October 5, 2012

Ms. Lisa Levy Buch 
Director of Public Affairs 
Gold Line Foothill Extension Construction Authority 
406 E. Huntington Drive, Ste. 202 
Monrovia, CA 91016 
llevybuch@foothillextension.org

RE: Comments on the Draft Environmental Impact Report for the Gold Line Foothill Extension from Azusa to Montclair Project [SCAG No. 120120174]

Dear Ms. Buch:

Thank you for submitting the Draft Environmental Impact Report for the Metro Gold Line Foothill Extension from Azusa to Montclair Project to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12372. Additionally, SCAG reviews the Environmental Impact Reports of projects of regional significance for consistency with regional plans pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

SCAG is also the designated Regional Transportation Planning Agency under state law, and as such is responsible for preparation of the Regional Transportation Plan including its Sustainable Communities Strategy component pursuant to SB 375. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of the regional goals and policies in the RTP/SCS.

SCAG staff has determined that the proposed project is regionally significant per CEQA Guidelines, Sections 15125 and 15206 and evaluated this project based on the goals of SCAG's 2012-2035 Regional Transportation Plan/Sustainable Community Strategy.

When available, please send a copy of the Final Environmental Impact Report to the attention of Pamela Lee at SCAG, 818 West 7th Street, 12th floor, Los Angeles, California, 90017. If you have any questions regarding the attached comments, please contact Pamela Lee at (213) 236-1895 or leep@scag.ca.gov. Thank you.

Sincerely,

Jonathan Nadler, 
Manager, Compliance and Performance Assessment

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1 SB 375 amends CEQA to add Chapter 4.2 Implementation of the Sustainable Communities Strategy, which allows for certain CEQA streamlining for projects consistent with the RTP/SCS. Lead agencies (including local jurisdictions) maintain the discretion and will be solely responsible for determining “consistency” of any future project with the SCS. Any “consistency” finding by SCAG pursuant to the IGR process should not be construed as a finding of consistency under SB 375 for purposes of CEQA streamlining.
SUMMARY

Based on SCAG staff review, the proposed project supports the SCAG 2012 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), where applicable.

2012-2035 RTP/SCS GOALS

The 2012-20135 RTP/SCS links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations (see http://rtpscs.scag.ca.gov). The goals included in the 2012 RTP/SCS, listed below, may be pertinent to the proposed project.

<table>
<thead>
<tr>
<th>2012-2035 RTP/SCS GOALS</th>
</tr>
</thead>
<tbody>
<tr>
<td>RTP/SCS G1: Align the plan investments and policies with improving regional economic development and competitiveness</td>
</tr>
<tr>
<td>RTP/SCS G2: Maximize mobility and accessibility for all people and goods in the region</td>
</tr>
<tr>
<td>RTP/SCS G3: Ensure travel safety and reliability for all people and goods in the region</td>
</tr>
<tr>
<td>RTP/SCS G4: Preserve and ensure a sustainable regional transportation system</td>
</tr>
<tr>
<td>RTP/SCS G5: Maximize the productivity of our transportation system</td>
</tr>
<tr>
<td>RTP/SCS G6: Protect the environment and health for our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking)</td>
</tr>
<tr>
<td>RTP/SCS G7: Actively encourage and create incentives for energy efficiency, where possible</td>
</tr>
<tr>
<td>RTP/SCS G8: Encourage land use and growth patterns that facilitate transit and non-motorized transportation</td>
</tr>
<tr>
<td>RTP/SCS G9: Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies</td>
</tr>
</tbody>
</table>

SCAG Staff Comments

As proposed, the Metro Gold Line Foothill Extension from Azusa to Montclair encourages regional connectivity, mobility and productivity by providing light rail transit service within the Glendora to Montclair corridor area (page 1-1). Each of the proposed stations included in the Gold Line Foothill Extension improve connectivity and accessibility to a variety of public transportation modes (page 2-13).

The proposed project would support the forecasted growth in employment and improve accessibility to jobs in the project area, thereby improving the overall regional economic development and competitiveness (pages 3.4-2, 3.4-6 - 3.4-7).
October 5, 2012
Ms. Buch

The proposed project provides an attractive public transit option for San Gabriel Valley patrons, which is expected to help alleviate traffic congestion, improve overall network speed within the study area, and maximize the productivity of the regional transportation system. Travel safety will be assessed and ensured for pedestrians, bicyclists and at-grade automobile crossings at each of the light rail stations. Assessment for safety treatments or grade separations will be made by employing Metro’s Policy for Grade Crossing for Light Rail Transit (pages 2-32 and 3.1-16).

By providing additional public transit, the proposed project is expected to reduce emissions within the study area as well as on a regional basis, therefore improving air quality and protecting the environment (page 3.1-17). The proposed project will use new, energy-efficient construction equipment and minimize idle times, thus reducing emissions associated during the construction phase (page 3.7-5).

The proposed project provides a transit alternative to the automobile, thereby supporting a sustainable and productive regional transportation system (page 3.10-38). Additionally, the creation of new public transit will help facilitate the use of non-motorized transportation and increase opportunities for active transportation, which in turn can facilitate improvements in the health of residents within the region (page 3.10-38).

It is noted that the project as proposed is included in the adopted 2012-2035 RTP/SCS. Since changes to the project scope or schedule may necessitate an RTP/SCS amendment, SCAG encourages the project proponent to notify SCAG as early as possible in such a case to minimize potential project delay.

2012-2035 RTP/SCS REGIONAL GROWTH FORECASTS

The Draft EIR for the Metro Gold Line Foothill Extension from Azusa to Montclair Project should reflect the most recently adopted SCAG forecasts, which are the 2012-2035 RTP/SCS population, household and employment forecasts (adopted by the SCAG regional Council in April 2012). The forecasts for the region and jurisdiction are presented below.

<table>
<thead>
<tr>
<th>Adopted SCAG Region Wide Forecasts</th>
<th>Adopted Los Angeles County Forecasts</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Year 2020</td>
</tr>
<tr>
<td>Population</td>
<td>19,663,000</td>
</tr>
<tr>
<td>Households</td>
<td>6,458,000</td>
</tr>
<tr>
<td>Employment</td>
<td>8,414,000</td>
</tr>
</tbody>
</table>

SCAG Staff Comments

Pages 3.4-1 – 3.4-3 indicate that the Draft EIR population, household and employment analyses were based on the adopted SCAG 2012-2035 RTP/SCS Regional Growth Forecasts.

MITIGATION

SCAG Staff Comments

SCAG staff recommends that you review the SCAG 2012-2035 RTP/SCS Final Program EIR List of Mitigation Measures Appendix for additional guidance, as appropriate. The SCAG List of Mitigation Measures may be found here: http://scag.ca.gov/igr/pdf/SCAG_IGRMMRP_2012.pdf
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Response 31-1

Your comment that the project is consistent with RTP/SCS Goal 2 of maximizing regional mobility is acknowledged.

