
to all Monrovia residents. Mr. Sizemore pointed out that, after several public meetings, only one resident spoke with concerns regarding the Phase 1 development and there was only one representative that spoke tonight, so staff feels that the public meetings have been successful.

Chair Palfrey asked about the alleged Brown Act violations. Ms. Stinnett said that proper notice was provided with regards to legal requirements of the Brown Act. The changes were appropriate for clarification purposes and noted this is the beginning of the process because it does go on to the City Council. She indicated that there could still be additional clarification changes made based on public comment.

Chair Palfrey questioned whether the circulation of trains going into a facility had been reviewed. Ms. Stinnett said that whatever development goes forward will be reviewed through either a Negative Declaration or full EIR, depending on the proposal.

Commissioner Beebe inquired about the time allowed for the City to respond to a request for documents. Ms. Stinnett said the City generally has ten days to give an answer.

Commissioner Beebe questioned the Planning Commission's role in the process. Mr. Sizemore explained that this is a land use issue and the Commission makes a recommendation to the City Council on land use issues that go forward to them. Commissioner Owens inquired whether a recommendation can be given with a caveat of CEQA review of actual development and noted that he is not comfortable with making a recommendation without specific development details. Mr. Sizemore answered that this is the first step in the process and reminded the Commission that the City Council certified the 2008 EIR and these scenarios for development are less impactful than what was reviewed in that process.

Mr. Sizemore noted that he had a discussion with a Gold Line Authority member, who had concerns about the linear park/greenbelt area that may be reduced. Mr. Sizemore felt that the Commission may want to look at alternatives, including an in-lieu fee to allow for open space/park plan. Ms. Stinnett suggested that the public hearing be reopened to discuss the issue of open space. Chair Palfrey reopened the public hearing, asking for comment on open space only.

Chris Berner

Chief project officer for the Gold Line Authority. They have identified that their conceptual plan is not compatible with the proposed Specific Plan because of the following – the proposed park is on the south side of the property, which they feel is not conducive to park uses and the sound wall would create a “canyon” park, which could be more likely to produce crime areas. He suggested that the greenbelt be placed on the California Avenue side with a small greenbelt on the Evergreen Avenue side. They are willing to work with staff on final placement. Commissioner Owens inquired whether the City is looking for a buffer zone. Mr. Sizemore explained that staff felt this could be a good pedestrian/bike route and they would be open to the idea of the east side of California Avenue, but would

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also like to consider the in-lieu fee to allow development of a park in another area of the Planned Development area. Commissioner Owens agreed with safety concerns. Commissioner Brown clarified that deleting the linear park would not negate providing open space.

Robert Silverstein

He said that the request that the park be deleted from the south side of the project again points to the serious proposal of the maintenance and operations yard and is more evidence of the impacts of this type of proposal. The rail yard, light industrial, and research and development uses were not studied in the 2008 EIR. Mr. Silverstein said that CEQA cannot review the request at a later date because the recommendation is made based on what information is available at the time, and it appears that the maintenance and operations yard is the project that is being proposed. By deleting opens space and introducing a rail yard, it is no longer in accordance with the goals and objectives of the Planned Development area.

Jordan Bull

Resident at California Avenue and Duarte Road. She is concerned about open space availability in the area and that the linear park along Duarte Road would have provided a noise buffer and is now suggested to be deleted.

Randy Rosaldo

Property owner in the area. Concerned that the existing properties would not be affected by the zone change. Mr. Sizemore explained that there would be no impact until development happens.

Burt DeFrane

Noted that green space could be either inside or outside of the sound wall.

Commissioner Brown asked to clarify that the discussion is to allow flexibility in how we achieve open space. Commissioner Cupp said that the Commission is creating documents that permit these uses with flexibility.

Eddie Phipps

He said that he has traveled on several rail lines and saw that the open space areas along them vary greatly depending on the area. He suggested that the rail road be elevated to allow a walkway under the tracks but noted that this could require the tracks to be moved further north, which would also create a larger green belt area in front of the sound wall.

Public hearing closed.

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Commissioner Beebe moved to recommend approval with the change to the Specific Plan for staff review of open space requirement, including a possible in-lieu fee. Commissioner Owens seconded the motion.

The motion carried with the following vote:

AYES: Beebe, Brown, Cupp, Owens, Palfry
NOES: None
ABSTAIN: Lowe
EXCUSED: Faith

Chair Palfrey explained that this item automatically goes on to the City Council.

Item7-1:

**Ordinance 2010-03/Planning
Commission Resolution No.
PCR2010-02 (cont)
Citywide
City of Monrovia**

**Consider an amendment to Title 17
(Zoning) of the Monrovia Municipal
Code allowing senior apartments to
be occupied with up to 25% disabled
residents.**

Staff Report

Steve Sizemore explained the request to continue this item. The public hearing was opened and continued to the March 10, 2010 Planning Commission meeting.

Old Business: None

New Business: None

Adjournment: 10:26 p.m.

