reinforce history on the light rail line & its stations, so we get actual stations/ shelters that (please!) both shade+ shelter passengers (unlike punched metal canopies on the Expo Line that do neither!), architecture drawn from San Gabriel Valley freight storage depots, or packing house building designs. A number of historically accurate architectural plans & standard rail station designs could be rebuilt if the research gets done. Complete facilities in original good materials (unlike one hapless MetroLink station of neo-historic design, ruined by execution of details and the selection of inferior (imitation materials wearing badly); up close no one is fooled this is an historic building). Select art/ artists that tell old local stories; a display of tools/ household items from the past would be far more engaging than "art that makes a statement"... like a display of painted shrunken metal heads on a table that graces several transit stations- (fortunately far out of view in another state). 33-5

6) TRY MOVING DEODARS NOW BEFORE CUTTING THEM ALL DOWN: Many large trees CAN be moved; most of the public would be shocked to learn there is equipment capable of moving huge specimen trees for successful transplanting. Unless there's a gas pipeline under them, it would be worth trying to box & transplant 3 to 5 of those large unique Deodar Cedars right now (to a station site location where they would be a landscaping asset) BEFORE the project starts, to see if they'll survive. Instead of slaughtering them all (as for the Space Shuttle move), then "replacing" them with (name any number of) "replacement" trees. These are usually the size of a pencil! & never a fair deal! In this case don't needlessly force us to look at warehouse walls (& graffiti that will soon appear) behind the deodars for decades, just because axxing is cheaper. If transplanting doesn't work, replacement trees & plant screening should use local natives; The Rancho Santa Ana Botanic Garden has plenty of acclimated plants & expertise, Huntington Gardens could consult... 33-6

7A) ONWARD TO ONTARIO Airport!: Detractors say the Foothill Gold Line is a line to nowhere; prove this insult to lineside cities wrong! Insist on a logical eastern hub to attract high ridership to both ends of the line! Insist at every phase! Ontario Airport is just that... 33-7

7B) ...And so is San Berd'oo... **SURGE ON TO SAN BERNARDINO! NOTHING IN THIS PROJECT SHOULD PRECLUDE OR BLOCK A NEAR-TERM RESTORATION OF AN ORIGINAL PACIFIC ELECTRIC (PE) RAILWAY LINE:** It is a disappointment to some commentators that the ORIGINAL PE alignment was not chosen, instead of the MetroLink-parallel alignment that was... because of perceived "competition". Though the 2 rail modes service different (not necessarily exclusive) travel markets, the opportunity to run more trains to more branches & station pairs should never be blocked! This PE line might be revived in light rail mode... or maybe, due to today's existing street configuration, as a traffic-signal-priority Trolley, fully compatible with Gold Line voltage & light-rail railcar width for inter-operability. That would allow through-running of Light Rail- & Trolley- cars, though up to San Bernardino County governments to complete & detail... The reason it's necessary for The Foothill Gold Line Authority to plan it right now is that this PE line branches off north-northeast from the north side of Cambridge Av. (MapSheet 24) easing a block north to 1st Street (where it could serve the north end of a transit village between Indian Hill to Mill Avenue INSTEAD OF PARKING there!)... thru to the end (MapSheet 29). This establishes parity, or "mutual aid" for cross-county transit that competes with freeways; just as the Foothill Gold Line is a LA County project to Ontario Airport in San Bernardino County *because that's where it ends*... LA County needs to plan the San Bernardino PE branch right, so San Bernardino County can build its branch right into LA County *because that's where it begins*. 33-8

For better transit- and more of it-

(John Jay Ulloth)

(James Henry Washington, Jr.)

P.S. While "Surging" on to San Bernardino (per 7B above), the Old Original Line to Downtown Pomona might also be restored!

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33. Ulloth, John Jay and James Henry Washington, October 5, 2012.

Response 33-1

The amount of parking proposed at each station meets the parking demand identified in the travel forecast models, which account for the fact that passengers will use multiple modes (bus, drive, walk and bicycle) to access the stations.

Section 6.12.3 of the Metro Design Criteria (the document that stipulates project design) states the following:

> Park-and-Ride, or long term parking, although the least efficient in terms of the physical facilities required, has proven to be a necessary facility for the success of transit systems. This facility, whether at-grade or within a structure, shall be located at a greater distance from the station entrance than other modes where site conditions allow. Whenever possible, the walking distance from the station entrance to the most remote parking space should not exceed 1,320 feet.

Response 33-2

The proposed flyover at Lone Hill Avenue and Towne Avenue are designed not to grade separate traffic but rather to allow the LRT tracks to switch sides with the freight/Metrolink track so that the BNSF freight can serve customers on the north side of the track in Pomona. The Construction Authority studied these intersections and all others along the alignment to determine which would be adversely affected by increased train traffic. Per Metro grade crossing criteria, traffic at the Lone Hill Avenue and Towne Avenue grade crossing do not warrant a grade separation and one would not be built were it not for the need for the LRT tracks to cross the freight/Metrolink track. A description and justification for the flyover structures is found in Section 1.3.3.1 of the Draft EIR. Acts of vandalism, if they occur, would be prosecuted by local law enforcement or the Los Angeles County Sherriff's Department Transit Services Bureau. All project stations are at-grade, precluding passenger's need to climb stairs or wait for elevators to access station platforms. At certain locations, pedestrian bridges may be needed between platforms due to specific safety considerations.

Response 33-3

The proposed San Dimas Station site was selected in large part due to the ease of access afforded by San Dimas Avenue and Walnut Avenue, both of which feed into East Arrow Highway. The site opposite the historic Santa Fe Station/Pacific Railway Museum lacks equivalent access.

Response 33-4

Providing spur service inside the Los Angeles County Fairgrounds is inconsistent with Metro's mandate to provide regional transit service.

Response 33-5

Section 3.13 of the Final EIR states: "All walls, structures and fences shall be properly screened or incorporate design features to improve appearance and reduce visual intrusion pursuant to the standards established in the Metro Rail Design Criteria. The goal of the Criteria is to create site-adapted designs that reflect the specific urban context of each station and that enhance the neighborhood context in which the project is proposed. The Criteria include artwork, signage, advertising, landscaping, and guidelines for the selection of materials and finishes. Station design shall feature materials, landscaping, art, and other elements consistent with Metro Rail Design Criteria, and developed by the station design team that includes architects, landscape architects, and lighting experts. Surface treatments shall be provided at the face of safety walls and at roadway/pedestrian portals, and landscaping along safety walls outside of the LRT portal shall be provided where feasible to provide wall screening. Per Metro Rail Design Criteria, artwork will be provided at each station and will be designed by professional artists. According to the Criteria, careful consideration must be given to station compatibility with proposed future development in the neighborhood of each station, and where applicable, future extensions and/or connecting line transfers. Neighborhood culture and character shall be emphasized through artwork. The Designer should become familiar with the general aspects of the entire system in order to determine how his individual project relates to the whole. The Landscape Architect shall coordinate design and production of construction drawings with Designers and Metro Art to ensure that landscaping, facilities architecture, site engineering and station art are visually and functionally compatible. Coordination is particularly important with regard to the design of lighting, paved surfaces, walls and site furnishings. Metro Facilities Maintenance group shall be involved in the review and comment stage of landscape design review submittals."