Response 31-2

Your comment that the project is consistent with RTP/SCS Goal 1 of improving regional economic development is acknowledged.

Response 31-3

Your comment that the project is consistent with RTP/SCS Goal 5 of maximizing the transportation system’s productivity, and with Goal 3 of ensuring travel safety, is acknowledged.

Response 31-4

Your comment that the project is consistent with RTP/SCS Goal 6 of protecting the environment by improving air quality is acknowledged.

Response 31-5

Your comment that the project is consistent with RTP/SCS Goal 4 of a sustainable regional transportation system, with Goal 6 of encouraging active transportation, and with Goal 8 of facilitating non-motorized transportation is acknowledged.

Response 31-6

Your comment that the project is included in the adopted 2012-2035 RTP/SCS is acknowledged. The Construction Authority will notify SCAG if the project scope or schedule changes in a way that may necessitate an RTP/SCS amendment.

Response 31-7

Your comment that SCAG 2012-2035 RTP/SCS Regional Growth Forecasts were used in the Draft EIR analysis is acknowledged.

Response 31-8

Your recommendation to review the SCAG 2012-2035 RTP/SCS Final Program EIR Mitigation Measures Appendix is acknowledged; the Mitigation Measures Appendix has been reviewed for guidance, as appropriate.
The University of La Verne main campus is located on 38 acres just north of the proposed Metro Gold Line Foothill Extension between B and F Streets. In addition, we have a 4 acre facility just south of Arrow Highway between A Street and Park Avenue and a 55 acre facility just south of Arrow Highway between Carrion Road and Wheeler Avenue. We have reviewed the Draft EIR for the Metro Gold Line Foothill Extension - Azusa to Montclair and have the following comments/feedback:

1. The Draft EIR indicates the proposed parking structure at the La Verne station will have a right-hand turn only exit with buses and vehicles being directed to loop north on E Street, east on 1st Street, and south on White Street to Arrow Highway. This will result in heavy traffic flow on the streets on the east side of the University of La Verne campus, right next to some of our residence halls. We are concerned about this additional traffic flow and the impact it will have on our pedestrian and vehicular traffic.

2. The railroad crossings at D and E Streets are primary arterial routes into the University of La Verne. We are concerned about the additional delays in pedestrian and vehicular traffic using these intersections given the increased railroad activity. The University operates shuttles from its A Street facility (south of Arrow Highway) to its main campus Parking Lot D off D Street north of Arrow Highway. We are concerned the additional five commuter trains per hour will impact the primary arterial route of these shuttles. The Draft EIR states that the D Street/Arrow Highway intersection will experience “residual impact” even after mitigation. We are concerned that this will negatively impact University traffic traveling between its main campus and it’s a Street facility.

3. The University is in the process of building an Athletics complex on land it owns on Wheeler Avenue south of Arrow Highway. Once this facility opens in 2013 the Wheeler Avenue/Arrow Highway crossing will become an important arterial route for University traffic moving between the main campus and the West Campus facility. The Draft EIR states that the Wheeler Avenue/Arrow Highway intersection will experience “residual impact” even after mitigation. We are concerned that this will negatively impact University traffic traveling between its main campus and its West Campus facility.

4. The Draft EIR states that “during construction, it may be necessary for traffic lanes to be
temporarily closed” and that “generally, these lane closures would take place at night to minimize traffic disruptions”. The University of La Verne holds more classes in the 5-10pm hours than any other time of day. Road closures at night, especially at the D Street/Arrow Highway and E Street/Arrow Highway intersections, would seriously affect our access to and from campus. The University requests that work on these intersections be conducted between the hours of 10 pm-6am or on weekends to minimize impact to the University. The report also says that construction could “require the temporary closure of lanes on roadways with at-grade crossings”. For the aforementioned reasons, the University requests that at no time the D Street/Arrow Highway and E Street/Arrow Highway intersections be closed to traffic simultaneously.

5. The University is concerned that the additional overall train traffic will pose a safety risk to its students, faculty, staff, and visitors during their commute to and from work and to and from its other facilities south of Arrow Highway. We are also concerned about the negative noise impact the additional train traffic (and whistles) will have on our residential students who live very close to the train tracks. The University would expect the project to take into consideration the need to mitigate the additional noise levels and frequencies caused by increased train traffic.

We look forward to further discussion about mitigation options to help offset these concerns. Please feel free to contact me to discuss further.

Clive K. Houston-Brown, Ed.D.
Associate Vice President for Facility & Technology Services
& Chief Information Officer
University of La Verne
(909) 593-3511 ext. 4122
32. Houston-Brown, Clive K., Associate Vice President for Facility & Technology Services & Chief Information Officer, University of La Verne, October 5, 2012.

Response 32-1

The Draft EIR traffic study evaluated the impacts of project-related traffic on intersections and roadways adjacent to the La Verne train station. Traffic circulation and vehicular access to and from the parking structure were also taken into consideration. Based on the results of the traffic analysis, several intersections in the City of La Verne were identified as being impacted by the proposed project. At these locations, mitigation measures were identified to alleviate the anticipated project impacts on vehicular traffic.

Response 32-2

The traffic analysis in the Draft EIR considered the increased railroad activity due to the proposed project along D and E Streets. The D Street/Arrow Highway intersection is impacted by the project because the change in delay and its associated level of service exceeds the significance levels set forth by the Los Angeles County Traffic Impact Analysis Study Guidelines. However, the resulting level of service (LOS) with the proposed project in the year 2035 is LOS C in both the AM and PM peak hours. LOS C and D are typically acceptable levels of service in urban areas where many streets operate at LOS E or F. It can be concluded that the intersection will continue to operate at an acceptable level of service and University traffic will not be adversely impacted.

Response 32-3

The Wheeler Avenue/Arrow Highway intersection is impacted by the project because the change in delay and its associated level of service exceeds the significance levels set forth by the Los Angeles County Traffic Impact Analysis Study Guidelines. However, since the resulting level of service with the proposed project in the year 2035, which is LOS D in both the AM and PM peak hours, it can be concluded that the intersection will continue to operate at an acceptable level of service. In summary, University traffic is not anticipated to be impacted.

