

COMMENT LETTER 98

RESPONSE TO LETTER 98

Chapter 3 - Environmental Evaluation

Page 3-1-2 Under "How Impacts Are Discussed" a "not significant" effect is not the same as "no effect." The 4th sentence should be reworded as follows: "...in terms of whether it is no impact, less than significant impact, potentially significant impact, or significant impact..." 98-52

3-1 Acquisitions and Displacements

General The DEIS/DEIR should discuss Phase II Site Investigations to determine the presence of contamination or hazardous substances at the site that may affect the project budget and schedule, the public health, regulatory compliance, or other issues. 98-53

Page 3-1-14 Paragraph 2: It is not clear how the acquisition of enough of the City of Hope (hospital) parking lot to building a 250-space parking structure "would not substantially affect the operation of the City of Hope medical center or auditorium." Please clarify how many hospital parking spaces would be taken, what percentage of the total hospital parking capacity would these spaces constitute, whether the hospital needs to replace the lost parking spaces, and whether it has enough vacant land for this. 98-54

Page 3-1-25 Cumulative Impacts, Paragraph 3, sentence 2: The document should clarify whether any remaining developments within a one-mile radius might result in displacement (e.g., location, size, and displacement impact of each). 98-55

Page 3.1-36 Paragraph 1, sentence 2: Please clarify the number of businesses displaced. In addition, the one probable institutional displacement should be added. 98-56

3-4 Community Facilities and Services

Page 3-4-13 Rancho Learning Center in the City of Arcadia is an alternative learning center with several programs including alternative high school and home school. This facility and the Serendipity Early Care and Education Center (Serendipity School), a private childcare provider, are adjacent to the proposed alignment. A comprehensive, targeted safety education program is required given the special circumstances at this site. 98-57

Page 3-4-13 Also, under the 2nd paragraph and 3-4-39 last paragraph – It should be mentioned that the Rancho Learning Center in the City of Arcadia is owned by the Arcadia Unified School District, and that it could revert back to an elementary school at anytime, as the lease is an annual contract, and therefore the age of the children and whether they walk to school or not can change at anytime also. 98-58

Page 3-4-13 A school safety program targeting all schools in the .25 miles radius of the proposed alignment should be developed and implemented prior to ROD. 98-59

Comment 98-58

This condition does not change the impact assessments reported in the EIS/EIR.

Comment 98-59

The provision of safety programs would be the responsibility of LACMTA, to be implemented prior to the commencement of LRT operations. Although the ROD may include this provision, there is no need to develop and implement such a program prior to issuance of the ROD.

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Page 3-4-15	All adjacent park facilities must be separated from the proposed alignment by an appropriate approved safety barrier.	98-60
Page 3-4-19	Should the TSM alternatives be approved, adequate funding for additional bus service and supporting facilities would be required.	98-61
Page 3-4-22	Funding would be required for a construction mitigation outreach program in affected communities.	98-62
Page 3-4-24	Under the last paragraph – Regarding the adjacent Rancho Learning Center in Arcadia, it is mentioned that “New sound walls would be built along the alignment that would protect school children from noise and prevent access to the alignment.” Please clarify whether this is a mitigation measure or commitment.	98-63
Pages 3-4-25, 3-4-27, 3-4-30, 3-4-31, 3-4-36, 3-4-37, 3-4-45, 3-4-46	– The references to the Noise Section 3-11.3.1 do not clarify specific mitigation measures that would apply here. Please clarify this issue to help determine where the sound walls would be used in relationship to the sites adjacent to the alignment.	98-64
Page 3-4-36	Please address safety concerns regarding adjacent playgrounds of the schools and parks and/or any mitigation that may make it safer for the children in those playgrounds (such as reinforced walls). The potential derailment or reference to the Hazards section should also be addressed. See also Pages 3-4-40 and 3-4-41.	98-65
3-5 <u>Cultural Resources</u>		
Page 3-5-38	Under Historic Bridges, there is a discussion concerning Phase II, Segment 1, but no conclusion as to whether these bridges will be impacted with no further discussion. The DEIS/DEIR should clarify whether the project will adversely affect the bridges or not.	98-66
Page 3-5-40	Under the last paragraph, “Monrovia Santa Fe Depot,” and Page 3-4-45 fifth paragraph, Packing House, it is identified that the “proposed parking structure would result in the introduction of a new visual element in the setting,” and that it “would not be adverse if it is properly designed and landscaped.” However, there are no design conditions or mitigation measures in this section to assure that the structure will be properly designed. Please see Page 3-5-42 for a similar issue.	98-67
Page 3-5-41	Under the first paragraph, the analysis should justify the assumption that the proposed parking structure “would be constructed as to not diminish the integrity of the Monrovia Santa Fe Depot’s setting, feeling, and association.”	98-68

Comment 98-60

The entire right of way will be fenced appropriately.

Comment 98-61

The locally preferred alternative was adopted and is not the TSM Alternative.

Comment 98-62

Costs for mitigation, which includes outreach efforts related to specific impacts (e.g., noise) are included in project costs.

Comment 98-63

Because the rail alignment is on an embankment adjoining the school, access to the right of way would be prevented by providing fencing along the lower edge of the rail right of way. The provision of fencing is a project element, not a mitigation measure. The precise location of soundwalls along the slope of the embankment has not yet been determined.

Comment 98-64

Please see revised Chapter 3-11.3 for a discussion of noise mitigation. The areas in which soundwalls would be provided have been determined by engineering station number and are reported in the Final EIS/EIR. The final locations of soundwalls within the right of way are subject to refinement during Final Design.

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Comment 98-65

The entire right of way, including areas next to schools, will be fenced appropriately to prevent unauthorized access. See Comment 98-59 regarding school safety programs. The potential for derailment of a rail vehicle adjacent to a school cannot be predicted, and under both CEQA and NEPA such an issue would be speculative and thus does not require discussion. The Foothill Extension would be designed to meet LACMTA, state, and federal standards for the safe operations of LRT and freight rail.

Comment 98-66

Subsequent to the Draft EIS/EIR, the SHPO concurred that there would be no adverse impacts to the historic Colorado Street Bridge, which is the only bridge determined historic in the Foothill Extension project.

Comment 98-67

A mitigation measure to require design of parking garages undertaken by the Construction Authority within the APE of historic depots to be done in accordance with the Secretary of Interior’s Standards and in consultation with the State Historic Preservation Officer has been added.

COMMENT 98-68

See Comment 98-67.

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Page 3-5-47	The fourth and six paragraphs mention "mitigation measures conducted during the construction phase," but these mitigation measures are not identified. Same comment for pages 3-5-49 and 3-5-50.	98-69
Page 3-5-48	Under "Construction Period Impacts," it is unclear whether these are local, federal, or state compliance standards.	98-70
3-6 <u>Energy</u>		
General	This section should discuss sources of electrical energy for any operation of the project and maintenance facility that will be electric (e.g., Southern California Edison and/or municipal power facilities). The total increase to energy consumption for "Long Term" should be identified rather than the brief reference given in Table ES-4.	98-71
General	The Maintenance Facility should be designed according to "Green" or Energy Star Building standards.	98-72
Page 3-6-3	Section 3-6 should be revised to meet the criteria provided in Appendix F of the <i>State CEQA Guidelines</i> for preparing an Energy analysis.	98-73
Page 3-6-3	Please justify the significance threshold of a one-percent increase in anticipated energy use over baseline conditions	98-74
	Energy consumption for the project includes both the one-time expenditures of energy for project construction and the continuing commitment of energy for system operations and maintenance. Energy consumption can be addressed in terms of the following project elements:	
	<ul style="list-style-type: none"> • Rail vehicles manufactured during construction; • Guideway and station construction; • Vehicle propulsion; • Station operations (including lighting, heating, and ventilation); • Vehicle maintenance; and • Changes in vehicle miles traveled and trip generation. 	
Page 3-6-4	Please justify the conclusion that construction-related activities associated with projects in the No Build Alternative would not result in substantial construction energy consumption and significant impacts within the Phase II Segment 1 area.	98-75
3.8 <u>Geologic-Seismic</u>		
Page 3-8-46	Under "Construction-Period Impacts," first paragraph, it is mentioned that construction impacts will be reduced through two steps "(1) compliance with local, state, and federal regulations and permits..." and "(2) implementation of the proposed alternatives with additional construction-period mitigation	98-76

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Comment 98-69

The referenced mitigation measures are defined in Section 3-5.2.6(a), Regulatory Compliance.

Comment 98-70

The regulatory compliance measures are federal and state standards.

Comment 98-71

Specific power sources will be identified during Final Design. Table ES-4 is part of the Executive Summary; detailed discussion of energy issues is provided in Chapter 3-6.

Comment 98-72

The Maintenance and Operations Facility would be designed to meet Green or Energy Star building standards where required by LACMTA Design Criteria or applicable codes.

Comment 98-73

The Energy analysis reports the information required, but has been updated to reflect a forecast year of 2025.

Comment 98-74

See response 98-73.

Comment 98-75

The No Build projects are listed in Chapter 2-2.1.1. There are no substantial construction efforts within the study corridor; most are service improvements or changes to the traffic management system.

Comment 98-76

For the Draft EIS/EIR, the Potential Design Solutions can be considered as potential mitigation measures for conceptual level design. The Final EIS/EIR reports mitigation measures associated with more advanced design development.

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measures defined in Section 3-8.3." Please clarify what these additional mitigation measures are and whether they are those listed in Table 3-8.15 as Potential Design Solutions.

98-76
cont'd.

Page 3-8-52 Under "Construction-Period Mitigation Measures," the reader is referred to Section 3-8.3.6, which refers to Section 3-8.3, and as mentioned in the previous comment, it is not clear where the mitigation measures are in the section.

98-77

3-9 Hazardous Materials

General Although there is some discussion in Table ES-3, significant contamination should be expected along the previous railroad right of way and adjacent properties from aerially deposited lead, the historic use of herbicides and pesticides resulting in arsenic or other metals, the potential for DDT, and various hydrocarbon dissemination. The soils relocated for grading, leveling, or other earthwork may require special handling that will substantially increase construction costs and project schedule. Soil may exceed re-use criteria and require export. In particular, the Nu-Way facility could present an impact to the budget and schedule.

98-78

Page 3-9-2 The analysis should justify the conclusion that "...it can be assumed that [hazardous material] impacts would be eliminated or reduced to less than adverse/less than significant levels by complying with the federal and state regulatory requirements and/or permits.

98-79

Pages 3-9-4/5 Please clarify how the thresholds were used to determine whether or not the proposed project would result in a significant adverse impact.

98-80

Page 3-9-5 The DEIS/DEIR should justify the finding that "...elements of the No Build Alternative have the potential to create construction-period impacts."

98-81

Page 3-9-6 Please provide the analysis to support the conclusions regarding the TSM Alternative.