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4.4 Response to Comment Letter 029 (Silverstein Law Firm)

- A) This comment does not raise any specific environmental- or Project-related issues.
- B) This comment does not raise any specific environmental- or Project-related issues. However, the firm is on the Authority's list of those who receive notices regarding the Project.
- C) In response to a request of the commenter in its letter dated November 8, 2010, the comment period was extended an additional 33 days for a total public comment period of 78 days. During this 78-day public comment period, all applicable information was available with the Supplemental EIR. Furthermore, CEQA Guidelines Section 15105 states that comment periods for Draft EIRs “should not be less than 30 days nor longer than 60 days except in unusual circumstances.” Filing far reaching public records act requests at the same time as an EIR public review period is not a sufficient basis to warrant a longer review period. If this was the case, any project opponent could simply use this tactic to unreasonably extend public comment periods and delay projects, which would be inconsistent with Public Resources Code Section 21003(f). Section 21003(f) provides that it is the policy of the State that

All persons and public agencies involved in the environmental review process be responsible for carrying out the process in the most efficient, expeditious manner in order to conserve the available financial, governmental, physical, and social resources with the objective that those resources may be better applied toward the mitigation of actual significant effects on the environment.

The Authority completed this Supplemental EIR for the proposed Project refinements with the intent to inform the public and the decision makers regarding the potential environmental impacts associated with the refinements. Public participation was sought through issuance of a notice of preparation and soliciting comments on the scope of the Supplemental EIR for a period from May 17, 2010 through July 2, 2010. Further, scoping meetings were held on June 16 and 17, 2010, as another means for members of the public to learn about the proposed refinements and provide comments regarding the scope of the environmental review. Notice of the scoping meetings was published on June 9, 2010, in the *San Gabriel Valley Tribune*. During the public comment period for the Draft Supplemental EIR, a public hearing was held to provide members of the public with an opportunity to provide written or oral comments. Based on the foregoing, the Authority

has provided substantial opportunity for public input regarding the proposed refinements and the Supplemental EIR, including many public meetings that are not required by CEQA.

D) The commenter asserts certain standards for analysis of alternatives. While these general statements are generally accurate, the statements do not acknowledge other standards and considerations relating to the analysis of alternatives. Some of these other considerations include:

1) EIRs (and Supplemental EIRs) must focus on alternatives that can avoid or substantially lessen a project's significant environmental effects (Pub. Res. Code Sec. 21002). Alternatives should generally offer environmental advantages over a proposed project, and avoid or lessen one or more environmental effects (CEQA Guidelines Section 15126.6(a)). In this case, the proposed Project, and particularly the proposed M&O Facility, will not result in any significant adverse impacts upon implementation of feasible mitigation measures. Therefore, analysis and even selection of another site would not serve to eliminate or reduce any significant impact associated with the M&O Facility.

2) Alternatives must meet the general objectives of a project. In this case, the objectives include the following:

M&O Facility refinements:

- Develop a maintenance and operations facility yard to accommodate LRT system capacity and storage requirements,
- Provide facilities to perform routine and special maintenance for Light Rail Vehicles (LRVs),
- Provide facilities to perform light and heavy duty LRV fleet repairs, and
- Provide storage facilities for LRVs including facilities to house the trains overnight.

Other refinements:

- Realign the Mountain Ave./Duarte Rd. intersection to improve safety,
- Relocate parking at Monrovia Station to better accommodate the City of Monrovia's future transit oriented development (TOD),
- Relocate parking location and configuration at Irwindale station and improve safety and constructability at the Irwindale Station,
- Replace the Colorado Boulevard Bridge to address structural issues and minimize property requirements, and
- Replace the San Gabriel River Bridge design.

The Supplemental EIR and alternatives discussion acknowledge that “current planning calls for completion and operation of the M&O Facility as part of Phase 2A” (Section 5.2.2 of the Supplemental EIR). This statement is in effect a Project qualification– that the M&O Facility be located in Phase 2A and be constructed and on-line to serve the system when Phase 2A is constructed. Therefore, any site that cannot be accessed from the Phase 2A segment alignment would not meet the Project objectives, and thus would not be feasible or appropriate for detailed analysis.

The commenter fails to acknowledge that an EIR need not consider every conceivable alternative to a project or alternatives that are infeasible (Citations omitted). *In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings* (2008) 43 Cal.4th 1143, 1163.

- E) This comment does not raise any specific environmental- or Project-related issues. The commenter’s reference to page 5-2 of the Supplemental EIR is noted.
- F) The commenter is correct that the 2007 Final EIR notes that two properties, which had been considered for development of the M&O Facility, were no longer viable as they had been acquired for residential development. At the time when the 2007 Final EIR was prepared the potential availability of the Monrovia site was not known. Consistent with the current objectives for an M&O Facility in Phase 2A, the Irwindale site remains potentially feasible and worthy of analysis as an alternative because of its location along the alignment for Phase 2A. The proposed Monrovia Site is also centrally located within Phase 2A and would alleviate strain on other M&O facilities, such as the Midway Yard, which is currently over capacity and cannot be expanded. As such another M&O Facility is required to accommodate the additional LRT vehicles that would service the Gold Line Foothill Extension.
- G) In response to other comments, text in Section 2.1.1 of the Supplemental EIR, cited in the comment, has been added as the last two sentences of the first bullet point, stating:

Current planning calls for completion and operation of the M&O Facility as part of Phase 2A. As such, this document analyzes the construction and operation of that facility in Monrovia, as described in Chapter 3, Project Description, and in Irwindale, as described in Chapter 5, Alternatives.

