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<tr>
<td>22</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-3—Soil that contains soluble concentrations of metals in excess of the Soluble Threshold Limit Concentration (STLC) is considered a California hazardous waste and shall be removed from the site and disposed of in accordance with federal and state regulations.&quot; How does this MM relate to HW-1? Are haz waste determined beforehand? Why specifically call it out.</td>
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<td>23</td>
<td>CL</td>
<td>Metro</td>
<td>Report</td>
<td>General</td>
<td>Environmental</td>
<td>Water Quality Section 3.14: Consider mention of Low Impact Development strategies such as the County of Los Angeles Low Impact Development Standards Manual, January 2009 and City of Los Angeles Low Impact Development (LID) Ordinance. Each city in study area may also have such guidelines or requirements.</td>
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<td>CL</td>
<td>Metro</td>
<td>Report</td>
<td>3.17-1</td>
<td>Environmental</td>
<td>Permits Section 3.17: Are any LA and San Bernardino County permits and approvals needed?</td>
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<td>25</td>
<td>J. Pardo</td>
<td>Metro</td>
<td>Report</td>
<td>Section 3.13.4.2 Mitigation Measures</td>
<td>Creative Services</td>
<td>Please revise VIS-5 to state: All walls structures and fences shall be properly screened or incorporate design features to improve appearance and reduce visual intrusion. Such features will be designed by the Design Team that includes architects, landscape architects and lighting experts. Station design shall feature materials, landscaping, and other elements developed by the Design Team and in keeping with Metro Rail Design Criteria. Surface treatments shall be provided the face of safety walls and at roadway/ pedestrian portals, and landscaping along safety walls outside of the LRT portal shall be provided where feasible to provide wall screening. Per Metro Rail Design Criteria, artwork will be provided at each station and will be designed by professional artists.</td>
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<td>26</td>
<td>Anthony Jusay</td>
<td>Metro</td>
<td>Report</td>
<td>S-20</td>
<td>Bike Program</td>
<td>Change text in &quot;Bicycle and pedestrian facilities and access-&quot; to: Comments typically concerned requests for bicycle storage and bikeway facilities, and bicycle and pedestrian paths at and to stations.</td>
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<tr>
<td>27</td>
<td>Amiri</td>
<td>Metro</td>
<td>Report</td>
<td>Bike Program</td>
<td>Bike Program</td>
<td>Per Metro’s bicycle directive, DEIR should incorporate robust bicycle facilities and bicycle parking spaces provided at a rate of 2.5% of daily bordings per station. We also recommend that the Authority, Metro, and cities work together to develop bike lanes and paths that facilitate first/last mile access to the station.</td>
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<tr>
<td>28</td>
<td>Anthony Jusay</td>
<td>Metro</td>
<td>Report</td>
<td>2-34</td>
<td>Bike Program</td>
<td>In section 2.6.1.4- City of Pomona is currently developing a bike masterplan. Document should note current and future plans for bicycle facilities developed by Pomona as it does for the cities of Glendora, San Dimas, Claremont, and Montclair.</td>
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<tr>
<td>29</td>
<td>Anthony Jusay</td>
<td>Metro</td>
<td>Report</td>
<td>2-34</td>
<td>Bike Program</td>
<td>Where roadways are impacted during construction including sidewalk closures or pinch points on travel lanes, ensure temporary signage warning motorists of pedestrian and bicycle movement where appropriate and/or provide detours for bicycle and pedestrians.</td>
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<tr>
<td>30</td>
<td>George Grein</td>
<td>Metro</td>
<td>Report</td>
<td>3.12-4</td>
<td>Safety and Security</td>
<td>In the section beginning with &quot;Over the last 10 years, Metro has established several transit-specific projects and programs&quot;, please add the following: 1) The “See Something Say Something” program has been adopted by LASD and Metro as part of a national approach to encouraging our patrons to participate in the security process by reporting something that is occurring or does not look right so that the matter can be investigated further; and 2) Metro’s Community Relations Rail Safety Education programs that engage all nearby schools and other public groups who may be impacted by the operation of a rail transit line in their community.</td>
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</table>
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>31</td>
<td>George Grein</td>
<td>Metro</td>
<td>Report</td>
<td>3.12-5</td>
<td>Safety and Security</td>
<td>In Section 3.12.2.1, please replace &quot;LASD Transit Police Services Bureau&quot; with &quot;LASD Transit Services Bureau (TSB)&quot;</td>
</tr>
<tr>
<td>32</td>
<td>George Grein</td>
<td>Metro</td>
<td>Report</td>
<td>3.12-5</td>
<td>Safety and Security</td>
<td>In Section 13.12.2.1, text should be added to fully describe the role of the TSB. TSB plays a direct role with Metro in the review of Design Criteria and in all phases of the design and construction process as it relates to security and law enforcement. TSB acts as a liaison to all local law enforcement agencies and encourages their participation in the review process, especially related to Fire Life Safety and Security (FLSSC) topics. TSB participates in all FLSS meetings, the Threat and Vulnerability Assessment (TVA) process and in Hazard Analysis. In the future, TSB will also plan and evaluate Pre-Revenue drills and its patrol force members will participate in these events.</td>
</tr>
<tr>
<td>33</td>
<td>George Grein</td>
<td>Metro</td>
<td>Report</td>
<td>3.12-17</td>
<td>Safety and Security</td>
<td>In section 3.12.4.2, SS-1 and SS-2 should be changed from &quot;Gold Line security personnel&quot; to &quot;Metro Rail Operations Center staff/LASD TSB Desk Operations&quot;</td>
</tr>
<tr>
<td>34</td>
<td>George Grein</td>
<td>Metro</td>
<td>Report</td>
<td>3.12-17</td>
<td>Safety and Security</td>
<td>In section 3.12.4.2, SS-4 and SS-6 should be changed from &quot;Gold Line security personnel&quot; to &quot;Metro/TSB&quot;</td>
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### SEGMENT

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<thead>
<tr>
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<tr>
<td>35</td>
<td>Farley/Wong</td>
<td>Metro</td>
<td>Report</td>
<td>Multiple sections</td>
<td>Rail Ops Planning &amp; Serv Dev</td>
<td>Per Section 10 of the Metro Rail Design Criteria, “The Light Rail Operational Headway shall be as defined by Operations and Maintenance Plan and consist of not greater than 5-minute interval of time between trains for single-line normal operations”. Therefore, for consistency with the Metro Design Criteria the project’s operational systems including trackwork, crossings, Automatic Train Control system, Traction Power Substation systems, etc. must be capable of supporting a scheduled five minute headway.</td>
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<tr>
<td>36</td>
<td>Brandon Farley</td>
<td>Metro</td>
<td>Report</td>
<td>Chptr 1; 1.3.3.6</td>
<td>Rail Ops Planning &amp; Serv Dev</td>
<td>Claremont Station proposal includes 1,120-space Parking Structure and references that it is related to Gold Line and Metrolink demand. The DEIR should evaluate and identify split between the two in the build-out year (2035) for cost assignment purposes.</td>
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<tr>
<td>37</td>
<td>Brandon Farley</td>
<td>Metro</td>
<td>Report</td>
<td>Chptr 1; 1.3.3.6</td>
<td>Rail Ops Planning &amp; Serv Dev</td>
<td>Claremont Station proposal cites pedestrian overpass to connect with EB Metrolink platform. DEIR should examine and provide detail to support the overpass. Should additionally examine relocating the overpass to the west end of the parking structure to leverage possible benefits with the LRT Station. Including an overpass of College Avenue to provide better connectivity to the LRT Station.</td>
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</table>
Claremont Station proposal cites possible extension of pedestrian overpass to connect with a park on the south side of the Metrolink ROW, pending funding from the City of Claremont. DEIR should examine impacts to parking demand as a result of connection to ball fields, including relative cost to maintain structure supposing their would be increased usage.