98-82

Page 3-9-6 Under the "Phase II, Segment 1" heading, the analysis states that "...[d]uring Preliminary Engineering, specific testing shall be conducted and necessary and appropriate means for remediation of these areas shall be developed, as appropriate, with the results reported in the Final EIS/EIR." This analysis should be included as part of the DEIS/DEIR to allow a comprehensive assessment of environmental impacts and identification of any necessary mitigation measures. Please provide this analysis to help justify the finding that impacts would be less than adverse under NEPA and less than significant under CEQA. Same comment for Page 3-9-6, second paragraph, and Page 3-9-7, first, second, and third paragraphs.

98-83

Page 3-9-12 Under the "Potential Mitigation" discussion, recommended mitigation measures should be identified in the DEIS/DEIR.

98-84

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Comment 98-77

See Comment 97-76.

Comment 98-78

The results of Phase 2 hazardous materials investigations are reported in the Final EIS/EIR in revised Chapter 3-9.

Comment 98-79

This statement needs no further justification; the premise for the conclusion is clearly stated: compliance with federal and state regulatory compliance and permits.

Comment 98-80

See revised Chapter 3-9.

Comment 98-81

This statement is correct as stated, in that the No-Build Alternative includes numerous construction projects, as outlined in Chapter 2.

Comment 98-82

This statement needs no further justification; the premise for the conclusion is clearly stated: compliance with federal and state regulatory compliance and permits.

Comment 98-83

The Final EIS/EIR reports mitigation measures associated with more advanced design development.

Comment 98-84

As stated in Section 3-9.3, Potential Mitigation, there are no impacts, and therefore there is no mitigation.

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3-10 Land Use

Page 3-10-47 Please identify mitigation measures for the two potentially significant impacts of providing parking facilities at an Azusa station. | 98-85

Page 3-10-48 Please identify mitigation measures to address the potentially significant impacts of providing parking facilities at a San Dimas station. | 98-86

Page 3-10-50 Please justify the statement that there would be no long-term land use impacts in Phase II, Segment 1 or 2 cities under the Triple Track Full Build LRT Alternative. | 98-87

3-11 Noise and Vibration

General In Section 3-11.2.1, please include an assessment methodology for construction (short-term) noise and vibration impacts. | 98-88

Page 3-11-15 Under subsection "a," please provide complete references for the Manuel Pardon & Associates plan and the prediction model specified in the FTA guidance manual (e.g., Sound 2000, TNM). | 98-89

Page 3-11-16 The "Noise Impact Assessment Methodology" section states that: "*The projections are based on noise measurements made on the Pasadena Gold Line Phase I light rail system in 2003.*" However, the sentence following this statement reads: "*The noise projections assume that the whistles generate a noise level of 76 dB at 50 feet from the track for a five second period...*" While there are measurements available (please provide who performed the measurements), please clarify why the maximum level of the whistle sound and the duration are assumed? | 98-90

Pages 3-11-17 to 3-11-22 Section 3-11.2.2, Impact Criteria. Please provide the criteria based on which a significant construction noise impact would be concluded. | 98-91

Pages 3-11-24 to 3-11-79 Section 3-11.2.4, Long-Term Impacts. The impacts analyses for all alternatives are provided for Categories 2 and 3 (referenced to the FTA definitions in its noise impact criteria guidelines). One would conclude that there is no Category 1 land use along the entire project corridor; however, this is not clearly stated anywhere in this section. Please include an appropriate explanation. | 98-92

Page 3-11-26 Under the first paragraph it is stated that: "*...would increase by substantially less than 1 dBA, which is ...*" Please clarify how substantial an amount can the range between 0 and 1 dBA be. | 98-93

Comment 98-85

Mitigation for the acquisition of property is defined in Chapter 3-1.2.6, Regulatory Compliance. All property acquisitions would be governed by the federal Uniform Relocation Assistance and Real Property Acquisitions Policies Act. A cross-reference has been added in the land use discussion.

Comment 98-86

The location of parking in San Dimas has changed since publication of the Draft EIS/EIR. However, the issue of acquisition and relocation would remain; see Comment 98-85.

Comment 98-87

The summary statement is built upon the preceding discussions of long-term impacts in each city, all of which concluded that there would be no long-term impacts because the cities have already accounted for the Foothill Extension and previously created or modified their individual land use plans.

Comment 98-88

Given that the proposed project is likely to be constructed under a Design-Build contract, the potential range of equipment to be used is too broad to support a typical construction period impact assessment. Instead, specific property line noise limits will be established to give the contractor flexibility and to help ensure that adjacent sensitive receptors are not exposed to excessive construction noise levels.

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Comment 98-89

The Manuel Padron & Associates plan is the proposed operating plan for the Foothill Extension and is a Technical Appendix, in Volume X of the Final EIS/EIR. There is no specific model; rather, the FTA guidance manual specifies a prediction methodology.

Comment 98-90

Predicted train noise levels for the Foothill Extension are based on measurements taken of P2000 light rail vehicle (LRV) operating on Phase I of the Metro Gold Line in South Pasadena. Measurements were performed by ATS Consulting, LLC, the noise and vibration consultant for the Final EIS/EIR. The analysis assumes that the on-vehicle audible warning device ("whistle") will generate a sound level of 85 dBA at 100 feet in front of the LRV. This assumption is consistent with both the California Public Utilities Commission General Order 143-B and previous measurements of the P2000 LRV performed by ATS Consulting, LLC at Metro's Gold Line maintenance facility.

It was also assumed that the audible warning device would sound continuously starting either 300 feet or five seconds in advance of the crossing. This assumption generates a worst-case estimate since the audible device would likely not sound continuously but rather in a pattern. The maximum sound level of the horn (Lmax), the total time that the horn would sound at each crossing per passby, and the total number of train passbys were used to predict the Ldn from the audible device. This Ldn was then added to the Ldn for the LRV (i.e., wheel/rail noise) to determine the total noise level from light rail transit operations.

Comment 98-91

Please see revised Chapter 3-11 discussion of construction period noise and proposed mitigation.

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Page 3-11-26 Under the first paragraph it is stated that: "*...would increase by substantially less than 1 dBA, which is ...*" Please clarify how substantial an amount can the range between 0 and 1 dBA be. | 98-93

Comment 98-92

A statement to the effect that there are no Category 1 land-uses along the Metro Gold Line Foothill Extension corridor has been added to Section 3-11.2.4.b of the Final EIS/EIR.

Comment 98-93

The text has been revised to delete the word "substantially." Any increase of less than 1 dBA would not be perceptible.

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Page 3-11-29	Based on noise sensitivity, residents in close proximity to rail tracks express mild to extreme noise impacts.	98-94
Page 3-11-75	Under the last paragraph under the title "LRT, Triple Track Configuration," the applicable local regulations should be specified.	98-95
Page 3-11-79	Under the first paragraph, the requirement: " <i>providing a complaint resolution procedure</i> (including a contact name and telephone number) <i>to rapidly address any problems that may develop</i> " should be listed as a separate mitigation measure, and also be added to the bullets in the summary sections that follow.	98-96
Page 3-11-81	The mitigation strategy of relocating crossovers or special track work could have a significant impact on single tracking times during failure management scenarios.	98-97
Page 3-11-81	MTA supports bullets 2 and 3 on this page. Speed reduction as a mitigation measure for noise and vibration should be deleted from the Final EIR. MTA can evaluate this option after revenue operations. To our knowledge, there does not exist a proven directional horn as mentioned in bullet No. 4. MTA has experimented with a wayside directional horn with no success.	98-98
Page 3-11-81	Privacy walls are limited to 5' or 6' and are not designed for noise attenuation, and may not be effective.	98-99
Page 3-11-81	It may not be structurally feasible to raise existing privacy walls without an extensive support system. (Ref: Tables 3-11.22 and 3-11.25)	98-100
Page 3-11-112	In the "Summary of "Results" section it is stated that: " <i>...impacts can be mitigated by the proposed measures, with the possible exception of properties located in close proximity to at-grade crossings.</i> " Please address whether these properties could be identified by the study.	98-101
3-12 <u>Railroad Operations</u>		
Page 3-12-01	The document should provide any explanation of MTA's role as legal owner/operator of ROW and eventual project. In addition, it should discuss MTA's sole and discretionary control over Reserved Rail Freight Easement under the Trust.	98-102
Page 3-12-01	Under "Summary of Impacts," the first and second lines should be amended to read: "The proposed LRT service could have impacts on freight service and would impact freight operations that is currently provided by the BNSF Railway over LACMTA owned tracks. One of the LRT alternatives...."	98-103
Page 3-12-03	MTA/BNSF Purchase and Sale Agreement is under MTA's control – not the Authority's.	98-104

Comment 98-94

This comment does not relate to any wording on the cited page. The text in the Draft EIS/EIR stated the conditions that would create noise impacts.

Comment 98-95

On March 17, 2005, the Construction Authority adopted a policy to comply with local noise requirements during the construction period. .

Comment 98-96

This section has been edited with the suggested change.

Comment 98-97

Impacts predictions and proposed mitigation are based on August 2005 conceptual level designs that are subject to further refinement during Final Design. During Final Design, data that affect the impact prediction process may change, such as the precise locations and grade of rails, switch locations, and the placement of grade crossing warning devices. If it is determined that crossovers cannot be relocated due to operational constraints, then moveable point frogs will be installed to eliminate the flangeway gap and mitigate the noise and vibration impact caused by the crossover. Accordingly, it is important to note that the calculation of impacts and specific mitigation measures reported in the Final EIS/EIR will be subject to further refinement.

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Comment 98-98

See Comment 98-43. Note that there are no speed reductions proposed as mitigation measures in the Final EIS/EIR. The existing audible devices on the P2000 LRV are directional due to their mounting location. This directionality has been incorporated into the noise analysis. However, a "directional" horn is not proposed.

Comment 98-99

Existing privacy walls were generally not factored into the impact analysis. However, if the existing walls meet the specifications for the proposed sound walls in terms of height above the top-of-rail, length, and material density, then mitigation may not be required. The effectiveness of these walls will be assessed as part of Final Design.

Comment 98-100

The structural feasibility of raising the existing privacy walls will be considered during Final Design. See Comment 98-99.

Comment 98-101

See revised Chapter 3-11.3 for the locations of proposed mitigation measures. Locations of remainder impacts are also described.

Comment 98-102

See revised Chapter 3-12, Railroad Operations, which indicates that MTA has sole rights to amend existing operating agreements.

Comment 98-103

Since publication of the Draft EIS/EIR, the LRT Alternative has been amended to eliminate potential conflicts between LRT and freight operations.

Comment 98-104

There is no statement that the Purchase and Sale Agreement is under the control of the Construction Authority.