The revisions clarify that there is a need for the M&O Facility to be constructed adjacent to the Phase 2A alignment and at the same time as Phase 2A to ensure sufficiency of support services for the expanded service area. Further, the site needs to be located in

Phase 2A not only because of the access need from the alignment but because the proposed M&O Facility is centrally located within overall Gold Line Foothill Extension alignment in order to reduce deadhead miles at the beginning of the day, after AM peak, before PM peak, after PM peak, and at the end of the day. With the Foothill Extension Phase 2A, the Gold Line will be approximately 32 miles long. The deadhead miles can have a significant impact on the operations and the operational costs because it involves running the cars without passengers.

The comment asserts that the Irwindale site “cannot come on-line prior to the scheduled completion of the Gold Line Foothill Extension.” The Supplemental EIR neither states nor implies this. Rather, the Supplemental EIR considers whether the Irwindale site alternative is superior to the Monrovia site from an environmental impact perspective as well as consideration of the overall needs and costs of the Project. Theoretically speaking, the Irwindale site could come on-line at about the same time as the Monrovia site, but at a substantially increased cost and with greater environmental impacts and future site stability risks.

Further, as to footnote 1 in the comment letter, there has been no decision by the Authority Board to either abandon the Irwindale site or approve the Monrovia site. The Authority Board will consider this issue when it considers whether or not to approve the proposed Project refinements that were the subject of analysis in the Supplemental EIR. Board consideration of the two alternate sites does not trigger recirculation, as suggested in the comment.

Following completion of the environmental document, the decision-making agency must balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its environmental risks when determining whether to approve the project. Therefore, the concerns of the commenter will be considered in the overall evaluation of the Project.

At the time that the 2007 Final EIR was prepared, the Irwindale site was the environmentally superior alternative. Since certification of the 2007 Final EIR, the Authority became aware of the availability of the Monrovia site. The site, currently proposed as the site for the construction and operation of the M&O Facility is considered in the Supplemental EIR. The proposed site in Monrovia is the environmentally superior alternative as it has fewer significant environmental impacts as compared to the M&O Facility in Irwindale (Alternative 2).

H) The last two light rail projects built in Los Angeles County (Gold Line Eastside Extension and Expo) did not include maintenance facilities. Consequently, there currently is a need for maintenance and storage facilities. In addition, the Gold Line does not currently have a direct connection to any other line. While it is possible to move the light rail vehicles to other facilities on trucks over streets, this option is expensive and inconvenient. As such, the existing maintenance and operation facilities for other lines are not feasible alternatives to the proposed M&O Facility on the Gold Line. The future Regional Connector project will provide a connection to the other lines; however, the proposed Monrovia site is NOT intended to serve as the “central yard” mentioned in the Rail Yard Analysis. The central yard would have to be central to the system and connect to the other lines.

Response 4 on page two of the February 18, 2009 Rail Division Potential Storage Site Assessment Report (attached to the comment letter as exhibit 2) suggests that ultimately more than one additional M&O facility will be required, including one for the Expo Line, one for the Gold Line Foothill Extension, “as well as a central yard for heavy maintenance and general system wide storage.” Further, Response 4A in the Rail Yard Analysis Report recommends “the acquisition of a property along the Foothill Extension, the Exposition Line Phase 2, the Crenshaw Corridor, and one location in the Central Los Angeles area.” Therefore, the other alternatives referenced in the Rail Yard Analysis report are not really alternatives to address the maintenance and operational needs for the Foothill Extension. Finally and as noted above, the proposed Phase 2A M&O Facility is not intended to serve as the “central yard” mentioned in the Rail Yard Analysis.

Maintenance facilities are generally planned for a future use and not the immediate need because they are not easily expanded. A typical maintenance and operation facility consists of maintenance elements and storage elements. The maintenance elements represent approximately two-thirds of the facility (land area and movements to access the maintenance elements). The maintenance elements need to exist whether there is a large number of cars or a small number of cars. The maintenance elements must exist upon implementation since two-thirds of the site is needed immediately regardless of storage needs. The immediate need for storage is less than the 84 car capacity, but as the Gold Line ridership grows, the system will be modified to adjust headways or number of cars in train sets to accommodate increased ridership. This will result in a need to store more cars. In addition, Metro will possibly use the site to store vehicles from the overloaded existing Gold Line facility. The existing Gold Line facility is severely overloaded as a result of the Eastside Extension project not building a maintenance facility. As a result, that facility is extremely inefficient. It is likely that Metro will use the proposed M&O



Facility in Monrovia to store 10 to 20 cars that are currently at the existing facility to alleviate overcrowding.

Most of the alternate sites suggested by the commenter do not support the objectives of the Phase 2A Project, even if they may meet objectives of Metro as part of a separate study dealing with the overall system needs for maintenance facilities.

CEQA Guidelines Section 15123.3(f)(1) provides various factors to be taken into consideration when addressing feasibility of alternatives. These factors include:

- Site suitability
- Economic viability
- Availability of infrastructure
- General plan consistency
- Other plans of regulatory limitations
- Jurisdictional boundaries
- Whether the project proponent can reasonably acquire, control or otherwise have access to the alternative site

Further, as to alternative locations, CEQA Guidelines Section 16126.6(f)(2)(A) states, “The key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR.”