Montclair Station, as depicted in on Page 1-30, is inconsistent with Metro Design Criteria Section 10. It currently lacks crossovers east of the platform.

Chapter 1 is silent concerning Special Trackwork, except in 1 map illustration for the proposed Montclair Station. It does discuss TPSS's.

Observe only 2 sets of crossovers (near Loraine in Glendora and at Montclair). Given distance involved, should see upwards of 5 sets before Montclair area, then, 2 at Montclair (before & after station platforms). Please include or cite where these are located. Crossover locations need to be supported by an Operational Analysis and supporting 10-minute single track operations. See Metro Design Criteria Section 10 for more information.
<table>
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<tr>
<td>42</td>
<td>Michael Ratnasingham</td>
<td>Metro</td>
<td>DWG C-105</td>
<td>Systems Engineering</td>
<td>Grade separation should be considered for the main junction between Foothills Blvd and Grand Ave. Preemption time needed to clear the crossing from the city for train control will affect train headways throughout the alignment.</td>
<td></td>
</tr>
<tr>
<td>43</td>
<td>Michael Ratnasingham</td>
<td>Metro</td>
<td>Report 1-12</td>
<td>Systems Engineering</td>
<td>Past experience has shown that substations should be ideally about a mile apart to meet contingency requirements (1 substation out service). The substation locations are sometime fixed due to extra power demands such as uphill grades etc. Given this, 12 substations will be required to avoid voltage drop due to train meets, contingency situations and alignment power demands. Typically the first step would be to place 6 substations in the vicinity of passenger stations (train starts/meets etc). The next step would be to place 2 substations close to the two grade separations (uphill power demand). The current locations of TPSS B3 and B8 meet this requirement. The final step would be, based on available real estate to place the remainder of the substations to meet the 5000 to 6000 feet requirement between all substations (contingency). Given the above in our opinion an additional substation will be required.</td>
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<td>44</td>
<td>Michael Ratnasingham</td>
<td>Metro</td>
<td>DWG</td>
<td>C-151</td>
<td>Systems Engineering</td>
<td>At the end of the line the OCS or Catenary need to be terminated. From a safety point of view the distance between the bumper post and termination pole should be a minimum of 20 feet. Is there sufficient real estate to place termination poles at the end of the line?</td>
</tr>
<tr>
<td>45</td>
<td>Zoric Sheynman</td>
<td>Metro</td>
<td>Dwg</td>
<td>C-105 and other applicable plans with grade crossings</td>
<td>Guideway and Trackwork</td>
<td>Along certain parts of the alignment, four tracks (two for Gold Line, two for freight and Metrolink) would run adjacent to each other. Given the projected vehicular and train volume from four tracks, would those intersections with four track grade crossings require grade separation per the Metro Policy for Grade Crossing for Light Rail Transit?</td>
</tr>
<tr>
<td>46</td>
<td>David Chong</td>
<td>Metro</td>
<td>Vol 1 Draft EIR</td>
<td>Page S-1</td>
<td>Facilities Engineering</td>
<td>Specify the average design speed for the LRT track system.</td>
</tr>
<tr>
<td>47</td>
<td>David Chong</td>
<td>Metro</td>
<td>Vol 1 Draft EIR</td>
<td>Page S-12, S.6.1.4</td>
<td>Facilities Engineering</td>
<td>Add statement after the VIS-4 paragraph as follow: All lighting should conform to standard practice as defined by ANSI-IESNA guidelines.</td>
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<tr>
<td>46</td>
<td>David Chong</td>
<td>Metro</td>
<td>Vol 1 Draft EIR</td>
<td>Page S-12, S.6.1.4</td>
<td>Facilities Engineering</td>
<td>Add stormwater mitigation requirements under section S.6.2 per NPDES General Permit requirements for stormwater discharge during construction.</td>
</tr>
<tr>
<td>49</td>
<td>David Chong</td>
<td>Metro</td>
<td>Dwg. C-111</td>
<td>Facilities Engineering</td>
<td>TPSS as shown on plan is out of Metro ROW, property acquisition is required.</td>
<td>1 - Incorporation Planned</td>
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<td>50</td>
<td>David Chong</td>
<td>Metro</td>
<td>Dwg. C-121</td>
<td>Facilities Engineering</td>
<td>TPSS as shown on plan is out of Metro ROW, property acquisition is required.</td>
<td>1 - Incorporation Planned</td>
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<td>51</td>
<td>David Chong</td>
<td>Metro</td>
<td>Dwg. C-130</td>
<td>Facilities Engineering</td>
<td>Property acquisition required for TPSS B-6 site.</td>
<td>1 - Incorporation Planned</td>
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<td>David Chong</td>
<td>Metro</td>
<td>Dwg. C-134</td>
<td>Facilities Engineering</td>
<td>Property acquisition required for TPSS B-7 site.</td>
<td>1 - Incorporation Planned</td>
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<td>53</td>
<td>David Chong</td>
<td>Metro</td>
<td>Dwg. C-140</td>
<td>Facilities Engineering</td>
<td>Property acquisition required for TPSS B-8 site.</td>
<td>1 - Incorporation Planned</td>
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<td>54</td>
<td>David Chong</td>
<td>Metro</td>
<td>Dwg. C-143</td>
<td>Facilities Engineering</td>
<td>Property acquisition required for TPSS B-9 site.</td>
<td>1 - Incorporation Planned</td>
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</tbody>
</table>
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28. Taylor, Paul C., Deputy Chief Executive Officer, Los Angeles County Metropolitan Transportation Authority (Metro). December 19, 2012.

Response 28-A

Please see Response 28-5.

Response 28-B

Please see Response 28-35

Response 28-1

The Construction Authority anticipates that a NEPA document will be prepared for the project in the future, at a time that has yet to be determined.

Response 28-2

The Construction Authority will work with the Cities and Metro to develop pedestrian connections as appropriate and feasible as part of the project final design.

Response 28-3

The following statement clarifying the relationship between the Construction Authority and Metro has been added to Sections S.1 and 1.1 of the Final EIR:

“The Construction Authority is responsible for managing the design and construction of the project. The Los Angeles County Metropolitan Transportation Authority (Metro) will fund, oversee design and construction in coordination with the Construction Authority, and operate the Gold Line from Azusa to Montclair service.”

