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Air Quality Management District
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E-mailed: October 10, 2012 October 10, 2012
RoseBowlNFLComments@cityofpasadena.net

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Review of the Draft Environmental Impact Report (Draft EIR) for the Rose Bowl NFL Project

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are intended to provide guidance to the lead agency and should be incorporated into the Final Environmental Impact Report (EIR) as appropriate.

Based on a review of the Draft EIR the proposed project will generate significant regional air quality impacts during operations. The project's significant air quality impacts are predominantly from the high traffic volumes generated by events occurring at the project site. AQMD staff notes that this project is intimately related to, and reliant upon the recently approved Farmer's Field project in the city of Los Angeles. While AQMD staff has concerns about air quality impacts from that project, it did include many features and mitigation measures designed to reduce emissions from vehicles travelling to the site. It appears that the proposed Rose Bowl project did not consider any of the measures included in that related EIR, with the result being substantially higher air quality impacts. Therefore, AQMD staff strongly recommends that the lead agency provide additional mitigation measures pursuant to CEQA Guidelines Section 15126.4. Detailed comments are attached.

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the lead agency to address our concerns about the analysis in the Draft EIR. Given the magnitude of the project's operational air quality impacts and the technical analyses required for the proposed project we encourage the

lead agency to set up a meeting with AQMD staff to discuss the enclosed comments. If you have any questions regarding the enclosed comments please contact Ian MacMillan, Program Supervisor – CEQA section at (909) 396-3105.

Sincerely,

Ian MacMillan
Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

Attachment
SN:IM:DG
LAC120810-03
Control Number

Operational Emissions Mitigation

1. The proposed project will facilitate games for the NFL during construction of the Farmer's Field Stadium Project in downtown Los Angeles approved by the Los Angeles City Council on September 28, 2012. The proposed project is intimately related to the Farmer's Field Project as it will provide a venue for NFL games until completion of the downtown LA Stadium. Like the downtown LA Stadium the proposed project will generate significant regional air quality impacts resulting from a high volume of vehicle trips on game days (i.e., over 55,000 weekday trips). Specifically, the lead agency's operational air quality analysis demonstrates that the project's NOx, VOC, CO, PM10 and PM2.5 emissions will exceed the AQMD's CEQA thresholds. Particularly noteworthy is that the project's NOx emissions are at least 22 times higher than threshold.

   Upon certification of the Final EIR for the downtown LA Stadium the City of Los Angeles determined that a substantial set of transportation-related mitigation measures for game day events are feasible and can effectively reduce vehicle trips, thereby minimizing air quality impacts. Therefore, the AQMD recommends that the lead agency require similar operational mitigation measure as those previously adopted by the City of Los Angeles for game day events. Further, given that the proposed project will emit significantly higher peak daily emissions (i.e., at least 100% higher than the Downtown LA Stadium) due to the lack of available mass transit in the City of Pasadena the lead agency should minimize or eliminate significant adverse air quality impacts by adding all feasible mitigation measures. The AQMD staff recommends that the lead agency provide the following additional mitigation measures pursuant to CEQA Guidelines Section 15126.4.

   Transportation Mitigation Measures

   a) Develop and implement transportation related measures that at a minimum achieve a trip ratio that is 10% better than other NFL Stadiums (Consistent with the target identified in paragraph (h)(2) of Section 21168.6.5 of the Public Resources Code).
   b) Require that the measure identified as "Additional Measure 3.7-2.1" in the Draft EIR be included in the Mitigation, Monitoring, and Reporting Plan and set forth specific areas of transportation demand management to be addressed by this measure such as:
      - Additional Metro and Metrolink service
      - Additional Special Metrolink trains
      - Express Bus Park-and-Ride
      - Charter Bus Service
      - Encouraging and incentivizing transit (e.g., ticket bundling)
      - Parking Discounts for high occupancy vehicles
   c) Ensure that all mass transit capacity that is assumed to be utilized for this project is facilitated with a direct transit link to the project. Therefore, the lead agency should provide direct access to the project site (e.g., dedicated zero or near-zero emission shuttle buses to events that could further minimize walking distances to the event center and improve accessibility).
   d) Provide both Level 2 and Level 3electric vehicle chargers onsite.