The Union Pacific alternate site suggested by commenter is not feasible for the following reasons:

- 1) It does not meet the objectives for a location along the Gold Line Foothill Extension Phase 2A alignment, and it is not directly accessible from the Gold Line alignment as it is located approximately one mile from the Gold Line. Thus, it is not a suitable site for operational and locational reasons.
- 2) The extensive design constraints needed to connect the Gold Line Foothill Extension to the proposed site make it infeasible. This site is located in close proximity to the Midway Yard, which is a great distance from the terminus of Phase 2A. As such it would result in increased deadhead as compared to the proposed M&O Facility in Monrovia. A central site and other sites further out along the system helps eliminate deadhead miles at the beginning of the day, after AM peak, before PM peak, after PM peak, and at the end of the day.

With the Foothill Extension Phase 2A, the Gold Line will be approximately 32 miles long. The deadhead miles can have a significant impact on the operations and the operational costs because it involves running the cars without passengers.

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

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

- 1) The property owner is not interested in selling, calling into question availability of the site. See comment letter exhibit 5, Michael Brandman letter dated September 4, 2009, which states the owner “is on record as opposed to any attempt by MTA and/or the Metro Gold Line Foothill Extension Construction Authority (MGLFCA) to acquire and develop the Mt. Olive site as a LRT maintenance and operation facility.”
- 2) There are approximately 1,860 tenants at the Mt. Olive Storage site and each would be impacted by such an acquisition.
- 3) The cost of constructing an appropriate rail line connection across the Interstate 210 (whether underground or over head) would greatly exceed the costs that might be incurred to create an appropriate connection on other sites. Further, although there currently is a tunnel under Interstate 210, that tunnel is not of sufficient width to be used as an access point to the site. As noted in the Michael Brandman report (exhibit 5 and page 2 of comment letter), “An existing track was identified in the Consolidated Rail Yard Analysis Report; however, contrary to that Report, the trackage had actually been removed sometime before 1993.” Furthermore, the existing tunnel does not have sufficient space to accommodate the number of track leads required to make a functional maintenance and operation facility, and another tunnel or overcrossing would be necessary to achieve suitable access. Therefore, the site is not readily accessible and the construction costs would be exorbitantly high.
- 4) CEQA does not require analysis of infeasible alternatives.
- 5) The Michael Brandman study submitted on behalf of the owners of the 2500 E. Central site provides evidence that development of an M&O Facility on that site would likely have significant environmental impacts unlike the Monrovia site,

which the Supplemental EIR demonstrates will not have any significant environmental impacts that cannot be mitigated.

The Cornfields site is located north of downtown Los Angeles and is discussed in Comment I and in exhibit 3 of the comment letter. The exhibit identifies the interest of the property owner in developing the site for mixed use. The site is deemed infeasible for the following reasons:

- 1) The site is not located in Phase 2A of the Gold Line Foothill Extension, and thus would not meet the Project objectives related to location and service capabilities for the Gold Line, as it would result in increased deadhead miles as compared to the proposed M&O Facility in Monrovia. A central site and other sites further out along the system helps eliminate deadhead miles at the beginning of the day, after AM peak, before PM peak, after PM peak, and at the end of the day. With the Foothill Extension Phase 2A, the Gold Line will be approximately 32 miles long. The deadhead miles can have a significant impact on the operations and the operational costs.
 - 2) The site is characterized by a significant grade change, which would result in exorbitantly high construction costs.
 - 3) The cited interest of the property owner in a public private partnership would further constrain the size of the site available for maintenance and operation use. The site could only accommodate storage capacity requirements for the Gold Line and would not be adequately sized to accommodate the maintenance and operations needs required for the Gold Line.
- J) Refer to Response to Comment I above for discussion of the 2500 E. Central site. As for the other referenced sites, none (beyond item number one) are feasible as noted:
- 1) Evergreen Avenue / California Avenue, Monrovia: This is the proposed Monrovia site analyzed in the Supplemental EIR, which was deemed to be feasible, and environmentally superior.
 - 2) 1801 Highland Avenue, Duarte: This site is 16.4 acres and will be further reduced by the development of the Duarte Station surface parking lot. As such, the site is not large enough to accommodate the acreage necessary for circulation, access, and other required facilities within a maintenance and operation facility. The Duarte Station is located immediately adjacent to this site making the rail access into the M&O facility incapable of providing the necessary storage on the

yard lead tracks without fouling the mainline tracks. Significant impacts would occur to acquire the additional property to eliminate this operational issue.

- 3) 1850 Highland Avenue, Duarte: This site is 8.0 acres. As such, the site is not large enough to accommodate the acreage necessary for circulation, access, and other required facilities within a maintenance and operation facility.
- 4) Miller Brewery Site (M&O Facility in Irwindale (Alternative 2)): This site was fully considered in the Supplemental EIR as an alternative but was deemed to environmentally inferior to the Monrovia site.
- 5) 1111 Third Street, Azusa: This site would have access constraints and would require grade separation to avoid conflicts with the existing freight line. As such, the construction costs would be exorbitantly high.
- 6) Rosedale Development Site, Azusa: A developer has procured this site and has plans to develop the site in accordance with prior approvals.

For the foregoing reasons, none of the alternate sites suggested by the commenter are feasible.