Response 28-4

The sentence appearing in Sections S.4.1.2 and 3.4 has been clarified accordingly.

Response 28-5

As suggested in the comment, a sentence stating the project will be built to comply with Metro design standards and criteria and approved deviations has been added to Sections S.3 and 1.3.3.

Response 28-6

As suggested in the comment, a statement clarifying that trains operating on the Azusa to Montclair alignment will be stored and maintained at the Division 21 rail yard near downtown Los Angeles as well as at the new maintenance facility currently under construction in Monrovia, has been added to Section 1.3.3.1.
Response 28-7
The reference to the Long Range Transportation Plan (LRTP) has been removed from Section 3.1.1.3.

Response 28-8
The statement in Section 3.4.2.3 has been updated accordingly.

Response 28-9
The reference to flange-bearing frogs has been removed from Section 3.11-63.

Response 28-10
The moveable-point and spring frogs are listed in Section 3.11.9.2 as mitigation measures for vibration, not for noise. Soundwalls are not an effective alternative mitigation measures for vibration.

Crossovers are identified in the plan and profile drawings that appear in Appendix A of the Draft EIR. The Draft EIR environmental analyses were based on these proposed crossover locations as illustrated in Appendix A.

Response 28-11
Metro’s preference for minimizing train speed reductions is acknowledged; however, train speed reduction is a necessary mitigation measure to avoid significant impacts at the locations identified in Table 3.11-31.

Response 28-12
Crossovers are identified in the plan and profile drawings that appear in Appendix A of the Draft EIR. The Draft EIR environmental analyses were based on these proposed crossover locations as illustrated in Appendix A.

Response 28-13
Mitigation Measure CON-1 in Section 3.1 of the Draft EIR is consistent with South Coast Air Quality Management District (AQMD) regulation, and states: “Water or a stabilizing agent shall be applied to exposed surfaces in sufficient quantity to prevent generation of dust plumes.” Therefore, in the event of drought or water shortage, the Mitigation Measure (as written) allows for the use of an alternative stabilizing agent.

Response 28-14
Mitigation Measure CON-19 has been added to Section 3.3.5.1 (Climate Change) and Section 3.7.6.1 (Energy), as follows:

CON-19—LED lighting shall be used for construction activities taking place at night, to the extent feasible.
Response 28-15

As discussed in the Draft EIR, no mitigation measures for geologic hazards are required for the project. Existing regulations are described in Section 3.8.1 of the Draft EIR because these regulations are part of the existing regulatory setting, i.e., existing regulatory conditions.

Response 28-16

In the Draft EIR, noise mitigation measures were recommended only for locations where the predicted noise levels exceeded the “Moderate” impact threshold. In addition, the mitigation measures recommended were designed such that the predicted noise levels were below the “Moderate” impact threshold. This is a conservative approach to mitigating noise to ensure that noise levels are acceptable to most of the community. This is the approach that has been used on recent Metro projects including the Gold Line Phase I, Expo Phase I, and Expo Phase II. The FTA Guidance Manual indicates that when the predicted noise levels exceed the FTA “Severe” impact threshold, “there is a presumption by FTA that mitigation will be incorporated in the project unless there are truly extenuating circumstances which prevent it.”

Noise mitigation measures other than sound walls that are proposed in the DEIR include sound insulation and quiet zones for existing freight and Metrolink operations. It is reasonable to implement these measures after the system is operational and measurements demonstrate that the LRT associated noise exceeds the applicable impact threshold. This approach for implementing these types of mitigation measures was used for Expo Phase I (currently under construction), and the Gold Line Phase I (opened in 2004) used this approach to identify noise mitigation requirements near at-grade crossings with audible warnings.

Transparent panels were used on the Expo Phase I project to provide noise mitigation at intersections and other locations where visibility was an issue. These panels were installed and are effective. The panels were removed from one location at the La Brea Station due to concerns about fire safety. According to the supplier of the transparent panels, the material has passed appropriate fire safety tests.

Response 28-17, 28-18, 28-19

References to Metro’s Green Construction Policy have been added in Sections 3.1, 3.3, and 3.7.

Response 28-20

The noise analysis in the Draft EIR considered a “worst-case” scenario with LRT trains traveling at 65 miles per hour. For this scenario, in addition to identifying locations for sound walls, certain locations were identified for additional noise mitigation because the heights for the sound barriers assume that, if a noise impact is predicted and if the source height of BNSF horn noise is 10 feet, building insulation would be considered for residential second-story windows. However, as the project design progresses further noise investigations will be part of the preliminary engineering phase.

Response 28-21

In accordance with existing requirements any environmental investigation, sampling, and/or remediation would be conducted under a Work plan that would be submitted to the appropriate regulatory agency for
approval. The findings of any investigations, including any sampling, would be clearly summarized. The project is currently in the conceptual engineering phase, and any additional investigations and remedial activities, if needed, would occur following final design and engineering, at the time the property acquisition process is being undertaken.

Response 28-22

The Mitigation Measure HW-3 has been replaced with a requirement to establish a risk-based cleanup levels in the Soil Mitigation Plan that has been included in the Mitigation Measure HW-1. The Plan will be reviewed and approved by the oversight agency. If excavated soil contains metals above the soluble thresholds limit concentration (STLC), in compliance with existing regulations the soil would be disposed of as a California Hazardous Waste.

Response 28-23

Future development around the stations or along the project corridor is within jurisdiction of local governments. The project does not involve any residential, commercial, industrial, or other development that would be subject to low impact development standards or strategies.

Response 28-24

Anticipated major permits were listed in Section 3.17 of the Draft EIR.

Response 28-25

Mitigation Measure VIS-5 has been updated to include the suggested references to Metro Rail Design Criteria as follows:

**VIS-5**—All walls, structures and fences shall be properly screened or incorporate design features to improve appearance and reduce visual intrusion pursuant to the standards established in the Metro Rail Design Criteria. The goal of the Criteria is to create site-adapted designs that reflect the specific urban context of each station and that enhance the neighborhood context in which the project is proposed. The Criteria include artwork, signage, advertising, landscaping, and guidelines for the selection of materials and finishes. Station design shall feature materials, landscaping, art, and other elements consistent with Metro Rail Design Criteria, and developed by the station design team that includes architects, landscape architects, and lighting experts. Surface treatments shall be provided at the face of safety walls and at roadway/pedestrian portals, and landscaping along safety walls outside of the LRT portal shall be provided where feasible to provide wall screening. Per Metro Rail Design Criteria, artwork will be provided at each station and will be designed by professional artists. According to the Criteria, careful consideration must be given to station compatibility with proposed future development in the neighborhood of each station, and where applicable, future extensions and/or connecting line transfers. Neighborhood culture and character shall be emphasized through artwork. The Designer should become familiar with the general aspects of the entire system in order to determine how his individual project relates to the whole. The Landscape Architect shall coordinate design and production of construction drawings with Designers and Metro Art to ensure that landscaping, facilities architecture, site engineering and station art are visually and functionally compatible. Coordination is particularly important with regard to the design of lighting, paved surfaces, walls and site furnishings. The Authority shall coordinate with Metro...
Chapter 7—Responses to Comments

Facilities Maintenance group in the review and comment stage of landscape design review submittals.

