Grading

The Draft EIR does not adequately describe the proposed grading, the volumes of earthwork, import or export quantities, the air and noise impacts, the impacts on local streets during grading operations, etc. Our review of the preliminary plan and profiles in Appendix A revealed that retaining walls must be constructed in a variety of locations along the project. Specifically on sheets C101 thru C103 and C114 thru C118 it appears the nature of grading at these locations will involve work on private property. Construction of retaining walls may require sheet piling or shoring. Any pile driving or shoring work on private property must be submitted to our Building & Safety Division for review and approval. In any area where grading must occur on private property, the Gold Line must first obtain grading permits and temporary construction easements. These temporary construction easements must be signed and notarized by the property owners prior to beginning the work. All of this work will require a large amount of truck traffic which was not discussed in the Draft EIR. The Draft EIR is inadequate since it does not address these issues.

The Draft EIR does not make any statements related to existing soil contamination from years of freight railroad use and an contaminates that may have leached from the railroad ties, tracks, cars, etc. into the soil. An initial investigation to preliminarily determine and soils impacts must be done for the Draft EIR to be considered complete.

Additionally, any grading which occurs must be consistent with the City's general plan and zoning codes. This includes any retaining walls planned for construction which, must be reviewed and approved by the Planning Commission. During our review of the information provided we did not find information regarding retaining wall height, finished slope, material or aesthetics of proposed walls.

Page 3.8-2 Grading was only briefly referred to under Section 3.8 Geologic Hazards. A review of the conceptual plans indicates there will be significant grading along the entire length of the Gold Line right of way which will affect residents/businesses throughout the City. So much so, that the City will most likely hire a full time construction inspector to monitor the construction within Glendora. The Draft EIR is inadequate in its discussion of the grading required. This section must be expanded so that reviewers understand the magnitude of the project.

Summary
While our review and comments are presented in our fiduciary role of representing the community of Glendora and our obligation to present them so that the lead agency can address them, our enthusiasm and support of the Gold Line should not be in doubt by the reader of this response to the Draft EIR. The City staff appreciates the opportunity to present the City's comments to the Draft EIR, and looks forward to the Authority adequately addressing these concerns prior to certifying the Draft EIR. We continue to look forward to the completion of phase 2B in the near future.
Should you have any questions, please feel free to contact me at (626) 914-8246.

Sincerely,

[Signature]

David A. Davies, C.B.O.
Director of Public Works

Attachments: Exhibit A – Gold Line Station Layout
Exhibit B – Cross Section East End
Exhibit C – Cross Section West End
Alternative 2
Alternative 2B
Rick Engineering Functional Evaluation November 2011
Rick Engineering Letter of update September 2012 based on the DEIR

Cc: City Manager
City Attorney
Director of Planning
Assistant Director of Public Works/City Engineer
File
GLENDORA STATION PARKING STRUCTURE

EXHIBIT B

WEST END NEAR VERMONT AVENUE - 30' TRACK SEPARATION

SECTION A-A
SCALE: 1" = 20'

SCRRMA/METROLINK RIGHT OF WAY

150'

25' ENCROACHMENT

FIRE LANE

20'

24'

20'

± 66'

70'

75° STANDARD PARKING

AISLE WIDTH

75° STANDARD PARKING

8'-6" CLR.

CL TRACK

30'

40'-8"

CL TRACK

CL TRACK

CL TRACK

8'-6" CLR.

CENTER PLATFORM

15' MIN.

15' MIN.

5'-4"
GLENDORA STATION PARKING STRUCTURE

EXHIBIT C

EAST END NEAR GLENDORA AVENUE

SECTION B-B
SCALE: 1" = 20'

75° STANDARD PARKING
AISLE WIDTH
75° STANDARD PARKING

8'-6" CLR.

15' ENCROACHMENT

SCARRA/METROLINK RIGHT OF WAY

150'

80'-8"

± 66'

20'

24'

20'

8'-6" CLR.

8'-6" CLR.

FREIGHT TRACK

PARKING GARAGE

LRT TRACK

LRT TRACK
Alternative Parking Concept

Glendora Station
Parking Study

Metro Gold Line Foothill Extension—Azusa to Montclair Environmental Clearance

GLEN DORA STATION
Parking Garage Study
400 Spaces on Three Levels
PB 4.19.11
0.50 100 FEET
FIGURE 2: Glendora Station with Center Platform

PARKING GARAGE STUDY
Land Exchange - Parking Garage / RV Parking
Two-Way 90° Parking
± 420 Spaces

PARSONS BRINCKERHOFF
9/7/10
September 18, 2012

Jerry L. Burke, P.E.
City of Glendora, Public Works Department
116 East Foothill Boulevard
Glendora, CA 91741

SUBJECT: GOLD LINE STATION PARKING STRUCTURE; CITY OF GLENDORA, CA
METRO GOLD LINE FOOTHILL EXTENSION - DRAFT EIR PEER REVIEW

Dear Mr. Burke,

Rick Engineering Company (RICK) is pleased to submit the following comments on the Metro Gold Line Foothill Extension Project (Azusa to Montclair) Draft Environmental Impact Report (EIR) dated August 2012. The Peer Review includes an evaluation of the following:

1. EIR Traffic Impact Analysis Scope
2. Operational Analysis of Existing Traffic Conditions
3. Project Trip Generation Estimates
4. Impact Analysis of Future Traffic Conditions
5. Project Mitigation Measures
6. Analysis of Construction Impacts
7. Functionality of Parking Structure

The Peer Review focuses on the roadway network within and adjacent to the City of Glendora.

1.0 EIR Traffic Impact Analysis Scope

The evaluation of the traffic analysis scope includes a review of existing and future traffic operations presented in the following public documents:

- City of Glendora Circulation Element (June 2007)

The City's Circulation Element provides an evaluation of 9 key intersections in the general vicinity of the proposed Metro Gold Line Station. The City's General Plan Circulation Element defines "LOS D" as the lower limit for acceptable traffic operations. The analysis of existing conditions identified that 3 of these intersections currently operate within the LOS D range during the PM peak hour. The analysis of buildout conditions identified 4 local intersections that are projected to operate within the LOS E or F range, assuming the existing intersection geometrics (no improvements). The following intersections could potentially be impacted by the Metro Gold Line Extension project:

1) Grand Avenue / Foothill Boulevard
2) Route 66 / Grand Avenue
3) Route 66 / Glendora Avenue
4) Grand Avenue / Baseline Road
The Traffic Impact and Functionality Evaluation prepared by Rick Engineering Company evaluated 12 local intersections that could potentially be impacted by the Metro Gold Line Extension project. The analysis of existing conditions identified 1 intersection that currently operates within the LOS D range during the PM peak hour (Route 66 / Glendora Avenue). Under cumulative conditions with the proposed Metro Gold Line Extension project this intersection is projected to continue operating within the LOS D range.

The traffic analysis in Chapter 2 (Transportation) of the Metro Gold Line Foothill Extension Project EIR evaluates the potential impacts at 22 intersections within the City of Glendora. The existing conditions analysis only identified 1 intersection that currently operates in the LOS E or F range during a typical weekday peak commuter period (Route 66 / Glenwood Avenue). This intersection was evaluated using “two-way” stop sign control. However, this intersection is currently signalized. The EIR traffic analysis did not include an evaluation of the Route 66 / Grand Avenue intersections or the project driveways on Glendora Avenue or Vermont Avenue.

Comment #1
The project EIR traffic analysis scope should be expanded to include an evaluation of the following key intersections:

- Route 66 / Grand Avenue
- Glendora Avenue / Project Parking Structure Driveway
- Vermont Avenue / Project Parking Structure Driveway

The evaluation of additional intersections is required to accurately analyze the potential project impacts within the City of Glendora.

Comment #2
The project EIR traffic analysis should be revised to include the current traffic control at the Route 66 / Glenwood Avenue intersection.

2.0 Operational Analysis of Existing Traffic Conditions

2.1 Traffic Volumes
The analysis of existing conditions in the City’s Circulation Element is based on intersection traffic count data collected in March 2006. The evaluation of existing conditions in the Rick Engineering analysis is based on intersection turning movement count data collected in June and July 2011. The existing conditions analysis in the Metro Gold Line Extension Project EIR traffic analysis is based on new turning movement traffic count data collected in 2010. A review of this data demonstrates that the count data used in the Metro Gold Line Extension Project EIR traffic analysis is acceptable.

2.2 Intersection Geometrics
The evaluation of existing conditions in the Metro Gold Line Extension Project EIR traffic analysis is based on intersection geometric illustrated of Figure 2-2. The majority of lane geometrics at the key local intersections are consistent with the existing conditions, except at the following locations:

- Route 66 / Vermont Avenue - The EIR traffic analysis treated the north and southbound approaches as having a separate right turn only lane. These approaches are not striped for a shared left-through lane and a right turn only lane.
• Vermont Avenue / W. Ada Avenue - The EIR traffic analysis treated the southbound approach as having a separate right turn only lane. This approach is not striped for a through lane and a right turn only lane.

• Foothill Boulevard / Vermont Avenue - The EIR traffic analysis treated the northbound approach as having a left turn only lane and a shared through-right lane, and southbound approach as having a shared left-through-right lane. The Rick Engineering analysis analyzed both the north and southbound approaches as having a shared left-through lane and a right turn only lane.