Response 33-6

The project is located primarily along the existing railway; therefore, it is anticipated that most existing trees would not be removed and would likely only require trimming. Per Mitigation Measure B-2, final design plans will be reviewed to determine if any trees would require removal or trimming. The commenter did not specify the location of the large Deodar cedars referenced in the comment; many jurisdictions protect this species of tree. Per Mitigation Measure B-2, a Certified Arborist will inspect trees that are protected by the City ordinance and will make a recommendation for removal or relocation based on the assessment of the tree's health and stature. Sometimes large trees do not survive relocation as well as young trees if a substantial portion of the root system would be lost. If feasible to move large trees, this option will be considered. The specific strategy for tree removal/replacement or relocation will be determined by the Project Arborist in consultation with each local jurisdiction. The appropriate tree permits will be obtained prior to construction.

Response 33-7

Your support of the extension of the Gold Line to San Bernardino County and the Ontario Airport is acknowledged.

Response 33-8

The proposed alignment was chosen to capitalize and introduce passenger service on currently under utilized Metro-owned right-of-way in the western part of the study area, which is not directly served by Metrolink. Section 1.2 of the Draft EIR states the objectives of the project.

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STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY EDMUND G. BROWN JR., Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7, Division of Environmental Planning
100 South Main Street, Suite 100
LOS ANGELES, CA 90012-3606
PHONE (213) 897-3643
FAX (213) 897-0685
TTY (213) 897-4937

Flex your power!
Be Energy efficient!

Metro Gold Line Foothill Construction Authority
406 E. Huntington Drive, Suite 202
Monrovia, CA 91016-3633

October 5, 2012

Thank you for the opportunity to review the Metro Gold Line Foothill Extension Project from Azusa to Montclair, Draft Environmental Impact Report (SCH No. 20100121069). Areas of concern to the Division of Environmental Planning include locations where the proposed light rail alignment comes into contact with our facility. Potential loc[redacted]would be at over/under crossings, state or locally owned bridges, as well as at locations where proposed light rail facilities may impact traffic operations at freeway on/off ramps or impact safety of the motoring public.

In regards to Biological Resources it's recommended that item BG-4 under 3.2.4.1 Short Term Construction Mitigation Measures be changed to the following:

> Should vegetation need to be removed during bird nesting season, February 15th through September 1st, a qualified biologist shall survey for nesting birds no more than three days prior to construction activities. In the event that nesting birds are observed, vegetation removal should not be conducted until the fledglings have left the nest. If this is not possible, coordination with the qualified biologist should take place in order to minimize the risk of violation the Migratory Bird Treaty Act, and the following minimization measure put in place: a buffer of 150 feet for songbirds and 500 feet for raptors which must be maintained during all phases of construction. Nesting birds may not be impacted by any construction activity including noise and dust pollution along with destruction of habitat. 34-1

Should you seek federal funds in the future for this project, Caltrans, Division of Environmental Planning would be interested in being a participating agency for NEPA. 34-2

Please update your mailing list and remove Garrett Damrath, Senior Environmental Planner, Caltrans, Division of Environmental Planning from your mailing list and replace his name with Dawn Kukla, Senior Environmental Planner, Caltrans, Division of Environmental Planning. Include her in all correspondence for this project. 34-3

We hope you will continue to inform our office of future meetings and look forward to working with you. If you have any questions regarding these comments, please contact Brian Manor at (213) 897-0704 or myself at (213) 897-3643.

Sincerely,

FOR Brian Manor

Dawn Kukla,
Senior Environmental Planner
Division of Environmental Planning

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34. Kukla, Dawn, Senior Environmental Planner, Division of Environmental Planning, Department of Transportation (Caltrans), District 7, October 5, 2012.

Response 34-1

Mitigation Measures B-3 and B-4 have been revised as follows:

> **B-3** – The Construction Authority shall direct the contractor to avoid or minimize removal of vegetation (including ornamental tree and shrub removal) during the breeding season (February 1 to June 30 for nesting raptors, ~~March~~ February 15 to September 1~~5~~ for all other birds). To the extent practicable, the contractor shall conduct vegetation and tree removal activities during the non-breeding season (September ~~16~~2 through January 31) to limit impacts to nesting birds/raptors.
>
> **B-4**– In the event that removal of vegetation (including ornamental tree and shrub removal) must occur between February 1 and September 1~~5~~, the Construction Authority (or contractor) shall retain a qualified biologist to conduct a nesting bird/raptor survey of the project impact area prior to the initiation of construction. The survey shall be conducted no more than three days prior to the initiation of construction to minimize the potential for nesting following the survey and prior to construction. If the biologist detects any active nests within or adjacent to the project impact area (within ~~25~~150 feet for nesting birds, within 500 feet for raptors), the area(s) supporting bird nests shall flagged for protection with a buffer determined at the biologist's discretion based on the sensitivity of the species (minimum buffer of ~~3~~500 feet for raptors). The Construction Authority shall direct the contractor to avoid any activities within the buffer zone until the nests are no longer occupied as determined by the biologist.

Response 34-2

Caltrans' interest in serving as a participating agency for NEPA, should the federal funds be sought for the project in the future, is acknowledged.

Response 34-3

The Construction Authority's mailing list has been updated per your comment.

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STATE OF CALIFORNIA

GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH

STATE CLEARINGHOUSE AND PLANNING UNIT

EDMUND G. BROWN JR.
GOVERNOR

KEN ALEX
DIRECTOR

RECEIVED

OCT 10 2012

MGL FOOTHILL EXT.
CONST. AUTHORITY

October 5, 2012

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

Subject: Metro Gold Line Foothill Extension Azusa to Montclair (Phase 2B)
SCH#: 2010121069

Dear Lisa Levy Buch:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on October 4, 2012, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

> "A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

35-1

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

Document Details Report
State Clearinghouse Data Base

SCH# 2010121069
Project Title Metro Gold Line Foothill Extension Azusa to Montclair (Phase 2B)
Lead Agency Sonoma County Water Agency

Type EIR Draft EIR

Description The Metro Gold Line light rail transit (LRT) system currently extends from Los Angeles to Pasadena serving cities and communities along the alignment corridor. The Metro Gold Line Foothill Extension is a phased project that extends the existing Metro Gold Line by 24 miles to the east, from the City of Pasadena to the City of Montclair. The extension is proceeding in two phases. Construction of the first phase from the Pasadena Sierra Madre Villa Station to the Azusa-Citrus Station began in late 2011, and construction is anticipated to be completed in late 2015.