Response 28-26

The text has been amended, as suggested, to delete the reference to bicycle paths.

Response 28-27

Bicycle parking at project stations has been added as a project element in Section 1.3.3.1 of the Final EIR. The Construction Authority will work with Metro and the Cities to facilitate bicycle access and parking.

Response 28-28

Section 2.5.4 of the EIR references existing bike facilities within the corridor cities. The EIR does not reference or analyze future bike facilities in any of the cities.

Response 28-29

The following additions have been made to Mitigation Measure CTR-3 in Section 2.8.1 of the Final EIR:

- Posting signage indicating detours for bicycles and pedestrians where roadways and/or sidewalks are closed during construction
- Posting temporary signage warning motorists of pedestrians and bicycles where roadway and/or sidewalk closures create “pinch points” on travel lanes.

Response 28-30

References to Metro’s “See Something Say Something” and Community Relations Rail Safety Education programs have been included in Section 3.12.1.2 of the Final EIR.

Response 28-31

References to “LASD Transit Police Services Bureau” have been changed to “LASD Transit Services Bureau (TSB)” in Section 3.12 of the Final EIR.

Response 28-32

Information in Section 3.12.2.1 has been clarified as follows:

The LASD Transit Police Services Bureau (TSB) provides security services for Metro patrons, employees, and facilities. In addition, the TSB is responsible for reviewing the security and law enforcement aspects of the Metro Design Criteria and the design and construction of new projects. Both special officers and deputies are assigned to Metro to provide law enforcement services, including field response at minor incidents involving Metro vehicles, as well as regular patrols of Metro property. LASD The TSB also provides special enforcement deputies who work both in uniform and plain clothes, depending on the type of enforcement conducted. Sheriff’s are on duty during system hours of operation, with detective support 10 hours per day, Monday through Friday. LASD The TSB also oversees the Metro security force, which patrols Metro
headquarters and Metro bus and rail yards, as well as a Metro counterterrorism and threat assessment team.

**Response 28-33 and Response 28-34**

References to “Gold Line security personnel” have been changed to “Metro Rail Operations Center staff/LASD TSB Desk Operations personnel.”

**Response 28-35**

The proposed project evaluated in this EIR is defined as operating on 10-minute headways in the peak period and 20-minute headways in the off-peak period, consistent with the Project Definition Report (March 2005), and the 2011 Metro Transit Service Policy. The system elements and track will be designed in full compliance with Metro Design Criteria Section 10 for both normal and single-track emergency operations.

**Response 28-36**

The travel demand forecasts prepared for the purposes of determining ridership estimated that average daily parking demand at Claremont Station in year 2035 will be 1,049 spaces. Metro Gold Line passengers are estimated to use, on average, 732 spaces; Metrolink passengers are estimated to use, on average, 317 spaces.

The analysis of cost and cost contributions to the Claremont Station parking structure is not part of the Environmental Impact Report analysis. The Construction Authority will work with the City, Metro, and the SCRRRA (Metrolink) to develop a MOU or similar agreement for funding and maintaining the parking structure.

**Response 28-37**

Section 1.3.3.6 of the Draft EIR states “A pedestrian bridge would be built to connect the parking structure with the Metrolink platform. The City of Claremont has indicated its willingness to pay for an extension of the pedestrian bridge to link the parking structure with the Little League fields to the south of the rail right-of-way.”

As stated, the pedestrian bridge would be built to connect the parking structure with the Metrolink platform. Relocating the pedestrian bridge to the west end of the Metrolink platform, as suggested, would not provide any benefit to Metro Gold Line passengers.

As stated in the Draft EIR, the City has indicated a willingness to pay for an extension of its pedestrian bridge that would connect to the south of the rail right-of-way. This possible overpass extension is not part of the project and therefore, it is not analyzed in the EIR.

**Response 28-38**

The analysis of cost and cost contributions to the Claremont Station parking structure is beyond the scope of this Environmental Impact Report analysis. The Construction Authority will work with the City,
Metro, and the SCRRRA (Metrolink) to develop a MOU or similar agreement for funding and maintaining the parking structure.

Response 28-39

A double crossover cannot be placed east of the platform without additional right-of-way acquisitions. The proposed design follows the current Gold Line end of track design, east of Sierra Madre Villa Station, where there is also no crossover east of the platform.

Response 28-40

Crossovers are identified in the plan and profile drawings that appear in Appendix A of the Draft EIR. The Draft EIR environmental analyses were based on these current, proposed crossover locations as illustrated in Appendix A.

Response 28-41

The plan and profile drawings that appear in Appendix A of the Draft EIR indicate crossovers at four locations: Loraine Ave (Glendora); Walnut Ave (San Dimas); White Ave (La Verne); and west of the Montclair platform. The number and placement of these crossovers will support the 10-minute single-track emergency operations, as referenced in the comment, and as specified in Metro Design Criteria Section 10.

Response 28-42

The Milestone 1 analysis performed per Metro’s Light Rail Grade Crossing Criteria concluded that grade separation is not warranted at Foothill Boulevard and Grand Avenue.

Regarding signal alternations, Page 2-77 of the Draft EIR included information that at the Foothill Boulevard and Grand Avenue intersection “an exclusive signal phase for the LRT would be provided, whereby all other traffic movements would be stopped.”

Response 28-43

The TPSS locations presently indicated on the Drawings represent a practical and cost effective approach, and are sufficient for the operation plan proposed.

Response 28-44

There will be sufficient space for a 20-foot separation between the bumper post and the termination pole, as will be shown in more detailed preliminary engineering drawings.

Response 28-45

Metro’s Milestone 1 Grade Crossing Analysis considered the combined train operations of Metro Gold Line, Metrolink, and BNSF in determining whether grade separations were required. As referenced in Chapter 2 of the Draft EIR, the Milestone 1 analysis concluded that no grade separations are warranted at any of the project crossings.
Chapter 7—Responses to Comments

Response 28-46

The average train speed along the 12.6 mile alignment between Azusa-Citrus Station and Montclair Station (including 0.3 miles of track east of Azusa-Citrus Station that are part of the Pasadena to Azusa extension under construction, not part of the proposed project) is anticipated to be 42 mph, assuming a maximum operational speed of 55 mph. These distance and speed assumptions correspond with the anticipated travel time estimate between Azusa-Citrus Station and Montclair of approximately 18 minutes that is referenced in Section 1.3.3 (Project Description) of the Draft EIR.

Response 28-47

As suggested, the specific standards have been incorporated into Mitigation Measure VIS-4 as follows:

VIS-4—All lighting at the parking facilities and station locations shall utilize best available technology to reduce spillover to adjacent land uses and shall be directed away from adjacent residences. In addition, landscaping, fences, or other measures to shield adjacent residences from light and glare shall be provided where applicable. All lighting will conform to ANSI-IESNA standards.

Response 28-48

The NPDES permit requirements are existing requirements requiring mandatory compliance. As discussed in Section 3.14.4 of the Draft EIR, no mitigation measures are required of the project. Pursuant to CEQA, compliance with existing regulations and requirements is not a mitigation measure.