2.3 Intersection LOS Analysis
As previously stated, the City's Circulation Element, Rick Engineering traffic analysis, and Metro Gold Line Extension project EIR traffic analysis includes an evaluation of key intersections. A summary of the existing peak hour LOS data at key intersections within the immediate vicinity of the Metro Gold Line station is provided in Table 1.

<table>
<thead>
<tr>
<th>Study Intersection</th>
<th>City's Circulation Element</th>
<th>Metro Gold Line EIR Project TIA</th>
<th>Rick Engineering TIA</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>AM/PM</td>
<td>AM/PM</td>
<td>AM/PM</td>
</tr>
<tr>
<td>Route 66 / Grand Ave.</td>
<td>C/C</td>
<td>-</td>
<td>A/C</td>
</tr>
<tr>
<td>Foothill Blvd. / Grand Ave.</td>
<td>B/D</td>
<td>C/C</td>
<td>A/A</td>
</tr>
<tr>
<td>Foothill Blvd. / Loraine Ave.</td>
<td>C/A</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Route 66 / Glendora Ave.</td>
<td>C/D</td>
<td>B/C</td>
<td>B/D</td>
</tr>
<tr>
<td>Route 66 / Loraine Ave.</td>
<td>C/A</td>
<td>B/B</td>
<td>-</td>
</tr>
<tr>
<td>Vermont Ave. / Foothill Blvd.</td>
<td>-</td>
<td>A/A</td>
<td>A/A</td>
</tr>
<tr>
<td>Glendora Ave. / Foothill Blvd.</td>
<td>-</td>
<td>C/C</td>
<td>A/A</td>
</tr>
<tr>
<td>Vermont Ave. / E. Ada Ave.</td>
<td>-</td>
<td>B/B</td>
<td>A/A</td>
</tr>
<tr>
<td>Glendora Ave. / Ada Ave.</td>
<td>-</td>
<td>B/B</td>
<td>B/B</td>
</tr>
<tr>
<td>Vermont Ave. / W. Ada Ave.</td>
<td>-</td>
<td>B/B</td>
<td>A/A</td>
</tr>
<tr>
<td>Vermont Ave. / Route 66</td>
<td>-</td>
<td>A/A</td>
<td>A/B</td>
</tr>
<tr>
<td>Glenwood Ave. / Route 66</td>
<td>-</td>
<td>D/B</td>
<td>-</td>
</tr>
<tr>
<td>Grand Ave. / Ada Ave.</td>
<td>-</td>
<td>-</td>
<td>A/A</td>
</tr>
<tr>
<td>Vermont Ave. / Carroll Ave.</td>
<td>-</td>
<td>-</td>
<td>A/A</td>
</tr>
<tr>
<td>Glendora Ave. / Walnut Ave.</td>
<td>-</td>
<td>-</td>
<td>A/A</td>
</tr>
</tbody>
</table>

The LOS data in Table 1 demonstrates that the existing peak hour operations analyzed in the Metro Gold Line Extension project traffic analysis is fairly consistent with the City's Circulation Element and the Rick Engineering traffic analysis. However, as discussed in Section 1.0 (EIR Traffic Impact Analysis Scope) the Metro Gold Line Extension project analysis does not include an evaluation of the (1) Route 66 / Grand Avenue, (2) Glendora Avenue / Project Parking Structure Driveway or (3) Vermont Avenue / Project Parking Structure Driveway intersections.
Comment #3
The project EIR traffic analysis should provide an evaluation of the following intersections:

- Route 66 / Grand Avenue
- Glendora Avenue / Project Parking Structure Driveway
- Vermont Avenue / Project Parking Structure Driveway

3.0 Project Trip Generation Estimates

This section provides a review of the project trip generation estimates included in the Traffic Impact and Functionality Evaluation prepared by Rick Engineering and Metro Gold Line Extension project EIR traffic analysis.

3.1 Rick Engineering Traffic Impact and Functionality Evaluation

The analysis prepared by Rick Engineering evaluated to potential impacts associated with the following 3 parking structure alternatives:

- Parking Structure Option 1 - The structure would be 2 levels, with a one-way circulation pattern and 60 degree angled parking stall layout, and accommodate about 330 vehicles. Access would be provided via a driveway on Vermont Avenue and Glendora Avenue.
- Parking Structure Option 2 - The parking structure would be 3 levels, with a two-way circulation and 90 degree parking stall layout, and accommodate about 420 vehicles.
- Parking Structure Option 2B - The parking structure would be 3 levels, with a two-way circulation and 90 degree parking stall layout, and accommodate about 400 vehicles.

The trip generation rates used to estimate the Metro Gold Line station project trips were based on a study completed at the Metro Link Station in the City of Industry. These rates demonstrate that the Metro station in the City of Industry generates approximately 1.92 daily vehicle trips per parking stall. This indicates that a 400 parking stall structure could generate about 768 ADT.

3.2 Metro Gold Line Extension Project EIR Traffic Analysis

The evaluation presented in the EIR traffic analysis is based on a 400 parking stall structure, similar to Option 1 evaluated in the Rick Engineering analysis. It is estimated that the new Gold Line station will have a daily ridership of approximately 1,860. The project trip generation in the EIR traffic analysis does not clearly state the number of local trips that will be attracted to the Metro Gold Line Extension project site. The analysis of project impacts was completed using projections from a transportation model developed for the project. The model demonstrated that the project would reduce local traffic demands by approximately 1.763%, as compared to 2035 No-Build alternative.

Comment #4
The project EIR traffic analysis should provide a table quantifying the project trip generation.

4.0 Impact Analysis of Future Conditions

The analyses of environmental impacts presented in the EIR includes an evaluation of horizon Year 2035 conditions associated with the “no-build” and “build” scenarios.
4.1 Future Traffic Volume Forecasts
The evaluation of future conditions in the City’s Circulation Element is based on traffic model projection data developed for buildout (2025). Information provided by City staff indicates that the future traffic model projections are based on an annual growth rate of 1.0%. The evaluation of future conditions in the Rick Engineering analysis included an evaluation of the background (approved projects) and cumulative (approved and pending projects) scenarios. The traffic volume forecasts for each scenario were based on actual project information provided by the City’s Planning Department.

The future 2035 “no-build” traffic volume forecasts in the EIR traffic analysis were derived using a 0.7% annual growth rate between 2010 and 2035 (total 16.1%). The growth factor was then applied to each of the study intersections. The 2035 traffic volume forecasts for the “no-build” scenario were then reduced by 1.763% to represent the project “build” alternative. A detailed review of the traffic model forecasts for the 2035 conditions is beyond the scope defined for this peer review.

Comment #5
The project EIR traffic analysis should be based on an annual growth rate of 1.0% to be consistent with the City’s Circulation Element.

4.2 Intersection LOS Analysis
As previously stated, the City’s Circulation Element, Rick Engineering traffic analysis, and Metro Gold Line Extension project EIR traffic analysis includes an evaluation of key intersections. A summary of the future conditions peak hour LOS data at key intersections within the immediate vicinity of the Metro Gold Line station is provided in Table 2. It should be noted that the LOS data presented for the City’s Circulation Element reflects the implementation of mitigation measures.

<table>
<thead>
<tr>
<th>Study Intersection</th>
<th>City’s Circulation Element - 2025 -</th>
<th>Metro Gold Line EIR Project TIA - 2035 -</th>
<th>Rick Eng. TIA - Cumulative -</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>AM/PM</td>
<td>Opt. 1</td>
<td>Opt. 2</td>
</tr>
<tr>
<td>Route 66 / Grand Ave.</td>
<td>C/D</td>
<td>A/C</td>
<td>A/C</td>
</tr>
<tr>
<td>Foothill Blvd. / Grand Ave.</td>
<td>A/C</td>
<td>A/A</td>
<td>A/A</td>
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<tr>
<td>Foothill Blvd. / Loraine Ave.</td>
<td>C/A</td>
<td>-</td>
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</tr>
<tr>
<td>Route 66 / Glendora Ave.</td>
<td>D/D</td>
<td>B/D</td>
<td>B/D</td>
</tr>
<tr>
<td>Route 66 / Loraine Ave.</td>
<td>D/B</td>
<td>B/B</td>
<td>-</td>
</tr>
<tr>
<td>Vermont Ave. / Foothill Blvd.</td>
<td>-</td>
<td>A/A</td>
<td>A/A</td>
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<tr>
<td>Glendora Ave. / Foothill Blvd.</td>
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<td>A/A</td>
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<td>Vermont Ave. / E. Ada Ave.</td>
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<td>-</td>
<td>A/A</td>
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</tr>
<tr>
<td>Vermont Ave. / Route 66</td>
<td>-</td>
<td>A/B</td>
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</tr>
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<td>-</td>
<td>F/F</td>
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<td>A/A</td>
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<tr>
<td>Glendora Ave. / Walnut Ave.</td>
<td>-</td>
<td>A/A</td>
<td>A/A</td>
</tr>
</tbody>
</table>
As previously stated, the analysis of 2025 buildout conditions in the City’s Circulation Elements identified 4 local intersections that are projected to operate within the LOS E or F range. However, with the implementation of recommended mitigation measures these intersections would operate at LOS D or better during both peak hour periods. A majority of the LOS values for the “build” scenario in the EIR traffic analysis are consistent with the data contained in the City’s Circulation Element and Rick Engineering traffic analysis. However, as discussed in Section 1.0 (EIR Traffic Impact Analysis Scope) the evaluation of the Route 66 / Glenwood Avenue intersection is based on “two-way” stop sign control. This intersection is currently signalized.

