

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: tzipser@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.

--

Tammy

10-1

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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.

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.

11-1

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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LEROY D. BACA, SHERIFF

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



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MGL FOOTHILL EXT.
CONST. AUTHORITY

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.



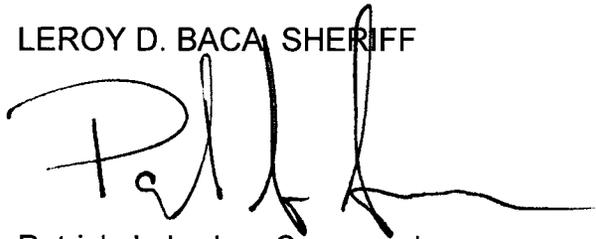
12-1

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

A handwritten signature in black ink, appearing to read 'Patrick J. Jordan', with a long horizontal flourish extending to the right.

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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MGL FOOTHILL EXT.
CONST. AUTHORITY

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

Office of the City Manager

LINDA C. LOWRY
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

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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:

- o Metro Gold Line Foothill Extension – Azusa to Montclair, Draft Environmental Impact Report (Metro Gold Line Foothill Extension Construction Authority, March 2012)
- o The Metro Grade Crossing Policy Initial Screening (Milestone 1) Metro Gold Line Foothill Extension Azusa to Montclair Draft Memorandum (Fehr & Peers, March 2011)
- o 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.

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

16-1

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.

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

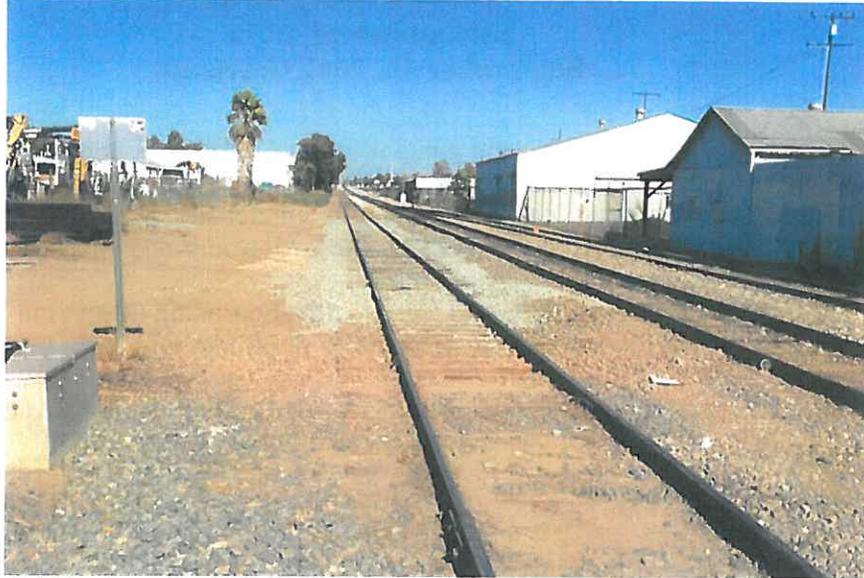
In the City of Pomona, existing BNSF (freight) and Metrolink rail lines are located south of Bonita Avenue and north of Arrow Highway. The existing freight line is north of the existing Metrolink lines.

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

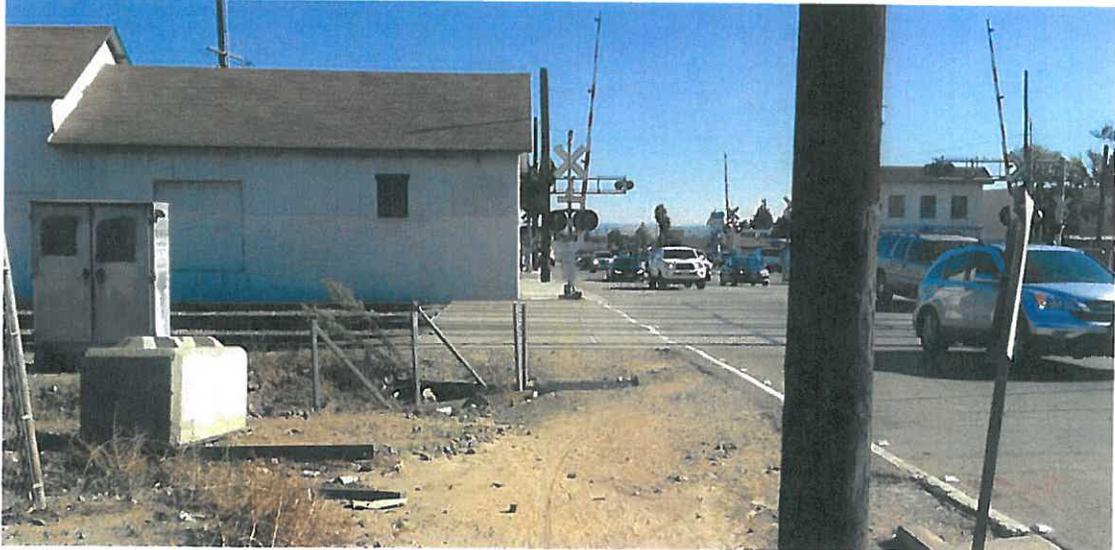
Existing at-grade street crossings are located at Fulton Road, Garey Avenue, and Towne Avenue. Fulton Road is a 2-lane road, while Garey Avenue and Towne Avenue are 4-lane roads. Each crossing has gates that control the automobile traffic when a train is using the crossing.

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.

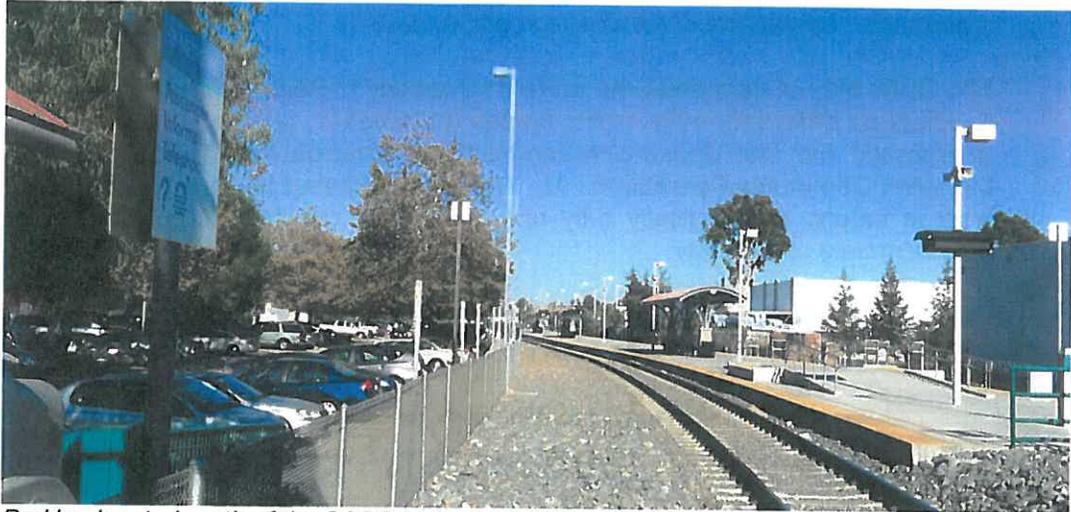
Existing restriction to southbound pedestrian activity at the Towne Avenue crossing (on the west side):



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 SCRRRA 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.