Lead Agency Contact

Name Lisa Levy Buch
Agency Metro Gold Line Foothill Extension Construction Authority
Phone 626 305 7004 **Fax**
email llevybuch@foothillextension.org
Address 406 E. Huntington Drive, Suite 202
City Monrovia **State** CA **Zip** 91016-3633

Project Location

County Los Angeles, San Bernardino
City Azusa, Glendora, San Dimas, La Verne, Pomona, Claremont, ...
Region
Lat / Long
Cross Streets
Parcel No.
Township **Range** **Section** **Base**

Proximity to:

Highways I-210, SR 57, US 66, I-10
Airports
Railways Metrolink, BNSF
Waterways
Schools
Land Use Residential and Mixed Use

Project Issues Air Quality; Archaeologic-Historic; Biological Resources; Economics/Jobs; Fiscal Impacts; Flood Plain/Flooding; Geologic/Seismic; Noise; Public Services; Recreation/Parks; Schools/Universities; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Water Quality; Growth Inducing; Landuse; Cumulative Effects; Other Issues; Aesthetic/Visual

Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Game, Region 5; Department of Fish and Game, Region 6; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 7; Caltrans, District 8; Caltrans, Division of Transportation Planning; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 8; Native American Heritage Commission; Public Utilities Commission; State Lands Commission; Department of Toxic Substances Control

Date Received 08/21/2012 **Start of Review** 08/21/2012 **End of Review** 10/04/2012

35. Morgan, Scott, Director, State Clearinghouse, State of California, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit, October 5, 2012.

Response 35-1

The information that the Construction Authority has complied with the State Clearinghouse's Draft EIR review requirements is acknowledged.

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From: Lisa Levy Buch
To: Laura Langford
Subject: FW: The DEIR for section 2B
Date: Tuesday, October 09, 2012 11:47:48 AM

-----Original Message-----
From: Erik Griswold [mailto:erik.griswold@gmail.com]
Sent: Saturday, October 06, 2012 12:59 AM
To: Lisa Levy Buch
Subject: The DEIR for section 2B

Wonderful work.

Why not repackage this into two parts. 2Ba from Asuza to the San Dimas/La Verne border and 2Bb from San Dimas/La Verne border to Montclair. Why? To avoid building a duplicative Light Rail line parallel to the existing Metrolink line.

Build a good joint Metrolink &Gold Line station which will act as the eastern terminus of the Gold Line until further, either on the site of the current Pomona (North) Station or better yet between D and E Streets by the Fairplex. This could/should be within the walkshed of downtown La Verne. At the least build this joint station at San Dimas Canyon Road if possible as the lines diverge away from each other when traveling west from there.

Where ever it ends up, 2e will conflict the existing Metrolink less so than if the Gold Line had been built to Montclair. Travellers from San Bernardino will know that they will be able connect from Metrolink to Metro, just as Metrolink passengers do today at Los Angeles Union Station.

36-1

-Erik Griswold

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36. Griswold, Scott, October 6, 2012.

Response 36-1

The Metro Gold Line is intended to serve a different travel market than Metrolink. The Gold Line has local stations spaced one to two miles apart, facilitating intra-regional travel, with frequent service throughout the day. Metrolink is a commuter rail service connecting the Southern California region, with frequent service only during peak weekday hours. The duplication of service is therefore minimal.

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From:	Lisa Levy Buch
To:	Laura Langford
Subject:	FW: EIR Draft questions
Date:	Tuesday, October 09, 2012 11:49:14 AM

From: norm bowers [mailto:normanebowers@gmail.com]
Sent: Friday, October 05, 2012 8:09 PM
To: Lisa Levy Buch
Subject: EIR Draft questions

Ms. Levy Buch,
I attended the EIR Hearing the other day in La Verne and had a question I would like addressed in the EIR. My question pertains to noise levels. I am specifically concerned with the at grade crossing of Barranca Ave in Glendora. Will the Gold Line trains need to sound any kind of horn or bell when they approach this at grade crossing? And if so is there any special crossing gates that can be used to eliminate the need to sound horns etc when approaching this crossing.

Currently the freight trains that use this track sound their horns at this crossing, that is a brief annoyance once or twice a day when they come through. But with the Gold Line running every 6 minutes it could be a real degradation in the quality of life for the surrounding homes.

37-1

The second part of the noise question is, in the EIR a sound wall is suggested as a means of mitigating the track noise of the Gold Line in this area. How high will these sound walls be and will they obstruct the views of the homes that enjoy a modest view of the foothills and surrounding area. I would ask that you address the make up of the walls and if there is a way to use a material that would block the noise but not obstruct the views.

I believe the Gold Line will be a real asset to the communities it will serve and hope that there are ways to mitigate the noise levels for those that live near these at grade crossings.

37-2

Thank you very much for the work you are doing on this project, I look forward to seeing your responses.
Norm Bowers

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37. Bowers, Norm, October 5, 2012.

Response 37-1

Audible warnings are required by the California Public Utilities Commission at all gate-protected at-grade light-rail transit (LRT)/roadway crossings. The required audible warnings are ringing bells that are located on the masts of the crossing gates and the sounding of horns located on the lead vehicle of the trains. The requirements and general Metro practices for sounding light-rail vehicle ("LRV") horns are:

- Every LRV must be equipped with a bell or horn that generates a sound level of 85 dBA at a distance of 100 feet from the vehicle (CPUC General Order 143B). Most automobile horns generate a sound level of 80 to 85 dBA at a distance of 100 feet, so the LRV horn is slightly louder than most automobile horns.
- The light-rail vehicles are also equipped with a low-volume horn with a sound level of 75 dBA at 100 feet from the vehicle.
- The light-rail vehicle operator must sound an audible warning when approaching at-grade crossings protected by automatic crossing signals. The standard operating procedure on Phase 1 of the Metro Gold Line is to sound the low-volume horn (75 dBA at 100 feet) before at-grade crossings.
- The louder horn is used in case of emergency and at the discretion of the train operator.