- K) The comment suggests that recirculation is required because of the various alternate sites suggested by the commenter. The information provided herein regarding proposed alternate sites demonstrates that none of the alternatives are feasible and that none of them, even if feasible, would reduce any environmental impacts associated with the proposed Monrovia Site. As such, recirculation is not required pursuant to CEQA Guidelines Section 15088 (a)(2). Further, the information provided herein merely clarifies and reinforces the determinations regarding the scope of the alternatives analysis and does not constitute significant new information.
- L) The quote on the comment is from prior to the Eastside Extension contract abandoning its proposed facility in the existing Red Line maintenance facility. As such, the proposed M&O Facility in Monrovia would accommodate the additional vehicles needs beyond those of the Gold Line. The Supplemental EIR analyzed the capacity now contemplated for the M&O Facility for the Gold Line Foothill Extension.
- M) Options A and B are considered options being considered by the Authority to the proposed M&O Facility in Monrovia. These two options represent alternatives that have been subject to a greater level of analysis than is typically required for alternatives under CEQA. Both options allow the Authority to meet the project objectives including fleet size and yard capacity requirements, which specify a maximum storage capacity of 84 cars plus additional storage for 20 cars in the shop (Section 3.4.1.1 of the Supplemental

EIR). The commenter is correct that the primary difference between Options A and B is a site that is approximately three acres smaller with Option B. If Option A is selected, the Authority would seek to obtain all parcels required for that option using eminent domain. The Board has not made any decisions regarding either option at this time. Refer to Response to Comment L above.

- N) Refer to Response to Comment M above.
- O) The Authority is considering Option B to the proposed M&O Facility in Monrovia, which is approximately three acres smaller than Option A. As such, the Supplemental EIR considers an alternative that requires a smaller footprint. Use of the Midway Yard and the Cornfields site for the purposes of the Foothill Extension are both infeasible.

Multiple sites are infeasible because of operational inefficiency and duplication of facility features that will lead to additional costs relative to staffing and maintaining an LRT vehicle fleet. Multiple sites will increase deadhead miles at the beginning of the day, after AM peak, before PM peak, after PM peak, and at the end of the day. With the Foothill Extension Phase 2A, the Gold Line will be approximately 32 miles long. The deadhead miles can have a significant impact on the operations and the operational costs because it involves running the cars without passengers. Further, all facilities have to have certain accommodations per union rules, a certain level of management, and specific overhead expenses that would be cost prohibitive. Additionally, if duplicative facilities would be required in multiple locations, neither site would be large enough to accommodate the storage requirements along with maintenance requirements of the Gold Line.

- P) The Supplemental EIR considers a smaller footprint, as noted in Response to Comment O above. As such, the basis for the comment concerning a failure of the Supplemental EIR to consider an alternative with a smaller footprint is incorrect. Further, the Response to Comment O addresses the suggestion for multiple smaller M&O sites. Because the suggested alternatives are either already addressed in the Supplemental EIR or are not feasible and do not meet Project objectives, recirculation is not required.
- Q) The M&O Facility is consistent with the policies and objectives stated in the City of Monrovia General Plan, which states that allowable land uses within the Station Square Transit Village Planning Area include “supporting [transit] parking facilities, a rider drop-off area, and other improvements supporting transit facilities.” All of the proposed facilities in Monrovia fit within this land use definition.

Furthermore, the Initial Study prepared for the Station Square Transit Village Phase II Specific Plan (an excerpt from which is provided in Exhibit 13) notes that other permitted uses in the Specific Plan would generate up to 4,404 average daily trips as compared to 190 average daily trips for the M&O Facility. This demonstrates that the M&O Facility would result in substantially less traffic generation than would other permitted uses of the site.

The proposed Monrovia location of the M&O facility is located in an area already zoned as planned development (refer to Figure 4.2-2 and Section 4.2.2.2 of the Supplemental EIR).

- R) It should be noted that the Monrovia Site is environmentally superior to the Irwindale site, as documented in the Supplemental EIR.
- S) The comment is noted. This comment does not raise any additional environmental- or Project-related issues.
- T) As discussed in Response to Comments V, W, X, Y, Z, and AA, the Monrovia site does not result in any significant impacts to land use/planning, traffic, noise, and hazardous materials with the implementation of mitigation measures identified in the Supplemental EIR. Regarding flooding impacts refer to Response to Comment BB below.
- U) The Authority supports the findings of the Supplemental EIR, which found that the Monrovia Site is environmentally superior to the Irwindale site.
- V) The comment is noted. This comment does not raise any additional environmental- or Project-related issues. It should, however, be noted that the City of Irwindale opposes location of the M&O Facility at this location. See Exhibit 5, page one of the comment letter, where it is noted, “Moreover, the City of Irwindale in its action of July 8, 2009, unanimously opposed location of such a facility in the City.”
- W) The M&O Facility is consistent with the policies and objectives stated in the City of Monrovia General Plan, which states that allowable land uses within the Station Square Transit Village Planning Area include “supporting [transit] parking facilities, a rider drop-off area, and other improvements supporting transit facilities.” All of the proposed facilities in Monrovia fit within this land use definition.

The proposed Monrovia location of the M&O facility is located in an area already zoned as planned development (refer to Figure 4.2-2 and Section 4.2.2.2 of the Supplemental EIR).