Comment #6
The project EIR traffic analysis should provide an evaluation of the following intersections:

- Route 66 / Grand Avenue
- Glendora Avenue / Project Parking Structure Driveway
- Vermont Avenue / Project Parking Structure Driveway

Comment #7
The project EIR traffic analysis should be revised to include the current traffic control at the Route 66 / Glenwood Avenue intersection.

5.0 Project Mitigation Measures

An evaluation of the 2035 “build” scenario in the EIR traffic analysis only identified a mitigation measure at the Route 66 / Glenwood Avenue intersection. The recommended mitigation measure is to signalize the intersection. As previously stated, this intersection is currently signalized (see Comments #2 and #7)

6.0 Analysis of Construction Impacts

The Metro Gold Line Extension project EIR contains limited information regarding the construction and potential impacts. The EIR does provide a brief overview of engineering considerations and construction methods.

Comment #8
The project EIR traffic analysis should include a discussion of potential construction impacts at key intersections in the City of Glendora.

7.0 Functionality of Parking Structure

7.1 Metro Gold Line Extension Project EIR Traffic Analysis
The project EIR contains a brief overview of engineering considerations, but no detailed analysis of the parking structure functionality or access. As previously stated, the parking structure would accommodate 400 vehicles (one-way circulation) with access on Glendora Avenue and Vermont Avenue. The parking structure would be located on a narrow parcel of land south of the existing railroad tracks (currently owned by Metro). The only major engineering consideration in the EIR traffic analysis is the construction of bridges over Route 66, which is located approximately 1.60 miles east of Glendora Avenue.
Comment #9
The project EIR should include additional details regarding the proposed parking structure, including but not limited to, design geometric features, functionality and access. The EIR does not demonstrate how adjacent properties could be impacted or the viability of purchasing the required property to accommodate the currently proposed parking structure. In addition, the project EIR traffic analysis should provide an evaluation of the potential access impacts on Glendora Avenue and Vermont Avenue (see Comments #1, #3 and #6). The additional analysis is required to adequately evaluate the potential impacts to the local street system in the City of Glendora.

7.2 Rick Engineering Evaluation of Parking Structure Functionality
The analysis prepared by Rick Engineering included a detailed evaluation of the parking structure functionality. The evaluation was conducted by Parking Design Associates (PDA) and performed for 3 parking structure alternatives (Option 1, 2 and 2B). A detailed layout of each parking structure alternative was prepared to identify the potential issues (copy is attached). Since the parking structure presented in the project EIR is similar to Option 1 analyzed in the Rick Engineering analysis, our review focuses on the design related aspects of Option 1.

7.2.1 Preliminary Geometric Design Features
The following is a summary of the preliminary geometric design features associated with Option 1 as provided by City staff:

- The parking structure has approximately 330 stalls, two levels with 60 degree parking on each side of a one way aisle, two ingress-egress points from two separate streets, one elevator and three sets of stairs. At the center of the structure is a crossover to the station platform at street level crossing all three train tracks. Vehicular access from one level to the next is by an exterior ramp.

To evaluate the parking structure functionality a layout of parking structure Option 1 was prepared by PDA using the following City’s Planning and Zoning Codes:

- Standard stall size: 9'-0" wide x 20'-0" long
- Compact stall size: 8'-0" wide x 17'-0" long (allowed up to 25% of capacity)
- Drive aisle width: 18'-0", 60 degree angle parking, one way

7.2.2 Functionality Evaluation Conclusions
The functionality evaluation of Option 1 concluded the following:

- A partial third level would be required to accommodate 400 parking stalls.
- The parking structure parcel has a width of approximately 60’.
- Based on City codes the overall width of the parking structure would need to 65’-8”.
- For a naturally ventilated parking structure a 10’ setback from the property line would be required per the 2010 California Building code. Another 10’ setback on the opposite side of the structure is recommended to maintain a fully open parking structure to prevent crime and to reduce lighting requirements.
- This would result in an overall width of 85’-8”, which would be a 25’-8” encroachment on to the adjacent property.
- The west side ingress-egress driveway on Vermont Avenue would encroachment further into the adjacent property.
• A 26' wide fire truck access roadway would be required along one side of the parking structure necessitating an overall width of approximately 101'-8". This would be a 41'-8" encroachment into the adjacent properties.

• Vehicular Circulation Issues:
  - Drivers in search of an open parking space may be forced to use the exterior ramp to get to the next level in search of an empty space. A conflict with incoming traffic from both streets (Vermont Avenue and Glendora Avenue) can be foreseen causing a traffic backup.
  - The possibility of a driver stopping the vehicle waiting until a parking space opens up will cause a traffic backup in a narrow one way drive aisle. There is no space to bypass a stopped vehicle.
  - In addition, a 3rd level would be required to provide the 400 parking stalls. This results in the provision of exterior circular ramps at each end of the structure requiring more space.
  - The inconvenience of such a parking layout will result in the people opting to park on the streets, at Albertsons and other public/private parking areas instead of in the parking structure causing congestion.

• Pedestrian Inconvenience Issues: The only crossover to the station is located at the center of the structure requiring the pedestrians to walk approximately 600 feet from the west end and 430 feet from the east end of the structure. The industry standard is to limit the maximum walking distance to approximately 300 feet.

• Pedestrian Safety Issue: Walking the long distances at a time when there are no other people around can cause a safety issue.

• Pedestrian Hazard Issue: Only walking travel path to the central crossover is within the one way narrow drive aisle. This is a hazardous condition especially for people with children and luggage.

• Pedestrian Accessibility Issues: Path from accessible parking to the station cannot cross railroad tracks per ADA and CA Title 24. Location of the station & accessible parking in relation to tracks need to be considered. Receiving a variance is highly unlikely.

• Design Related Issues: The variation of grade at the east end (Glendora Avenue) of the structure would require considerable excavation, retaining walls, waterproofing and backfill. The partial basement will require mechanical ventilation. All this would also drive up the cost (+5-10%).

• Construction Related Issues: Option 1 design/construction cost would be approximately 20% more per stall than Option 2B ($18,000 per stall). The parking structure construction costs could be $5,940,000; which does not include the acquisition of any property. Protection/maintenance of the southernmost track alignment would need to be considered during construction thus adding to the cost (+5-10%).

7.2.3 Project Structure Option 1 (EIR) Problems Foreseen
The functionality evaluation of Option 1 identified the following potential problems:

• Vehicles accessing the next level in search of vacant parking spaces exit the structure and have to share the entry/exit driveways with incoming traffic thereby creating a potential conflict.
• Ingress and egress traffic queuing can be reduced with the addition of additional entry/exit lanes at the driveways.
• The path of travel from accessible parking stalls to the station cannot cross railroad tracks. Receiving a variance is highly unlikely. The location of the station and accessible parking stalls in relation to the rail tracks need to be considered.
• Pedestrians parked furthest away from the central cross over to the station need to walk approximately 600' (with luggage) in the drive aisle to reach the crossover or elevator. This is a
hazardous condition. Their access to the station is also disrupted when a train is stopped at the station.

- The 60’ width of the existing parcel is too narrow to design an entrance from northbound Glendora Avenue which allows traffic to enter and make grade to the second floor within the minimum lane widths and maximum slopes.

7.2.4 Functionality Evaluation Recommendation
The functionality evaluation of Option 1 presented the following recommendation:

- Add another elevator at the west end and a continuous walkway along the south side of the structure with direct access to Vermont Avenue and Glendora Avenue. In an emergency, pedestrian egress traffic from the central exit stair to the public way is through rail tracks. This will not be permitted by code.

Comment #10
The project EIR should include sufficient detail to demonstrate how the parking structure could be built on the existing Metro parcel south of the existing railroad tracks and provide an evaluation demonstrating the Option 1 is the best layout for the City of Glendora.

7.3 Rick Engineering Evaluation of Parking Structure Access
The analysis prepared by Rick Engineering included a detailed evaluation of access. The evaluation of access was conducted for 3 parking structure alternatives (Option 1, 2 and 2B). Since the parking structure presented in the project EIR is similar to Option 1 analyzed in the Rick Engineering analysis, our review focuses on the access related issues for Option 1.

7.3.1 Existing Roadway Conditions Description
The Glendora Avenue driveway for Option 1 would be located approximately 55’ south of the railroad tracks. This driveway would be restricted to northbound left turns for ingress traffic and right turns only for egress traffic. The controlling line-of-sight factor for vehicles exiting the Glendora Avenue driveway and looking north will be the horizontal curve north of the railroad tracks and future development of the City Ventures project. In addition, there is also a “crest” vertical curve on Glendora Avenue between the railroad tracks and driveway location. It should be noted that the project driveway surface is anticipated to be at least 1-2’ lower than the railroad tracks and “crest” vertical curve, which would limit the visibility for smaller vehicles exiting the parking structure.

The Vermont Avenue driveway for Option 1 would be located about 215’ south of the railroad tracks. South of the railroad tracks, Vermont Avenue has a horizontal curve. An existing office building on the east side of Vermont Avenue (south of tracks) is currently the controlling line-of-sight factor along this horizontal curve. South of the horizontal curve Vermont Avenue continues on a straight horizontal alignment towards Route 66.