Response 32-4

During the construction phase of the project, the Metro Gold Line Foothill Extension Construction Authority and the contractor will work with the University of La Verne to address construction related issues. In addition, a Construction Management Plan (CMP) will be implemented that identifies strategies that would help minimize and mitigate construction related impacts and ensure that traffic moves safely and efficiently. Continuous dialogue will be maintained between the University and the contractor so that issues such as the specific times for night closures and simultaneous construction on adjacent at-grade crossings can be addressed.
Response 32-5

The noise analysis for the Draft EIR assessed potential for noise impact at all residential land uses (which includes University dormitories or any place where people sleep) and institutional land uses (which includes University classrooms) following the Federal Transit Administration guidelines. The results of the noise analysis for residential land uses in the city of La Verne are shown in Table 3.11.14 on page 3.11-35 of the Draft EIR. The Oaks Residence Hall is labeled as cluster WB7 in the analysis. The results of the noise analysis for institutional land uses is shown in Table 3.11-21 on page 3.11-50 of the Draft EIR. The Arts and Communication building is labeled as cluster F in the analysis. Mitigation measures are recommended where predicted levels exceed the FTA impact thresholds. Figure 3.11-22 on page 3.11-38 of the Draft EIR shows a sound wall is recommended between D Street and E Street to mitigate potential noise impacts at the Oaks Residence Hall and the Arts and Communications building.
DEIR Comments, Foothill Gold Line Extension Glendora - Montclair - Ontario Airport

To Whom It May Concern:

Thank you for the opportunity to comment on the DEIR. While the Foothill Gold Line is badly needed by Los Angeles Metropolitan Transportation Authority because it will be the first MetroRail Line to reach any edge of the County (eastern, 3 edges to go!) course-correcting is still needed; if these parts of the project are not changed- are built as-currently-designed-, they will prove to be mistakes:

1) DUMP ALL STATION PARKING STRUCTURES; INVEST THE SAVINGS IN "LAST-MILE" TRANSIT, BICYCLE, & PEDESTRIAN FACILITIES TO MAKE STATIONS COMMUNITY TRANSIT HUBS: Parking Garages are hideously expensive, never pay for themselves, sucking multi-millions out of transit capital budgets that could translate into more transit projects. Parking garages are transit suicide- "Once they pick up the keys, (drivers) are going to KEEP GOING..." said one attendee at MTA Orange Line meetings.

GOING past the transit parking garage... GOING to the gas station for more fossil fuel to send up the tailpipe into the sky & our lungs... then GONE on to the region's roadways clogging them up! Parking Garages attract cars & their hazards to stations, not the pedestrians & bicycles and their benefits we want. Failing to get people on transit for the "1st & Last Mile" of their trips is counterproductive to ridership- therefore efficiency, of transit vehicles. Nothing enables the single-occupant auto to kill transit marketshare more than adding concentrated parking garages to plentiful surface parking! Unless buried, broken up very small chunks, cleverly disguised, & thickly planted, Parking Garages & Lots are always eyesores & nuisances! Here are your capacity numbers, & our recommendations in italics:

<table>
<thead>
<tr>
<th>Station location</th>
<th>Station-related Surface Parking Lots</th>
<th>Station-related Parking Structures</th>
</tr>
</thead>
<tbody>
<tr>
<td>Glendora</td>
<td>-N- On-street only. Add local buses.</td>
<td>400 spaces Eliminate, save $millions</td>
</tr>
<tr>
<td>San Dimas</td>
<td>-N- *none needed; see 3) below</td>
<td>450 spaces, 30 feet tall Eliminate, save $millions</td>
</tr>
<tr>
<td>La Verne</td>
<td>-N- On-street + northern Fairplex</td>
<td>600 spaces, 55 feet tall Eliminate, save $millions</td>
</tr>
<tr>
<td>Pomona</td>
<td>-250 On-street only. Add local buses.</td>
<td>750 spaces, 45 feet tall Eliminate, save $millions</td>
</tr>
<tr>
<td>Claremont</td>
<td>-400 On-street only. Add local buses.</td>
<td>750 spaces Eliminate, save $millions</td>
</tr>
<tr>
<td>Montclair</td>
<td>-1,600 Enough already; don't add more!</td>
<td>N-</td>
</tr>
</tbody>
</table>

However, sending 1,600 cars per day to the bottom of the quarry north of Morningside Drive (on MapSheet 28) would do wonders for traffic! Whether a parking lot or car crusher goes down there should be up to San Bernardino County to decide.

2) NO "CHINESE WALLS": We found two (like the Towne Avenue Flyover). MTA's practice is to build track ramps' sidewalls unnecessarily high before becoming bridges or Elevated. "Chinese Walls"+ flyovers are graffiti-magnets for all time. Worse, flyovers aren't even needed here, but MTA made up a little game with made-up criteria, randomly setting car traffic count "cut-offs" to justify the waste of millions of dollars on needless overcrossings. No form of ground transportation is more efficient at moving crowds than rail-at-grade, & none less efficient than single-occupant cars! So why give ground to cars & send trains high into the air, forcing passengers to climb stairs or wait for elevators? There's nothing wrong with grade crossings! Want a roller coaster? try Magic Mountain, not the SGV!

* 3) SWITCH SAN DIMAS' PASSENGER STATION LOCATION WITH SAN DIMAS' ELECTRICAL SUBSTATION LOCATION!: What is this, some mad scheme to get MTA to pay a high price for San Dimas' Corporate yard? Move the substation west of Walnut: this location is an ARMPIT! Put the Light Rail Station back where it belongs- across the BNSF tracks from the historic Santa Fe station/ Pacific Railway Museum! It's wonderful San Dimas has a station when so many have been torn down; it's museum a cultural element in
the right place on Bonita Avenue we shouldn't run away from. It's THE gateway to San Dimas' walkable Old Town core, best served by putting the new train station near where the last one was & still is... an original that's got clean ADA bathrooms (open Saturday, 1 week day p.m., & for San Dimas' special events) the new MetroRail shelter is very never going to provide. Land parcels included in the right-of-way width widen it south (across the tracks) of existing BNSF tracks (where sidings & buildings were); just ideal in size & position for the light rail tracks, station, then bus bays for cross-platform transfers to buses entering from Cataract! Its station architecture could take cues from the existing station, other Santa Fe Stations, or recall the earlier "Mud Springs" Depot; "re-centering" the station in a now-larger transit center+ park, with common landscape elements framing & connecting both parts across the tracks... While we don't want any more parking (other than on-street parking), the Transit Center/Park boundary could be expanded by terminating Cataract between the end of the bus bays & Bonita, connecting parkland to the vacant lot west of Cataract, and the sports fields south of that.

In unbelievable contrast, the DEIR-chosen "Corporate Yard" site west of Walnut FAILS every transit-, features-, & historic character-comparison! If previously-proposed undistinguished condos go in there, their residents are NOT going to be interested in crowds of passengers discharging from trains in front of their doors at all hours- unlike the existing Bonita Avenue business owners who are! Businesses that provide amenities passengers need & want (food & drink, rest rooms, shopping, shade) that MTA won't/ can't afford. Conclusion: the "Corporate Yard" site is perfectly suitable for a light rail ELECTRICAL SUBSTATION; NOT for PASSENGERS!

