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 northbound 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.](image)

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:

![Goldline Vertical Alignment Rendering](image)

*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:
ATTACHMENT B

URBAN CROSSROADS, INC. TECHNICAL MEMORANDUM #2
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:

- The Metro Grade Crossing Policy Initial Screening (Milestone 1) Metro Gold Line Foothill Extension Azusa to Montclair Draft Memorandum (Fehr & Peers, March, 2011)

At-Grade Crossing Impacts
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)

<table>
<thead>
<tr>
<th>Time</th>
<th>Train Type</th>
<th>Track (N or S)</th>
<th># of Train Cars</th>
<th>Direction</th>
<th>Number of Approach Lanes</th>
<th>Max Auto Queue (# of Vehicles)</th>
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</thead>
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<td>n/a</td>
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<td>Metrolink</td>
<td>South</td>
<td>5</td>
<td>EB</td>
<td>2</td>
<td>8 4</td>
</tr>
<tr>
<td>7:10 AM</td>
<td>Metrolink</td>
<td>South</td>
<td>6</td>
<td>WB</td>
<td>2</td>
<td>11 6</td>
</tr>
<tr>
<td>7:33 AM</td>
<td>Metrolink</td>
<td>South</td>
<td>6</td>
<td>WB</td>
<td>2</td>
<td>16 19</td>
</tr>
<tr>
<td>7:53 AM</td>
<td>Metrolink</td>
<td>South</td>
<td>7</td>
<td>WB</td>
<td>2</td>
<td>7 14</td>
</tr>
<tr>
<td>8:46 AM</td>
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<td>n/a</td>
<td>2</td>
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</tr>
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<td>South</td>
<td>5</td>
<td>WB</td>
<td>2</td>
<td>12 10</td>
</tr>
</tbody>
</table>

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).
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

CHANGES > 10 VEHICLES SHOWN ON MAP

LEGEND:

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

Metro Gold Line Phase II EIR Review
City of Pomona, CA (JN - 08095-300.dwg)
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.
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 D

PRIOR CITY OF POMONA LETTER DATED FEBRUARY 1, 2011
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
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

<table>
<thead>
<tr>
<th>Inbound (Time)</th>
<th>Train Type</th>
<th>Outbound (Time)</th>
<th>Train Type</th>
</tr>
</thead>
<tbody>
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<td>Metrolink Regular</td>
</tr>
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<td></td>
</tr>
<tr>
<td>6:50</td>
<td>Metrolink Regular</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6:57</td>
<td>Gates down, no train</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Outbound (Time)</th>
<th>Train Type</th>
<th>Inbound (Time)</th>
<th>Train Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>5:05</td>
<td>Metrolink Regular</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5:11</td>
<td>Gates down, no train</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5:23</td>
<td>Metrolink Regular</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5:28</td>
<td>Gates down, no train</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5:55</td>
<td>Express</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5:59</td>
<td>Metrolink Regular</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
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

<table>
<thead>
<tr>
<th>Time (Start)</th>
<th>Time (End)</th>
<th>Duration (Seconds)</th>
<th>Train Type</th>
<th>Direction</th>
<th>Max Auto Queue (# of vehicles)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>NB</td>
</tr>
<tr>
<td>5:11:30</td>
<td>5:13:00</td>
<td>90</td>
<td>Gates down, no train</td>
<td>n/a</td>
<td>16</td>
</tr>
<tr>
<td>5:13:30</td>
<td>5:14:15</td>
<td>45</td>
<td>Metrolink</td>
<td>EB</td>
<td>4</td>
</tr>
<tr>
<td>5:28:00</td>
<td>5:29:00</td>
<td>60</td>
<td>Gates down, no train</td>
<td>n/a</td>
<td>21</td>
</tr>
<tr>
<td>5:30:00</td>
<td>5:30:45</td>
<td>45</td>
<td>Metrolink</td>
<td>EB</td>
<td>19</td>
</tr>
<tr>
<td>5:53:20</td>
<td>5:54:20</td>
<td>60</td>
<td>Metrolink</td>
<td>EB</td>
<td>14</td>
</tr>
<tr>
<td>5:53:20</td>
<td>6:01:00</td>
<td>60</td>
<td>Gates down, no train</td>
<td>n/a</td>
<td>15</td>
</tr>
</tbody>
</table>

Average 60

VISSIM OUTPUT

<table>
<thead>
<tr>
<th>Time (Start)</th>
<th>Time (End)</th>
<th>Description</th>
<th>Queue Length (ft)</th>
<th>Max Auto Queue (# of vehicles)*</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>1-hour peak simulation and 60 seconds gates down with and without train</td>
<td>321</td>
<td>13 NB 15 SB</td>
</tr>
<tr>
<td>5:00:00</td>
<td>6:00:00</td>
<td></td>
<td>373</td>
<td></td>
</tr>
</tbody>
</table>