7.3.2 Existing Traffic Volumes and Vehicle Speeds
Average daily traffic (ADT) along Glendora Avenue is 18,000 ADT and on Vermont Avenue is 3,800 ADT. Spot speed surveys have documented 85th percentile speeds of 25-30 mph on Vermont Avenue and 35-40 mph on Glendora Avenue.
7.3.3 Adequacy of Sight Distance
The Rick Engineering analysis included an evaluation of sight distance adequacy. The analysis demonstrates that vehicles exiting the parking structure will not have adequate corner sight distance of southbound vehicles on Glendora Avenue. Future development of private property north of the railroad tracks and the existing vertical curve “crest” on Glendora Avenue (near railroad tracks) restricts visibility looking north from the proposed parking structure driveway. The Metro Gold Line Authority has indicated that the existing tracks will eventually be lowered. Due to the lack of specific details in the project EIR it is anticipated that vehicles exiting the project driveway will still have inadequate corner sight distance of southbound vehicles. The project driveway would need to be moved further south in order to achieve adequate corner sight distance for exiting vehicles, which would encroach on the Albertson’s property and parking lot.

The analysis also indicates that vehicles exiting the project driveway will have a limited view looking north at southbound vehicles on South Vermont Avenue. Development of parking structure Options 1 would somewhat limit the view of southbound vehicles due to the corner of the parking structure.

Comment #11
The project EIR should include specific information regarding project access and provide an evaluation to demonstrate that all potential impacts can be mitigation.

7.3.4 Turn Lane Channelization Warrants
An evaluation of turn lane channelization warrants concluded the cumulative plus project peak hour demands would not warrant a separate left or right turn lane on Vermont Avenue.

7.3.5 Vehicle Queue Analysis
The queue analysis of the ingress northbound left turn movement on Glendora Avenue concluded that if traffic during the AM peak hour arrived at the parking structure near the same time, vehicles entering the parking structure could potentially impact access at the Albertson’s driveway, as well as at the existing and future driveways (east side of Glendora Avenue).

Comment #12
The project EIR should include an analysis of the project driveway intersections on Glendora Avenue and Vermont Avenue (see Comments #1, #3, #6 and #9). The analysis should include an evaluation of the northbound left turn queue on Glendora Avenue.

7.3.6 Pedestrian Traffic
Data in the Gold Line Foothill Expansion Ridership report indicates that the modeling used for the parking assumed a vehicle occupancy rate of 1.05 people per vehicle with no turnover (a parking stall only gets used by 1 vehicle per day). This would equate to about 400 people per day, with approximately 800 pedestrian crossings per day Monday through Friday. Pedestrian access to and from the station platform would be provided via an "at-grade" track crossing about halfway between Vermont Avenue and Glendora Avenue. A pedestrian crossing at this location would be inefficient and unsafe due to the potential for stopped trains to block access and visibility. A pedestrian crossing at this location would need to be protected and adhere to standard ADA accessibility requirements.
Comment #13
The project EIR should include specific information regarding pedestrian access to and from the station, and demonstrate how pedestrian traffic will be handled in a safe manner.

7.4 Rick Engineering Traffic Impact and Functionality Evaluation Conclusions
The evaluation of potential traffic impacts associated with the parking structure alternatives (Option 1, 2 and 2B) includes an analysis of existing, background and cumulative conditions. The evaluation of background and cumulative “plus project” conditions concluded that the development of the Metro Gold Line parking structure will not significantly impact peak hour operations.

The evaluation of Option 1 (similar to that presented in the project EIR) concluded that a third level would be required to accommodate 400 stalls and the structure would not fit within the project site width. Setbacks would be required per the 2010 California Building code and a fire truck access road would be needed along at least one side of the structure, which would result in encroachment on to the adjacent property south of the project site. A review of vehicular and pedestrian circulation associated with Option 1 identified numerous efficiency and safety issues.

The potential project access impacts associated with Option 1 may not be able to be feasibly mitigated. Based on the evaluation of potential impacts the preferred alternative for the Glendora Gold Line parking structure would be Option 2 or 2B, not the alternative presented in the project EIR.

Comment #14
The project EIR should include an evaluation of additional parking structure alternatives (i.e., Option 2 or 2B) that would fit better of the Metro parcel, minimize impacts to adjacent parcels and mitigate the potential project access impacts.

If you have any questions or need additional information, please contact me at your earliest possible opportunity. Thank you again for your support and having Rick Engineering Company help the City of this project.

RICK ENGINEERING COMPANY

Larry D. Hail, PE, TE, PTOE
Principal Traffic Engineer

LDH:ms

Response 26-1

The City’s support of the project is acknowledged.

Response 26-2

The physical layout of the parking structure at Glendora Station is depicted in Figure 1-11 of the Draft EIR. Track spacing is depicted in Appendix A of the Draft EIR.

The Construction Authority has reviewed a functionality evaluation prepared by Rick Engineering and disagrees with the conclusions for the following reasons.

The evaluation is based on Metrolink standards, which the Metro Gold Line does not employ. The Gold Line is to be designed and constructed using not Metrolink standards but the Los Angeles County Metropolitan Transportation Authority’s (Metro) Metro Rail Design Criteria and Standards.

Metrolink standards do not apply to this project or area. Metrolink, the service name for the Southern California Regional Rail Authority (SCRRA), is a separate agency that does not operate trains in Glendora and is unaffiliated with the Gold Line project.

The applicable Metro standards specify a platform width of 16’ 2”, not the referenced 30’ Metrolink standard. Under the Metro standards, required clearances are met by the current project design.

Rick Engineering’s Exhibit C shows the overall ROW distance as being 60’ from track centerline to track centerline. Employing the Metro standard, the distance is 43’-3 1/2”. Instead of the 80.6’ shown in Exhibit C, this allows approximately 92’-2 ½’ from north side of the parking structure to the south property line, and provides sufficient space for a 26’ wide fire lane.

The Right of Way (ROW) shown in Rick Engineering’s Exhibit B and Exhibit C is not the property of SCRRRA / Metrolink, as shown, but of BNSF and LACMTA (Metro).

Response 26-3

As required, station lighting will follow Metro standards. Mitigation Measure SS-3 has been revised to reflect this.

Response 26-4

The station parking at the City of Glendora has been added to the list of Areas of Controversy and Issues to be Resolved in the Summary in the Final EIR.

Response 26-5

The comment is correct: both Glendora Station and La Verne Station are anticipated to have approximately 1,850 daily boardings by 2035. Although the number of passengers is forecasted to be similar between the stations, the passengers’ mode of accessing each station differs.
Chapter 7—Responses to Comments

The smaller size of the Glendora parking structure accounts for the fact that a larger percentage of trips to the station are expected to be via bus in Glendora (14%) than in La Verne (1%).

Response 26-6

The comment refers to an analysis prepared by Rick Engineering, which used Metrolink standards that do not apply to this Metro project, as explained in Response 26-2. Using applicable Metro, not Metrolink, criteria, the clearances are sufficient for a 400-stall, two-story parking structure.

Response 26-7

The Construction Authority will ensure that sight distance issues are addressed as the design is being refined during the preliminary engineering and final design phases of the project.

Response 26-8

The configuration of the raised median can be designed such that a northbound left turn opening is provided for access into the parking structure and at the same time prohibit southbound left turn access into the new development.

Response 26-9

The statement has been removed.

Response 26-10

The City’s concern about queuing issues on Glendora Avenue is addressed under the section "Additional Traffic Issues at Specific Locations" on page 2-90 of the Draft EIR:

“The City of Glendora raised concerns about a potential traffic impact near the proposed parking structure for the LRT station located along Glendora Avenue north of Route 66. Currently, the Albertsons shopping plaza is accessed through an existing driveway situated between Route 66 and the proposed parking structure access. The City is concerned that the additional traffic generated by the future LRT parking structure would compromise the gaps available for vehicles exiting and entering the Albertsons driveway to maneuver safely in and out of the site. A traffic count was conducted at the Albertsons driveway, and existing and future operating conditions were analyzed to determine if any significant impacts would occur as a result of the traffic generated by the project. The analysis showed that no queuing issues would affect vehicles entering or exiting the shopping plaza. In addition, programming of the signal at the intersection of Glendora Avenue and Route 66 would create adequate gaps for vehicles to complete their turn movements."

The methodology for determining impacts is discussed in Section 2.3 of the Draft EIR and in greater detail in Chapter 3 of the Transportation Technical Report, which is available on the Construction Authority’s website:

Chapter 7—Responses to Comments

The Construction Authority will ensure that sight distance issues are addressed as the design is being refined during the preliminary engineering and final design phases of the project.

Response 26-11

As explained in Response 26-2, the analysis performed by Rick Engineering used Metrolink standards that do not apply to Metro rail projects. Using the applicable Metro design standards and criteria, clearances are sufficient to accommodate a two-level, 400-space parking structure.

Response 26-12

Please see Response 26-11.

Response 26-13

The description of the right of way in the City of Glendora in Section 3.13 has been updated to reflect the recent reduction in the width of the right of way. The proposed parking structure at the Glendora Station would still fit within the existing right of way.

Response 26-14

Please see Response 26-11.

Response 26-15

Table 4-2 in the Draft EIR references points shared by the City of Glendora at the station planning workshop held on May 4, 2011, and does not include comments received during the official scoping period. Locating a kiss-n-ride on the north side of the tracks is infeasible due to traffic circulation and station access issues. Furthermore, a kiss-n-ride in this location would require property acquisition due to the small width of the right-of-way north of the station.