Metro's operating procedure calls for train operators to sound the 75 dBA warning horn prior to all gate-protected crossings starting approximately 300 feet prior to the crossing. At speeds greater than 35 mph, the noise from the horn adds less than 1 dB to the noise exposure caused by the light-rail trains. In other words, the train noise combined with the horn noise is not significantly greater than the train noise alone. The regulations governing the LRT horns are much different than the regulations governing the freight horns. LRT horns are much quieter and are sounded for a shorter duration at each intersection.

Cities can petition the Federal Railroad Administration (FRA) for "quiet zones" in which exemptions from horn sounding apply, provided that other warning and safety devices at the crossing are sufficient, as determined by the FRA. Project grade crossings will have quad gates (crossing gates that span the entire roadway) and/or other safety features that are likely to be sufficient for a quiet zone determination.

Response 37-2

Typically, sound walls installed to mitigate noise from light-rail projects are 6 to 8 feet high. The primary noise source from light-rail trains is the sound from the steel wheels rolling on the steel rails. However, because one of the main noise sources near the Barranca intersection is noise from the freight horns (which are located at a greater height than the wheels and rails of the train), some of the sound walls are specified to be 12 feet high to block the line-of-sight from the horns.

The implementation of mitigation measures, including final height and design of the sound walls, will be decided by the Construction Authority with input from the cities. In addition, if the project were to include a successful quiet zone petition for the intersection at Barranca Avenue, the recommended height of the sound walls would decrease.

Transparent panels were used on the Expo Phase I project to provide noise mitigation at intersections and other locations where visibility was an issue. These panels were installed and are effective. The panels were removed from one location at the La Brea Station due to concerns about fire safety. According to the supplier of the transparent panels, the material has passed appropriate fire safety tests.

COUNTY OF LOS ANGELES
DEPARTMENT OF PARKS AND RECREATION
"Creating Community Through People, Parks and Programs"
Russ Guiney, Director

October 10, 2012 Sent via email:llevybuch@foothillextension.org

Ms. Lisa Levy Buch
Metro Gold Line
Foothill Extension
406 E. Huntington Dr, Suite 202
Monrovia, CA 91016-3633

Dear Ms. Buch:

NOTICE OF AVAILABILITY OF THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE METRO GOLD LINE FOOTHILL EXTENSION FROM AZUSA TO MONTCLAIR PROJECT

The Department of Parks and Recreation has reviewed the above project for potential impact on the facilities of the Department. The proposed project may impact an existing County trail, the Marshall Canyon Trail (subject trail). The subject trail is in close proximity to the intersection of Arrow Hwy and Wheeler Ave and travels underneath the railroad tracks through the flood control channel. (See attached map)

The subject trail is located within a County flood control channel. Any work affecting the channel may require a right-of-entry permit from this Department and the County Department of Public Works Flood Control District. For inquiries on the right-of-entry permit from the Department of Parks and Recreation, please contact Ms. Diane Thorne at 213-351-5128 or dthorne@parks.lacounty.gov. For more information on flood control channels please contact Mr. Steve Sheridan at 626-445-7630 or ssheridan@dpw.lacounty.gov. 38-1

Prior to construction or any disturbance of the subject trail, Metro shall notify the public at-large of the pending construction activity, if any, forty-five (45) days prior to commencing construction. The form of public outreach shall be through several mediums such as local publications and public signs within a one mile radius of trail access points or existing trails. Notices on the trail shall begin approximately two (2) miles north and south of the construction zone in both directions with intermediate signs every one half mile. Notice shall be sent to groups such as equestrian, mountain bike, and hiking groups in the general area.

Construction of the project may also result in noise impacts to trail users, requiring mitigation or avoidance measures.

Thank you for including this Department in the environmental review process. If you have any trail inquiries, please contact Mr. Francis Yee at 213-639-6058 or fyee@parks.lacounty.gov. If we may be of further assistance, please contact me at (213) 351-5129 or jchien@parks.lacounty.gov.