COMMENT LETTER 98

RESPONSE TO LETTER 98

- Page 3-12-03 The Draft EIS/EIR indicates the Purchase and Sale Agreement, dated 10/30/92, covers the operational relationship between MTA and BNSF. There are also other documents that cover that relationship. The following additional documents should be referenced: 1) Shared Use Agreement, dated 10/30/92, 2) Grant Deed, AT&SF to LACTC as recorded 12/15/92 where the Shared Use Agreement and other exceptions related to BNSF freight operations are covered.

98-105
- Page 3-12-03 Regarding the 10-foot BNSF Freight Service Easement, an exception to the Grant Deed Recorded 12/15/92 (above) indicates the BNSF Freight Service Easement shall expand to 15-feet when property that is within 15-feet of the track centerline is conveyed (by Grantee) to others.

98-106
- Page 3-12-04 The DEIS/DEIR should provide further analysis to show the full impacts to the transportation system, particularly for freight, heavy rail and light rail operations in the impacted corridors for all of the alternatives. In the case of the Double Track with No Freight, the truck traffic generated by discontinuing rail freight services in portions of the corridor and its impact on the corridor's mobility must be evaluated. In the case of the Double Track with Freight and Time separation, more analysis is needed to assess the impacts of reduced operating hours for freight services in terms of such factors as economic impact and traffic operations.

98-107
- Page 3-12-04 Please justify Bullet number 4, since it makes reference to a condition that is highly unlikely due to BNSF Policy and FRA rules.

98-108
- Page 3-12-04 Regarding Bullet number 7, MTA is not responsible for any costs related to the LRT project. Any change of freight usage is under the authority of the initial agreement between MTA and BNSF and not for the benefit of the Authority, which would violate the farebox and transfer of obligations to MTA per enabling statute for Authority.

98-109
- Page 3-12-04 Under Bullet number 8, the document should clarify that only MTA has the authority to act here.

98-110
- Page 3-12-05 Under Section 3-12.2.1, the DEIS/DEIR should note that abandonment will require MTA's cooperation as it is the legal entity. The Surface Transportation Board would look to MTA to process an application. MTA is a railroad and the Authority has no legal operational authority under federal law.

98-111
- Page 3-12-05 In the discussion of track alternatives, it should be acknowledged that freight service by the BNSF cannot be discontinued without permission granted by the Federal Surface Transportation Board. If service were to be adversely affected by unauthorized action recourse would be available through the Surface Transportation Board.

98-112

Comment 98-105

The additional references have been added, but do not change to overview of operating conditions provided in the EIS/EIR.

Comment 98-106

The clarification has been added.

Comment 98-107

Subsequent to the Draft EIS/EIR, the Build Alternatives were modified to provide two rail grade separations so that LRT and freight operations occur on separate tracks. Accordingly, there is no impact to freight operations from the LRT operations.

Comment 98-108

See Comment 98-107. Future electrification of the freight line is a possibility, regardless of current BNSF policy.

Comment 98-109

The bullet states a condition of the Purchase and Sale Agreement. Subsequent state legislation creating the Construction Authority transferred the obligation for LRT construction to the Construction Authority.

Comment 98-110

The bullet states a condition of the Purchase and Sale Agreement and need not be edited.

Comment 98-111

See Comment 98-107. BNSF can discontinue service to individual customers at will. STB approval is required only if service over the entire subdivision line were to be requested.

COMMENT LETTER 98

RESPONSE TO LETTER 98

Page 3-12-06	Section 3-12.4.1 should acknowledge need for MTA approval.	98-113
Page 3-12-06	Section 3-12.4.2 should acknowledge the need for MTA's approval and the fact that limited freight delivery hours may result in added costs to companies and require payment from the Authority for losses.	98-114
Page 3-12-06	Section 3-12.4.5 should be augmented to address cost factors involved before and after mitigation for double track. Further, it should address SCRRA comments regarding 4-track areas, including added costs/impacts/mitigations.	98-115
Page 3-12-06	The Draft EIS/EIR must recognize that to enable BNSF's current and future operations to continue on a freight operation only single track the following measures would be necessary: <ul style="list-style-type: none"> • Construction of a new track with proper clearances with new bridges and appurtenances. • Turnouts, crossings in LRT tracks and interlocking authorized by FRA and CPUC that would enable freight operations across the LRT track to serve industries. • Replacement of 6000 foot-long siding now existing at Irwindale to another location within the BNSF network. • CPUC order and FRA agreement would be necessary before construction." 	98-116
Page 3-12-06	The first bullet should be rewritten to read: "Turnouts, crossing in LRT tracks and interlockings authorized by FRA and CPUC that would enable freight operations across the LRT track to serve industries."	98-117
Page 3-12-06	The third bullet should be rewritten to read: "A constrained operating schedule under which freight service would occur during non-revenue hours which would have to be negotiated with BNSF since it would be a drastic change from existing agreements."	98-118
Page 3-12-06	The second line of the final paragraph must read: "Fourth would be negotiated and settled by agreement with BNSF prior to construction."	98-119
Page 3-12-06	In Section 3.12-5, in the fourth line of first paragraph, replace: "storage of cars" for "functions."	98-120
Page 3-12-06	In Section 3.12-5, in the first line of second paragraph, replace: "Turnouts and track crossings" for "switches."	98-121
Page 3-12-06	In Section 3.12-5, in the fifth line of the second paragraph, substitute "storage of cars for "functions"	98-122

13

Comment 98-112

See Comment 98-111.

Comment 98-113

See Comment 98-107.

Comment 98-114

See Comment 98-107

Comment 98-115

See Comment 98-107.

Comment 98-116

See Comment 98-107.

Comment 98-117

See Comment 98-107.

Comment 98-118

See Comment 98-107.

Comment 98-119

See Comment 98-107.

Comment 98-120

Activities in Irwindale include more than storage of cars; the word "function" is appropriate.

COMMENT LETTER 98

RESPONSE TO LETTER 98

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Comment 98-121

See Comment 98-107. The Double Track option has been eliminated.

Comment 98-122

See Comment 98-121.

COMMENT LETTER 98

RESPONSE TO LETTER 98

3-13 Safety and Security

General Comments

- General The MTA Grade Crossing Policy for Light Rail Transit, adopted in December 2003, should be used to evaluate all crossings of the project. | 98-123
- General Design of the Gold Line extension will comply with MTA design requirements for safety and operational compatibility. | 98-124
- General Areas having restricted access will be required to have additional fire protection such as wet standpipe and walkway lighting. | 98-125
- Page 3-13-02 In the second paragraph replace "underpasses or overheads" with "grade separations." In the same paragraph, revise the third sentence to read: "The CPUC staff reviews proposals of crossings, evaluates proposed warning devices or other safety features at at-grade crossings, and recommends..." | 98-126
- Page 3-13-02 In the third paragraph, replace "FRA" with "FTA." | 98-127
- Page 3-13-03 The MTA Rail Safety Education and Outreach team provides on-going education in rail safety offering presentations in several technical formats and multiple languages designed for classrooms and other community venues. Further, the "MTA Experience," a mobile safety-theatre, appears at community events to educate the public about rail safety through the use of advanced video and 3-D effects to simulate the real operation of a MTA Train. It provides an opportunity to make a compelling and lasting impression on children and adults about the consequences of illegal or risky behavior around trains. Prior to the opening of any new rail line a major safety campaign is launched by MTA to acquaint and prepare the public for the safe operation of the system in their community. | 98-128
- Page 3-13-03 In the second full paragraph, the second sentence should be deleted since the listing of safety related items is at best incomplete and some items are listed as "may include." | 98-129
- Page 3-13-03 Please clarify in the first bullet that photo equipment be installed on bus vehicles. | 98-130
- Page 3-13-03 On the last bullet, last line, we recommend that the words "identification and resolution of unsafe conditions" be deleted. | 98-131
- Page 3-13-04 Recommend that all of page 3-13-04 be deleted beginning with the paragraph "Due to the implementation..." | 98-132
- Page 3-13-05 Recommend that all of page 3-13-05 be deleted along with the table on page 3-13-06 and the first written paragraph on page 3-13-06. | 98-133

14

Comment 98-123

A grade separation analysis was completed on the 43 grade crossings using Metro Grade Crossing Analysis Policy.

Comment 98-124

The text has been revised to indicate compliance with LACMTA policies and design standards.

Comment 98-125

MTA safety standards are being utilized for all design.

Comment 98-126

Although the comment does not change the meaning of the information presented in the EIS/EIR, the requested edits have been made.

Comment 98-127

The suggested change is incorrect.

Comment 98-128

Although the comment does not change the meaning of the information presented in the EIS/EIR, the requested edits have been made.

Comment 98-129

The comment does not change the meaning of the information presented in the EIS/EIR; no edit to the EIS/EIR has been made.

Comment 98-130

The description of LACMTA safety efforts is clearly stated to apply to all transit types, including buses. No edit to the EIS/EIR has been made.

COMMENT LETTER 98

RESPONSE TO LETTER 98

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14

Comment 98-131

The requested edits have been made.

Comment 98-132

Although no specific reasons for the deletion are given, some edits to the EIS/EIR have been made to delete commentary.

Comment 98-133

See Comment 98-132.

COMMENT LETTER 98

RESPONSE TO LETTER 98

Page 3-13-06 Rather than the statement about the existing rail operations by MTA, a detailed statement of what the Authority intends to do to build a safe system would be appropriate. 98-134

Page 3-13-10 The document should include a safety and security discussion under "Public Services – Police Protection." The purpose of this section should be to describe existing and future safety and security services for passengers and the surrounding community, and to identify and quantify any potentially significant safety and security impacts associated with the development of the project. The CEQA thresholds would be: 98-135

- Cause or create the potential for substantial adverse safety conditions, including: station accidents, boarding and disembarking accidents, right-of-way accidents, collisions, fires, and major structural failures; or substantially limit the delivery of community safety services, such as police, fire, or emergency services; 98-136

- Cause or create the potential for substantial adverse fire/life safety conditions, including: vehicle fires, trainway electrical fires, station and facility fires, and smoke and toxic fume-generating fires. 98-137

- Cause or create the potential for substantial adverse security conditions, including: incidents, offenses, and crimes, or 98-138

- Substantially interfere with implementation of an emergency evacuation plan. 98-139

Page 3-13-16 The construction-period mitigation measures should specify the specific practices that would be the mitigation measures for the significant adverse impacts identified in the impact discussion. This same comment applies for "Long-Term Mitigation Measures." 98-140

3-15.1 Traffic and Transportation

Page 3-15-122 It is stated that "some right-of-way" may need to be acquired for the following street intersections:

- Myrtle Avenue and Evergreen Avenue (210 EB)
- Myrtle Avenue and Duarte Road
- Irwindale Avenue and Foothill Blvd
- Irwindale Avenue and EB I-210 Freeway
- Irwindale Avenue and W First Street

98-141

More information needs to be provided regarding the widths of these acquisitions, and the analysis of such potential land acquisitions should be conducted. If these acquisitions were analyzed in Section 3.1, "Acquisition and Displacement," it was not apparent. CEQA Guidelines Section 15123.4

Comment 98-134

See Comment 98-132.