4) MODIFY TRACKAGE AROUND LA VERNE FOR DIRECT RAIL SERVICE INSIDE TO LOS ANGELES COUNTY FAIRGROUNDS' INNER GATE: La Verne station area planning, right-of-way alterations & real estate buys are needed for Short-Term advance planning & modification RIGHT NOW (because this will not be done later!) to allow Foothill Gold Line 1) trainsets to become captive shuttle trains (trains running only between La Verne and the Fair & Racetrack's inner ticketing gates) to bridge the unwalkable distance through the Fair's north parking lot acreage between MetroLink's Fairplex station and the Fair's & Racetrack's inner gates whenever they are open 2) to make the Fair's & Racetrack's inner gates a Temporary MetroRail Hub (meaning all Light Rail trains go to/ from the Gold Line main line to stop or layover in there) during the weeks of the County Fair and large Racing weekends Research is needed to determine whether the historic rail spur that used to do this could be rebuilt, or a new alignment is needed 3) to avoid lengthening end-to-end trip times while adding this inner Fair gate stop: "governors" limiting the top speed of all railcars on this line should be set higher to allow Dispatch & Operators to distribute "make-up time" to the schedule between stations. Governors would be re-set at the end of the Fair when its Inner Gate station would shutter for the season.

5) BUILD INFRASTRUCTURE THAT REINFORCES SAN GABRIEL VALLEY HISTORY & RAIL HISTORY: Much of the San Gabriel Valley's appeal is historic; lots of its Chambers of Commerce & businesses are all over the cult of Route 66, and work hard to cash in on its appeal. Please take Next Steps to ensure the same synergistic effort is applied here to reinforce history on the light rail line & its stations, so we get actual stations/ shelters that (please!) both shade+ shelter passengers (unlike punched metal canopies on the Expo Line that do neither!), architecture drawn from San Gabriel Valley freight storage depots, or packing house building designs. A number of historically accurate architectural plans & standard rail station designs could be rebuilt if the research gets done. Complete facilities in original good materials (unlike one hapless MetroLink station of neo-historic design, ruined by execution of details and the selection of inferior (imitation materials wearing badly); up close no one is fooled this is an historic building). Select art/ artists that tell old local stories; a display of tools/ household items from the past would be far more engaging than "art that makes a statement"... like a display of painted shrunken metal heads on a table that graces several transit stations- (fortunately far out of view in another state).
6) TRY MOVING DEODARS NOW BEFORE CUTTING THEM ALL DOWN: Many large trees CAN be moved; most of the public would be shocked to learn there is equipment capable of moving huge specimen trees for successful transplanting. Unless there's a gas pipeline under them, it would be worth trying to box & transplant 3 to 5 of those large unique Deodar Cedars right now (to a station site location where they would be a landscaping asset) BEFORE the project starts, to see if they'll survive. Instead of slaughtering them all (as for the Space Shuttle move), then "replacing" them with (name any number of) "replacement" trees. These are usually the size of a pencil! & never a fair deal! In this case don't needlessly force us to look at warehouse walls (& graffiti that will soon appear) behind the deodars for decades, just because axing is cheaper. If transplanting doesn't work, replacement trees & plant screening should use local natives; The Rancho Santa Ana Botanic Garden has plenty of acclimated plants & expertise, Huntington Gardens could consult...

7A) ONWARD TO ONTARIO Airport!: Detractors say the Foothill Gold Line is a line to nowhere; prove this insult to lineside cities wrong! Insist on a logical eastern hub to attract high ridership to both ends of the line! Insist at every phase! Ontario Airport is just that...

7B) ...And so is San Ber'doo... SURGE ON TO SAN BERNARDINO! NOTHING IN THIS PROJECT SHOULD PRECLUDE OR BLOCK A NEAR-TERM RESTORATION OF AN ORIGINAL PACIFIC ELECTRIC (PE) RAILWAY LINE: It is a disappointment to some commentators that the ORIGINAL PE alignment was not chosen, instead of the MetroLink-parallel alignment that was... because of perceived "competition". Though the 2 rail modes service different (not necessarily exclusive) travel markets, the opportunity to run more trains to more branches & station pairs should never be blocked! This PE line might be revived in light rail mode... or maybe, due to today's existing street configuration, as a traffic-signal-priority Trolley, fully compatible with Gold Line voltage & light-rail railcar width for inter-operability. That would allow through-running of Light Rail- & Trolley- cars, though up to San Bernardino County governments to complete & detail... The reason it's necessary for The Foothill Gold Line Authority to plan it right now is that this PE line branches off north-northeast from the north side of Cambridge Av. (MapSheet 24) easing a block north to 1st Street (where it could serve the north end of a transit village between Indian Hill to Mill Avenue INSTEAD OF PARKING there!)... thru to the end (MapSheet 29). This establishes parity, or "mutual aid" for cross-county transit that competes with freeways; just as the Foothill Gold Line is a LA County project to Ontario Airport in San Bernardino County because that's where it ends... LA County needs to plan the San Bernardino PE branch right, so San Bernardino County can build its branch right into LA County because that's where it begins.

For better transit- and more of it-

\[Signature\]

(John Jay Uloth)

\[Signature\]

(James Henry Washington, Jr.)

P.S. While "Surging" on to San Bernardino (per 7B above), the Old Original Line to Downtown Pomona might also be restored!
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Response 33-1

The amount of parking proposed at each station meets the parking demand identified in the travel forecast models, which account for the fact that passengers will use multiple modes (bus, drive, walk and bicycle) to access the stations.

Section 6.12.3 of the Metro Design Criteria (the document that stipulates project design) states the following:

Park-and-Ride, or long term parking, although the least efficient in terms of the physical facilities required, has proven to be a necessary facility for the success of transit systems. This facility, whether at-grade or within a structure, shall be located at a greater distance from the station entrance than other modes where site conditions allow. Whenever possible, the walking distance from the station entrance to the most remote parking space should not exceed 1,320 feet.

Response 33-2

The proposed flyover at Lone Hill Avenue and Towne Avenue are designed not to grade separate traffic but rather to allow the LRT tracks to switch sides with the freight/Metrolink track so that the BNSF freight can serve customers on the north side of the track in Pomona. The Construction Authority studied these intersections and all others along the alignment to determine which would be adversely affected by increased train traffic. Per Metro grade crossing criteria, traffic at the Lone Hill Avenue and Towne Avenue grade crossing do not warrant a grade separation and one would not be built were it not for the need for the LRT tracks to cross the freight/Metrolink track. A description and justification for the flyover structures is found in Section 1.3.3.1 of the Draft EIR. Acts of vandalism, if they occur, would be prosecuted by local law enforcement or the Los Angeles County Sheriff’s Department Transit Services Bureau. All project stations are at-grade, precluding passenger’s need to climb stairs or wait for elevators to access station platforms. At certain locations, pedestrian bridges may be needed between platforms due to specific safety considerations.