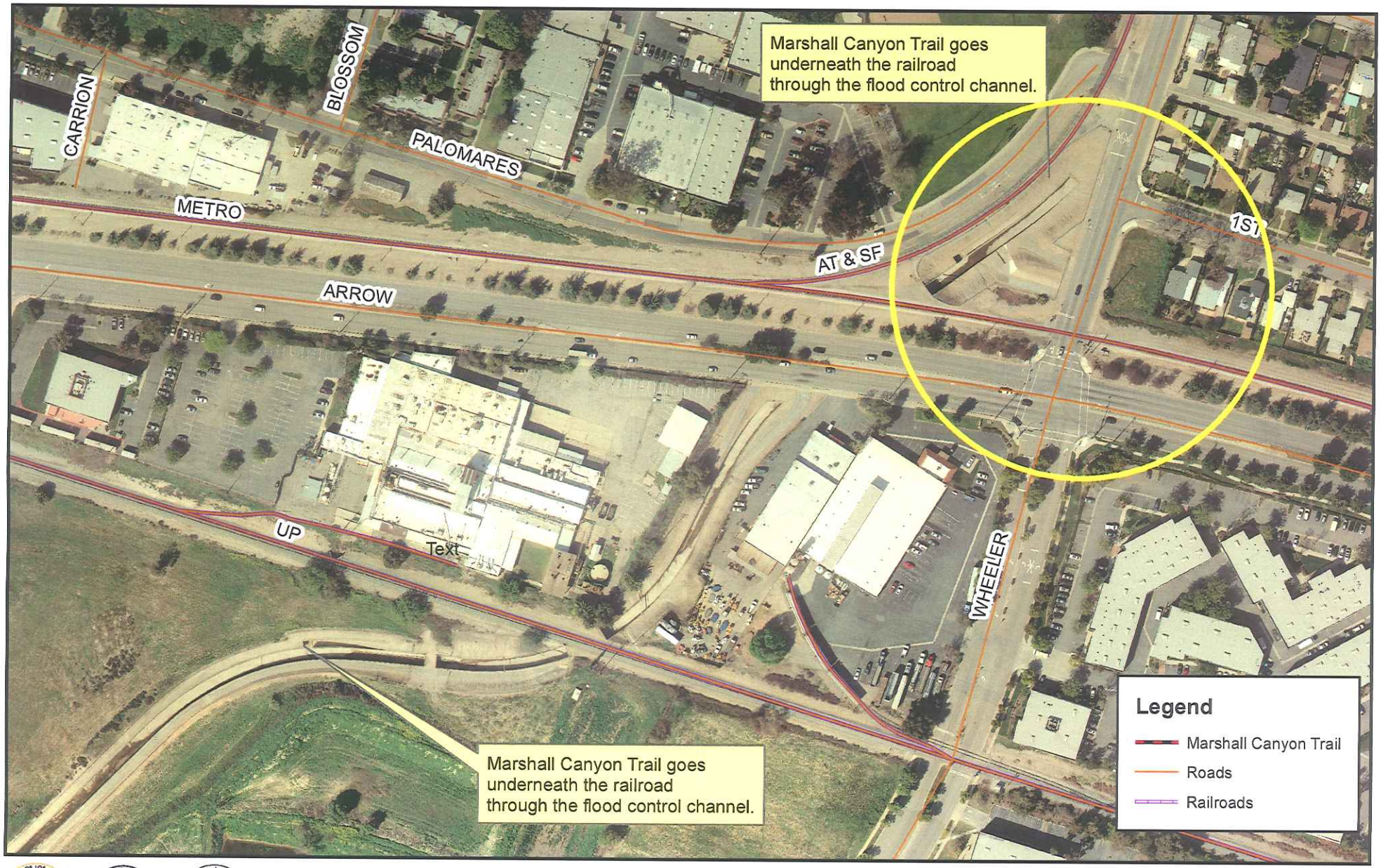
Sincerely,

Jui Ing Chien
Park Planner

JC/ Response to Metro – Gold Line Extension Azusa to Montclair DEIR

Enclosure: MCT Near Arrow Hwy and Wheeler Ave Gold Line Foothill Ext DEIR

c: Parks and Recreation (N. E. Garcia, K. King, J. Rupert, F. Yee, F. Moreno, L. Bradley, O. Ruano, D. Thorne, S. Sheridan)



Marshall Canyon Trail Near Arrow Hwy and Wheeler Ave Intersection

Los Angeles County Department of Parks and Recreation

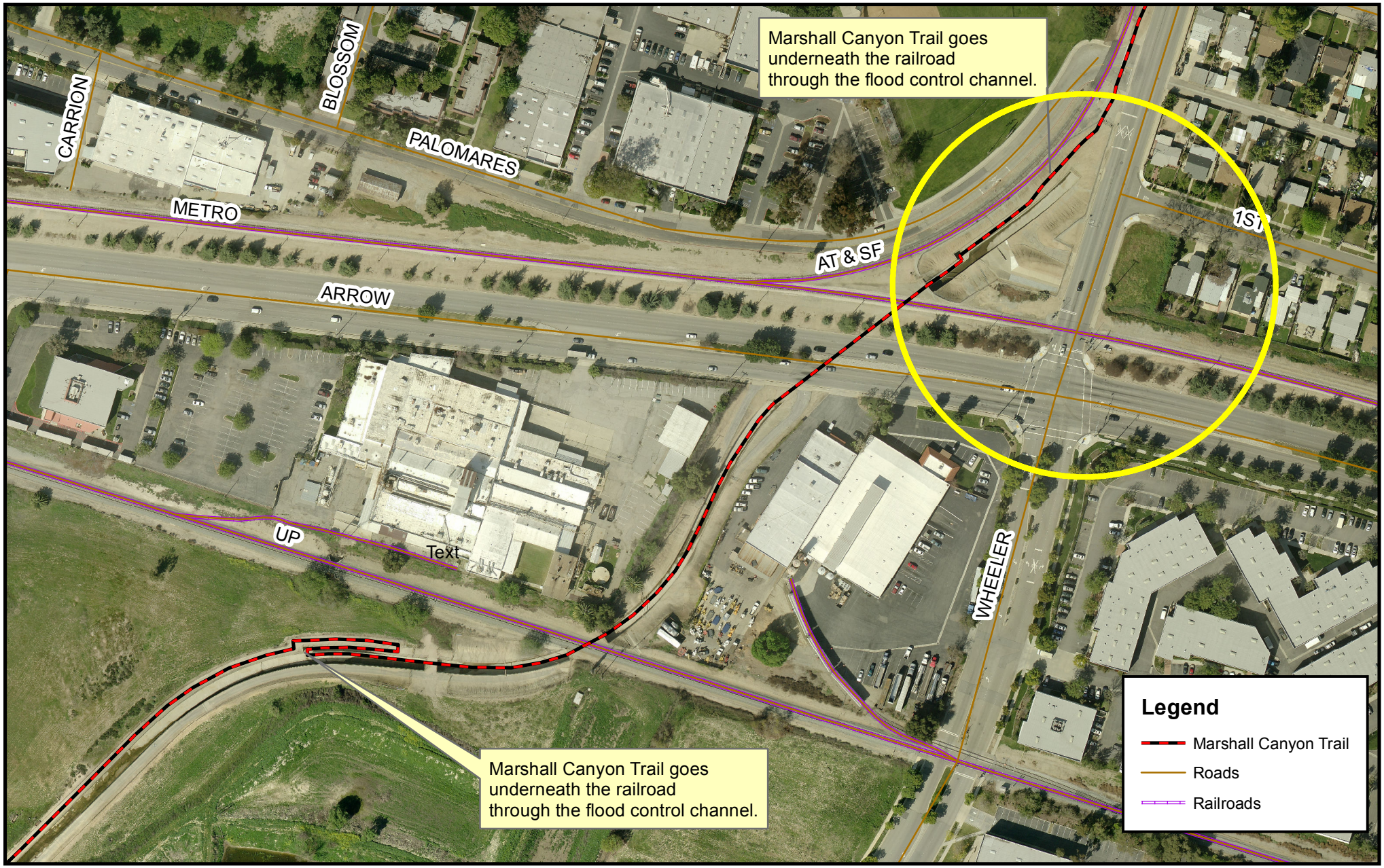
2,900 Feet

N

Sources:
Trails: DPR
Roads: Thomas Brothers (All Rights Reserved)
Aerial Imagery: LARIAC 3

Olga Ruano
Map prepared by Planning Division
Date: October 4, 2012

7-345



Marshall Canyon Trail Near Arrow Hwy and Wheeler Ave Intersection

Los Angeles County Department of Parks and Recreation

2,900 Feet

N

Sources:
Trails: DPR
Roads: Thomas Brothers (All Rights Reserved)
Aerial Imagery: LARIAC 3

Map prepared by Planning Division_OR
Date: 10/10/12

7-346

38. Chien, Jui Ing, Park Planner, County of Los Angeles Department of Parks and Recreation, October 10, 2012.

Response 38-1

The information about the Marshall Canyon Trail has been incorporated into the Final EIR as requested. Marshall Canyon Trail is a linear trail beginning in Marshall Canyon Park 3.4 miles to the north of the project, which runs along the Los Angeles County flood control channel to its terminus at the Frank G. Bonnelli Regional Park. The trail crosses the project alignment through the grade-separated flood control channel. The construction and operation of the project will not result in impacts to the trail as no construction work would be conducted in the flood control channel or along the trail, and operations of the project LRT are grade-separated from the channel. The Construction Management Plan (CMP) that will be implemented throughout the project construction activities will include public notifications, and signage at affected locations.