Comment 98-135

An impact assessment of police protection is provided under the discussion of Community Facilities and Services, Chapter 3-4. The impact thresholds stated are not defined under CEQA, and are not those selected by the Construction Authority, as the CEQA Lead Agency, to assess safety issues.

Comment 98-136

See Comment 98-135.

Comment 98-137

See Comment 98-135.

Comment 98-138

The impact threshold stated is not defined under CEQA, and is not one selected by the Construction Authority, as the CEQA Lead Agency, to assess safety issues.

Comment 98-139

An impact assessment of emergency response is provided under the discussion of Community Facilities and Services, Chapter 3-4.

COMMENT LETTER 98

RESPONSE TO LETTER 98

Page 3-13-06 Rather than the statement about the existing rail operations by MTA, a detailed statement of what the Authority intends to do to build a safe system would be appropriate. 98-134

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More information needs to be provided regarding the widths of these acquisitions, and the analysis of such potential land acquisitions should be conducted. If these acquisitions were analyzed in Section 3.1, "Acquisition and Displacement," it was not apparent. CEQA Guidelines Section 15123.4

Comment 98-140

No significant adverse impacts were identified, only potential adverse impacts. The EIS/EIR states that these potential adverse impacts would be reduced by regulatory compliance and the safety and operational standards of federal agencies, state agencies, and LACMTA.

Comment 98-141

See revised Chapter 3-1, Acquisitions and Displacements, for a listing of all required acquisitions, including those needed for intersection modifications. Right of way needs are also shown on drawings in Volume 4.

The revised Chapter 3-15.6 (Impact Results with Mitigation) describes the resulting functions of intersections following proposed mitigation.

COMMENT LETTER 98

RESPONSE TO LETTER 98

(D) state that the "effects of the mitigation measure shall be discussed..." Same comment for Pages 3-15-123 and 3-15-124 for the intersections mentioned there.

↑ 98-141
cont'd.

Page 3-15-130 Section 3-15.5.2. Generally, all mitigations described in Section 3-15.5.2.c should provide more information regarding who would be responsible for implementing the mitigation measures, especially the land acquisition and relocation impacts. The finding that "the 2-foot right-of-way expansions... would be less than adverse/less than significant..." should be substantiated.

98-142

Page 3-15-138 In the discussion under LRT Triple Track Configuration, the mitigation measures suggested on page 3-15-119 should be augmented to warrant the conclusion that construction period impacts would be reduced to less than significant.

98-143

3-16 Utility Disruptions and Relocations

Page 3-16-1 The summary statement states that utilities within the ROW would be relocated at the specific utility's expense. Please clarify whether this been confirmed with the affected utilities, and can be relied on as a legally binding statement.

98-144

Page 3-16-4 Please provide legal confirmation that the utility (franchise) agreements with the BNSF (and later MTA) clearly indicate that the cost of any required relocation would be borne by the utility owner. A similar concern is on page 3-16-5.

98-145

Page 3-16-7 Under "Potential Mitigation, Construction-Period Mitigation Measures," add that area businesses and residents will be advised by notice of any work or utility interruption that will impact their property.

98-146

3-17 Visual Impacts

General There is no discussion of environmental impacts relating to glare or light, which are two of the six CEQA impact criteria lists in 3.17.2.2 Impact Criteria, b. CEQA Impact Criteria. Assuming that the new stations would be lighted at night, the potential for these impacts should be noted throughout Section 3.1.7.2.

98-147

General Please clarify the discrepancy between the references to "local, state, and/or federal regulatory requirements and/or permits identified in Section 3-17.2.9" and Section 3-17.2.9, which states: "mitigation of effects through regulatory compliance is not germane to the visual resources aspect of this particular project."

98-148

Comment 98-142

All mitigation measures would be the responsibility of the Construction Authority. Justification for the conclusion of less than adverse/less than significance is stated within the same sentence: "structures are typically 10 feet off of curb lines and thus would not likely be affected."

Comment 98-143

There is no page 3-15-138 in the Draft EIS/EIR. The discussion on page 3-15-119 adequately describes the construction period mitigation measures to support the conclusion.

Comment 98-144

See revised Chapter 3-16.

Comment 98-145

See Comment 98-144.

Comment 98-146

The suggested measure is included in a typical Work Site Traffic Management Plan.

Comment 98-147

See revised Chapter 3-17, Visual.

Comment 98-148

See revised Chapter 3-17, Visual.

COMMENT LETTER 98

RESPONSE TO LETTER 98

3-18 Water Quality

General There is no discussion for the design of, nor the construction of, facilities according to the Los Angeles Regional Water Quality Control Board (LARWQCB) requirements for the Standard Urban Stormwater Mitigation Plan (SUSMP), which applies to commercial and industrial facilities which may contribute storm water runoff contamination to the storm drain system and the groundwater or estuaries. These LARWQCB requirements must be designed into the project. There is not specific discussion for SUSMP nor Table ES-3 or ES-4. 98-149

General The Maintenance Facility seems to be located in a drinking/groundwater recharge basin and may disrupt riparian habitat. Please expand your discussion of possible impacts to better address environmental impacts. 98-150

Page 3-18-21 In paragraphs 1, 3, and 4, only Arcadia is discussed, with no mention of Pasadena. Please clarify whether there are any effects in Pasadena. 98-151

Page 3-18-19 In Section 3-18.2.3, "Construction-Period Impacts," none of the study area is in a Zone A flood zone or an area subject to seiche, tsunami, or mudflow. Perhaps this should be stated before the first heading ("a. No Build Alternatives") and tied in to a general statement about no impacts overall related to several of the impact criteria listed in Section 3-18.2.2, Page 3-18-18, (i.e., worker safety, etc.). Also, the impact criterion of violation of water quality standards or waste discharge requirements is not specifically mentioned in the later discussions of impacts. 98-152

Chapter 4 – Financial Analysis

General Section 4.2 discusses offering opportunities at "later stages of project development for stations to have individual and community identities through creative design of other station components such as roof canopies, guardrails, floor finishes, station furniture, plaza and entrance areas, artworks, vertical finishes, and related items." MTA is in the process of updating overall station design criteria to address significant maintenance and operational as well as community concerns. It is anticipated that the updated station design criteria will include standardized elements such as canopies, floor finishes, signage, artwork, etc. The new criteria will include a revised list of acceptable station finishes and materials and should be used on all future Metro Rail lines/stations. Due to the unique nature of art and the significant operational impacts, and in order to ensure curatorial consistency and appropriateness, MTA shall implement and manage the art program directly and in collaboration with communities along the alignment. 98-153

General Section 4.2 also discusses offering opportunities at "later stages of project development for stations to have individual and community identities through creative design of other station components such as roof canopies, guardrails, 98-154

Comment 98-149

The Draft EIS/EIR states that the project would be designed in accordance with all required permits, including those of the LARWRCB. A Standard Urban Stormwater Mitigation Plan (SUSMP) will be prepared during Final Design

Comment 98-150

Modifications to the Build alternatives have eliminated potential impacts to riparian habitat. See revised Chapter 3-3.

Comment 98-151

The text has been edited to indicate that the existing rail alignment is within both Pasadena and Arcadia.

Comment 98-152

See revised Chapter 3-18.

Comment 98-153

No revised LACMTA Design Criteria have been issued. The Construction Authority has already conducted a station art and design program with the corridor cities, including selection of artists for each station. The Construction Authority shall continue to manage station design, including the inclusion of art, in conformance with the current LACMTA Design Criteria.

Comment 98-154

See Response 98-153.

COMMENT LETTER 98

RESPONSE TO LETTER 98

floor finishes, station furniture, plaza and entrance areas, artworks, vertical finishes, and related items.” MTA is in the process of updating overall station design criteria to address significant maintenance and operational as well as community concerns. It is anticipated that the updated station design criteria will include standardized elements such as canopies, floor finishes, signage, artwork, etc. The new criteria will include a revised list of acceptable station finishes and materials and should be used on all future Metro Rail lines/stations. Due to the unique nature of art and the significant operational impacts, and in order to ensure curatorial consistency and appropriateness, Metro shall implement and manage the art program directly and in collaboration with communities along the alignment.

98-154
cont'd.

Chapter 5 – Financial Analysis

General The funding assumed in this environmental impact report is assumed for modeling purposes, but does not reflect the commitment or actual programming of funds by the MTA. The Long Range Transportation Plan and Short Range Transportation Plan do not currently designate the magnitude of funding or annual availability that is depicted in this document. MTA strongly urges that caveat language be incorporated into the document to better reflect the proposed project's funding availability.

98-155

General The availability of local sales tax funding from provisions of State of California Senate Bill 314 requires a local ballot measure and voter approval. While this is mentioned in the document, it should be footnoted to the financial tables.

98-156

Chapter 6 - Agency Coordination

General MTA requests a copy of full scoping report dated September 5, 2003.

98-157

General Section 6.4 states that MTA was active in the weekly Project Development Team (PDT) meetings held at the Construction Authority's offices in South Pasadena from the beginning of the EIS/EIR. Please clarify which MTA representative attended these PDT meetings after January 2004 to the present time.

98-158

Chapter 8- Public Outreach

MTA requests a copy of the Study Steering Committee membership list, along with the notes and minutes from the meeting with BNSF (Page 8-4).

98-159

Comment 98-155

Please see revised Chapter 5, Financial Analysis, for an updated discussion of project funding.

Comment 98-156

See Response 98-144

Comment 98-157

A Scoping Report was provided on August 1., 2005.

Comment 98-158

The requested Scoping Report was provided.

Comment 98-159

The requested information was provided.