Response 28-49

A full property acquisition (3,000-3,500 square feet) for the TPSS B-2 site was identified as being necessary in Appendix C of the Draft EIR.

Response 28-50

A partial property acquisition (3,200-3,800 square feet) for the TPSS B-4 site was identified in Appendix C of the Draft EIR.

Response 28-51

A full property acquisition (1,800-2,200 square feet) for the TPSS B-6 site was identified in Appendix C of the Draft EIR.

Response 28-52

A full property acquisition (3.3 acres) for the TPSS B-7 and the La Verne parking structure site was identified in Appendix C of the Draft EIR.

Response 28-53

Property acquisition for the TPSS B-8 site is not required. The engineering drawings (Appendix A) show only the right of way line, and not certain adjacent parcels which are owned by Metro and therefore do not require acquisition. TPSS B-8 straddles the right of way and a Metro-owned parcel.
Response 28-54

Property acquisition for the TPSS B-9 site is not required. The engineering drawings (Appendix A) show only the right of way line, and not certain adjacent parcels which are owned by Metro and therefore do not require acquisition. As illustrated, TPSS B-9 is located on a Metro-owned parcel.
October 5, 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

RE: Gold Line Extension (Azusa to Montclair) DEIR - SCRRRA Comments

Dear Ms. Buch:

The Southern California Regional Rail Authority (SCRRRA) has reviewed the DEIR issued for public comment on August 21, 2012, for Metro Gold Line Foothill Extension from Azusa to Montclair. During earlier reviews of the EIR, SCRRRA recommended that grade separations be considered for several crossings. We have reviewed the response to this comment and don’t accept the response provided in the DEIR, particularly for Garey Avenue in Pomona. Our comments are described in more detail below:

MAJOR ISSUES/CONCERNS

1. Garey Avenue Crossing:

On June 21, 2004, SCRRRA commented that a grade separation for Garey Avenue be considered, among other crossings. We have reviewed the analysis in the DEIR for identifying whether a crossing would be a candidate for a grade separation, or not, and find it flawed for the following reasons:

- It is based on a LTR model that doesn’t take into consideration a shared corridor with commuter and freight service on adjacent tracks to the LRT.

- It doesn’t appear to use the total number of trains (LRT, Metrolink, and BNSF Freight) that will be using the crossing during the peak period.

- It doesn’t use a vehicle traffic count taken during the peak period. If it had used a peak period traffic count the crossing would have been rated for a possible grade separation.
SCRRA Grade Crossing Guidelines published in 2009 recommend a grade separation if there are more than 3 tracks. With the addition of 2 LTR tracks to the existing 2 Metrolink mainline tracks and BNSF freight track there will be 5 tracks at the Garey Avenue crossing.

We believe the "gate down time" that the public will experience at this crossing will be extensive at times, particularly during commute hours. All railroad gates would operate simultaneously when any train movement enters the crossing from any track. During peak periods with numerous LTR and Metrolink trains crossing, the cumulative effect of gate down times could reach a cumulative total of 30 minutes of gates down during a peak hour. With traffic back-ups during gate down periods an unsafe condition will be created where impatient motorists may attempt movements around crossing gates. Garey Avenue is designated as a major north-south arterial for the City of Pomona that connects to I-210 and I-10. This amount of traffic interruption for a major artery is not recommended. SCRRA recommends a grade separation at Garey Avenue.

2. Alignment and Right-of-Way:

- As noted in Article 1.3.3.1 Project Elements, separation of LRT and Metrolink tracks is noted as little as 16 ft. between track centerlines of each mode. This does not provide any room for an inter-track fence to separate the heavy rail from the LRT tracks. A minimum of 18 ft. track spacing is needed. In a previous response to SCRRA comment letter dated June 21, 2004, the Authority responded that an inter-track fence would be provided to separate the modes. This is not possible with 16 ft. track clearance.

- In shared corridors where track centers between modes are less than 25 feet apart it is considered under the FRA as "Shared Right-of-Way" and defined as "adjacent tracks". As such, FRA would require certain roadway worker regulations to apply when working on or about the LRT and/or the Metrolink tracks. This will impact Metrolink and LRT operations as one railroad will have to shut down operations on their respective track when the other railroad works on the "adjacent track".

3. Engineering Standards:

- Consideration should be made to look at both LRT and SCRRA standards for Highway-Rail Grade Crossing safety improvements. Current SCRRA crossing standards incorporate a much higher level of pedestrian safety enhancements than in the past. SCRRA may have the maintenance responsibility for maintaining the automatic warning devices and pedestrian treatments adjacent to the Metrolink tracks in the shared corridor. SCRRA requires that our Grade Crossing Engineering Standards be used in

4. Glendora Station (Section 1.3.3.2):

- To access the station east end from the proposed parking garage south of the station passengers have to cross the freight track. SCRRRA recommends that all access to the platform be from the existing crossing on the west side of the platform.

5. Claremont Station (Section 1.3.3.6)

- New LRT south platform should have some form of protection on the platform or adjacent to it to prevent LRT passengers on the platforms from getting in the way of oncoming Metrolink trains that will operate on the track just south of the platform.
- Fencing to prevent trespassing across the tracks must be provided. This includes the property line south of the Metrolink platform east of College Avenue.

6. Montclair Station (Section 1.3.3.7)

- Must provide fencing to prevent unsafe conditions for passengers changing from Metrolink trains to LRT trains or vice versa. Passengers and pedestrians should be channelized to proper crossings of the tracks without the opportunity to trespass.

GENERAL COMMENTS

1. Crossings: SCRRRA recommends crossing consolidations, closures, and grade separations to enhance safety for the system.

2. Fencing: Must install and maintain adequate fence to separate light rail tracks from heavy rail tracks. Also must maintain fencing around stations and all along the route to discourage and prevent trespassing across entire right-of-way.

3. Working adjacent to Metrolink tracks: For construction and maintenance activities on or adjacent to Metrolink tracks and right-of-way, contractors must follow SCRRRA Right-of-Way Encroachment Procedures, including obtaining a Right of Entry Agreement (Form 6) and
obtain flagging protection. These procedures are available on the SCRRRA website at http://www.metrolinktrains.com/pub_projects/?id=11.

4. **Relocation of Metrolink facilities:** Authority shall be responsible to pay and have relocated any and all facilities (Ticket vending machines, signage, signals, PIS, etc.) that must be relocated due to track shifts or station modifications.

5. **Requirements for PTC:** Authority shall be responsible for complying with federally mandated PTC requirements for any Metrolink relocations that impact the PTC System.

6. **Station Access /ADA Issues:** Any modifications to Metrolink station and platform access must adhere to all current ADA requirements and not impede our patrons from easy access to our platforms and parking.

7. **Construction of New Facilities:** Construction of new improvements and relocation of existing Metrolink facilities must be done and coordinated so as not to impact current or future Metrolink operations.

8. **Transit Oriented Developments (TOD):** SCRRRA encourages the use of TOD’s around the stations to enhance patronage for all modes of transportation.