X) The commenter is correct in stating that traffic impacts associated with the M&O Facility in Irwindale (Alternative 2) would be less than significant (Section 5.2.3.4 of the Supplemental EIR). However, it should be noted that three intersections within the vicinity of the M&O Facility in Irwindale (Alternative 2) would operate at a level of service (LOS) E or F in the buildout year with the implementation of Alternative 2. Traffic mitigation measures to ensure that construction and/or with-project/operations traffic do not aggravate these three near or at capacity intersections would likely need to be considered in the same way it is currently being proposed for construction-related traffic at the M&O Facility in Monrovia. Additionally, it is assumed that “low traffic volumes on East 1st Street would provide extra capacity for construction vehicles and the with-project/operations period trip generation during peak hours” at the M&O Facility in Irwindale (Alternative 2). However, increases in construction and with-project/operations traffic would affect LOS at East 1st Street in the same way it affects the intersections near the M&O Facility in Monrovia. Therefore, there is no evidence to show that the “Monrovia Site has greater impacts on traffic than the Irwindale Site,” as the commenter has noted. Finally regardless of the analysis of the Irwindale site, it should be noted that the Monrovia site does not result in any significant impacts with the implementation of mitigation measures identified in the Supplemental EIR.

Y) The commenter is correct regarding the increased traffic associated with construction truck and construction employee vehicle activity at the intersection of California Avenue/Evergreen Avenue (see Table 4.4-4 in Section 4.4.4.2. of the Supplemental EIR). However, there would be no significant impacts associated with construction truck and construction employee vehicle activity at the intersection of California Avenue/Shamrock Avenue because these two roads do not intersect. If the commenter is referring to the Shamrock Avenue/Evergreen Avenue intersection where a significant impact could occur during the PM peak hours (Table 4.4-4 in Section 4.4.4.2. of the Supplemental EIR), implementation of Mitigation Measure T-7 (Section 4.4.5 of the Supplemental EIR) to address these traffic impacts would reduce any impact to a less-than-significant level.

Additionally, the intersections impacted during the construction period of the proposed M&O Facility in Monrovia would not increase traffic demand enough to cause either intersection to have an LOS E or F. Both intersections would still be at or above LOS C, a level of service reasonable for this area. As noted in Response to Comment X above, the intersections within the vicinity of the M&O Facility in Irwindale (Alternative 2) would be operating at an LOS E or F in the buildout year (Section 5.2.3.4 of the Supplemental EIR). And while construction and with-project/operations traffic associated with the M&O Facility in Irwindale (Alternative 2) would be utilizing East 1st Street,

additional project-related traffic would certainly exacerbate the already at capacity intersections at and around the M&O Facility in Irwindale (Alternative 2). Therefore, there is no evidence to show that the “Monrovia Site has greater impacts on traffic than the Irwindale Site,” as the commenter has noted. Further, in any event, there are not any significant impacts associated with the Monrovia Site.

- Z) Under future conditions, noise levels calculated for the M&O Facility using the Traffic Noise Model would range from 60.5 dBA Leq to 74.5 dBA Leq at nearby sensitive receptors. The model calculates traffic noise from various sources in the Project area, including the “relatively small” increases in traffic associated with the M&O Facility (Section 4.12.4.2 of the Supplemental EIR). Implementation of mitigation measures N-1 through N-4 from the 2007 Final EIR and N-5 through N-9 from the Supplemental EIR would reduce the impacts at the M&O Facility to a less-than-significant level.

Regarding the commenter’s concerns about the M&O Facility operations, it is unlikely that noise from the operations of the M&O Facility (56 dBA Leq at nearest sensitive receptor) would be audible in relation to the noise levels associated with the future traffic, given that the noise levels associated with the M&O Facility are estimated to be 56 dBA Leq and that noise levels associated with traffic are anticipated to be 60.5 dBA Leq to 74.5 dBA Leq.

The commenter is correct that operations at the M&O Facility would occur on a 24-hour basis. Per Section 4.4.1.3 of the Supplemental EIR, "Maintenance would occur on a 24 hour, 7 day a week basis in three shifts. A swing shift time period, from 2:00 p.m. to 10:00 p.m., would be the highest period of activity for maintenance operations." As such, noise levels from maintenance and operations would peak between 2:00 p.m. and 10:00 p.m. However, noise levels during this time would not exceed the 56 dBA Leq level as discussed above. According to Table 4.12-8 of the Supplemental EIR, existing nighttime noise levels at the corner of California Avenue and Duarte Road adjacent to the proposed M&O Facility were measured at 64.5 dBA Leq. Therefore, operational noise from the M&O Facility would not exceed existing ambient noise levels, and traffic noise would still be the dominant noise source in the Project area during nighttime hours after Project implementation.

- AA) The commenter is correct in stating that hazardous material impacts associated with the M&O Facility in Irwindale (Alternative 2) would be less than significant (Section 5.2.3.6 of the Supplemental EIR). However, the limited hazardous material impacts associated with the M&O Facility in Monrovia would also not result in any significant impacts with

the implementation of mitigation measures HZ-1 through HZ-13 and compliance with federal, state, and other applicable regulatory requirements (Section 4.6.5 of the Supplemental EIR). Therefore, there is no evidence to show that the “Monrovia Site has greater impacts on hazardous materials than the Irwindale Site,” as the commenter has noted.