Response 33-3

The proposed San Dimas Station site was selected in large part due to the ease of access afforded by San Dimas Avenue and Walnut Avenue, both of which feed into East Arrow Highway. The site opposite the historic Santa Fe Station/Pacific Railway Museum lacks equivalent access.

Response 33-4

Providing spur service inside the Los Angeles County Fairgrounds is inconsistent with Metro’s mandate to provide regional transit service.
Response 33-5

Section 3.13 of the Final EIR states: “All walls, structures and fences shall be properly screened or incorporate design features to improve appearance and reduce visual intrusion pursuant to the standards established in the Metro Rail Design Criteria. The goal of the Criteria is to create site-adapted designs that reflect the specific urban context of each station and that enhance the neighborhood context in which the project is proposed. The Criteria include artwork, signage, advertising, landscaping, and guidelines for the selection of materials and finishes. Station design shall feature materials, landscaping, art, and other elements consistent with Metro Rail Design Criteria, and developed by the station design team that includes architects, landscape architects, and lighting experts. Surface treatments shall be provided at the face of safety walls and at roadway/pedestrian portals, and landscaping along safety walls outside of the LRT portal shall be provided where feasible to provide wall screening. Per Metro Rail Design Criteria, artwork will be provided at each station and will be designed by professional artists. According to the Criteria, careful consideration must be given to station compatibility with proposed future development in the neighborhood of each station, and where applicable, future extensions and/or connecting line transfers. Neighborhood culture and character shall be emphasized through artwork. The Designer should become familiar with the general aspects of the entire system in order to determine how his individual project relates to the whole. The Landscape Architect shall coordinate design and production of construction drawings with Designers and Metro Art to ensure that landscaping, facilities architecture, site engineering and station art are visually and functionally compatible. Coordination is particularly important with regard to the design of lighting, paved surfaces, walls and site furnishings. Metro Facilities Maintenance group shall be involved in the review and comment stage of landscape design review submittals.”

Response 33-6

The project is located primarily along the existing railway; therefore, it is anticipated that most existing trees would not be removed and would likely only require trimming. Per Mitigation Measure B-2, final design plans will be reviewed to determine if any trees would require removal or trimming. The commenter did not specify the location of the large Deodar cedars referenced in the comment; many jurisdictions protect this species of tree. Per Mitigation Measure B-2, a Certified Arborist will inspect trees that are protected by the City ordinance and will make a recommendation for removal or relocation based on the assessment of the tree’s health and stature. Sometimes large trees do not survive relocation as well as young trees if a substantial portion of the root system would be lost. If feasible to move large trees, this option will be considered. The specific strategy for tree removal/replacement or relocation will be determined by the Project Arborist in consultation with each local jurisdiction. The appropriate tree permits will be obtained prior to construction.

Response 33-7

Your support of the extension of the Gold Line to San Bernardino County and the Ontario Airport is acknowledged.
Response 33-8

The proposed alignment was chosen to capitalize and introduce passenger service on currently under utilized Metro-owned right-of-way in the western part of the study area, which is not directly served by Metrolink. Section 1.2 of the Draft EIR states the objectives of the project.
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Thank you for the opportunity to review the Metro Gold Line Foothill Extension Project from Azusa to Montclair, Draft Environmental Impact Report (SCH No. 20100121069). Areas of concern to the Division of Environmental Planning include locations where the proposed light rail alignment comes into contact with our facility. Potential locations would be at over/under crossings, state or locally owned bridges, as well as at locations where proposed light rail facilities may impact traffic operations at freeway on/off ramps or impact safety of the motoring public.

In regards to Biological Resources it’s recommended that item BG-4 under 3.2.4.1 Short Term Construction Mitigation Measures be changed to the following:

Should vegetation need to be removed during bird nesting season, February 15th through September 1st, a qualified biologist shall survey for nesting birds no more than three days prior to construction activities. In the event that nesting birds are observed, vegetation removal should not be conducted until the fledglings have left the nest. If this is not possible, coordination with the qualified biologist should take place in order to minimize the risk of violation the Migratory Bird Treaty Act, and the following minimization measure put in place: a buffer of 150 feet for songbirds and 500 feet for raptors which must be maintained during all phases of construction. Nesting birds may not be impacted by any construction activity including noise and dust pollution along with destruction of habitat.

Should you seek federal funds in the future for this project, Caltrans, Division of Environmental Planning would be interested in being a participating agency for NEPA.

Please update your mailing list and remove Garrett Damrath, Senior Environmental Planner, Caltrans, Division of Environmental Planning from your mailing list and replace his name with Dawn Kukla, Senior Environmental Planner, Caltrans, Division of Environmental Planning. Include her in all correspondence for this project.

We hope you will continue to inform our office of future meetings and look forward to working with you. If you have any questions regarding these comments, please contact Brian Manor at (213) 897-0704 or myself at (213) 897-3643.

Sincerely,

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

Response 34-1

Mitigation Measures B-3 and B-4 have been revised as follows:

**B-3** – The Construction Authority shall direct the contractor to avoid or minimize removal of vegetation (including ornamental tree and shrub removal) during the breeding season (February 1 to June 30 for nesting raptors, March 15 to September 15 for all other birds). To the extent practicable, the contractor shall conduct vegetation and tree removal activities during the non-breeding season (September 16 through January 31) to limit impacts to nesting birds/raptors.

**B-4** – In the event that removal of vegetation (including ornamental tree and shrub removal) must occur between February 1 and September 15, the Construction Authority (or contractor) shall retain a qualified biologist to conduct a nesting bird/raptor survey of the project impact area prior to the initiation of construction. The survey shall be conducted no more than three days prior to the initiation of construction to minimize the potential for nesting following the survey and prior to construction. If the biologist detects any active nests within or adjacent to the project impact area (within 150 feet for nesting birds, within 500 feet for raptors), the area(s) supporting bird nests shall flagged for protection with a buffer determined at the biologist’s discretion based on the sensitivity of the species (minimum buffer of 500 feet for raptors). The Construction Authority shall direct the contractor to avoid any activities within the buffer zone until the nests are no longer occupied as determined by the biologist.

Response 34-2

Caltrans’ interest in serving as a participating agency for NEPA, should the federal funds be sought for the project in the future, is acknowledged.

Response 34-3

The Construction Authority’s mailing list has been updated per your comment.
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October 5, 2012

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

Subject: Metro Gold Line Foothill Extension Azusa to Montclair (Phase 2B)  
SCH#: 2010121069

Dear Lisa Levy Buch:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on October 4, 2012, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project’s ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

“A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation.”