Please note that these are initial comments to meet the public comment period. SCRRRA may follow up with more specific comments for consideration if further analysis deems it necessary.

Sincerely,

[Signature]

William Doran  
Director, Engineering & Construction

Cc: Dennis Marzec
   Gray Crary
   Patricia Watkins
   Ron Mathieu
29. Doran, William, Director, Engineering and Construction, Metrolink, October 5, 2012.

Response 29-1

As stated in Section 2.5.5 of the Draft EIR, the grade crossing analysis for the Garey Avenue rail crossing intersection was evaluated using the Los Angeles County Metropolitan Transportation Authority’s (Metro) Policy for Grade Crossing for Light Rail Transit (December 4, 2003). The grade crossing analysis for the Garey Avenue crossing intersection assumed 10-minute headways (6 trains per hour) for the proposed project LRT operations, consistent with the Gold Line Phase II - Foothill Extension Project Description Report, dated March 10, 2005 and the 2011 Metro Transit Service Policy. A portion of the project alignment between La Verne and Montclair would operate parallel to the existing San Bernardino-Los Angeles Metrolink commuter trains. This grade crossing analysis included in the Draft EIR has taken into consideration the future proposed headways for Metrolink trains in the shared corridor, operating at 15 minute headways during the peak (four trains per hour) and 60 minutes off-peak (one per hour). This translates into a maximum of five Metrolink trains per hour during the peak period. Research was conducted to ascertain the BNSF freight activity in the corridor, which was determined to be minimal during the typical weekday peak periods. Therefore, no freight activity was assumed during the peak hour in the grade crossing analysis. This segment, with the dual track alignment, accounts for a total of 11 trains (6 LRT trains and 5 Metrolink trains) in the peak hour at the Garey Avenue crossing intersection.

Regarding vehicle traffic counts in the peak period, the analysis reflects the highest AM and PM peak hour roadway segment traffic volumes (count data) collected on Garey Avenue between Arrow Highway and Bonita Avenue. The counts were conducted during a non-holiday week when schools were in session on a typical weekday in May 2010.

Regarding the comment on the SCRRRA Grade Crossing Guidelines, the Draft EIR grade crossing analysis for the Garey Avenue location was thus conducted using the Metro Grade Crossing Policy and is consistent with the technical analysis approach for other Metro light rail lines in the Los Angeles area. The Draft EIR analysis indicated that the highest peak hour volumes at Garey Avenue crossing would not meet the criteria for grade-separation per the application of the Metro Grade Crossing Policy. Overall, the Metro methodology is more detailed for LRT operations given that it accounts for the number of trains in the peak hour, crossing vehicular traffic volumes, and, gate down delay, etc. In comparison, the SCRRRA guidelines only account for total number of tracks to determine whether grade separation is recommended.

To fully evaluate the question of “gate down time” at the Garey Avenue crossing, an additional VISSIM analysis was performed subsequent to the Draft EIR. Please see Response 16-4 for detailed description of the methodology, and the model validation procedures, and results.

The analysis evaluated traffic and train operations and specifically looked at the following intersections:

- Garey Avenue and Bonita Avenue
- Garey Avenue and Santa Fe Street
- Garey Avenue and Arrow Highway
A field observation on November 27, 2012 indicated that the average gates-down time is 60 seconds, which was used in the model.

AVISSIM model was built for a one-hour period with gates down four times in the AM peak, and six times in the PM peak. The Metrolink schedule was modeled as follows:

<table>
<thead>
<tr>
<th>AM Peak</th>
<th>Train Type</th>
<th>Outbound (Time)</th>
<th>Train Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>Inbound (Time)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6:09</td>
<td>Express</td>
<td>6:52</td>
<td>Metrolink Regular</td>
</tr>
<tr>
<td>6:30</td>
<td>Metrolink Regular</td>
<td></td>
<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>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PM Peak</td>
<td>Train Type</td>
<td>Inbound (Time)</td>
<td>Train Type</td>
</tr>
<tr>
<td>Outbound (Time)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5:05</td>
<td>Metrolink Regular</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5:11</td>
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<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.

The VISSIM analysis concluded that one of the main issues for existing and future conditions is that gates go down when no train is present. Typically, the false “gate down” comes from a Metrolink 1 minute (60 seconds) to 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 have been identified to provide for adequate levels of service:

1. The existing inaccurate Metrolink track circuitry needs to be recalibrated to eliminate false gate closures.

2. Preemption to adjacent signals. Preemption is justified when long queues would gridlock the intersection. In the preemption state, all vehicular phases not directing traffic toward the railroad
tracks would be allowed to be served. It is noted that only Bonita Avenue would actually experience queues that would reach all the way to the intersection. Therefore, the intersection of Garey Avenue and Bonita Avenue should have an interconnection with the railroad signaling and allow for preemption when trains are present.

3. Additionally, to ensure adequate levels of service, it is necessary to make Bonita Avenue protected/permited in the east/west direction. Currently, the provision is for permitted turns only onto Garey Avenue.

Response 29-2

Although the distance between the two Metro Gold Line LRT tracks is typically 16 feet, the minimum track clearance between the LRT and Metrolink or BNSF tracks is never less than 18 feet. The statement in Section 1.3.3.1 Project Elements has been clarified accordingly.

Response 29-3

Major trackwork can be performed at night when neither Gold Line LRT nor Metrolink trains would operate. Concerning safety issues when trains are operating, a fence will separate the LRT from Metrolink trains and provide the minimum CPUC clearances for each mode. Such “adjacent track” operations, are already in place in California, including the Folsom corridor LRT in Sacramento and the Vasona corridor LRT in San Jose where in some locations the LRT track is separated from an active freight railroad by 18 feet, as proposed in the project.

Response 29-4

The Construction Authority will work with SCRRRA to ensure that any existing SCRRRA safety improvements at shared crossings that also meet LRT standards are retained, or re-installed if relocation becomes necessary, as part of the project’s construction. If any future safety improvements are identified in preliminary or advanced engineering, the Construction Authority will work with SCRRRA to ensure both SCRRRA and Metro standards are met at shared crossings. The maintenance of safety improvements would be the responsibility of the operating agency.

Response 29-5

Metrolink does not operate in the area of Glendora Station, so SCRRRA standards and policies would not apply at this location. Nevertheless, in response to Comment 39-5 from the California Public Utilities Commission, the Glendora Station concept has been refined to include a pedestrian bridge over the LRT and freight tracks between the platform and the parking structure on the south side of the right of way.

Response 29-6

Protection on the south side of the Claremont south side platform is possible with the proposed track clearances and platform dimensions. The Construction Authority will work with SCRRRA and the City of Claremont as the station platform is refined in final design, at which point the specific type of protection would be selected.
Response 29-7

As stated in Section 3.12.3.4 of the Draft EIR, fencing will be provided along the alignment where LRTs travel at speeds in excess of 35 mph in adherence with CPUC guidelines. As more detailed design plans are completed, it is anticipated that fencing also will be specified at other locations. The Construction Authority will work with Metrolink and the City of Claremont to identify where these safety measures are needed and feasible.

