Text of remarks to transportation commission, September 27, 2012

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The NFL DEIR is simplistic and misleading. We must balance the gains and losses from any new project, but CEQA statutes assume that EIR challenges must focus on the validity of harm estimates. This DEIR relies on naïve optimism rather than collecting data to address the problems.

1. Consider air quality, section 3.1. They refer to measurements taken at the AQMD station near Cal Tech, far from the Rose Bowl and unlikely to detect CO and particulate matter produced by NFL games. They provide no UCLA game measurements. Particulates in Pasadena are above state safety thresholds at baseline and likely worse down in the Arroyo. Vehicles are the main source of particulates; they also come from tailgaters cooking. Charcoal cooking produces far more particulates and CO (carbon monoxide) than propane cooking, but the RBOC allows it.

Page 3.1-25 says that there is reason to suspect a CO (carbon monoxide) hot spot in the Arroyo.

Then they use a mathematical model, CALINE4, to dismiss the CO problem. They provide an appendix of theoretical calculations predicting levels of various pollutants. Those calculations show very high levels of important pollutants. However, real air quality may be even worse than predicted. Shouldn't we measure air quality on site (particulates and CO will tend to be trapped in and near to the Arroyo) instead of relying on theoretical calculations? The DEIR did not include charcoal fires or Devil's Gate sediment trucks (see below) in their model.

2. Recreation is a critical issue, in section 3.6. The Rose Bowl is filled with people doing all kinds of active exercise. The most numerous are those who use the exercise loop, estimated by the city at 1.5 million visits/year (3.6-4), mostly women from my observation.

The city has no idea how many live in Pasadena, how many exercise only on weekends, etc. but assumes that other city parks can substitute for the Arroyo. They even list the Gamble House among resources (3.6-12). Most city parks are far from the Arroyo, totally unsuited for cycling or jogging strollers, and not very good for running. The city didn't ask about the needs of the many people using the Arroyo for constructive exercise. Active recreation improves mental and physical health, but the city stupidly lists more football games as a recreational benefit (3.6-30). Passive entertainment plus or minus alcohol is no justification for reducing active health benefits for so many people.

3. Traffic. The traffic data is flawed, particularly with reference to weeknight games. We must consider both peak traffic and the area under the curve-how long the congestion persists. I can drive after the kickoff of UCLA games. I could not do that on weeknight soccer games or during the Billy Graham crusade. Traffic was backed up for hours. I couldn't get home from work. Congestion lasted longer

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and the chance of a period of clear streets was much less than with weekend UCLA games. The DEIR ignores this issue. Weeknight games benefit only the NFL.

Monday night games would be worse than Thursday because Monday traffic is greater. But the city sampled only Thursday night.

The DEIR ignores the massive Devil's Gate reservoir sediment removal process. That project hasn't started, but there is no doubt that sediment removal will be necessary and will require many trucks moving East along the 210 freeway, probably 6 days a week for years. Those trucks will produce congestion, air pollution and other problems. The initial journey passes very close to the Arroyo Seco. Another large project, the Lincoln Property Parsons Project, will involve construction at the current Parsons site and impact weeknight games since trucks entering and leaving the Parsons site will interfere with access to the site for parking and use of the Rose Bowl shuttle. This project will reduce access to Parsons parking for years.

The DEIR ignores the duration of congestion on weeknights, the likely major additional impacts of the Devil's Gate Sediment removal, and the Lincoln Property Parsons Project. It ignores the fact that current particulates measured away from the site are too high, there's no idea how much higher that they will go. This DEIR represents wishful thinking and should be rejected.

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Letter No. 55: Bob Snodgrass

Bob Snodgrass Comments to the Transportation Advisory Committee September 27, 2012

Response 55-1

Please see Response 17-5 and Response 2-6 regarding localized air quality impacts

Response 55-2

Refer to **Response 15-9** regarding recreational users.

Response 55-3

Please refer to **Response 17-8**.

Response 55-4

Please refer to **Response 15-18** with respect to comment about inclusion of Devil's Gate reservoir sediment removal project and the proposed mixed-use project at Parson's site.

As shown in Table 10 of the Appendix 3.7 - Traffic Study, the Draft EIR did analyze potential environmental impacts associated with the development of the Parsons site. This project was included as part of background cumulative traffic for the proposed project. As shown in the table, approximately 1,454 trips were assumed as a result of this project during the weekday pre-event peak hour. Any construction traffic as a result of this project would likely be lower than the number of trips estimated once the Parsons project is complete and therefore no additional traffic analysis is needed.