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Enclosures

cc: Resources Agency

1400 10th Street  P.O. Box 3044  Sacramento, California  95812-3044
(916) 445-0613  FAX (916) 323-3018  www.opr.ca.gov
**Project Title:** Metro Gold Line Foothill Extension Azusa to Montclair (Phase 2B)

**Lead Agency:** Sonoma County Water Agency

**Type:** EIR  Draft EIR

**Description:** The Metro Gold Line light rail (LRT) system currently extends from Los Angeles to Pasadena serving cities and communities along the alignment corridor. The Metro Gold Line Foothill Extension is a phased project that extends the existing Metro Gold Line by 24 miles to the east, from the City of Pasadena to the City of Montclair. The extension is proceeding in two phases. Construction of the first phase from the Pasadena Sierra Madre Villa Station to the Azusa-Citrus Station began in late 2011, and construction is anticipated to be completed in late 2015.

**Lead Agency Contact**

- **Name:** Lisa Levy Buch
- **Agency:** Metro Gold Line Foothill Extension Construction Authority
- **Phone:** 626 305 7004
- **Fax**
- **email:** levybuch@foothillextension.org
- **Address:** 406 E. Huntington Drive, Suite 202
- **City:** Monrovia
  - **State:** CA
  - **Zip:** 91016-3633

**Project Location**

- **County:** Los Angeles, San Bernardino
- **City:** Azusa, Glendora, San Dimas, La Verne, Pomona, Claremont, ...
- **Region**
- **Lat / Long**
- **Cross Streets**
- **Parcel No.**
- **Township**
- **Range**
- **Section**
- **Base**

**Proximity to:**

- **Highways:** I-210, SR 57, US 66, I-10
- **Airports**
- **Railways:** Metrolink, BNSF
- **Waterways**
- **Schools**
- **Land Use:** Residential and Mixed Use

**Project Issues**

- Air Quality; Archaeologic-Historic; Biological Resources; Economics/Jobs; Fiscal Impacts; Flood Plain/Flooding; Geologic/Seismic; Noise; Public Services; Recreation/Parks; Schools/Universities; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Water Quality; Growth Inducing; Landuse; Cumulative Effects; Other Issues; Aesthetic/Visual

**Reviewing Agencies**

- Resources Agency; Department of Conservation; Department of Fish and Game, Region 5; Department of Fish and Game, Region 6; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 7; Caltrans, District 8; Caltrans, Division of Transportation Planning; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 8; Native American Heritage Commission; Public Utilities Commission; State Lands Commission; Department of Toxic Substances Control

**Date Received:** 08/21/2012  
**Start of Review:** 08/21/2012  
**End of Review:** 10/04/2012
Chapter 7—Responses to Comments

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

Response 35-1

The information that the Construction Authority has complied with the State Clearinghouse’s Draft EIR review requirements is acknowledged.
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-----Original Message-----
From: Erik Griswold [mailto:erik.griswold@gmail.com]
Sent: Saturday, October 06, 2012 12:59 AM
To: Lisa Levy Buch
Subject: The DEIR for section 2B

Wonderful work.

Why not repackage this into two parts. 2Ba from Asuza to the San Dimas/La Verne border and 2Bb from San Dimas/La Verne border to Montclair. Why? To avoid building a duplicative Light Rail line parallel to the existing Metrolink line.

Build a good joint Metrolink &Gold Line station which will act as the eastern terminus of the Gold Line until further, either on the site of the current Pomona (North) Station or better yet between D and E Streets by the Fairplex. This could/should be within the walkshed of downtown La Verne. At the least build this joint station at San Dimas Canyon Road if possible as the lines diverge away from each other when traveling west from there.

Where ever it ends up, 2e will conflict the existing Metrolink less so than if the Gold Line had been built to Montclair. Travellers from San Bernardino will know that they will be able connect from Metrolink to Metro, just as Metrolink passengers do today at Los Angeles Union Station.

-Erik Griswold
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Response 36-1

The Metro Gold Line is intended to serve a different travel market than Metrolink. The Gold Line has local stations spaced one to two miles apart, facilitating intra-regional travel, with frequent service throughout the day. Metrolink is a commuter rail service connecting the Southern California region, with frequent service only during peak weekday hours. The duplication of service is therefore minimal.
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From: norm bowers [mailto:normanebowers@gmail.com]
Sent: Friday, October 05, 2012 8:09 PM
To: Lisa Levy Buch
Subject: EIR Draft questions

Ms. Levy Buch,

I attended the EIR Hearing the other day in La Verne and had a question I would like addressed in the EIR. My question pertains to noise levels. I am specifically concerned with the at grade crossing of Barranca Ave in Glendora. Will the Gold Line trains need to sound any kind of horn or bell when they approach this at grade crossing? And if so is there any special crossing gates that can be used to eliminate the need to sound horns etc when approaching this crossing.

Currently the freight trains that use this track sound their horns at this crossing, that is a brief annoyance once or twice a day when they come through. But with the Gold Line running every 6 minutes it could be a real degradation in the quality of life for the surrounding homes.

The second part of the noise question is, in the EIR a sound wall is suggested as a means of mitigating the track noise of the Gold Line in this area. How high will these sound walls be and will they obstruct the views of the homes that enjoy a modest view of the foothills and surrounding area. I would ask that you address the make up of the walls and if there is a way to use a material that would block the noise but not obstruct the views.

I believe the Gold Line will be a real asset to the communities it will serve and hope that there are ways to mitigate the noise levels for those that live near these at grade crossings.

Thank you very much for the work you are doing on this project, I look forward to seeing your responses.

Norm Bowers
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Response 37-1

Audible warnings are required by the California Public Utilities Commission at all gate-protected at-grade light-rail transit (LRT)/roadway crossings. The required audible warnings are ringing bells that are located on the masts of the crossing gates and the sounding of horns located on the lead vehicle of the trains. The requirements and general Metro practices for sounding light-rail vehicle (“LRV”) horns are:

- Every LRV must be equipped with a bell or horn that generates a sound level of 85 dBA at a distance of 100 feet from the vehicle (CPUC General Order 143B). Most automobile horns generate a sound level of 80 to 85 dBA at a distance of 100 feet, so the LRV horn is slightly louder than most automobile horns.
- The light-rail vehicles are also equipped with a low-volume horn with a sound level of 75 dBA at 100 feet from the vehicle.
- The light-rail vehicle operator must sound an audible warning when approaching at-grade crossings protected by automatic crossing signals. The standard operating procedure on Phase 1 of the Metro Gold Line is to sound the low-volume horn (75 dBA at 100 feet) before at-grade crossings.
- The louder horn is used in case of emergency and at the discretion of the train operator.

Metro’s operating procedure calls for train operators to sound the 75 dBA warning horn prior to all gate-protected crossings starting approximately 300 feet prior to the crossing. At speeds greater than 35 mph, the noise from the horn adds less than 1 dB to the noise exposure caused by the light-rail trains. In other words, the train noise combined with the horn noise is not significantly greater than the train noise alone. The regulations governing the LRT horns are much different than the regulations governing the freight horns. LRT horns are much quieter and are sounded for a shorter duration at each intersection.