Response 29-8

As stated in Section 3.12.3.4 of the Draft EIR, fencing will be provided along the alignment where LRTs travel at speeds in excess of 35 mph in adherence with CPUC guidelines. As more detailed design plans are completed, it is anticipated that fencing also will be specified at other locations. The Construction Authority will work with Metrolink and the City of Montclair to identify where these safety measures are needed and feasible.

Response 29-9

As stated in Section 3.12.1.1 of the Draft EIR, the Construction Authority has submitted a comprehensive set of plans for the CPUC’s review. The CPUC’s highway-rail crossing safety branch oversees the safety for all public and private highway-rail crossings in California.

Response 29-10

SCRRA’s request for fencing to separate light-rail tracks from the Metrolink tracks is acknowledged. The Construction Authority will work with SCRRA and the Cities to provide fencing along the right-of-way where LRT speeds exceed 35 mph and where special conditions warrant.

Response 29-11

SCRRA’s comment concerning the required adherence to SCRRA Right-of-Way Encroachment Procedures is acknowledged.

Response 29-12

The Construction Authority recognizes that any necessary relocation of Metrolink facilities is part of the project cost.

Response 29-13

The Construction Authority recognizes that compliance issues associated with PTC relocation due to the project are the responsibility of the Construction Authority.

Response 29-14

The Construction Authority will comply with all current ADA requirements, including any modifications to Metrolink stations and platforms. Modifications to Metrolink stations and platforms are not expected to impede Metrolink passengers, and the station refinements accomplished in final design will allow as much as possible for easy transfers between Metrolink and Gold Line.
Chapter 7—Responses to Comments

Response 29-15

The Construction Authority will work cooperatively with Metrolink to minimize impacts to Metrolink operations throughout construction.

Response 29-16

SCRRA’s encouragement of TOD in the station areas is acknowledged.
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October 5, 2012

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

Dear Ms. Buch:

Notice of Availability of a Draft Environmental Impact Report
for the Metro Gold Line Foothill Extension From Azusa to Montclair Project

The Metropolitan Water District of Southern California (Metropolitan) reviewed the Draft Environmental Impact Report (Draft EIR) for the Metro Gold Line Foothill Extension, Azusa to Montclair (Project). The Construction Authority is the lead agency under the California Environmental Quality Act for the Project. The Project proposes to extend the existing Metro Gold Line utilizing light rail transit, from the city of Azusa, thru cities of Glendora, San Dimas, La Verne, Pomona, Claremont, and Montclair, within Los Angeles and San Bernardino Counties. This letter contains Metropolitan’s response to the Draft EIR as a potentially-affected public agency.

The Construction Authority has contacted Metropolitan regarding this proposed Project, and we appreciate these efforts and look forward to continued coordination. Specific comments on potential environmental issues for consideration and incorporation into the Draft EIR are listed below. Metropolitan also encloses and incorporates by reference its prior comments, including those dated April 15, 2010 and January 19, 2011.

1) Chapter 3.17- Anticipated Permits and Approvals. The Draft EIR needs to identify Metropolitan as an agency whose approval is required.

2) Chapter 1.0- Project Description and Other Areas. Our review of the Draft EIR indicates that Metropolitan owns and operates the Orange County Feeder, Middle Feeder, Upper Feeder, Yorba Linda Feeder, and ancillary facilities within the proposed project location. The Orange County Feeder, which runs in a northerly to southerly direction along Wheeler Avenue, is within the street right-of-way; the Metro Gold Line Foothill Extension route would intersect the Orange County Feeder at Wheeler Avenue. The Middle Feeder runs in a south-westerly to easterly direction along Bonita Avenue; the Metro Gold Line Foothill Extension route would intersect the Middle Feeder at Bonita Avenue. The Upper Feeder runs in a north-westerly to south-easterly direction between Fulton Road and North Garey Avenue; the Metro Gold Line Foothill...
Extension route would intersect the Upper Feeder at the Metrolink Pomona (North) Station. The Yorba Linda Feeder runs in a northerly to southerly direction along A Street; the Metro Gold Line Foothill Extension route would intersect the Yorba Linda Feeder at A Street.

The enclosed map shows these facilities in relation to the proposed project. It will be necessary for the applicant to consider these facilities in its project planning. We are concerned with both direct and indirect effects created during construction and post-construction uses that may result from implementation of the proposed Project. Development associated with the proposed Project must not restrict any of Metropolitan’s day-to-day operations and/or access to its facilities. Metropolitan must be allowed to maintain its rights-of-way and requires unobstructed access to our facilities and properties at all times in order to repair and maintain our system.

In order to avoid potential conflicts with Metropolitan’s rights-of-way, we require that any design plans for any activity in the area of Metropolitan’s pipelines or facilities be submitted for our review and written approval. Approval of the Project where it could impact Metropolitan’s property should be contingent on Metropolitan’s approval of design plans for the Project. Detailed prints of drawings of Metropolitan’s pipelines and rights-of-way may be obtained by calling Metropolitan’s Substructures Team at (213) 217-7663. To assist in preparing plans that are compatible with Metropolitan’s facilities, easements, and properties, we have enclosed a copy of the “Guidelines for Developments in the Area of Facilities, Fee Properties, and/or Easements of The Metropolitan Water District of Southern California.” Please note that all submitted designs or plans must clearly identify Metropolitan’s facilities and rights-of-way.

We appreciate the opportunity to provide input to your planning process and we look forward to receiving the Final EIR and future environmental documentation on this Project. If we can be of further assistance, please contact Ms. Brenda S. Marines at (213) 217-7902.

Very truly yours,

Deirdre West
Manager, Environmental Planning Team

BSM/bsm
(EPT Project No 2012090706)

Enclosures: Letter dated January 19, 2011
            Letter dated April 15, 2010
            Map
            Guidelines
January 19, 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

Dear Ms. Buch:

Invitation to Become Participating Agency in the
Metro Gold Line Foothill Extension Azusa to Montclair EIS/EIR Project

The Metropolitan Water District of Southern California (Metropolitan) received an invitation to become a participating agency on the Metro Gold Line Foothill Extension Azusa to Montclair Environmental Impact Statement/Environmental Impact Report (EIS/EIR) (Project). The Federal Transit Administration and the Metro Gold Line Foothill Extension Construction Authority are the lead agencies under the National Environmental Policy Act (NEPA). The project proposes to extend the existing Metro Gold Line utilizing light rail transit, from the city of Azusa to the city of Montclair. The project will affect the cities of Azusa, Glendora, San Dimas, La Verne, Pomona, Claremont, and Montclair, within Los Angeles and western San Bernardino County. The following is Metropolitan’s response to the Public Notice as a potentially-affected public agency.

While Metropolitan appreciates the invitation, we will respectfully decline the opportunity to become a participating agency in the Agencies’ environmental review process. We will continue to review the Agencies’ environmental documents during the formal public review process and provide comments as appropriate. From our preliminary review of the materials provided, we have identified several issues that we would like to see addressed in the draft EIS/EIR.