* 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

<table>
<thead>
<tr>
<th>Approaches</th>
<th>Garey Avenue</th>
<th>LOS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Garey Ave &amp; Bonita Ave</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Northbound Garey Ave</td>
<td>25</td>
<td>25</td>
</tr>
<tr>
<td>left</td>
<td>64</td>
<td>62</td>
</tr>
<tr>
<td>through</td>
<td>8</td>
<td>9</td>
</tr>
<tr>
<td>right</td>
<td>5</td>
<td>5</td>
</tr>
<tr>
<td>Southbound Garey Ave</td>
<td>15</td>
<td>15</td>
</tr>
<tr>
<td>left</td>
<td>59</td>
<td>56</td>
</tr>
<tr>
<td>through</td>
<td>13</td>
<td>14</td>
</tr>
<tr>
<td>right</td>
<td>6</td>
<td>6</td>
</tr>
<tr>
<td>Eastbound Bonita Ave</td>
<td>31</td>
<td>32</td>
</tr>
<tr>
<td>left</td>
<td>54</td>
<td>54</td>
</tr>
<tr>
<td>through</td>
<td>39</td>
<td>39</td>
</tr>
<tr>
<td>right</td>
<td>9</td>
<td>9</td>
</tr>
<tr>
<td>Westbound Bonita Ave</td>
<td>59</td>
<td>63</td>
</tr>
<tr>
<td>left</td>
<td>81</td>
<td>86</td>
</tr>
<tr>
<td>through</td>
<td>51</td>
<td>57</td>
</tr>
<tr>
<td>right</td>
<td>46</td>
<td>46</td>
</tr>
<tr>
<td>Garey Ave &amp; Santa Fe St</td>
<td>3</td>
<td>2</td>
</tr>
<tr>
<td>Northbound Garey Ave</td>
<td>11</td>
<td>12</td>
</tr>
<tr>
<td>left</td>
<td>3</td>
<td>3</td>
</tr>
<tr>
<td>through</td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>right</td>
<td>3</td>
<td>0</td>
</tr>
<tr>
<td>Eastbound Santa Fe St</td>
<td>11</td>
<td>10</td>
</tr>
<tr>
<td>right</td>
<td>11</td>
<td>10</td>
</tr>
<tr>
<td>Garey Ave &amp; Arrow Hwy</td>
<td>34</td>
<td>33</td>
</tr>
<tr>
<td>Northbound Garey Ave</td>
<td>21</td>
<td>22</td>
</tr>
<tr>
<td>left</td>
<td>58</td>
<td>60</td>
</tr>
<tr>
<td>through</td>
<td>16</td>
<td>16</td>
</tr>
<tr>
<td>right</td>
<td>12</td>
<td>12</td>
</tr>
<tr>
<td>Southbound Garey Ave</td>
<td>20</td>
<td>21</td>
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<tr>
<td>left</td>
<td>56</td>
<td>52</td>
</tr>
<tr>
<td>through</td>
<td>15</td>
<td>18</td>
</tr>
<tr>
<td>right</td>
<td>17</td>
<td>11</td>
</tr>
<tr>
<td>Eastbound Arrow Hwy</td>
<td>44</td>
<td>43</td>
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<tr>
<td>left</td>
<td>73</td>
<td>67</td>
</tr>
<tr>
<td>through</td>
<td>41</td>
<td>40</td>
</tr>
<tr>
<td>right</td>
<td>29</td>
<td>33</td>
</tr>
<tr>
<td>Westbound Arrow Hwy</td>
<td>48</td>
<td>49</td>
</tr>
<tr>
<td>left</td>
<td>88</td>
<td>96</td>
</tr>
<tr>
<td>through</td>
<td>43</td>
<td>43</td>
</tr>
<tr>
<td>right</td>
<td>33</td>
<td>33</td>
</tr>
</tbody>
</table>
### Table 4. Delay and Level of Service (LOS) for PM Peak Hour

<table>
<thead>
<tr>
<th>Approaches</th>
<th>Garey Avenue</th>
<th></th>
<th></th>
<th>Existing (2010)</th>
<th>No Build (2035)</th>
<th>Build (2035)</th>
<th>LOS</th>
</tr>
</thead>
</table>
|                                  |              | Garey Ave & Bonita Ave | Northbound Garey Ave | left | through | right | Southbound Garey Ave | left | through | right | Eastbound Bonita Ave | left | through | right | Westbound Bonita Ave | left | through | right | Garey Ave & Santa Fe St | Northbound Garey Ave | left | through | right | Eastbound Santa Fe St | left | through | right | Garey Ave & Arrow Hwy | Northbound Garey Ave | left | through | right | Eastbound Arrow Hwy | left | through | right | Westbound Arrow Hwy | left | through | right |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |     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              |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |               |          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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.

---

**Chapter 7—Responses to Comments**

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**Chapter 7—Responses to Comments**

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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.
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.