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STATE OF CALIFORNIA
EDMUND G. BROWN JR., *Governor*

PUBLIC UTILITIES COMMISSION
320 WEST 4TH STREET, SUITE 500
LOS ANGELES, CA 90013
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October 15, 2012

Levy Buch
Director of Public Affairs
Metro Gold Line Foothill Extension Construction Authority
406 E. Huntington Drive, Suite 202
Monrovia, CA 91016-3633

Re: Draft Environmental Impact Report - Metro Gold Line Foothill Extension - Azusa to Montclair Project

Dear Ms. Buch:

Thank you for providing us with a copy of your Draft Environmental Impact Report (DEIR) for the Gold Line Foothill Extension from Azusa to Montclair Project. Although the California Public Utilities Commission (CPUC or Commission) has been interacting with the Metro Gold Line Foothill Extension Construction Authority (Foothill Extension Authority) regarding the project, the CPUC has not specifically provided written comments on this project prior to this date and we appreciate the opportunity to provide the following comments:

The project is subject to a number of rules and regulations involving the CPUC. These may include: Sections 1201 et al, and 99152 of Sate of California Public Utilities Code, which requires Commission authority to construct rail lines over existing streets. The design criteria of the proposed project must comply with CPUC General Orders (GOs), such as GO 72-B, Rules Governing the Construction and Maintenance of Crossings at Grade of Railroads with Public Streets, Roads and Highways; GO 75-D, Regulations Governing Standards for Warning Devices for At-Grade Highway-Rail Crossings; GO 143-B, Safety Rules and Regulations Governing Light-Rail Transit; and GO 164-D, Regulations Governing State Safety Oversight of Rail Fixed Guideway Systems. 39-1

As part of its mission to reduce hazards associated with at-grade crossings, the Commission's policy is to reduce the number of at-grade crossings on rail corridors.

In acquiring Commission approval for construction of at-grade rail crossings, Foothill Extension Authority should file formal applications in accordance with the Commission's Rules of Practice and Procedure for new crossing locations, including grade separation structures, and filing requests for modification of existing crossings in accordance with the Commission's General Order 88-B, Rules for Alerting Public Highway Rail Crossings.

The Light Rail Transit (LRT) alternative described in your DEIR passes through high density commercial, residential and industrial areas of the greater Los Angeles Metropolitan Area. High density areas near rail tracks lead to a high amount of pedestrians around the tracks. Constructing tracks at the existing right-of-way is likely to result in trespassing issues and pedestrian conflicts similar to those currently experienced along other Metro Rail corridors in Los Angeles. Elevating or lowering the tracks would mitigate this concern. Additionally, fencing any remaining at-grade portions of the rail alignment selected should be a requirement of the project. 39-2

While we understand the cost of grade separating a highway-rail at-grade crossing makes for a perceived detriment to your project, the CPUC normally does not take cost into its consideration of the practicability of grade separating a crossing. 39-2

Below we provide specific project concerns for the LRT Segments identified in your DEIR within each City jurisdiction:

Glendora Segment:

1. We recommend grade-separating the proposed Grand Avenue and Foothill Boulevard intersection LRT crossing proposed for at-grade operations. Your DEIR identifies this intersection as having the highest traffic volume of the proposed crossing locations in the City of Glendora. The proposed 10 minute peak time headways may negatively impact traffic circulation and increase delay at the intersection. 39-3

2. We recommend evaluating the Vermont Avenue at-grade crossing, located between two intersections (West Ada Avenue/Vermont Avenue and East Ada Avenue/Vermont Avenue), for traffic signalization and interconnection of the 2 intersections to ensure safe traffic movement across the tracks. 39-4

3. Glendora Station – the proposed at-grade pedestrian crossing should be grade separated with a bridge between the two (2) level parking structure and station center platform. The proposed at-grade crossing location would require pedestrians to cross the freight/Metrolink track and the southern LRT track in order to access the station. This type of configuration presents pedestrians with the potential for two trains approaching on adjacent tracks and can lead to confusion and/or one train blocking visibility of a second train approaching the crossing. RCES staff will not support an at-grade crossing at this location. 39-5

4. Four of the nine (9) proposed at-grade crossings in the City of Glendora are within 1 mile of each other (Pasadena Avenue, Glenwood Avenue, Elwood Avenue and Loraine Avenue). RCES recommends evaluating the short rail corridor for closure and consolidation of at-grade crossings. 39-6

San Dimas Segment:

1. We recommend grade-separating the proposed Bonita Avenue and Cataract Avenue intersection LRT crossing proposed for at-grade operations. Your DEIR identifies this intersection as having the highest traffic volume of proposed crossing locations in the City of San Dimas. The proposed 10 minute peak time headways may negatively impact traffic circulation and increase delay at the intersection. 39-7

2. Five of the six (6) proposed at-grade crossings in the City of San Dimas are within 1 mile of each other (Eucla Avenue, Bonita Avenue/Cataract Avenue, Monte Vista Avenue, San Dimas Avenue and Walnut Avenue). RCES recommends evaluating the short rail corridor for closure and consolidation of at-grade crossings. 39-8

3. San Dimas Station – the proposed at-grade pedestrian crossing should be grade separated with a bridge between the three (3) level parking structure and station center platform. The proposed at-grade crossing location would require pedestrians to cross the southern LRT 39-9

track in order to access the station. RCES staff will not support an at-grade crossing at this location. 39-9

La Verne Segment:

1. Four of the five (5) proposed at-grade crossings in the City of La Verne are within 1 mile of each other (Wheeler Avenue, A Street, D Street and E Street). RCES recommends evaluating the short rail corridor for closure and consolidation of at-grade crossings. 39-10

2. La Verne Station - the proposed at-grade pedestrian crossing should be grade separated with a bridge between the six (6) level parking structure and station center platform. The proposed at-grade crossing location would require pedestrians to cross the southern LRT track in order to access the station. RCES staff will not support an at-grade crossing at this location. 39-11

3. La Verne Station – the proposed signalized driveway intersection with Arrow Highway that will provide access into station parking structure may require interconnection to the existing Metrolink crossing (San Gabriel Valley Line) located to the southeast on Arrow Highway and/or the Arrow Highway /E Street intersection to the northwest. 39-12