Response 26-16

As with station concepts drawn for all other Cities served by the project, the Glendora station concept does not illustrate the specifics of future or planned development. Pedestrian access to the paseo would likely require an overpass to comply with state regulatory requirements. The Construction Authority is willing to work with the City and the developer to facilitate an overpass to the station platform, but not to incur the cost of the overpass and/or connection to the private development.

Response 26-17

The City requests an analysis of a revision to a single project component (the parking structure for the Glendora station) as an “alternative,” however, CEQA does not require consideration of alternatives to components of a project. Further, as explained in Response 26-2, the analysis performed by Rick Engineering used Metrolink standards that do not apply to Metro rail projects to conclude that the proposed parking structure is infeasible due to constrained clearances. Using the applicable Metro design standards and criteria, clearances are sufficient to accommodate a two-level, 400-space parking structure.
Nonetheless, the Construction Authority, in response to the issues raised by the City of Glendora, has considered a redesigned parking structure that is similar in design and location as shown in Exhibit 2B of the comment letter. This redesigned structure has been included in the Final EIR as “Option 2.”

The Option 2 structure is designed to have 420 spaces (versus 410 in the structure considered in the Draft EIR or Option 1). As a 3-level structure, it has a more compact footprint. As Option 2 is located close to Option 1 and is within the same commercial area, it has no new environmental impacts except for the acquisition of the RV property. Option 2 is accessed from Vermont Avenue only, avoiding the “sightline” concern at the Glendora Avenue railroad crossing associated with Option 1. It is noted in the Final EIR that Option 2 is the preferred City of Glendora option.

Table 1 below indicates the results of the traffic analysis conducted for Option 2. This information has been added to Table 2-26 in the Final EIR.

<table>
<thead>
<tr>
<th>ID</th>
<th>Intersection</th>
<th>Jurisdiction</th>
<th>Control Type</th>
<th>AM LOS</th>
<th>AM Delay</th>
<th>PM LOS</th>
<th>PM Delay</th>
</tr>
</thead>
<tbody>
<tr>
<td>5</td>
<td>Vermont Avenue/Route 66</td>
<td>Glendora</td>
<td>Signalized</td>
<td>A</td>
<td>7.5</td>
<td>A</td>
<td>9.1</td>
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<tr>
<td>7</td>
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<td>Glendora</td>
<td>Unsignalized</td>
<td>B</td>
<td>12.3</td>
<td>B</td>
<td>13.2</td>
</tr>
<tr>
<td>9</td>
<td>Glendora Avenue/Ada Avenue</td>
<td>Glendora</td>
<td>Unsignalized</td>
<td>B</td>
<td>12.3</td>
<td>C</td>
<td>15.3</td>
</tr>
<tr>
<td>10</td>
<td>Glendora Avenue/Route 66</td>
<td>Glendora</td>
<td>Signalized</td>
<td>C</td>
<td>22.8</td>
<td>C</td>
<td>32.4</td>
</tr>
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</table>

Option 2: Access on Vermont Avenue

<table>
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<tr>
<th>ID</th>
<th>Intersection</th>
<th>Jurisdiction</th>
<th>Control Type</th>
<th>AM LOS</th>
<th>AM Delay</th>
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<th>PM Delay</th>
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<tbody>
<tr>
<td>5</td>
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<td>9.8</td>
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<td>B</td>
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<td>Unsignalized</td>
<td>B</td>
<td>13.3</td>
<td>C</td>
<td>17.1</td>
</tr>
<tr>
<td>10</td>
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<td>Glendora</td>
<td>Signalized</td>
<td>C</td>
<td>21.1</td>
<td>C</td>
<td>28.6</td>
</tr>
</tbody>
</table>

*Average vehicle delay in seconds

Peak hour volumes for forecast year 2035 were diagrammed for Option 2 and included in Section 2.6.3.3 of the Final EIR.

Response 26-18

The statement has been removed.

Response 26-19

The statement concerning traffic/pedestrian warning measures has been incorporated.
Response 26-20

The percentage growth in Table 1-1 of the EIR is calculated based on 2010 vehicle trip tables and 2035 vehicle trip tables developed from person-trip tables developed by the Southern California Association of Governments (SCAG), the federally mandated metropolitan planning organization (MPO) of Southern California.

<table>
<thead>
<tr>
<th></th>
<th>San Dimas</th>
<th>La Verne</th>
<th>Pomona</th>
<th>Claremont</th>
<th>Montclair</th>
</tr>
</thead>
<tbody>
<tr>
<td>Glendora</td>
<td>7,395</td>
<td>2,971</td>
<td>1,285</td>
<td>1,641</td>
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<td>La Verne</td>
<td></td>
<td>3,201</td>
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<tr>
<td>Pomona</td>
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<td>4,406</td>
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</table>

2035 Daily Vehicle Trips

<table>
<thead>
<tr>
<th></th>
<th>San Dimas</th>
<th>La Verne</th>
<th>Pomona</th>
<th>Claremont</th>
<th>Montclair</th>
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</thead>
<tbody>
<tr>
<td>Glendora</td>
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<td>3,268</td>
<td>1,478</td>
<td>1,854</td>
<td>731</td>
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<tr>
<td>San Dimas</td>
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<tr>
<td>La Verne</td>
<td></td>
<td>3,745</td>
<td>2,607</td>
<td>919</td>
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<tr>
<td>Pomona</td>
<td></td>
<td></td>
<td>5,419</td>
<td>1,597</td>
<td></td>
</tr>
<tr>
<td>Claremont</td>
<td></td>
<td></td>
<td></td>
<td>3,798</td>
<td></td>
</tr>
</tbody>
</table>

Response 26-21

Daily boardings are projected by the Corridor Base Model-2009 which is developed and maintained by LACMTA (Metro) and approved by Federal Transit Administration (FTA). The inputs of the model include transportation supply (highway network and transit network) and demand (person trips, socioeconomic data, etc). Glendora Station is an urban rail station within the transit network. Boardings at the station are estimated as part of the ridership forecasting of the entire transit system. Boardings are not estimated individually or based solely on features and socioeconomics specific to its surrounding area.

The Corridor Base Model-2009 is a four-step travel forecasting model, which is comprised of four procedures: trip generation, trip distribution, mode choice, and route assignment. A procedure of land-use forecasting starts before the four-steps model and provides some of the inputs into the model. The land-use forecasting is conducted by SCAG, the MPO of Southern California.

For more details about four-step travel forecasting model, please refer to this source: [http://www.siliconcreek.net/transportation/introduction-to-the-four-step-travel-demand-model](http://www.siliconcreek.net/transportation/introduction-to-the-four-step-travel-demand-model)
Response 26-22

The Los Angeles County 2010 Congestion Management Program does reference the Circular 212 method (page D-4) as one of the methods for intersection LOS calculations.

Response 26-23

Responses for the eleven intersections in question are provided in "Response 26-24" below.

Response 26-24

For Intersection 6 (Vermont Avenue/Foothill Boulevard), the northbound approach curb lane is wide enough for left turn traffic to operate simultaneously alongside the shared through/right turn movement.

For Intersection 20, through and right turn traffic waiting behind a left turning vehicle, which is waiting for a gap in the opposing traffic stream, will opt to use the available wide lane width to bypass a waiting left turn vehicle and cross the intersection.

As noted in the comment, the intersection of Glenwood Avenue/Route 66 (Intersection 14) was revised and changed from unsignalized to a signalized condition and the functional eastbound and westbound right turn lanes were removed. The LOS was recalculated and the tables were updated accordingly.

The traffic study in the Draft EIR was prepared by professional traffic engineers. In this study, all the intersection approaches that show a dedicated right turn lane (Intersections 5, 6, 7, 9, 10, 12, 16, 18, and 21) were analyzed as having dedicated right turn lanes, even though they are not striped as such, because the curb lane is wide enough such that both the through and right turn traffic can operate simultaneously. The Construction Authority acknowledges that multiple approaches to this analysis are valid, and that a difference of professional opinion exists among experts as to which approach is most appropriate. The Construction Authority believes the approach of considering these intersections unstriped functional right turns is most appropriate, as it reflects real world existing traffic operating conditions.

However, in response to the City of Glendora’s concerns, an additional analysis was conducted without functional dedicated right turn lanes assumed at these intersections. The results of the analysis are presented in Table 2 below, and show that the level of service (LOS) at 7 of the 9 intersections would remain the same in both AM and PM peak hours. At Lorraine Avenue/Route 66, the LOS would not change in the PM peak hour; in the AM peak hour, the LOS would be C (rather than LOS B). At the intersection of Vermont Avenue/Route 66, the LOS would remain the same in the AM peak hour; in the PM peak hour, the LOS would be B (rather than LOS A). As shown, all these intersections operate at acceptable LOS both with and without a functional striped right turn lane assumed in the analysis.