COMMENT LETTER 98

VOLUME THREE

General Comments

- The document should recognize that CPUC General Order 143-B has definite regulations regarding clearance and safety walkways with regard to light rail. CPUC General Order 26-D orders clearance requirements and General Order 118 orders walkway requirements for BNSF. | 98-160
- The two track plan and section drawings should show the location of the OCS poles, the unobstructed emergency walkway for the light rail, fences and clearance for BNSF. For the track used by BNSF, the OCS contact wire must be a minimum of 22 feet six inches above the top of the rail and the side clearance must be provided a minimum of 8 feet six inches from centerline of track. Thus, a gauntlet track at each station platform must be provided for BNSF use. | 98-161
- The three tracks plan and section drawings should show the required light rail unobstructed emergency walkway of 2.5 feet, fences and the OCS poles. If the emergency walkway and OCS poles are between the light rail tracks the track centers must be 14.78 feet minimum. The track centers between parallel BNSF and light rail tracks should be 18 feet, with a fence eight feet from the light rail centerline and 10 feet from the BNSF track centerline. | 98-162
- Side clearance must be increased as necessary for track curvature. | 98-163
- Drawing C-100
Note 8 refers to a report entitled "Traction Power Sub-Station Locations." This report should be made available for consultation. | 98-164
- Drawing C-247
The notation "MTA ROW" should be corrected to read "SANBAG." | 98-165
- Drawings C-340, C-340F and C-342F
These drawings show connection from the BNSF-SCRRA tracks to the Gold Line right of way but the connection from the BNSF-SCRRA tracks to the Gold Line tracks for the two-track configuration is not shown. | 98-166
- Drawings X-201 to X-307
All track cross-section views excluding stations shall show and identify emergency walkways (30 inches wide outside walkways, 36 inches wide center walkways) for passenger evacuation as required by MTA fire/life safety design criteria sections 3.9.4 and 3.10.4, and NFPA 130 Standards. | 98-167
- Drawings X-201 to X-307
Where non-ballasted walkways are provided, for example on bridges, locate track centers to minimize horizontal distance from edge of train to walkway to allow passengers to access the walkway without difficulty. | 98-168

RESPONSE TO LETTER 98

Comment 98-160

The requested clarification has been added.

Comment 98-161

Design has advanced only to the advanced conceptual level (August 2005). Note that the potential shared use of a track for LRT and BNSF has been eliminated. See drawings in Volume IV of the Final EIS/EIR. The requested details are appropriate for when the project is in the Final Design phase.

Comment 98-162

See Comment 98-161.

Comment 98-163

See Comment 98-161.

Comment 98-164

The note has been removed. See Comment 98-51.

Comment 98-165

The requested edit has been made.

Comment 98-166

Subsequent to the Draft EIS/EIR, the project was amended to allow LRT and freight to operate independently within the rail right of way.

COMMENT LETTER 98

RESPONSE TO LETTER 98

VOLUME THREE

General Comments

- The document should recognize that CPUC General Order 143-B has definite regulations regarding clearance and safety walkways with regard to light rail. CPUC General Order 26-D orders clearance requirements and General Order 118 orders walkway requirements for BNSF. | 98-160

- The two track plan and section drawings should show the location of the OCS poles, the unobstructed emergency walkway for the light rail, fences and clearance for BNSF. For the track used by BNSF, the OCS contact wire must be a minimum of 22 feet six inches above the top of the rail and the side clearance must be provided a minimum of 8 feet six inches from centerline of track. Thus, a gauntlet track at each station platform must be provided for BNSF use. | 98-161

- The three tracks plan and section drawings should show the required light rail unobstructed emergency walkway of 2.5 feet, fences and the OCS poles. If the emergency walkway and OCS poles are between the light rail tracks the track centers must be 14.78 feet minimum. The track centers between parallel BNSF and light rail tracks should be 18 feet, with a fence eight feet from the light rail centerline and 10 feet from the BNSF track centerline. | 98-162

- Side clearance must be increased as necessary for track curvature. | 98-163

- Drawing C-100
Note 8 refers to a report entitled "Traction Power Sub-Station Locations." This report should be made available for consultation. | 98-164

- Drawing C-247
The notation "MTA ROW" should be corrected to read "SANBAG." | 98-165

- Drawings C-340, C-340F and C-342F
These drawings show connection from the BNSF-SCRRA tracks to the Gold Line right of way but the connection from the BNSF-SCRRA tracks to the Gold Line tracks for the two-track configuration is not shown. | 98-166

- Drawings X-201 to X-307
All track cross-section views excluding stations shall show and identify emergency walkways (30 inches wide outside walkways, 36 inches wide center walkways) for passenger evacuation as required by MTA fire/life safety design criteria sections 3.9.4 and 3.10.4, and NFPA 130 Standards. | 98-167

- Drawings X-201 to X-307
Where non-ballasted walkways are provided, for example on bridges, locate track centers to minimize horizontal distance from edge of train to walkway to allow passengers to access the walkway without difficulty. | 98-168

Comment 98-167

All design is being developed in accordance with CPUC General Orders.

Comment 98-168

See Comment 98-167.

COMMENT LETTER 98

RESPONSE TO LETTER 98

Drawing X-201, Sheet 1/13
Drawing Detail Section #5: Show guardrail or fence protection along outer edges of bridge structure adjacent to walkway. | 98-169

Drawing X-205, Sheet 5/13
Drawing Detail section #20: U-shaped structures leading from the mainline to the maintenance facility require fire protection (MTA Fire/life safety design criteria 3.9.5) Walkway lighting will be needed here also. | 98-170

Drawing S-004
Bridge 4 Freeway Over crossing: A wet standpipe and walkway lighting are required on this structure (MTA fire/life safety design criteria 3.10.4. and 3.10.5). Provide fall protection on outer edges of structure. | 98-171

Drawing S-016 to S-022
San Gabriel River Crossing: A wet standpipe and walkway lighting are required on this structure (MTA fire/life safety design criteria 3.10.4. and 3.10.5). | 98-172

Comment 98-169
See Comment 98-167.

Comment 98-170
See Comment 98-167.

Comment 98-171
See Comment 98-167.

Comment 98-172
See Comment 98-167.

COMMENT LETTER 99

RESPONSE TO LETTER 99



10410622
CT2

CITRUS COMMUNITY COLLEGE DISTRICT
BOARD OF TRUSTEES
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Duarte/Arcadia/Azusa/Monrovia Representative
Ms. Paulette Rice, *Student Representative*
Michael J. Viera, Ph.D., *Superintendent/President*

June 16, 2004

RECEIVED
JUN 21 2004
PBL
CONST. AUTHORITY

Metro Gold Line Foothill Extension
Construction Authority
625 Fair Oaks Avenue, Suite 200
South Pasadena, California 91030

To Whom It May Concern:

As Superintendent/President of Citrus College, I am writing in support of the Full Build LRT Alternative for Phase II of the Metro Gold Line.

Citrus College serves the communities located across the 24 miles of the Foothill Corridor. We are one of four major colleges along this proposed segment of the Gold Line. Currently we serve approximately 12,000 students. However, planning and construction is underway to complete our Educational and Facilities Master Plan, which will facilitate a student body projected to grow to as high as 20,000 in the next decade. Citrus College is also a substantial provider of employment opportunities for area residents.

The Full Build LRT Alternative would create 12 new Gold Line stations, one of which is a Citrus Avenue station. Citrus College and our neighbor, Azusa Pacific University, are bounded on the west by Citrus Avenue. Both colleges are a short distance from the site of the proposed Citrus Avenue station. Our students live and work in the area and often make multiple trips to campus each day. A Citrus Avenue station would address the significant transportation needs of our students and our staff.

99-1

The Full Build LRT Alternative would connect Pasadena to Montclair and have a station at every city across the 24 miles of the Foothill Corridor. It would mean that one day many thousands of students would commute to Citrus College and Azusa Pacific University via the Gold Line and disembark at Citrus Avenue station. This alternative would enable Citrus College to better provide for the educational needs of our communities, and it would promote future economic growth and opportunity in our region.

Thank you for this opportunity to comment on the Draft Environmental Impact Report for the Metro Gold Line Foothill Extension.

Sincerely,

Michael J. Viera, Ph.D.
Superintendent/President

MJV/MG:cl

c: Board of Trustees

1000 West Foothill Boulevard
Glendora, CA 91741-1899
TEL: 626.963.0323
www.citruscollege.edu

COMMENT LETTER 100

RESPONSE TO LETTER 100



NATIONAL MEDICAL CENTER AND BECKMAN RESEARCH INSTITUTE

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P0513

June 21, 2004

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JUN 21 2004
PBL
CONST. AUTHORITY

Via Hand Delivery

Metro Gold Line Phase II Light Rail Transit
Construction Authority
625 Fair Oaks Avenue, Suite 200
South Pasadena, CA 91030

Re: Comments of City of Hope to the Metro Gold Line Rail DEIS/DEIR

Dear Construction Authority:

On behalf of City of Hope National Medical Center (City of Hope), I am writing this letter to you to provide City of Hope's comments on the Draft Environmental Impact Statement/Report (DEIR). On a conceptual level, City of Hope is supportive of the proposed Metro Gold Line Rail Project (Project) because of the Project's goal to improve regional transportation and alleviate traffic-related congestion. City of Hope also understands and appreciates the goals of the City of Duarte and others in desiring to provide this form of mass transportation for the benefit of the public generally. While City of Hope must oppose the DEIR for the reasons addressed below, we look forward to working cooperatively with the Construction Authority and the City of Duarte as alternatives are analyzed and developed.

100-1

The City of Hope campus (Campus), comprising about 110 acres bordering on the south side of East Duarte Road, is principally focused on care of cancer patients and related cancer research. The grounds include many low-rise clinic and research buildings, a new hospital, a rose garden and open space with trees (park-like areas for patients to walk and rest) and surface parking throughout. The quality of the environment of City of Hope is a central feature of the care of critically ill patients. City of Hope annually has over 100,000 visits of patients with varying stages of cancer, more than any other medical facility in the San Gabriel Valley. City of Hope has been operating at this location for 90 years and, with over 2,300 employees, is the largest employer in the City of Duarte.



1500 East Duarte Road, Duarte, CA 91010-3000
Tel 626-359-8111
www.cityofhope.org

A National Cancer Institute-designated Comprehensive Cancer Center

Comment 100-1

The City of Hope's support for the project is acknowledged. Subsequent to the Draft EIS/EIR, changes in the proposed Duarte Station and parking have been made in response to comments submitted. Specifically, the proposed parking location shown at the City of Hope has been moved to the north side of the railroad track, on an existing commercial lot, with access to be provided from Business Center Drive. The City of Duarte approved this parking location on February 22, 2005 (PDR, page 4-15). Pedestrian access to the parking and station would be provided from Business Center Drive, which links to Three Ranch Road. The City of Duarte affirmed in the February 22 action that the station location would remain at the same location as shown in the Draft EIS/EIR, which is across the street from the City of Hope campus. Please see revised Chapter 2, Alternatives.

COMMENT LETTER 100

RESPONSE TO LETTER 100

Metro Gold Line Phase II Light Rail Transit
 Construction Authority
 June 21, 2004
 Page 2

Keeping in mind the nature and mission of City of Hope, we have analyzed the proposed DEIR which indicates a light rail station to be located across the street from City of Hope (Duarte Station) and a multi-level parking structure (Parking Structure) to be located on land presently owned by City of Hope. We found essentially no substantial analysis demonstrating why this would be the most viable and environmentally sensitive location for the Duarte Station and the Parking Structure, nor any consideration as to what advantages or disadvantages are relevant. Instead, the DEIR says there would be no impact at all from this development proposal. City of Hope respectfully disagrees with this conclusion.