4. White Avenue – the proposed addition of two (2) LRT tracks at this at-grade crossing location would result in a three (3)-track crossing adjacent to the existing single track Metrolink (San Gabriel Valley Line) crossing approximately 100 feet to the south. The increase in train operations by the addition of the LRT may require interconnection of these two crossings or modification of existing interconnection. 39-13

Pomona Segment:

1. Fulton Road – the proposed addition of two (2) LRT tracks at this at-grade crossing location would result in a three (3)-track crossing adjacent to the existing 2-track Metrolink (San Gabriel Valley Line) crossing approximately 100 feet to the south. The increase in train operations by the addition of the LRT may require interconnection of these two crossings or modification of existing interconnection. 39-14

2. We recommend grade separating the proposed Garey Avenue at-grade crossing. Garey Avenue serves as one the City of Pomona's major north-south arterial roadway and provides a critical connection to the I-10 freeway. 39-15

Claremont Segment:

1. We recommend grade separating the proposed Indian Hill Boulevard at-grade crossing. Indian Hill Boulevard serves as the City of Claremont's major north-south arterial roadway and provides critical connections to both the I-210 and I-10 freeways. 39-16

2. Claremont Boulevard. – we recommend grade separating this proposed at-grade crossing location. The existing two (2) tracks cross the roadway at approximately 45 degrees presenting a highly skewed crossing to motorists and pedestrians. Visibility of approaching trains is obstructed by the skew and existing structures and trees. The addition of 2 LRT tracks would result in a 4-track at-grade crossing with a mixture of light rail, freight and 39-17

commuter rail activity at varying speeds. Such a configuration will present pedestrians with an extended path across 4 tracks that would need to be cleared in advance of approaching trains. 39-17

Montclair Segment:

1. Montclair Station – we recommend minimizing the number of at-grade pedestrian crossings to the LRT platforms and maximizing the use of safe access via the underpass/tunnel connecting the Metrolink and LRT platforms to the parking lots and the bus transit loop. 39-18

We understand that this is a highly complex and challenging project with funding, design and environmental approval for the greater Los Angeles area. It is imperative that the CPUC be involved with the details of this project from its inception in order to be informed and to be of greater assistance in the future.

The CPUC will need to provide applicable regulatory oversight for all phases of the project. This will require early consultation with not only the Foothill Extension Authority personnel but contracted consultants as well in order to provide early consultation on all proposed design and engineering of the proposed project improvements on the corridor. 39-19

This will assist with the review of the environmental documents and final CEQA approval of the project by the CPUC, since we are a responsible agency under CEQA section 15381 with regard to this project and in complying with any and all General Order requirements as they apply to the Gold Line Foothill Extension from Azusa to Montclair Project.

Thank you very much for the opportunity to review and comment on your DEIR. Commission staff is available to meet with you and discuss our concerns.

We look forward to working with the Foothill Extension Authority on this project. Should you have any questions, please contact Jose Pereyra at (213) 576 – 7083 or email at jfp@cpuc.ca.gov.

Sincerely,

Anton Garabetian, P.E.
Program and Project Supervisor
Rail Crossings Engineering Section
Consumer Protection and Safety Division

39. Garabetian, Anton, Program and Project Supervisor, Rail Crossings Engineering Section, Consumer Protection and Safety Division, California Public Utilities Commission, October 15, 2012.

Response 39-1

The Construction Authority acknowledges the rules and regulations to which this project is subject. The Construction Authority will file formal applications in accordance with the CPUC's Rules of Practice and Procedure for new crossing locations, including grade separation structures. The Construction Authority will also file requests for modifications to existing crossing in accordance with the CPUC's General Order 88-B. With the exception of two new flyover structures, all grade crossings are existing rail at-grade crossings.

Response 39-2

The project is proposed as an at-grade system similar in design to Metro's existing Blue Line and Gold Line between Union Station and Sierra Madre Villa. As stated in Section 3.12.3.4 of the Draft EIR, fencing will be provided along the alignment where LRTs travel at speeds in excess of 35 mph in adherence with CPUC guidelines. As the design of the project is refined, it is possible that fencing also will be specified at other locations. The Construction Authority will work with SCRRA/Metrolink and the Cities to identify additional fencing locations as needed.

Response 39-3

As shown in Table 2-27 of the Draft EIR, the operation of the project would result in additional traffic delay at the Grand Avenue and Foothill Boulevard (Intersection No. 3) in the AM peak period. However, the analysis also indicated that the highest peak hour volumes at this crossing intersection would not result in a significant impact. Following the Metro *Policy for Grade Crossing for Light Rail Transit*, the Grand Avenue and Foothill Boulevard intersection was evaluated in the Initial Screening, Milestone 1 evaluation and it was determined that a grade separation would not be required. The intersection was categorized as "Possible At-Grade Operation" and will be evaluated further in a Milestone 2 analysis. Table 2-32 in the Draft EIR presented the recommended improvements at the Grand Avenue/Foothill Boulevard intersection. As the design of the project is refined, the Construction Authority will work with the City of Glendora to determine which of the recommended improvements to implement.

Response 39-4

Section 2.6 of the Draft EIR included a traffic impact analysis of both the Vermont Avenue/East Ada Avenue (#4) and Vermont Avenue/West Ada Avenue (#7) intersections and did not identify a significant traffic impact at either intersection. Both intersections are currently Stop controlled.

Response 39-5

The Construction Authority has refined the design of the Glendora Station to include a pedestrian bridge at the Glendora Station connecting the parking garage and the station platform as recommended in the comment. This information, including a description of the pedestrian bridge has been included in the Final EIR.

Response 39-6

As stated in Section 2.5.5 of the Draft EIR, 26 crossings were evaluated using Metro's *Policy for Grade Crossing for Light Rail Transit*. This evaluation shows how highway traffic would be affected by proposed train headway operations. It is also used to determine whether an at-grade crossing is feasible or a grade separation should be studied in more detail. The study concluded that at-grade crossings were feasible for the nine crossings in the City of Glendora referenced in the comment. The Construction Authority proposes using safety measures, including four-quadrant gates, at each crossing in order to ensure safety while also maintaining the access needed for local traffic and emergency vehicle response time.