Table 2. Build Alternative Intersection Level of Service (2035)

<table>
<thead>
<tr>
<th>#</th>
<th>Intersection</th>
<th>Jurisdiction</th>
<th>Control Type</th>
<th>AM LOS</th>
<th>AM Delay</th>
<th>PM LOS</th>
<th>PM Delay</th>
</tr>
</thead>
<tbody>
<tr>
<td>5</td>
<td>Vermont Avenue/Route 66</td>
<td>Glendora</td>
<td>Signalized</td>
<td>A</td>
<td>4.7</td>
<td>A</td>
<td>4.9</td>
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<tr>
<td>6</td>
<td>Vermont Avenue/Foothill Blvd</td>
<td>Glendora</td>
<td>Signalized</td>
<td>A</td>
<td>8.6</td>
<td>B</td>
<td>12.5</td>
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<tr>
<td>7</td>
<td>Vermont Avenue West/Ada Ave</td>
<td>Glendora</td>
<td>1-Way Stop</td>
<td>A</td>
<td>7.5</td>
<td>A</td>
<td>7.7</td>
</tr>
<tr>
<td>9</td>
<td>Glendora Avenue/Ada Avenue</td>
<td>Glendora</td>
<td>All-Way Stop</td>
<td>B</td>
<td>12.9</td>
<td>B</td>
<td>13.6</td>
</tr>
<tr>
<td>10</td>
<td>Glendora Avenue/Route 66</td>
<td>Glendora</td>
<td>Signalized</td>
<td>C</td>
<td>23.0</td>
<td>C</td>
<td>32.4</td>
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<tr>
<td>12</td>
<td>Pasadena Avenue/Route 66</td>
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<td>Signalized</td>
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<td>13.7</td>
<td>B</td>
<td>11.9</td>
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<tr>
<td>16</td>
<td>Elwood Avenue/Route 66</td>
<td>Glendora</td>
<td>Signalized</td>
<td>B</td>
<td>16.3</td>
<td>B</td>
<td>18.9</td>
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<td>18</td>
<td>Loraine Avenue/Route 66</td>
<td>Glendora</td>
<td>Signalized</td>
<td>C</td>
<td>20.1</td>
<td>B</td>
<td>12.7</td>
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<tr>
<td>21</td>
<td>Glendora Avenue/Sierra Madre Avenue</td>
<td>Glendora</td>
<td>All-Way Stop</td>
<td>E</td>
<td>44.8</td>
<td>B</td>
<td>14.4</td>
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</table>
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Response 26-25
The intersections analyzed in the traffic study are the intersections selected and analyzed in the Gold Line Phase II Pasadena to Montclair – Foothill Extension Final Environmental Impact Report, February 2007. In the Draft EIR, a total of 90 intersections and 35 roadway segments were studied within the project corridor, including 22 intersections and 10 segments located in the City of Glendora.

Response 26-26
Please see response to comment 26-24.

Response 26-27
Table 2-10 has been updated accordingly.

Response 26-28
Table 2-13 has been updated accordingly.

Response 26-29
The roadway segments selected for inclusion in the traffic study were adjacent to the proposed railroad alignment and the at-grade crossings. In addition, they are consistent with the locations evaluated in the Gold Line Phase II Pasadena to Montclair – Foothill Extension Final Environmental Impact Report, February 2007.

Response 26-30
Tables 2-17, 2-18, and 2-19 were updated accordingly.

Response 26-31
Please see Response 26-21.

Response 26-32
Please see Response 26-24.

Response 26-33
Tables 2-27 and 2-28 have been updated accordingly.

Response 26-34
The proposed right-turn-on-red ban is one of the recommended treatments to improve at-grade crossing operations and safety. The intent of the recommended treatments listed in Table 2-30 of the Draft EIR is to provide a set of potential steps, some or all of which could be taken, as necessary. The City’s objection to the right-turn treatment at the Grand Avenue/Foothill Boulevard is noted and specific project intersection control and design treatments, including right-turn overlap, will be refined during the
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preliminary engineering phase of the project. The text has been revised to “Incorporate provisions to ban right turn on red or provide right turn overlap.”

Response 26-35

The proposed modification of the median on Foothill Boulevard is one of the recommended treatments to improve at-grade crossing operations and safety. The City’s comment is acknowledged, and prior to selection of specific treatment(s), specific project intersection control and design treatments will be evaluated further as part of the preliminary engineering of the project.

Response 26-36

Section 2.8.2 and Table 2-33 were revised accordingly.

Response 26-37

A visual example of the project elements (including a photograph of a representative station platform) is presented in Table 1-3, and a visual rendering of the flyover structure is presented in Figure 1-8 in Chapter 1 of the Draft EIR. Chapter 1 also contains figures that illustrate the footprints of the proposed parking structures.

Visual impacts of project elements are analyzed in Section 3.13 of the Draft EIR.

The Construction Authority will continue to coordinate with local cities including the City of Glendora in the development of plans for project facilities.

Response 26-38

The information has been updated accordingly; and the conclusions of the analysis were not affected.

Response 26-39

Dam inundation area due to San Dimas Dam failure is not shown on Exhibit SAF-5 Dam Inundation Areas in the Safety Element of the City’s Community Plan 2025. Dam inundation due to San Dimas Dam failure is discussed in Section 4.8.3.4 of the Draft EIR.

Response 26-40

The State Water Resources Control Board geotracker website lists a release of aviation fuel on soil located at N & G Business Park, 505 West Foothill Boulevard, Glendora, CA 91741 (NW corner of Foothill & Grand, south of tracks). The building appears to be currently addressed as 507 W. Foothill Blvd through 517 W. Foothill Blvd. This listing can be viewed online at the following link: http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0603703562

Response 26-41

A mitigation measure (N-5) that the Construction Authority will contact property owners of residences identified as having vibration impacts listed as significant and unavoidable has been included in Section 3.11 of the Final EIR.
Response 26-42

It is anticipated that retaining walls, sound walls and other project infrastructure can be constructed within the right of way and the parcels identified in Appendix C of the Draft EIR.

It is anticipated that grading will be contained within the right of way (including parcels that will be acquired for that purpose). Nonetheless, the Construction Authority will ensure the construction contractor’s for any grading plan outside the right of way meets all City requirements and that all necessary permits are obtained.

Response 26-43

A Phase II ESA was conducted between June 6 and June 27, 2005 to address contamination from railroad use and/or adjacent properties. Twenty-five borings (E60 – E84) were advanced along the railroad right-of-way in the City of Glendora. Selected soil samples were analyzed for pH, total petroleum hydrocarbons (TPH), volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), organochlorine pesticides (OCPs), and Title 22 metals. The results of the investigation are summarized in the Draft EIR (Section 3.9.2.1). Soils that can be classified as potential hazardous waste because of the detected concentrations of arsenic and lead were identified within surface soil samples. Petroleum hydrocarbon concentrations varied throughout the railroad right-of-way; and potentially significant levels were identified within three feet of the ground surface. Mitigation measures were identified in Section 3.9.4 of the Draft EIR to mitigate contaminants detected in the soil, and with implementation of these mitigation measures impact would be less than significant.

Response 26-44

At this time it is anticipated that no retaining walls outside the project’s right of way area, which would include the identified acquisitions, would be needed. As further project engineering progresses, additional refinements would be incorporated into the project design. The Construction Authority will communicate with the City about those refinements, and if the further engineering includes a possibility of retaining walls, the Construction Authority will work with the City to ensure that construction of any walls outside the project’s right of way area will be consistent with the City’s general plan and zoning codes.

Response 26-45

It is anticipated that grading will be contained within the right of way (including parcels that will be acquired for that purpose). Nonetheless, the Construction Authority will ensure the construction contractor’s for any grading plan outside the right of way meets all City requirements and that all necessary permits are obtained.

Response 26-46 [Rick Engineering Attachment] As noted in Response 26-2, the City’s analysis of the Glendora Station parking structure proposed in the Draft EIR (labeled “Option 1” in the Final EIR), was based on Metrolink (commuter rail) standards which do not apply to Metro (light rail transit) projects. Based on the correct Metro clearance and platform standards, the “Option 1” parking structure is feasible.
As noted in Response 26-17, the Construction Authority has nonetheless opted to study a second “Option 2” structure similar to the “2B” concept suggested in the City’s letter. Both Option 1 and Option 2 are included in the Final EIR.

In response to the City and Rick Engineering’s comment concerning pedestrian traffic and safety, a pedestrian bridge has been added to both Option 1 and Option 2 to prevent passengers from having to walk over the two tracks (one freight, one LRT) between the parking structure and the platform.
FACSIMILE TRANSMITTAL SHEET

DATE: October 4, 2012  
NUMBER OF PAGES: 6

FROM: Robert P. Silverstein, Esq.  
CLIENT/MATTER NO.: S7650-001

<table>
<thead>
<tr>
<th>NAME</th>
<th>Fax No.</th>
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</table>
| Metro Gold Line Foothill Extension Construction Authority  
   Lisa Levy Buch, Director of Public Affairs  
   Hon. Doug Tessitor, Metro Gold Line Chair  
   Hon. Sam Pedroza, Metro Gold Line 1st Vice Chair  
   Hon. Ed Reyes  
   Hon. Keith Hanks  
   Hon. John Fasana  
   Hon. Bill Bogaard  
   Hon. Lara Larramendi  
   Hon. Daniel M. Evans  
   Habib F. Balian, Metro Gold Line CEO | | (626) 471-9049 |
| City of San Dimas  
   Hon. Curtis W. Morris  
   Hon. Emmett Badar  
   Hon. Denis Bertone  
   Hon. John Ebner  
   Hon. Jeff Templeman  
   Blaine Michaelis, City Manager | | (909) 394-6209 |

MESSAGE:

Please see attached. Thank you.