100-2

The DEIR provides a “broad-brush” approach to the analysis of the entire Metro Gold Line and its stations, yet it fails to identify critical site-specific concerns, especially in regards to City of Hope. The analysis has assumed conclusions, provided cursory analysis and, perhaps most importantly, ignored real impacts and potential alternative locations for the proposed stations and associated parking. The DEIR does not provide, and has not produced, the analysis necessary to afford reasonable support for a determination of where and how to locate, among other things, the various stations, parking structures and associated facilities for the Project.

100-3

As explained below, the deficiencies of the DEIR are numerous, and the Project as proposed would substantially and adversely affect City of Hope.

Project Definition

City of Hope submits that the DEIR does not properly define the Project by emphasis on the Duarte Station and associated facilities. The plans for each station should be analyzed, described, and justified in detail as superior.

100-4

Impacts

As it pertains to City of Hope, the proposed Duarte Station development threatens to significantly and adversely impact City of Hope’s mission and introduce relative “strangers” to the health care facility and nearby community. The open, patient-friendly nature of the property would have to change as barriers are added to mitigate the risk of intrusions. Even so, there will be greater risk of trespassing and intrusions onto the Campus that, among other things, would affect our patients and their families.

100-5

We believe a fair assessment of the Project, impacts, cumulative effects, and alternatives among other factors, would lead to the reasonable conclusion that the neighborhood onsite impacts are too great for any perceived benefit derived from the specific location of the Duarte Station-related facilities on City of Hope-owned land. Although there are numerous elements of the Project that will create negative impacts to City of Hope, the following are four primary areas we see as the greatest potential for risks under the proposed configuration:

- **Safety & Security.** By constructing the Parking Structure on City of Hope property, it is our assessment that there will be increased risks associated with safety and

100-6

Gold Line DEIR Comment Letter Final 6-21-04.doc

Comment 100-2

During numerous meetings with the City of Duarte throughout the alternatives analysis and environmental process during the period 2000–2004, several station options were presented, evaluated, and narrowed down to the station location proposed in the Draft EIS/EIR. Options at Buena Vista Avenue and Mountain Avenue were discussed and sketch-level plans prepared, but the City and the Construction Authority agreed that the location near City of Hope would be the optimal location for a number of reasons; the key ones being ridership, freeway access, and limited impact on residential properties.

Comment 100-3

A discussion of the station location process was included in the Alternatives Analysis Report (AA) released in January 2003. The AA Report was one of the reference documents used to prepare the Draft EIS/EIR. In addition, further consultation with the City of Duarte occurred subsequent to the release of the Draft EIS/EIR about station location. Detailed information about the city’s selection (affirmation) of the station site is included in the March 2005 Project Definition Report (PDR), which is an appendix to the Final EIS/EIR.

Comment 100-4

The Draft EIS/EIR does properly describe the project in that it defines a proposed station location. As stated previously, there was only one station location in the City of Duarte in the Draft EIS/EIR, the location of that station being defined based on numerous meetings with City staff during the environmental process. The purpose of a Draft EIS/EIR is not to pick a best option (or even to justify one); rather, it is to present the impacts related to overall transportation alternatives and of any location options for specific facilities.

COMMENT LETTER 100

RESPONSE TO LETTER 100

Metro Gold Line Phase II Light Rail Transit
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Page 2

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100-2

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100-3

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City of Hope submits that the DEIR does not properly define the Project by emphasis on the Duarte Station and associated facilities. The plans for each station should be analyzed, described, and justified in detail as superior.

100-4

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100-5

We believe a fair assessment of the Project, impacts, cumulative effects, and alternatives among other factors, would lead to the reasonable conclusion that the neighborhood onsite impacts are too great for any perceived benefit derived from the specific location of the Duarte Station-related facilities on City of Hope-owned land. Although there are numerous elements of the Project that will create negative impacts to City of Hope, the following are four primary areas we see as the greatest potential for risks under the proposed configuration:

- **Safety & Security.** By constructing the Parking Structure on City of Hope property, it is our assessment that there will be increased risks associated with safety and

100-6

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Because the City of Duarte was able to identify their preferred station option prior to release of the Draft EIS/EIR, only one location was presented and analyzed in the report. With other cities that could not narrow down their station options prior to release of the Draft EIS/EIR, the impacts of each station option were presented objectively, with no discussion as to superiority.

Comment 100-5

This concern should be alleviated with the relocation of the parking facility to Business Center Drive, thus removing garage users from the City of Hope campus.

Comment 100-6

For City of Hope visitors and employees, a signalized crossing on Duarte Road would control access to the campus from the LRT station. Please see revised Chapter 3-13, Safety and Security. With regard to issues raised, please note the following:

re "security guards:" All LACMTA LRT vehicles and station areas are under the jurisdiction of Los Angeles County Sheriff.

re "lighting:" LACMTA provides station design criteria for all LRT projects within Los Angeles County. These design criteria include lighting specifications for the platform and station area. These criteria can be augmented if necessary to provide additional shielding so that light remains focused within the immediate vicinity of the station platforms.

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Metro Gold Line Phase II Light Rail Transit
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Page 3

security. Several components will need to be addressed including at-grade (or grade separated) street crossings, security guards, lighting, traffic control and parking enforcement, and maintenance. The physical proximity of the existing City of Hope facilities and the proposed Parking Structure will result in heavy pedestrian/vehicle interaction during peak hours. Additional security patrols will be required 24 hours a day to mitigate crime, potential vagrancy and vandalism. The Parking Structure will need substantial maintenance to keep travel ways clear of debris, liquids, and litter. During construction, safety will be a concern for City of Hope's patients, visitors, and employees with regards to traffic impacts, construction equipment and materials, and debris.

100-6
cont'd.

- **Traffic & Circulation.** The proposed Duarte Station and Parking Structure will significantly impact traffic and circulation patterns into, and around, City of Hope. Recognizing that most commuters will arrive early, park all day, and leave in late afternoon or evening, for the majority of weekdays, station facilities operate on a traffic pulse system. It is this pulse of morning and evening traffic that is of major concern. The additional traffic entering and exiting City of Hope will create significant impacts to the Campus, our patients, visitors, and employees. There is the potential for greater pedestrian versus vehicle interaction, and significant delays will generate longer queues that will impact accessibility to City of Hope. In addition, the tranquil environment of City of Hope will be greatly impacted by the additional on-site traffic, as well as the increased movements on East Duarte Road. We presume a traffic signal or pedestrian bridge will be required although neither were mentioned as potential mitigating measures in the document nor was there an adequate identification or treatment of alternate (or separate) means of ingress or egress of vehicles.

100-7

- **Noise & Vibrations.** Although the DEIR addresses noise and vibration, it limits the study limits to 125 feet from the alignment. Due to the sensitive condition of City of Hope's patients, we do not feel that this portion of the DEIR sufficiently analyzed and addressed the impacts to City of Hope. Recognizing that construction noise is limited in terms of duration and hours of operation, the noise, vibrations and dust associated with constructing the Parking Structure on-site will significantly impact our patients, visitors, and employees each construction period workday. The long term operational impacts will introduce additional noise through commuter traffic, rail and train operations, rail signals, train whistles, and pedestrians. All these components will "carry" beyond the 125-foot limit of investigation and impact the City of Hope facilities.

100-8

- **Aesthetics & Patient Impacts.** The construction and operation of the Duarte Station and Parking Structure will intrude on the existing tranquil and inviting nature of the Campus. Our patients are typically more sensitive to air pollution, noise, and other airborne components than most people. The DEIR does not specially address these concerns as to the Duarte Station and Parking Structure as they will impact City of

100-9

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re "traffic control and parking enforcement:" A detailed traffic circulation analysis reported in the EIS/EIR identified two intersections within the City of Duarte that will be subject to significant impacts by the implementation of the Gold Line LRT: Buena Vista Street / Three Ranch Road, and Highland Avenue / Central Avenue. Currently, these are stop sign-controlled intersections that are recommended in the EIS/EIR to be signalized in order to mitigate the impacts of the proposed project. On-street parking on Duarte Road is not currently monitored for enforcement by the City of Duarte, and they have stated that there are no plans to change this policy. Private property owners would be responsible for monitoring parking on their property, as is currently the policy.

re "maintenance:" The LACMTA will maintain the Gold Line Phase II stations and alignment following the completion of construction. The LACMTA currently operates and maintains three LRT lines (Blue, Gold, Green) and a subway (Red Line).

Comment 100-7

Subsequent to the Draft EIS/EIR, proposed parking on the City of Hope campus has been eliminated, which changes the traffic impacts reported in the Draft EIS/EIR. Parking has been moved to the north side of the railroad track, on an existing commercial lot, with access to be provided from Business Center Drive. The resulting impacts to traffic from this parking location are reported in revised Chapter 3-13, Safety and Security. For City of Hope visitors and employees, a signalized crossing on Duarte Road would control access to the campus from the LRT station.

COMMENT LETTER 100

RESPONSE TO LETTER 100

Metro Gold Line Phase II Light Rail Transit
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June 21, 2004
Page 3

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100-6
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100-7

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100-8

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100-9

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Comment 100-8

Subsequent to the Draft EIS/EIS, the proposed parking garage on the City of Hope campus was eliminated. The closest construction in the vicinity would now occur on the rail right of way, more than 250 feet from the nearest City of Hope facility. See revised Chapter 3-11, Noise and Vibration, for a discussion of construction period noise and vibration

Comment 100-9

Subsequent to the Draft EIS/EIS, the proposed parking garage on the City of Hope campus was eliminated. Relocating the parking facility to off-campus would significantly decrease anticipated construction and operational impacts to the City of Hope campus. Construction hours would be limited to daytime hours, and specific approval by the City of Duarte. Information on measures to limit air pollution impacts during construction are reported in revised Chapter 3-2.2 and 3-.2 3. Noise mitigation measures during construction are described in revised Chapter 3-11.2 and 3-11.3. A Work Site Management Plan will be developed for each station and parking construction area with the assistance of the cities along the corridor.

COMMENT LETTER 100

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Metro Gold Line Phase II Light Rail Transit
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Page 4

Hope. In addition, the aesthetic nature of the Campus will be lost as the Parking Structure will consume and forever change significant areas of our Campus and a significant amount of our street frontage.

These points are only four of the potential impacts on City of Hope as a result of the proposed Duarte Station and Parking Structure. As a cancer care facility, all of these issues would dramatically impact and alter the serene environment that City of Hope provides to seriously and/or terminally ill patients, who are much more sensitive and susceptible to environmental impacts than the general public. As a result, and despite the overall community benefits of the Project, City of Hope must formally oppose the DEIR, the analysis and considerations provided therein, and the project as currently proposed, as technically insufficient and unsound.