- BB) The commenter is correct in referencing the 2007 Final EIR regarding hydrology and water quality impacts relative to the M&O Facility in Irwindale (Alternative 2). As stated in Section 5.2.3.11 of the Supplemental EIR, “The M&O Facility in Irwindale (Alternative 2) would result in more grading work than the proposed M&O Facility in Monrovia.” The existing condition of the M&O Facility in Monrovia is characterized in Section 4.11.3.4 of the Supplemental EIR as such, “the M&O Facility is currently paved and used for industrial and commercial uses.” Given the developed nature of the proposed M&O Facility in Monrovia, if construction as proposed in Chapter 3, Project Description, of the Supplemental EIR were to occur at this location, the amount of impermeable surface area would not be substantially altered. As such, the potential for flooding would not increase. Conversely, given the undeveloped nature of the M&O Facility in Irwindale (Alternative 2), construction at this site will involve grading activities and would result in an increase in the amount of impermeable surface. As such, the potential for downstream flooding would be increased with development of the M&O Facility in Irwindale (Alternative 2).
- CC) The comment alleges that the determination as to the environmentally superior site shows post hoc rationalization for decisions already made. To the contrary, the Authority Board has reached no decision regarding the proposed Monrovia M&O Facility site. The Authority Board will be called upon to make a decision only after it has considered the Final Supplemental EIR and the 2007 Final EIR. The Authority Board will consider comments from the public, including those provided in this comment letter. Because there has been no decision by the Authority as to the location of the M&O Facility, the Supplemental EIR does not represent a post-hoc rationalization. Per Section 5.4 of the Supplemental EIR, although both the M&O Facility in Monrovia and the M&O Facility in Irwindale (Alternative 2) meet the project objectives, the M&O Facility in Irwindale would result in greater environmental impacts relative to biological resources, hydrology, water quality, and worker safety as it pertains to soil and slope stability. As such, the M&O Facility in Monrovia is identified as the environmentally superior alternative.

The record contains various items that demonstrate that no decisions as to the location of the M&O Facility have been made at this time. In the October 28, 2009 minutes, Board

Member Fasana notes, “until the Monrovia location has been secured, other sites, including Irwindale would remain viable options.” This shows no decision has been made by the Board. Similarly, even though staff level communications may have occurred, all such communications carry the caveat that the Project must work through the EIR process (see Scott Ochoa e-mail dated September 15, 2010, in the last page of Exhibit 15 of the comment letter) as well as Draft Deal Points dated 9/15/2010 (see page 3 of Exhibit 19) that notes, “Proposed project is conditioned upon certification of environmental review process.”

DD) Reasonable alternatives to the proposed M&O Facility in Monrovia have been thoroughly assessed in Volume 1, Chapter 5 of the Supplemental EIR. The commenter asserts certain standards for analysis of alternatives. While these general statements are generally accurate, the statements do not acknowledge other standards and considerations relating to the analysis of alternatives as discussed in Response to Comment D above. In addition, refer to Response to Comments F, H, I and J above, which describe the constraints of developing and operating a maintenance and operation facility at sites identified earlier in the comment letter. As a result of those constraints, those sites are not considered feasible alternatives.

EE) Refer to Response to Comment DD above.

FF) Contrary to commenter’s allegations, the Supplemental EIR is not a “sham” and the suggested alternatives are not feasible for the reasons provided above.

Footnote 4 discusses the City of Monrovia’s status as a responsible agency. However, the Supplemental EIR, like the prior 2007 Final EIR, has been completed by the Authority as the lead agency. Therefore, the City of Monrovia has assumed the role of a responsible agency, which will also have an approval role in the process.

GG) In addition to the project objectives for the M&O Facility, as presented in Section 3.2 of the Supplemental EIR and in Response to Comment D above, minimum requirements for a maintenance and operation facility on the Gold Line include characteristics such as a minimum of approximately 24 acres within close proximity to the Phase 2A alignment. As such, the number of alternative sites was narrowed to those that would meet these requirements and the objectives of the project.

The record contains various items that demonstrate that no decisions as to the location of the M&O Facility have been made at this time. In the October 28, 2009 minutes, Board Member Fasana notes, “until the Monrovia location has been secured, other sites,

including Irwindale would remain viable options.” This shows no decision has been made by the Board. Similarly, even though staff level communications may have occurred, all such communications carry the caveat that the Project must work through the EIR process (see Scott Ochoa e-mail dated September 15, 2010, in the last page of Exhibit 15 of the comment letter) as well as Draft Deal Points dated 9/15/2010 (see page 3 of Exhibit 19) that notes, “Proposed project is conditioned upon certification of environmental review process.”

The Authority Board has reached no decision regarding the proposed Monrovia M&O Facility site. The Authority Board will be called upon to make a decision only after it has considered the Final Supplemental EIR and the 2007 Final EIR. The Authority Board will consider comments from the public, including those provided in this comment letter.

- HH) Contrary to the commenter’s assertion, there is no decision or “deal” approved at this time. While negotiations of potential deal terms have occurred, none of these conversations constitutes a selection of a particular M&O Facility site because neither the Authority Board nor the City of Monrovia have yet taken any action to approve a particular potential site. None of the documents attached to the letter show that there has been any type of pre-approval granted for this Project. Further, CEQA does not require analysis of infeasible alternative or an alternative site that would not reduce or eliminate significant environmental effects. Refer to Response to Comment HH above.
- II) As noted in Section 3.4.1.1 of the Supplemental EIR, “After construction, landscaping a small park-like area would be developed on the northwest corner of the site to enhance the visual aesthetics of the M&O Facility and surrounding neighborhood.” Furthermore, the M&O Facility is consistent with the policies and objectives stated in the City of Monrovia General Plan, which states that allowable land uses within the Station Square Transit Village Planning Area include “supporting [transit] parking facilities, a rider drop-off area, and other improvements supporting transit facilities.” All of the proposed facilities in Monrovia fit within this land use definition. As defined earlier, the M&O Facility meets all established Project objectives, including Monrovia’s future transit oriented development (TOD).
- JJ) Refer to Response to Comment GG (second paragraph).
- KK) Refer to Response to Comment HH above.
- LL) As stated in the Supplemental EIR, the North Colorado Boulevard Bridge has been recommended as not eligible for the National Register of Historic Places or the California

Register of Historic Resources. There is no evidence that the bridge is associated with any events or persons of recognized significance in national, state, or regional/local history. Neither is there evidence that the bridge represents the work of a prominent architect, designer, or builder. The bridge exhibits the basic characteristics of the then-popular Art Deco style of the 1930s, but it is essentially a product of standard design and construction and does not qualify as an important example of its style, type, period, region, or method of construction except in a local context.