Response 39-7

As stated on page 2-92 of the Draft EIR, operation of the project will not result in a significant traffic impacts at the intersection of Bonita Avenue and Cataract Avenue (Intersection 34). The Milestone 1 analysis, in accordance with Metro's *Policy for Grade Crossing for Light Rail Transit,* also indicated that the highest peak hour volumes at this crossing intersection would not meet the warrants for grade-separation per the application of the Metro Grade Crossing Policy. The Milestone 1 grade-crossing analysis identified the Bonita/Cataract intersection as a location that would required detailed engineering-level operation and safety analyses, concluding that an improvement would be required to maintain safe operations with an at-grade configuration. These potential improvements are listed in Table 2-30 of the Draft EIR and include a recommendation to reconfigure the intersection as a traffic island or re-align Bonita Avenue and reduce the median width to reduce the size of the intersection. As stated in Section 2.6 of the Draft EIR, one of these recommendations will be implemented. The Construction Authority will continue to work with the City of San Dimas to further refine the design of the crossing to incorporate this recommendation or other improvements as the project design progresses.

Response 39-8

As stated in Section 2.5.5 of the Draft EIR, 26 crossings were evaluated using Metro's *Policy for Grade Crossing for Light Rail Transit*. This evaluation shows how highway traffic would be affected by proposed train headway operations. It is also used to determine whether an at-grade crossing is feasible or a grade separation should be studied in more detail. The study concluded that at-grade crossings were feasible for the six crossings in the City of San Dimas referenced in the comment. The project description includes safety measures, including four-quadrant gates, at each crossing in order to ensure safety while also maintaining the access needed for local traffic and emergency vehicle response time.

Response 39-9

The proposed at-grade pedestrian crossing location at the City of San Dimas connects the platform with the parking structure with a minimum of walking distance. The crossing in San Dimas, unlike the one in Glendora, traverses only one LRT track. Several such configurations are currently part of the operating Gold Line (Del Mar Station, Little Tokyo/Arts District Station), indicating that the proposed pedestrian crossing is safe and fully consistent with Metro design policy and practice. The Construction Authority will work with CPUC and the City of San Dimas to ensure that safety measures (such as pedestrian crossing gates, signs, and/or barriers) are appropriately configured in final design to address safety concerns.

Response 39-10

As stated in Section 2.5.5 of the Draft EIR, 26 crossings were evaluated using Metro's *Policy for Grade Crossing for Light Rail Transit*. This evaluation shows how highway traffic would be affected by proposed train headway operations. It is also used to determine whether an at-grade crossing is feasible or a grade separation should be studied in more detail. The study concluded that at-grade crossings were feasible for the five crossings in the City of La Verne referenced in the comment. The Construction Authority proposes using safety measures, including four-quadrant gates, at each crossing in order to ensure safety while also maintaining the access needed for local traffic and emergency vehicle response time.

Response 39-11

The proposed at-grade pedestrian crossing location at the City of La Verne connects the platform with the parking structure with a minimum of walk distance. The crossing in La Verne, unlike the one in Glendora, traverses only one LRT track. Several such configurations are currently part of the operating Gold Line (Del Mar Station, Little Tokyo/Arts District Station), indicating that the proposed pedestrian crossing is safe and fully consistent with Metro design policy and practice. The Construction Authority will work with CPUC and the City of La Verne to ensure that safety measures (such as pedestrian crossing gates, signs, and/or barriers) are appropriately configured in final design to address safety concerns.

Response 39-12

Mitigation measure LTR-2 in the Final EIR has been expanded as follows to include an interconnection to the Metrolink crossing and the Arrow Highway/E Street intersection:

> **LTR-2**—In La Verne, the Construction Authority shall cooperatively work with the City, and contribute funding as necessary, to ensure the signalization of the intersections of White Avenue and First Street, White Avenue and Second Street, <u>Arrow Highway at the Metrolink crossing, Arrow Highway and E Street,</u> and La Verne Avenue and Arrow Highway when warranted.

Response 39-13

Mitigation measure LTR-3 listed in Section 2.8.2 of the Draft EIR calls for the Construction Authority to work cooperatively with the City of La Verne, and contribute funding as necessary, to ensure the signalization of the intersections of White Avenue and First Street, White Avenue and Second Street, and La Verne Avenue and Arrow Highway.

Response 39-14

Mitigation measure LTR-4, listed in Section 2.8.2 of the Draft EIR calls for the Construction Authority to work cooperatively with the City of Pomona, and contribute funding as necessary, to ensure the signalization of the intersection of Fulton Road and Bonita Avenue and to address this issue.

Response 39-15

As stated in Section 2.5.5 of the Draft EIR, 26 crossings were evaluated using Metro's *Policy for Grade Crossing for Light Rail Transit*. This evaluation shows how highway traffic would be affected by proposed train headway operations. It is also used to determine whether an at-grade crossing is feasible or a grade separation should be

studied in more detail. The study concluded that at-grade crossing was feasible for the Garey Avenue crossing in the City of Pomona. A subsequent additional VISSIM analysis similarly concluded that at-grade operation is feasible without significant impacts with the implementation of the identified mitigation measures. Please see Response 16-4, which provides the details of the VISSIM methodology and results.

The Construction Authority also proposes using safety measures, including four-quadrant gates, at each crossing in order to ensure safety while also maintaining the access needed for local traffic and emergency vehicle response time.

Response 39-16

As stated in Section 2.5.5 of the Draft EIR, 26 crossings were evaluated using Metro's *Policy for Grade Crossing for Light Rail Transit*. This evaluation shows how highway traffic would be affected by proposed train headway operations. It is also used to determine whether an at-grade crossing is feasible or a grade separation should be studied in more detail. The study concluded that at-grade crossing was feasible for the Indian Hill Boulevard crossing in the City of Claremont referenced in the comment. The Construction Authority proposes using safety measures, including four-quadrant gates, at each crossing in order to ensure safety while also maintaining the access needed for local traffic and emergency vehicle response time.

Response 39-17

As stated in Section 2.5.5 of the Draft EIR, twenty-six crossings were evaluated using Metro's *Policy for Grade Crossing for Light Rail Transit*. This evaluation shows how highway traffic would be affected by proposed train headway operations. It is also used to determine whether an at-grade crossing is feasible or a grade separation should be studied in more detail. The study concluded that at-grade crossing was feasible for the Claremont Boulevard crossing in the City of Claremont referenced in the comment.

CPUC's comment regarding the extensive pedestrian crossing over four tracks is acknowledged; the concern is addressed by the four quadrant gates and pedestrian gates that will be part of the project design at this rail crossing location.

Response 39-18

The project definition includes the extension of the existing pedestrian tunnel at Montclair Station to provide safe access to the Metrolink and LRT platforms and parking lot/TransCenter. Please see Section 1.3.3.7 of the Draft EIR.

Response 39-19

The Construction Authority acknowledges the CPUC is a responsible agency under CEQA Section 15381 with regard to this project. The Construction Authority will submit for CPUC review the Final EIR and any substantial future design refinements.