e) Ensure that if employees use transit that the transit will be available after their work shift is completed.
f) Provide incentives to encourage public transportation and carpooling possibly through local retail, restaurant, and the stadium discounts.
g) Provide incentives for employees and the public to use public transportation such as discounted transit passes, reduced ticket prices, and/or other incentives.
h) Implement a rideshare program for employees.
i) Construct off-site bicycle facility improvements, such as bicycle trails linking the facility to designated bicycle commuting routes or on-site improvements such as bicycle paths, bicycle parking facilities, etc.
j) Require the use of 2010 diesel trucks, or alternatively fueled delivery trucks (e.g., food, retail and vendor supply delivery trucks) at project start.
k) Provide an alternative fueling station for delivery trucks (e.g., natural gas or electric).
l) Require the use of electric or alternative fueled maintenance vehicles, field vehicles, and forklifts.

Parking Mitigation Measures

m) Provide a parking system for quick entry and exit that will reduce vehicle idling time. A system should also be installed that provides sufficient signage or communication for available parking, parking locations, and parking fees.
n) Provide pre-paid parking opportunities that reduce idling and provide dedicated express entrances and exits for pre-paid parking tickets.
o) Provide preferential parking spaces for alternative fuel vehicles, and vanpools.
p) Set up parking systems that minimize the time required to collect parking fees and reduce vehicles queuing for example walkup kiosks and electronic payments.
q) Provide real time information on parking availability in the parking structures to minimize the time it takes to find available parking.

Other Mitigation Measures

r) Provide outlets for electric and propane barbecues.
s) Provide a designated shaded recreation area with propane and electrical outlets to reduce vehicle idling emissions associated with tailgating.
t) Require diesel particulate filters on all diesel-fueled emergency generators.
u) Require use of electric lawn mowers and leaf blowers.
v) Require use of electric or alternatively fueled sweepers with HEPA filters.
w) Use of water-based or low VOC cleaning products.

Tailgating Event Emissions

2. The Draft EIR does not discuss or include emissions from personal barbeques used during game related tailgating in parking areas at the project site to calculate the project's overall operational air quality impacts. Given that the proposed project will allow barbecues and tailgating (as described on page 2.0-16 of the Draft EIR), air quality impacts from tailgating must be included in the Final EIR.

Fireworks

3. It is unclear if the proposed project will allow the use of fireworks at future events. If fireworks might be used, then the air quality impacts of this activity must be analyzed to determine potential project impacts. Further, if fireworks will be used, AQMD staff recommends that the project require the use of low emission launch systems and low emitting fireworks.

Project Description

4. Page 2.0-14 of the Draft EIR states that the project would allow "the NFL to use the Rose Bowl for a period of up to five years beginning no sooner than the 2013-2014 season." However, the draft amended ordinance has not been provided within the Draft EIR. It is therefore unclear if the increased number of allowable major events (up to 13 extra events per year) will be allowed at the project site after the five-year period designated for use by the NFL. The Final EIR should clarify if any extra events allowed by the proposed amended ordinance would continue beyond the five-year period.

Localized Analysis

5. The proposed project will emit substantial emissions from local roadways due to significant traffic volumes accessing and exiting the project site. However, the Draft EIR does not contain a modeling analysis of all sources of NO2 and PM emissions from local roadways around the project site. Because of the substantial emissions from vehicles associated with this project, AQMD staff recommends that the emissions from NO2 and PM emissions be modeled from offsite NO2 and PM transportation emission sources (i.e., up to a quarter of a mile perimeter from the project site) and all onsite sources to determine the project's potential acute health impacts and ambient air quality impacts.

Trip Length and Mode Split

6. The air quality analysis includes an estimate of mobile source emissions from trips generated by the project. These emissions values are based on a set of trip characteristics for mostly light duty vehicles (e.g., passenger cars). For example, the lead agency assumes that the typical game event attendee will travel on average 12.5 miles to the project site (see Appendix 3.1 of the Draft EIR). Further, the lead agency assumes a transit mode split of approximately seven percent for patrons taking transit and/or biking or walking to the site (See Table 5 of Appendix 3.7). The lead agency does not justify the use of the average vehicle trip distance to the project site nor the assumed mode split. Therefore, the AQMD staff recommends that the lead agency substantiate the use of these trip assumptions with additional supporting technical information, for example from data collected from past events. If the lead agency determines that these values do not accurately reflect the project's characteristics, the lead agency should provide updated information and any additional or new air quality information warranted in the Final EIR.