A previous study did note that “no other examples of a thru girder railroad bridge with decorative abutments similar to the Colorado Boulevard bridge were observed along the existing rail corridor,”¹ and concludes that the bridge is eligible for local listing or designation, although it is not eligible for the California Register or the National Register of Historic Places.² Under CEQA provisions, it thus meets the definition of a "historical resource" at the local level.

There are many other examples of Art Deco bridges throughout California, including several in the Los Angeles area that retain much of their original character. At least 16 bridges with Art Deco motifs exist within Los Angeles County and have been declared as Historic/Cultural Monuments by the City of Los Angeles.³ Since the North Colorado Boulevard Bridge is not eligible for either the National Register or the California Register but does have a local level of significance, impacts due to demolition of the bridge under CEQA are identified as significant, but with implementation of the recommended mitigation measures the impacts would be reduced to less than significant. Given the local-level of the bridge's historic significance, implementation of mitigation measures CR-4 and CR-5 identified in the EIR would reduce the Project's effect on this historical resource to a less than significant level.⁴

MM) The comment is noted. This comment does not raise any additional environmental- or Project-related issues.

¹ Feldman, Jessica B. 2005. *California Historical Resources Information System record forms, ATSF Railway Bridge over Colorado Boulevard*. Myra L. Frank/Jones & Stokes and Applied Earthworks 2005, Appendix F.

² Myra L. Frank/Jones & Stokes and Applied Earthworks. 2005. *Supplemental Historic Properties Survey and Effects Report for the Gold Line Foothill Extension Project (Pasadena to Montclair), Formerly Gold Line Phase II Project, Los Angeles and San Bernardino Counties, California*. Report prepared by Myra L. Frank/Jones & Stokes, Los Angeles, and Applied Earthworks, Hemet, for the Federal Transit Administration, the Los Angeles to Pasadena Blue Line Construction Authority, and the Metro Gold Line Foothill Extension Construction Authority.

³ City of Los Angeles, 2009. Department of City Planning, City of Los Angeles, Historic-Cultural Monument (HCM) Report. Updated December 29, 2009. Internet site accessed December 30, 2010 and located at: http://cityplanning.lacity.org/complan/HCM/dsp_hcm_result_CityALL.cfm

⁴ Response to Comment LL was prepared by Gary Fink, AICP, RPA; a copy of Mr. Fink's analysis is attached hereto as appendix 4 -1.

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4.5 Errata Table

This errata table lists all applicable changes made to Volume 1: SEIR based on the preceding comments and responses. This table is also appended to Volume 1: SEIR.

Section #	Page #	Revision	Comment
Section 2.1.1	2-1	<u>Current planning calls for completion and operation of the M&O Facility as part of Phase 2A. As such, this document analyzes the construction and operation of that facility in Monrovia, as described in Chapter 3, Project Description, and in Irwindale, as described in Chapter 5, Alternatives.</u>	This revision has been added as the last two sentences of the first bullet point in Section 2.1.1 to clarify that there is a need for the M&O Facility to be constructed adjacent to the Phase 2A alignment and at the same time as Phase 2A to ensure sufficiency of support services for the expanded service area.



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January 13, 2011

Habib F. Balian
Chief Executive Officer
Metro Gold Line Foothill Extension
Construction Authority
406 E. Huntington Drive, Suite 202
Monrovia, CA 91016

Re: Metro Gold Line Foothill Extension Cultural Resources Response to Comment
Letter 029

As stated in the Supplemental EIR, the North Colorado Boulevard Bridge has been recommended as not eligible for the National Register of Historic Places or the California Register of Historic Resources. There is no evidence that the bridge is associated with any events or persons of recognized significance in national, state, or regional/local history. Neither is there evidence that the bridge represents the work of a prominent architect, designer, or builder. The bridge exhibits the basic characteristics of the then-popular Art Deco style of the 1930s, but it is essentially a product of standard design and construction and does not qualify as an important example of its style, type, period, region, or method of construction except in a local context.

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CEQA are identified as significant, but with implementation of the recommended mitigation measures the impacts would be reduced to less than significant. Given the local-level of the bridge's historic significance, implementation of mitigation measures CR-4 and CR-5 identified in the EIR would reduce the Project's effect on this historical resource to a less than significant level.



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Cultural Resources Expert

³ City of Los Angeles, 2009. Department of City Planning, City of Los Angeles, Historic-Cultural Monument (HCM) Report. Updated December 29, 2009. Internet site accessed December 30, 2010 and located at: http://cityplanning.lacity.org/complan/HCM/dsp_hcm_result_CityALL.cfm