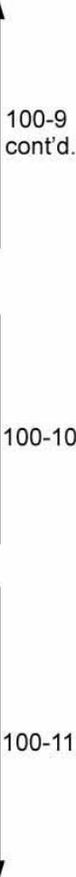
Alternatives

The DEIR discussed no alternatives. City of Hope would expect to see discussions of positives and negatives of placing the Duarte Station to the west, closer to Buena Vista Street, or to the east, closer to Highland Avenue. It is our belief that the new Duarte Station and its associated parking facilities should both be located on the north side of East Duarte Road and take primary access from the north side of the tracks. By having both the Duarte Station and parking facilities north of the rail tracks, there will be less risk associated with vehicle/rail v. pedestrian interaction. In addition, it may reduce the costs associated with constructing grade-separated crossings and traffic signal improvements. These locations can be expected to have less of an impact on the Project's neighbors by being primarily located at industrial or commercial intersections and not impinging on medical care facilities. If the proposed station and parking facilities are north and either to the east or west of our primary entrance, so as not to adversely impact our facility, then City of Hope would anticipate being able to support having a station in the Duarte vicinity.

It is apparent that an analysis of each Project component and the cumulative effects of the entire project warrant further review. The specific issues identified above should be studied and alternatives identified and evaluated. Construction duration and hours of operation, alternative access routes, air pollution impacts, and construction period laydown areas and parking should also be identified and evaluated. Operational impacts should be addressed for traffic access, circulation (both to the Duarte Station and City of Hope), as should the potential signalization for both vehicles and pedestrians; lighting of Duarte Station and parking areas; noise and vibrations from train operations, vehicles circulation, and public address systems; air pollution; aesthetics and environmental impacts; and safety and security of patients, visitors, staff, travelers, and neighboring properties should be addressed at a minimum. In doing this analysis, besides the impacts to City of Hope generally, note should be taken of Project specific issues raised above, such as:

- the incalculable cost of altering the patient experience and the unique calm, open environment

Gold Line DEIR Comment Letter Final 4-21-04.doc



Comment 100-10

See Response to Comment 100-3.

Comment 100-11

The Draft EIS/EIR meets the requirements of both federal and state environmental laws. Under the National Environmental Policy Act (NEPA), where adverse effects are identified, mitigation options are to be identified in a draft environmental document. There is no requirement to develop “alternatives” for specific types of impacts. Under CEQA, alternatives are required only when impacts are identified as significant after the application of mitigation measures. The Final EIS/EIR identifies and describes impacts for all required environmental topics, and reports those that are adverse under NEPA and significant under CEQA, the mitigation measures that will be implemented to reduce effects/impacts, and any remaining significant CEQA impacts.

COMMENT LETTER 100

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Metro Gold Line Phase II Light Rail Transit
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Page 5

- dust mitigation, noise and lighting for highly-sensitive (immuno-compromised) health care patients
- security and control of unauthorized pedestrian entry
- separation of hospital and commuter parking allocation
- temporary loss of parking during construction
- parking enforcement and protection of City of Hope spaces set aside for others
- liability/responsibility for accidents, security and maintenance

100-11
cont'd.

Cumulative Effects/Impacts

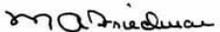
The DEIR should address not only the current planned parking count for Gold Line train usage, but should make contingency plans for cumulative effects over the long term. If the Gold Line ridership is greater than anticipated, additional commuters will likely park in City of Hope reserved parking therefore requiring additional parking facilities. Where would such a facility be located? These impacts should be addressed now, analyzing the same types of impact from vehicle access, pedestrian access, traffic signalization, noise, lighting, air pollution, security and safety, and impact on aesthetics and quality of environmental experience.

100-12

In summary, we unfortunately find the DEIR to be deficient in defining the Project, analyzing impacts and cumulative effects and exploring alternatives. We request that the Construction Authority undertake a comprehensive, location by location analysis of the advantages and disadvantages of each reasonable alternative, and then prepare a new first draft of the DEIR which, among other things, reaches a supportable conclusion of where best to locate the Duarte Station. City of Hope believes that there are alternative locations for the Duarte Station and its parking facilities that will have a far less adverse impact on City of Hope, its employees, patients, and visitors while still reaching the goals of the Gold Line.

We have preliminarily discussed our concerns about the DEIR with the City of Duarte and, based upon these discussions, we are confident that a location can be identified for a station in Duarte which would be mutually satisfactory to all concerned. We again want to reiterate our desire to work cooperatively with the Construction Authority and the City of Duarte to arrive at an alternate solution to achieve the Gold Line's goals without altering the pastoral, unique healing and treatment ambiance of City of Hope's Campus.

Thank you for your consideration.

Very truly yours,

Michael A. Friedman, M.D.
President and Chief Executive Officer
City of Hope National Medical Center

cc: Jesse Duff, City Manager, City of Duarte

Gold Line DEIR Comment Letter Final 4-21-04.doc

Comment 100-12

The long-term parking impacts were analyzed and reported in the Draft EIS/EIR for 2025. These parking estimates, and the 2025 forecast in the Final EIS/EIR, are based on projected ridership for the Foothill Extension. It should be noted that the Duarte station is planned for a maximum of 250 spaces (PDR, page 4-13) and would be located west of the Irwindale station, which would have 700 parking spaces. The Irwindale site has good transit connections and excellent freeway access. Many patrons within the Duarte / Irwindale area are expected to use the Irwindale station because of these attributes. To the west, the existing Sierra Madre Villa Station, with nearly 1,000 parking spaces and excellent freeway access, will attract riders as well. We do not anticipate that additional parking facilities within the City of Duarte would be necessary based on the ridership forecasts. By locating the parking facilities off-campus, the City of Hope "reserve parking" will be less attractive to LRT patrons. Clear signage by both the Authority and the City of Hope would discourage improper parking.

COMMENT LETTER 101

RESPONSE TO LETTER 101

10410624
CTZ
p0513

EIRCOMMENTS

From: EIRCOMMENTS
Sent: Monday, June 21, 2004 10:33 PM
To: EIRCOMMENTS
Subject: EIR Comments

First Name: Robert
Last Name: Chang
Address:
City: Pomona
State: CA
Zip: 91767
Email Address: robertchang@verizon.net
Phone Number:

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Comments:
Dear Sir:

Here are my comments on the Gold Line Extension EIR.

Another issue that should be touched on in the EIR is the possibility of running Alternative Rapid Transit (ART) like the Regioprinter DMUs which were tested out on that corridor about 7 or 8 years ago. The EIR should address why a permanent, light rail transit extension offers more benefits and for have less impacts than a diesel light rail car operating along the corridor. While it would require time segregation of service to accommodate freight, the EIR for the electrified light rail would also require time segregation to allow freight trains to pass through. While I am not asking for a full blown alternatives analysis as in chapter 2, a recognition of this technology and its history on the corridor as an option, and possibly a more in-depth analysis than the few paragraphs devoted to it should be provided.

101-1

As for the alternatives, I favor the triple track alternative, to accommodate future freight growth and development along the corridor as the quarries become developed. It also permits freight trains to operate at times other than the middle of the night, which may be more of an impact than the construction impacts of building the additional track.

101-2

In Pomona, I favor the Garey Avenue station alternative, to consolidate activities with Metrolink and offer an alternative terminus should funding run out. It also offers an alternative to Metrolink for passengers when Metrolink service is not frequent.

101-3

The rail line will have impacts on residences, particularly along San Dimas Avenue, the closest and most readily accessible station to the 210 freeway from points east, and for residents from Rancho Cucamonga and beyond commuting into the San Gabriel Valley. The 210 freeway builds up congestion at the 57th/210 interchange most days

Comment 101-1

The proposed project has undergone an Alternative Analysis phase in which various rail technologies, including DMU, were considered. That phase is documented in the revised Chapter 2, Project Description.

Comment 101-2

Your support for freight operations and the Triple Track Alternative of the proposed project is acknowledged. Subsequent to the release of the Draft EIS/EIR, the triple track option was selected for the area east of Irwindale. The proposed project has also been redefined to eliminate restrictions on the hours of operation of freight. Please see revised Chapter 2, Alternatives.

Comment 101-3

Your support for the Garey Avenue option is acknowledged. Subsequent to the release of the Draft EIS/EIR, the proposed project has undergone further refinement. In that process, the Gary Avenue station site was selected by the City of Pomona. Please see revised Chapter 2, Alternatives for more information.

COMMENT LETTER 101

RESPONSE TO LETTER 101

Comment 101-4

The demand for parking was developed to respond to the forecasted ridership at each station. The ridership forecast considers the distance from which riders at each station along the line would be likely to drive in order to use the LRT service. For potential Rancho Cucamonga patrons, there are four LRT stations (La Verne, Pomona, Claremont and Montclair) that are considerably closer than the San Dimas Station. The City of San Dimas has selected a site west of Eucla Avenue, north of Bonita Avenue (PDR, page 4-30) to serve the city; no station at I-210 will be considered. The Eucla site was not included in the Draft EIS/EIR, but has been evaluated in the Final EIS/EIR.

Please see revised Chapter 2, Alternatives, for a detailed description of stations elements, including near-term and long-term parking. Please see revised Chapter 3-15, Traffic and Transportation for an analysis of traffic and parking conditions around the stations. Parking policies at an LRT station will be determined by LACMTA. The LACMTA does provide for paid and non-paid parking at rail station locations. On-street parking is under the jurisdiction of each city in which a station would be located

Comment 101-5

Station locations have been determined through consultation between the Authority and affected cities, with input from the engineering team, railroad agencies, and the public. The Glendora City Council approved the station location to be 180 feet east of Vermont Avenue on February 22, 2005 (PDR, page 4-25). No station is planned for the Lone Hill area.

westbound, and so drivers will likely drive through neighborhood and secondary streets to access the station. In addition, there may be impacts due to street parking around the station because of the convenience to the 210 and the tradeoff between stops and free-flowing traffic which still generally prevails east of San Dimas, and impacts to traffic at the 210/San Dimas interchange. Similar impacts may occur at other stations conveniently located to the freeway network, including Irwindale and Glendora. Has on-street parking impacts due to success of the light rail line been considered? How was the number of spaces at each lot determined? Through a market study, or by examining site constraints? Have mitigations such as charging for peak period parking, reserved parking, and residential parking permit restrictions been explored?

101-4

Similarly, those points also warrant consideration to a SR 57/I-210 station located at Auto Center Drive and Lone Hill Avenue that would have easy access to the 210 and 57 freeways and be convenient to park and riders, with little or no impact to streets with residences on them. While there would be little to no land use integration at this station, the point of this station is to intercept drivers who do not want to sit in congestion and can take the light rail to where they want to go. This station should be considered in the planning phases.

101-5

Finally, I want to congratulate the Foothill Extension team on an aggressive and comprehensive public outreach program. The public hearing program was complete and offered multiple opportunities for individuals to participate in the planning and environmental review process, and educated communities about the light rail and its impacts in the community.