Cities can petition the Federal Railroad Administration (FRA) for “quiet zones” in which exemptions from horn sounding apply, provided that other warning and safety devices at the crossing are sufficient, as determined by the FRA. Project grade crossings will have quad gates (crossing gates that span the entire roadway) and/or other safety features that are likely to be sufficient for a quiet zone determination.

Response 37-2

Typically, sound walls installed to mitigate noise from light-rail projects are 6 to 8 feet high. The primary noise source from light-rail trains is the sound from the steel wheels rolling on the steel rails. However, because one of the main noise sources near the Barranca intersection is noise from the freight horns (which are located at a greater height than the wheels and rails of the train), some of the sound walls are specified to be 12 feet high to block the line-of-sight from the horns.

The implementation of mitigation measures, including final height and design of the sound walls, will be decided by the Construction Authority with input from the cities. In addition, if the project were to include a successful quiet zone petition for the intersection at Barranca Avenue, the recommended height of the sound walls would decrease.
Transparent panels were used on the Expo Phase I project to provide noise mitigation at intersections and other locations where visibility was an issue. These panels were installed and are effective. The panels were removed from one location at the La Brea Station due to concerns about fire safety. According to the supplier of the transparent panels, the material has passed appropriate fire safety tests.
October 10, 2012

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

Dear Ms. Buch:

NOTICE OF AVAILABILITY OF THE
DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE METRO GOLD LINE
FOOTHILL EXTENSION FROM AZUSA TO MONTCLAIR PROJECT

The Department of Parks and Recreation has reviewed the above project for potential impact on the facilities of the Department. The proposed project may impact an existing County trail, the Marshall Canyon Trail (subject trail). The subject trail is in close proximity to the intersection of Arrow Hwy and Wheeler Ave and travels underneath the railroad tracks through the flood control channel. (See attached map)

The subject trail is located within a County flood control channel. Any work affecting the channel may require a right-of-entry permit from this Department and the County Department of Public Works Flood Control District. For inquiries on the right-of-entry permit from the Department of Parks and Recreation, please contact Ms. Diane Thorne at 213-351-5128 or dthorne@parks.lacounty.gov. For more information on flood control channels please contact Mr. Steve Sheridan at 626-445-7630 or ssheridan@dpw.lacounty.gov.

Prior to construction or any disturbance of the subject trail, Metro shall notify the public at-large of the pending construction activity, if any, forty-five (45) days prior to commencing construction. The form of public outreach shall be through several mediums such as local publications and public signs within a one mile radius of trail access points or existing trails. Notices on the trail shall begin approximately two (2) miles north and south of the construction zone in both directions with intermediate signs every one half mile. Notice shall be sent to groups such as equestrian, mountain bike, and hiking groups in the general area.

Construction of the project may also result in noise impacts to trail users, requiring mitigation or avoidance measures.
Thank you for including this Department in the environmental review process. If you have any trail inquiries, please contact Mr. Francis Yee at 213-639-6058 or fyee@parks.lacounty.gov. If we may be of further assistance, please contact me at (213) 351-5129 or jchien@parks.lacounty.gov.

Sincerely,

[Signature]

Jui Ing Chien
Park Planner

JC/ Response to Metro – Gold Line Extension Azusa to Montclair DEIR

Enclosure: MCT Near Arrow Hwy and Wheeler Ave Gold Line Foothill Ext DEIR

c: Parks and Recreation (N. E. Garcia, K. King, J. Rupert, F. Yee, F. Moreno, L. Bradley, O. Ruano, D. Thorne, S. Sheridan)
Marshall Canyon Trail goes underneath the railroad through the flood control channel.
38. Chien, Jui Ing, Park Planner, County of Los Angeles Department of Parks and Recreation, October 10, 2012.

Response 38-1

The information about the Marshall Canyon Trail has been incorporated into the Final EIR as requested. Marshall Canyon Trail is a linear trail beginning in Marshall Canyon Park 3.4 miles to the north of the project, which runs along the Los Angeles County flood control channel to its terminus at the Frank G. Bonnelli Regional Park. The trail crosses the project alignment through the grade-separated flood control channel. The construction and operation of the project will not result in impacts to the trail as no construction work would be conducted in the flood control channel or along the trail, and operations of the project LRT are grade-separated from the channel. The Construction Management Plan (CMP) that will be implemented throughout the project construction activities will include public notifications, and signage at affected locations.
October 15, 2012

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

Re: Draft Environmental Impact Report - Metro Gold Line Foothill Extension - Azusa to Montclair Project

Dear Ms. Buch:

Thank you for providing us with a copy of your Draft Environmental Impact Report (DEIR) for the Gold Line Foothill Extension from Azusa to Montclair Project. Although the California Public Utilities Commission (CPUC or Commission) has been interacting with the Metro Gold Line Foothill Extension Construction Authority (Foothill Extension Authority) regarding the project, the CPUC has not specifically provided written comments on this project prior to this date and we appreciate the opportunity to provide the following comments:

The project is subject to a number of rules and regulations involving the CPUC. These may include: Sections 1201 et al, and 99152 of State of California Public Utilities Code, which requires Commission authority to construct rail lines over existing streets. The design criteria of the proposed project must comply with CPUC General Orders (GOs), such as GO 72-B, Rules Governing the Construction and Maintenance of Crossings at Grade of Railroads with Public Streets, Roads and Highways; GO 75-D, Regulations Governing Standards for Warning Devices for At-Grade Highway-Rail Crossings; GO 143-B, Safety Rules and Regulations Governing Light-Rail Transit; and GO 164-D, Regulations Governing State Safety Oversight of Rail Fixed Guideway Systems.

As part of its mission to reduce hazards associated with at-grade crossings, the Commission’s policy is to reduce the number of at-grade crossings on rail corridors.

In acquiring Commission approval for construction of at-grade rail crossings, Foothill Extension Authority should file formal applications in accordance with the Commission’s Rules of Practice and Procedure for new crossing locations, including grade separation structures, and filing requests for modification of existing crossings in accordance with the Commission’s General Order 88-B, Rules for Alerting Public Highway Rail Crossings.

The Light Rail Transit (LRT) alternative described in your DEIR passes through high density commercial, residential and industrial areas of the greater Los Angeles Metropolitan Area. High density areas near rail tracks lead to a high amount of pedestrians around the tracks. Constructing tracks at the existing right-of-way is likely to result in trespassing issues and pedestrian conflicts similar to those currently experienced along other Metro Rail corridors in Los Angeles. Elevating or lowering the tracks would mitigate this concern. Additionally, fencing any remaining at-grade portions of the rail alignment selected should be a requirement of the project.
While we understand the cost of grade separating a highway-rail at-grade crossing makes for a perceived detriment to your project, the CPUC normally does not take cost into its consideration of the practicability of grade separating a crossing.