IMPORTANT: THIS MESSAGE IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHICH IT IS ADDRESSED, AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, OR THE EMPLOYEE OR AGENT RESPONSIBLE FOR DELIVERING IT TO THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT READING, DISSEMINATING, DISTRIBUTING OR COPYING THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE IMMEDIATELY NOTIFY THE SENDER BY TELEPHONE, WHO WILL ARRANGE TO RETRIEVE IT AT NO COST TO YOU. THANK YOU.

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October 5, 2012

VIA FAXSIMILE (626) 471-9049, EMAIL AND U.S. MAIL

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

Re: Objections to Gold Line Draft Environmental Impact Report for Proposed Light Rail Extension from Azusa to Montclair Project, Phase 2B;
SCH No. 2010121069

Dear Ms. Buch:

This firm and the undersigned represent Storage Centers, LP, owner of the Storage Centers self-storage facility at 195 East Arrow Highway, San Dimas. We submit these preliminary comments on its behalf.

Please ensure that all communications from the Authority to our client regarding the Project are also promptly copied to our office. Please also ensure that notices of all hearings, actions, events, votes and decisions related to the Metro Gold Line Foothill Extension - Azusa to Montclair (“Project”) are timely provided to this office. We reserve the right to provide further comment.

Although Storage Centers has concerns about the Project, Storage Centers supports the Authority’s choice of the San Dimas City Yard as the site for the Project’s San Dimas parking facility.

Storage Centers further supports the deletion of the Storage Centers self-storage facility at 195 East Arrow Highway from consideration and analysis as a potential alternative to the City Yard. While it is not a listed objective, the Authority’s decision comports with what should be a stated consideration to avoid or minimize impacts to existing businesses to the maximum extent feasible. This was one of the criteria by which the Mt. Olive self-storage facility site in Duarte was rejected for consideration for the Maintenance & Operations Facility site in the Authority’s Final Supplemental EIR for
the Pasadena to Azusa portion of the Gold Line Foothill Extension. (Exhibit A [Phase
2A FSEIR, Volume 4, p. 155].)

Storage Centers has been in business for more than 34 years, serving thousands of
residents and businesses in San Dimas and the surrounding communities. There are
currently about 300 tenants at the facility, some whom have been tenants since the
facility opened. Condemning the Storage Centers property for a parking facility or any
other use would cause severe disruption and hardship to Storage Centers, its tenants, and
other local stakeholders, and would prove very costly for the Authority. It would also
ruin the substantial goodwill the Storage Centers business has built in the community
over the last 34 year and, given the competition in the industry and difficulties in
relocating a self-storage facility, would most likely result in a complete loss of business
goodwill that would be attributable to the Authority’s actions. Those actions could be
either direct or, in the event of a disguised condemnation via the City, indirect. In either
scenario, Storage Centers would look to the Authority and/or the City for damages and
other relief.

In the unlikely event that the Storage Centers site may yet be considered for the
Authority’s San Dimas parking facility – or be considered as a replacement site for the
loss of the City’s lot – either the Draft EIR would need to be recirculated, including
pursuant to CEQA Guidelines Section 15088.5, or a Supplement to the EIR would be
required pursuant to Guidelines Section 15163 because the Draft EIR does not analyze
the Storage Centers site. If this event occurs, or if it is currently being considered or
contemplated yet has been concealed by the Authority from public disclosure, Storage
Centers will not only vigorously oppose consideration of its property, but will oppose the
Project as a whole.

Thank you for your consideration of this correspondence and inclusion of it in the
administrative record for this matter.

Very truly yours,

ROBERT P. SILVERSTEIN
FOR
THE SILVERSTEIN LAW FIRM

RPS:jmr
Encl.
cc: Hon. Doug Tessitor, Metro Gold Line Chair
    Hon. Sam Pedroza, Metro Gold Line First Vice Chair
Hon. Ed Reyes
Hon. Keith Hanks
Hon. John Fasana
Hon. Bill Bogaard
Hon. Lara Larramendi
Hon. Daniel M. Evans
Habib F. Balian, Metro Gold Line Chief Executive Officer
    (All via email and facsimile)
Hon. Michael D. Antonovich, Metro Chair
Hon. Diane DuBois, Metro First Vice Chair
Hon. Richard Katz, Metro Second Vice Chair
Hon. Don Knabe
Hon. Antonio R. Villaraigosa
Hon. José Huizar
Hon. Gloria Molina
Hon. Ara Najarian
Hon. Pam O’Connor
Hon. Mark Ridley-Thomas
Hon. Zev Yaroslavsky
Hon. Mel Wilson
Hon. Michael Miles
Arthur T. Leahy, Metro Chief Executive Officer
Ronald Stamm, Esq.
    (All via email)
Hon. Curtis W. Morris
Hon. Emmett Badar
Hon. Denis Bertone
Hon. John Ebinder
Hon. Jeff Templeman
Blaine Michaelis, City Manager, City of San Dimas
    (All via email and facsimile)
With the Foothill Extension Phase 2A, the Gold Line will be approximately 32 miles long. The deadhead miles can have a significant impact on the operations and the operational costs because it involves running the cars without passengers.

3) The Union Pacific site would not avoid any significant and unmitigable impacts, and thus is not an appropriate site for consideration per CEQA Guidelines Section 15126.6(f)(2).

I) The commenter states that there are other alternate sites that should be considered as alternatives to the Monrovia site. The first, 2500 E. Central (also referred to as the Mt. Olive site), which is discussed in Comment I and in exhibits 4 and 5 of the comment letter, was deemed infeasible at this time because:

1) The property owner is not interested in selling, calling into question availability of the site. See comment letter exhibit 5, Michael Brandman letter dated September 4, 2009, which states the owner “is on record as opposed to any attempt by MTA and/or the Metro Gold Line Foothill Extension Construction Authority (MGLFCA) to acquire and develop the Mt. Olive site as a LRT maintenance and operation facility.”

2) There are approximately 1,860 tenants at the Mt. Olive Storage site and each would be impacted by such an acquisition.

3) The cost of constructing an appropriate rail line connection across the Interstate 210 (whether underground or over head) would greatly exceed the costs that might be incurred to create an appropriate connection on other sites. Further, although there currently is a tunnel under Interstate 210, that tunnel is not of sufficient width to be used as an access point to the site. As noted in the Michael Brandman report (exhibit 5 and page 2 of comment letter), “An existing track was identified in the Consolidated Rail Yard Analysis Report; however, contrary to that Report, the trackage had actually been removed sometime before 1993.” Furthermore, the existing tunnel does not have sufficient space to accommodate the number of track leads required to make a functional maintenance and operation facility, and another tunnel or overcrossing would be necessary to achieve suitable access. Therefore, the site is not readily accessible and the construction costs would be exorbitantly high.

4) CEQA does not require analysis of infeasible alternatives.

5) The Michael Brandman study submitted on behalf of the owners of the 2500 E. Central site provides evidence that development of an M&O Facility on that site would likely have significant environmental impacts unlike the Monrovia site,
Chapter 7—Responses to Comments

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

Response 27-1

Your support for the proposed site of the San Dimas Station parking facility at the San Dimas City Yard is acknowledged.

Response 27-2

The Storage Centers’ facility at 195 East Arrow Highway is no longer being considered as a site for the San Dimas Station parking facility.
December 19, 2012

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

RE: Azusa to Montclair Draft Environmental Impact Report

Dear Ms. Buch:

Thank you for providing the Los Angeles County Metropolitan Transportation Authority (Metro) with the opportunity to review and comment on the Metro Gold Line Foothill Extension Phase 2B Azusa to Montclair Draft Environmental Impact Report (DEIR).

Based on conversations with Foothill Extension Construction Authority staff, we are providing this letter that supersedes our October 5, 2012 DEIR comment letter. We now distinguish between those comments that are to be treated as DEIR comments and comments that will be addressed by the Authority separately through the later design stages of the project. Metro understands that the Authority will provide responses to our DEIR comments as part of the Final Environmental Impact Report.

Metro’s DEIR comments can be found on the attached spreadsheet and cover a range of disciplines including planning, systems, construction, rail operations, environmental, safety and security, and creative services. In particular, we would like to highlight two comments:

- Metro will be operating and maintaining the Azusa to Montclair extension after it is completed. For this reason, the project will be constructed to conform to Metro design standards and criteria. Although the DEIR references Metro design criteria, it should clearly state that the Project will be built to comply with Metro’s most recent design standards and criteria in effect at the time the design-build contract is awarded. For example, special track work related to turnouts and crossovers shall not be located on vertical curves.
- Per Section 10 of the Metro Rail Design Criteria, “The Light-Rail Operational Headway shall be as defined by Operations and Maintenance Plan and consist of not greater than 5-minute interval of time between trains for single-line normal operations”. Metro’s understanding is that as proposed, the project’s operational systems including trackwork,
crossings, Automatic Train Control system, Traction Power Substation systems, etc. are capable of supporting a scheduled five minute headway in compliance with Metro Design Rail Criteria.

In addition to these comments, Metro is providing separate comments specific to project design elements including station design, operations, and headways, which we trust you will consider in the next phase of project development. In fact, we encourage the Construction Authority to proceed with the preparation of the DEIS to enable the project to seek federal funding.