Metropolitan reviewed the project description of the proposed project, study area map, and the Federal Register Notice of Intent and have the following comments. The following Metropolitan facilities are within the proposed project areas:

- The Orange County Feeder is a 42-inch diameter precast concrete pipeline that runs in a northerly to southerly direction along Wheeler Avenue. The Metro Gold Line Foothill Extension route would intersect the Orange County Feeder at Wheeler Avenue.
• The **Middle Feeder** is a 72-inch diameter steel pipeline that runs in a south-westerly to easterly direction along Bonita Avenue. The Metro Gold Line Foothill Extension route would intersect the Middle Feeder at Bonita Avenue.

• The **Upper Feeder** is a 140-inch diameter precast concrete pipeline that runs in a north-westerly to south-easterly direction between Fulton Road and North Garey Avenue. The Metro Gold Line Foothill Extension route would intersect the Upper Feeder near North Garey Avenue.

• The **Yorba Linda Feeder** is a 102-inch diameter steel pipeline that runs in a northerly to southerly direction along A Street. The Metro Gold Line Foothill Extension route would intersect the Yorba Linda Feeder at A Street.

The enclosed map shows these facilities in relation to the proposed project. It will be necessary for the Agencies to consider these facilities in its project planning. We are concerned with potential impacts to these facilities associated with future excavation, construction, utilities or any redevelopment that may occur as a result of proposed activity under the proposed Project. Development and redevelopment associated with the proposed Project must not restrict any of Metropolitan’s day-to-day operations and/or access to its facilities. Metropolitan must be allowed to maintain its rights-of-way and requires unobstructed access to our facilities and properties at all times in order to repair and maintain our system.

In order to avoid potential conflicts with Metropolitan’s rights-of-way, we require that any design plans for any activity in the area of Metropolitan’s pipelines or facilities be submitted for our review and written approval. Approval of the Project where it could impact Metropolitan’s property should be contingent on Metropolitan’s approval of design plans for the Project. Detailed prints of drawings of Metropolitan’s pipelines and rights-of-way may be obtained by calling Metropolitan’s Substructures Information Line at (213) 217-6564. To assist in preparing plans that are compatible with Metropolitan’s facilities, easements, and properties, we have enclosed a copy of the “Guidelines for Developments in the Area of Facilities, Fee Properties, and/or Easements of The Metropolitan Water District of Southern California.” Please note that all submitted designs or plans must clearly identify Metropolitan’s facilities and rights-of-way.

Additionally, Metropolitan encourages projects within its service area to include water conservation measures. While Metropolitan continues to build new supplies and develop means for more efficient use of current resources, projected population and economic growth will increase demands on the current system. Water conservation, reclaimed water use, and groundwater recharge programs are integral components to regional water supply planning. Metropolitan supports mitigation measures such as using water efficient fixtures, drought-tolerant landscaping, and reclaimed water to offset any increase in water use associated with the proposed project.
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We appreciate the opportunity to provide input to your planning process and we look forward to receiving the Draft EIS/EIR and future environmental documentation on this Project. If we can be of further assistance, please contact Ms. Brenda S. Marines at (213) 217-7902.

Very truly yours,

John Shamma  
Manager, Environmental Planning Team

BSM/bsm  
(EPT Task No. 2011011208)

Enclosures: Map  
Guidelines
April 15, 2010

Mr. Reky C. Hiramoto  
Metro Gold Line  
Foothill Extension Construction Authority  
Suite 202  
406 East Huntington Drive  
Monrovia, CA 91016

Dear Mr. Hiramoto:

Metro Gold Line Foothill Extension — Phase II Segment A & B

Thank you for your email dated March 11, 2009, requesting information regarding Metropolitan’s facilities located in the vicinity of your proposed Metro Gold Line Foothill Extension project, in various cities in the county of Los Angeles.

As shown on the enclosed maps, our 42-inch-inside-diameter precast concrete cylinder Orange County Feeder pipeline is located in and adjacent to Wheeler Avenue in the city of La Verne; our 73-inch-inside-diameter welded steel Middle
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Feeder pipeline is located in Bonita Avenue/Arrow Highway in the city of San Dimas; our 140-inch-inside-diameter precast concrete cylinder Upper Feeder pipeline is located diagonally across the railroad tracks from north of Supply Street to Pine Street and parallel to the railroad tracks on the south side of the railroad tracks from Pine Street to Maple Avenue in the city of Pomona; and our 121\(\frac{1}{2}\) -inch-inside-diameter welded steel Yorba Linda Feeder pipeline is located in “A” Street crossing Arrow Highway in the city of La Verne, in the vicinity of your proposed light rail project areas.

We are transmitting a copy of our “Guidelines for Development in the Area of Facilities, Fee Properties, and/or Easements of The Metropolitan Water District of Southern California and prints of our Drawings B-8557, B-21380 through B-21383, B-25483, and B-52548 and Right-of-Way Maps 1404-23, 1404-24, 1421-2, and 1425-3A, for your information and use.

For any further correspondence with Metropolitan relating to this project, please make reference to the Substructures Job Number shown in the upper right-hand corner of this letter. Should you require any additional information, please contact Francisco Flores at (213) 217-6679.

Very truly yours,

[Signature]

Kieran M. Callanan, P.E.  
Manager, Substructures Team

FF/ly  
DOC#: 2011-10-012

Enclosure
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bcc: F. Flores
     Substructures Book
     Substructures File
Hi Kieran:

Thank you for the quick response. I have attached the alignment maps for the full Phase II Segment (A & B), for your information and reference.

Segment A (page 1 to 7) covers the connection to existing station at Pasadena to/thru Azusa. Segment B (page 7 to 14) takes it from Azusa border with Glendora to the Montclair. Segment B is a few years behind in timing from Segment A, therefore I am okay for now, but can file anything you provide me.

The portion west of our alignment/project was part of Phase I, which has been built/complete.

Appreciate you help. Thank you.

Reky C Hiramoto

Hi Mr. Hiramoto
I was forwarded your email and attached alignment from Curtis and wanted to let you know that Metropolitan does not have any facilities within the limits of this alignment. We do however have facilities just west and east of this area that would likely cross the MTA’s foothill extension under a different segment. If you need information on these facilities please forward me a map of the area of interest.

Regards
Kieran Callanan, P.E.
Manager, Substructures Team
Metropolitan Water District
of Southern California
(213) 217-7474
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30. West, Deidre, Manager, Environmental Planning Team, Metropolitan Water District of Southern California, October 5, 2012.

Response 30-1

The Metropolitan Water District of Southern California has been added to the list of agencies whose approval is required, in Section 3.17 of the Final EIR.

Response 30-2

The map showing the Metropolitan Water District of Southern California’s facilities is acknowledged. As the proposed project is a light rail transit project operating at-grade, it is not anticipated that the project will affect the District’s facilities or access to its facilities. Nevertheless, the final design plans will be submitted to the District, to ensure compatibility with the Metropolitan facilities and operations.

Metropolitan’s “Guidelines for Developments in the Area of Facilities, Fee Properties, and/or Easements of The Metropolitan Water District of Southern California” were not received as an enclosure to the District’s comment letter; the Construction Authority requests that a copy be sent for reference.
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