Below we provide specific project concerns for the LRT Segments identified in your DEIR within each City jurisdiction:

**Glendora Segment:**

1. We recommend grade-separating the proposed Grand Avenue and Foothill Boulevard intersection LRT crossing proposed for at-grade operations. Your DEIR identifies this intersection as having the highest traffic volume of the proposed crossing locations in the City of Glendora. The proposed 10 minute peak time headways may negatively impact traffic circulation and increase delay at the intersection.

2. We recommend evaluating the Vermont Avenue at-grade crossing, located between two intersections (West Ada Avenue/Vermont Avenue and East Ada Avenue/Vermont Avenue), for traffic signalization and interconnection of the 2 intersections to ensure safe traffic movement across the tracks.

3. Glendora Station – the proposed at-grade pedestrian crossing should be grade separated with a bridge between the two (2) level parking structure and station center platform. The proposed at-grade crossing location would require pedestrians to cross the freight/Metrolink track and the southern LRT track in order to access the station. This type of configuration presents pedestrians with the potential for two trains approaching on adjacent tracks and can lead to confusion and/or one train blocking visibility of a second train approaching the crossing. RCES staff will not support an at-grade crossing at this location.

4. Four of the nine (9) proposed at-grade crossings in the City of Glendora are within 1 mile of each other (Pasadena Avenue, Glenwood Avenue, Elwood Avenue and Loraine Avenue). RCES recommends evaluating the short rail corridor for closure and consolidation of at-grade crossings.

**San Dimas Segment:**

1. We recommend grade-separating the proposed Bonita Avenue and Cataract Avenue intersection LRT crossing proposed for at-grade operations. Your DEIR identifies this intersection as having the highest traffic volume of proposed crossing locations in the City of San Dimas. The proposed 10 minute peak time headways may negatively impact traffic circulation and increase delay at the intersection.

2. Five of the six (6) proposed at-grade crossings in the City of San Dimas are within 1 mile of each other (Eucla Avenue, Bonita Avenue/Cataract Avenue, Monte Vista Avenue, San Dimas Avenue and Walnut Avenue). RCES recommends evaluating the short rail corridor for closure and consolidation of at-grade crossings.

3. San Dimas Station – the proposed at-grade pedestrian crossing should be grade separated with a bridge between the three (3) level parking structure and station center platform. The proposed at-grade crossing location would require pedestrians to cross the southern LRT track in order to access the station. This type of configuration presents pedestrians with the potential for two trains approaching on adjacent tracks and can lead to confusion and/or one train blocking visibility of a second train approaching the crossing. RCES staff will not support an at-grade crossing at this location.
track in order to access the station. RCES staff will not support an at-grade crossing at this location.

La Verne Segment:

1. Four of the five (5) proposed at-grade crossings in the City of La Verne are within 1 mile of each other (Wheeler Avenue, A Street, D Street and E Street). RCES recommends evaluating the short rail corridor for closure and consolidation of at-grade crossings.

2. La Verne Station - the proposed at-grade pedestrian crossing should be grade separated with a bridge between the six (6) level parking structure and station center platform. The proposed at-grade crossing location would require pedestrians to cross the southern LRT track in order to access the station. RCES staff will not support an at-grade crossing at this location.

3. La Verne Station – the proposed signalized driveway intersection with Arrow Highway that will provide access into station parking structure may require interconnection to the existing Metrolink crossing (San Gabriel Valley Line) located to the southeast on Arrow Highway and/or the Arrow Highway /E Street intersection to the northwest.

4. White Avenue – the proposed addition of two (2) LRT tracks at this at-grade crossing location would result in a three (3)-track crossing adjacent to the existing single track Metrolink (San Gabriel Valley Line) crossing approximately 100 feet to the south. The increase in train operations by the addition of the LRT may require interconnection of these two crossings or modification of existing interconnection.

Pomona Segment:

1. Fulton Road – the proposed addition of two (2) LRT tracks at this at-grade crossing location would result in a three (3)-track crossing adjacent to the existing 2-track Metrolink (San Gabriel Valley Line) crossing approximately 100 feet to the south. The increase in train operations by the addition of the LRT may require interconnection of these two crossings or modification of existing interconnection.

2. We recommend grade separating the proposed Garey Avenue at-grade crossing. Garey Avenue serves as one the City of Pomona’s major north-south arterial roadway and provides a critical connection to the I-10 freeway.

Claremont Segment:

1. We recommend grade separating the proposed Indian Hill Boulevard at-grade crossing. Indian Hill Boulevard serves as the City of Claremont’s major north-south arterial roadway and provides critical connections to both the I-210 and I-10 freeways.

2. Claremont Boulevard – we recommend grade separating this proposed at-grade crossing location. The existing two (2) tracks cross the roadway at approximately 45 degrees presenting a highly skewed crossing to motorists and pedestrians. Visibility of approaching trains is obstructed by the skew and existing structures and trees. The addition of 2 LRT tracks would result in a 4-track at-grade crossing with a mixture of light rail, freight and
Levy Buch  
Director of Public Affairs  
Metro Gold Line Foothill Extension Construction Authority  
Page 4 of 5  
October 15, 2012

commuter rail activity at varying speeds. Such a configuration will present pedestrians with an extended path across 4 tracks that would need to be cleared in advance of approaching trains.

Montclair Segment:

1. Montclair Station – we recommend minimizing the number of at-grade pedestrian crossings to the LRT platforms and maximizing the use of safe access via the underpass/tunnel connecting the Metrolink and LRT platforms to the parking lots and the bus transit loop.

We understand that this is a highly complex and challenging project with funding, design and environmental approval for the greater Los Angeles area. It is imperative that the CPUC be involved with the details of this project from its inception in order to be informed and to be of greater assistance in the future.

The CPUC will need to provide applicable regulatory oversight for all phases of the project. This will require early consultation with not only the Foothill Extension Authority personnel but contracted consultants as well in order to provide early consultation on all proposed design and engineering of the proposed project improvements on the corridor.

This will assist with the review of the environmental documents and final CEQA approval of the project by the CPUC, since we are a responsible agency under CEQA section 15381 with regard to this project and in complying with any and all General Order requirements as they apply to the Gold Line Foothill Extension from Azusa to Montclair Project.

Thank you very much for the opportunity to review and comment on your DEIR. Commission staff is available to meet with you and discuss our concerns.

We look forward to working with the Foothill Extension Authority on this project. Should you have any questions, please contact Jose Pereyra at (213) 576 – 7083 or email at jfp@cpuc.ca.gov.

Sincerely,

Anton Garabedian, P.E.  
Program and Project Supervisor  
Rail Crossings Engineering Section  
Consumer Protection and Safety Division