We hope that these comments assist the Construction Authority in preparing an EIR that addresses project impacts and stakeholder concerns, which will enable the project to continue to move forward. Again, Metro appreciates the opportunity to comment on this DEIR and we hope to continue the progress made to date on the Gold Line.

Sincerely,

[Signature]

Paul C. Taylor
Deputy Chief Executive Officer

Enclosure
## METRO GOLD LINE Foothill Extension - Phase 2B DEIR Comments

**PROJECT / CONTRACT NO.** Gold Line Foothill Extension Phase 2B Azusa to Montclair

**DATE:** December 19, 2012

**SUBMITTAL PACKAGE:** Draft Environmental Impact Report

**TECHNICAL DISCIPLINE:**

**Response Code:** 1-Incorporation Planned; 2-Discussion/Clarification Required; 3- Not Applicable; 4-Not Due for this Submittal; 5-Authority Direction Required

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<tr>
<td>1</td>
<td>Amir/Wong</td>
<td>Metro</td>
<td>Report</td>
<td>General</td>
<td>Planning</td>
<td>Will this CEQA document be followed by a NEPA document to enable the project to seek federal funding?</td>
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<td>2</td>
<td>Amir/Wong</td>
<td>Metro</td>
<td>Report</td>
<td>General</td>
<td>Planning</td>
<td>Authority should work with cities and Metro to look at creating and improving pedestrian connections between the cities and stations in the next phases of project development.</td>
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<tr>
<td>3</td>
<td>Amir/Wong</td>
<td>Metro</td>
<td>Report</td>
<td>1-10</td>
<td>Planning</td>
<td>DEIR should include a paragraph stating the relationship between the Construction Authority and Metro. Specifically, the Construction Authority is responsible for managing the design and construction of the project while the Los Angeles County Metropolitan Transportation Authority's (Metro) role is to fund, oversee design and construction in coordination with the Construction Authority, and operate project when completed. Suggest adding in Sections S.1 and 1.1.</td>
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### Response Code: 1-Incorporation Planned; 2-Discussion/Clarification Required; 3- Not Applicable; 4-Not Due for this Submittal; 5-Authority Direction Required

**Status Code:**
- **R** - Resolved
- **U** - Unresolved
- **C** - Completed

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<td>4</td>
<td>Amiri/Wong</td>
<td>Metro</td>
<td>Report</td>
<td>S-6 and 3.4-8</td>
<td>Planning/Real Estate</td>
<td>In Section S.4.1.2 and on page 3.4-8, although Metro funded the property acquisitions, relocation assistance, and compensation for Phase 2A through project funds, the Authority was the entity responsible for conducting all real estate negotiations, offers, and legal matters. This sentence should be rephrased to read &quot;Similar to Phase 2A, all property acquisitions, relocation assistance, and compensation would be handled and negotiated by the Construction Authority as required by the California Relocation Assistance Act.&quot;</td>
</tr>
<tr>
<td>5</td>
<td>Amiri/Wong</td>
<td>Metro</td>
<td>Report</td>
<td>1-10</td>
<td>Planning</td>
<td>While the DEIR references Metro design criteria throughout the document, the DEIR should include an overarching sentence stating that the Project will be built to comply with Metro design standards and criteria and approved deviations. Suggest adding language in sections S.3 and 1.3.3.</td>
</tr>
<tr>
<td>6</td>
<td>Amiri/Wong</td>
<td>Metro</td>
<td>Report</td>
<td>1-13</td>
<td>Planning</td>
<td>We recommend adding in a sentence in Section 1.3.3.1 stating that trains running on Phase 2B will be stored and maintained at the new maintenance facility currently under construction in Monrovia.</td>
</tr>
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SEGMENT

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<td>7</td>
<td>Amiri/Wong</td>
<td>Metro</td>
<td>Report</td>
<td>3.1-2</td>
<td>Planning</td>
<td>In Section 3.1.1.3, SCAG prepares a Regional Transportation Plan and not a Long Range Transportation Plan, which is prepared by Metro. DEIR should remove reference to the Long Range Transportation plan because 1) it is not prepared by SCAG; and 2) it does not satisfy any federal air quality requirements.</td>
</tr>
<tr>
<td>8</td>
<td>Amiri/Wong</td>
<td>Metro</td>
<td>Report</td>
<td>3.4-3</td>
<td>Planning</td>
<td>In Section 3.4.2.3, the right-of-way is guided by the terms of the Property Trust Agreement and not the Master Cooperative Agreement. Please revise accordingly.</td>
</tr>
<tr>
<td>9</td>
<td>M. Harris-Gifford</td>
<td>Metro</td>
<td>Report</td>
<td>3.11-63</td>
<td>Systems</td>
<td>Please delete all reference to flange-bearing frogs. Experience in other properties (e.g. Pittsburgh) suggests these cause severe LRV wheel damage.</td>
</tr>
<tr>
<td>10</td>
<td>M. Harris-Gifford</td>
<td>Metro</td>
<td>Report</td>
<td>3.11-63</td>
<td>Systems</td>
<td>The need for spring or moveable-point frogs should be avoided where possible by crossover location or use of soundwalls.</td>
</tr>
<tr>
<td>11</td>
<td>M. Harris-Gifford</td>
<td>Metro</td>
<td>Report</td>
<td>Table 3.11-31</td>
<td>Systems</td>
<td>Reducing train speed, unless necessary for safety-related issues, or occurring naturally due to alignment speed and/or proximity to a station should be avoided.</td>
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### SEGMENT

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<tr>
<td>12</td>
<td>M. Harris-Gifford</td>
<td>Metro</td>
<td>Dwg</td>
<td>General Systems</td>
<td>Presumably crossovers will be added later.</td>
<td></td>
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<tr>
<td>13</td>
<td>CL/ME</td>
<td>Metro</td>
<td>Report</td>
<td>3.1-18</td>
<td>Environmental</td>
<td>Air Quality section's mitigation monitoring (3.1.5.1) AQ-1 - Add a qualifier that Metro may limit the use of water as a dust mitigator in the event of water shortages or drought or in some way address how operations regarding watering down dust will change if such an event were to occur.</td>
</tr>
<tr>
<td>14</td>
<td>CL/ME</td>
<td>Metro</td>
<td>Report</td>
<td>3.3-8</td>
<td>Environmental</td>
<td>Climate Change section's mitigation monitoring (3.3.5.1) should include using LED lighting to the extent possible for construction activities taking place at night. This comment also applies to the Energy section.</td>
</tr>
<tr>
<td>15</td>
<td>CL/ME</td>
<td>Metro</td>
<td>Report</td>
<td>3.8-29</td>
<td>Environmental</td>
<td>Geologic Hazards section, the mitigation measures should be indicated in detail, not simply refer to following the &quot;Regulatory Setting&quot; section. For example, it should specifically state the required actions that apply to the project from the Seismic Hazards and Mapping Act - this simplifies monitoring and enforcement of the mitigation measures during and after construction.</td>
</tr>
</tbody>
</table>
Noise section Section 3.11 – The DEIR appears to commit Metro to indefinitely providing sound/noise barrier enhancements (soundwalls and building improvements) for the project. However, the FTA Guidance Manual on Noise and Vibration indicates that mitigation is required at levels determined to be “Severe”, but only need be considered when reasonable at “Moderate” levels. Therefore, additional mitigation measures that are proposed after construction and/or during operation will only be implemented if necessary or found to be required. The section also mentions transparent panels for soundwalls used in Expo Phase I - were these effective?

Air Quality section, 3.1 and Energy Section 3.7: A number of these mitigation measures are already included in Metro’s Green Construction Policy. Consider Metro’s Green Construction Policy or mention in document.

Climate Change section, 3.3: A number of these mitigation measures are already included in Metro’s Green Construction Policy. Consider incorporating Metro’s Green Construction Policy or mention in document.
### SEGMENT REVIEWER:

As noted

**TECHNICAL DISCIPLINE:**

- **DATE:** December 19, 2012
- **Project/Contract No.:** Gold Line Foothill Extension Phase 2B Azusa to Montclair
- **Submittal Package:** Draft Environmental Impact Report
- **Status Code:** R - Resolved, U - Unresolved, C - Completed
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<td>19</td>
<td>CL</td>
<td>Metro</td>
<td>Report</td>
<td>General</td>
<td>Environmental</td>
<td>Climate Change section, 3.3: Metro has climate change mitigation and adaptation requirements for its infrastructure projects that should be incorporated into this project.</td>
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<tr>
<td>20</td>
<td>CL</td>
<td>Metro</td>
<td>Report</td>
<td>3.11-56</td>
<td>Environmental</td>
<td>Noise and Vibration, Section 3.11, p. 3.11-56. “Table 3.11-26 indicates the locations for sound insulation for second stories; sound insulation is considered for all second-story windows facing the tracks within the identified clusters.” This is precedent setting. Is this required and how do you measure significant impacts under FTA guidelines?</td>
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<td>21</td>
<td>CL</td>
<td>Metro</td>
<td>Report</td>
<td>3.9-9</td>
<td>Environmental</td>
<td>Hazardous Materials Section 3.9, p 3.9-9: &quot;HW-2—During project final design, specific soil testing shall be conducted and necessary and appropriate specific means for remediation shall be selected and incorporated into construction or contract documents, such as excavation with offsite disposal or onsite reuse in low risk areas, vapor extraction, or in-situ remediation.” Deferring testing up to “project final design” may result in delay to project. Consider testing at earlier timeframe.</td>
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