101-6

Two points of note in terms of outreach would be to make the appendices Volumes 3 and 4 more available to the public. Perhaps they could have fit on the CD-ROM, or copies might have been deposited at a few libraries in addition to the Construction Authority's headquarters. While the vast majority of commenters will have their needs met by the EIR and Executive Summary, having those available in an environment where people can review them at more convenient hours and at their leisure would help promote more informed comments since the EIR response and response to the scoping notice can direct persons to the appropriate sections. Finally, for the public hearings, information about surrounding cities should be provided as well, to allow for persons that missed the hearing or otherwise couldn't attend the hearing in their city to comment. In addition, many residents in a given city are also interested in what is going on in the cities bordering them.

101-7

Thank you for receiving my comments.

Sincerely,

2

Robert Chang

COMMENT LETTER 101

RESPONSE TO LETTER 101

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101-7

Thank you for receiving my comments.

Sincerely,

2

Robert Chang

Comment 101-6 Your support for the public outreach program is acknowledged.

COMMENT 101-7

Volumes 2 and 3 of the Draft EIS/EIR were available for public review at local libraries and city halls during the public comment period, as well as at the public meetings. At each public meeting, information on adjoining cities was provided.

COMMENT LETTER 102

RESPONSE TO LETTER 102

EIRCOMMENTS

From: Benny Wu [bennywu@msn.com]
Sent: Saturday, June 19, 2004 7:49 AM
To: EIRCOMMENTS
Subject: Proposed Metro Goldline Extension

Metro Goldline Extension Construction Authority
 625 Fair Oaks Avenue
 Suite 200
 South Pasadena, CA. 91030

Dear Sir or Madam,

I am a resident of Arcadia and the Metro Goldline Extension (the "Extension") that is currently being contemplated will effect me. I live at 622 Santa Maria Road, three houses from the freeway and the proposed route of the Extension.

Since the 210 freeway extension has opened, the noise level at my residence has increased dramatically. This is especially noticeable in the early morning and late evening rush hours. The proposed Extension would only exacerbate that noise level.

I am opposed to the Extension for the reason stated and would support it only if a sound wall was constructed between the proposed Extension and my residence.

Thank you,

Benny Wu

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102-1

Comment 102-1

The project alignment follows the existing railroad alignment, which transitions from the middle of I-210 near your residence. Please see revised Chapter 3-11, Noise and Vibration, for a complete description of how noise impacts were evaluated, where impacts occur, and how they will be mitigated, if found to be significant. In most situations, noise would be mitigated by providing noise barriers (soundwalls), in some locations by providing sound-insulating windows, or a combination of such measures.

COMMENT LETTER 103

RESPONSE TO LETTER 103

EIRCOMMENTS

From: Stella Wu [stellawu@sbcglobal.net]
Sent: Saturday, June 19, 2004 7:56 AM
To: EIRCOMMENTS
Subject: Metro Goldline Extension

Metro Goldline Extension Construction Authority
 625 Fair Oaks Avenue
 Suite 200
 South Pasadena, CA. 91030

Dear Sir or Madam,

I am a resident of Arcadia and the Metro Goldline Extension (the "Extension") that is currently being contemplated will effect me. I live at 622 Santa Maria Road, three houses from the freeway and the proposed route of the Extension.

Since the 210 freeway extension has opened, the noise level at my residence has increased dramatically. This is especially noticeable in the early morning and late evening rush hours. The proposed Extension would only exacerbate that noise level.

I am opposed to the Extension for the reason stated and would support it only if a sound wall was constructed between the proposed Extension and my residence.

Thank you,
 Stella Wu

6/21/04

Page 1 of 1
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103-1

Comment 103-1

The project alignment follows the existing railroad alignment, which transitions from the middle of I-210 near your residence. Please see revised Chapter 3-11, Noise and Vibration, for a complete description of how noise impacts were evaluated, where impacts occur, and how they will be mitigated, if found to be significant. In most situations, noise would be mitigated by providing noise barriers (soundwalls), in some locations by providing sound-insulating windows, or a combination of such measures.

COMMENT LETTER 104

RESPONSE TO LETTER 104

Page 1 of 1

10410627
CTZ
POS13

EIRCOMMENTS

From: Matthew Wu [matthewwu@sbcglobal.net]
Sent: Saturday, June 19, 2004 8:07 AM
To: EIRCOMMENTS
Subject: Metro Goldline Extension

Metro Goldline Extension Construction Authority
625 Fair Oaks Avenue
Suite 200
South Pasadena, CA. 91030

Dear Sir or Madam,

I am a resident of Arcadia and the Metro Goldline Extension (the "Extension") that is currently being contemplated will effect me. I live at 622 Santa Maria Road, three houses from the freeway and the proposed route of the Extension.

Since the 210 freeway extension has opened, the noise level at my residence has increased dramatically. This is especially noticeable in the early morning and late evening rush hours. The proposed Extension would only exacerbate that noise level.

I am opposed to the Extension for the reason stated and would support it only if a sound wall was constructed between the proposed Extension and my residence.

Thank you,

Matthew Wu

104-1

6/21/04

Comment 104-1

The project alignment follows the existing railroad alignment, which transitions from the middle of I-210 near your residence. Please see revised Chapter 3-11, Noise and Vibration, for a complete description of how noise impacts were evaluated, where impacts occur, and how they will be mitigated, if found to be significant. In most situations, noise would be mitigated by providing noise barriers (soundwalls), in some locations by providing sound-insulating windows, or a combination of such measures.

COMMENT LETTER 105

RESPONSE TO LETTER 105

EIRCOMMENTS

From: EIRCOMMENTS
Sent: Saturday, June 19, 2004 11:19 AM
To: EIRCOMMENTS
Subject: EIR Comments

First Name: Dr. Brenda
Last Name: Barham Hill
Address: 150 E. 8th St.
City: Claremont
State: CA
Zip: 91711
Email Address: bhill@cuc.claremont.edu
Phone Number: 909429 621-8026

Comments:
I write as as CEO of Claremont University Consortium to express my concern regarding an aspect of Phase II Segment 2 of the proposed Metro Gold Line. Specifically, I draw your attention to the potential path of the Metro Goldline through the eastern portion of the City of Claremont. From what I am able to discern from both the Draft EIR as well as maps in the document, the possible northern route of the Gold Line east of the Claremont Station will put it along the south side of First St. between College Ave. and Claremont Blvd. Claremont University Consortium owns considerable roperity on the south side of First St. west of Claremont Blvd. There we have a large facility housing a number of CUC services, including the Central Facilities Services for The Claremont Colleges

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105-1

Comment 105-1

Rail alignments have been determined through consultation between the Authority and affected cities, with input from the engineering team, railroad agencies, and the public. Subsequent to the Draft EIS/EIR, the alignment in the Claremont area has been determined to continue due eastward via the San Bernardino Metrolink alignment. The potential use of the Pacific Electric right of way that would have affected Claremont College properties has been eliminated from consideration.

COMMENT LETTER 105

RESPONSE TO LETTER 105

this serious oversight in the EIR document. Further, it is unclear whether CUC will be affected in any way by proposed property acquisitions since neither your maps nor narrative reference our property -- it simply doesn't exist according to the EIR. I request that CUC be contacted regarding the Goldline's plans and that this omission be corrected, with appropriate mitigation, in the final EIR.



105-1
cont'd.

COMMENT LETTER 106

RESPONSE TO LETTER 106

EIRCOMMENTS

From: Kathleen Brindell [kbrindell@yahoo.com]
Sent: Sunday, June 20, 2004 5:05 PM
To: EIRCOMMENTS
Cc: ds.page@verizon.net
Subject: Comments on Goldline Phase II - Pasadena to Montclair

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June 20, 2004

My family lives at 425 Elder Dr. in Claremont. Our home is on the north side of the street and so the current discussion about the construction of the Gold Line has direct bearing on our quality of life. My husband and I are concerned about a number of issues.

The current amount of train traffic is distracting. We now have a second track to facilitate the Metrolink and freight traffic that uses this route. We are supporters of mass transit, but the idea of building yet another set of tracks along this right of way would literally put the Gold Line in our back yards. Of course, this would increase noise levels and directly degrade what is a lovely, middle class community. The impact on home values is of course of prime concern to me and my neighbors. This is an old community, certainly by southern California standards. Many of the long-time residents are older people who would be particularly vulnerable to lost equity in their homes--a critical component of their retirement planning.

106-1

West of the homes on Elder Dr. is a wonderful park that is home to the local Little League Baseball Teams. Walking through the park today my husband and I were trying to gauge how the proposed Gold Line tracks would impact the park. It seems impossible to construct a new set of tracks without removing some of the beautiful old trees that border the north side of the baseball diamonds. No doubt the many birds and other species that make their homes in these trees would suffer a loss as well as the obvious aesthetic loss.

106-2

I think the position of my family is clear. The construction of another set of tracks along the existing Metrolink tracks north of our property would be detrimental to us and our neighbors. We urge you to consider the alternative indicated on the illustration #C-245 which would place the Gold Line route along an existing Pacific Electric right of way and have a diminished impact on homeowners.

106-3

Sincerely,

Kathy Brindell
William Decker

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Comment 106-1

It is recognized that you are adjacent to the rail right of way. In general, noise from an electrically powered LRT system is low, with noise impacts typically occurring only where trains run very near homes and/or where there are grade crossings and warning devices must be sounded. In most situations, noise would be mitigated by providing noise barriers (soundwalls), in some locations by providing sound-insulating windows, or a combination of such measures. Please see revised Chapter 3-11, Noise and Vibration, for a complete description of how noise impacts were evaluated, where impacts occur, and how they will be mitigated, if found to be significant.

The focus of environmental analysis under CEQA and NEPA is on the proposed project's effect on physical changes (CEQA) and/or any economic or social effect that may cause a physical change (NEPA). Causal relationships between the proposed project and property values have not been established. Therefore, property value analysis as a result of the presence of the proposed project is not discussed in the EIR/EIS. Similarly, quality of life issues are not evaluated under CEQA and NEPA. However, the commentator's opinion will be considered by the Lead Agencies in deciding whether, and under what conditions, to approve the proposed project.

Comment 106-2

The rail right of way is of sufficient width to accommodate 2 LRT and 2 Metrolink/freight tracks and there is no need to expand to the south. However, trees along the right of way line may need to be trimmed to provide sufficient safety clearance along the rail alignment. Please see revised Chapter 3-3, Biological Resources for how nesting birds would be protected.

COMMENT LETTER 106

RESPONSE TO LETTER 106

EIRCOMMENTS

From: Kathleen Brindell [kbrindell@yahoo.com]
Sent: Sunday, June 20, 2004 5:05 PM
To: EIRCOMMENTS
Cc: ds.page@verizon.net
Subject: Comments on Goldline Phase II - Pasadena to Montclair

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106-3

Sincerely,

Kathy Brindell
William Decker

Do You Yahoo!?
Tired of spam? Yahoo! Mail has the best spam protection around
http://mail.yahoo.com

Comment 106-3

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