

Scott Johnson

From: Adriana Saltonstall <agsaltonstall@gmail.com>
Sent: Friday, January 31, 2014 7:24 PM
To: Scott Johnson
Subject: DEIR for ESC Project

Dear Mr. Johnson,

I wrote you a rather long e-mail commenting on the DEIR for the ESC project. Unfortunately, before I was able to send the e-mail my computer crashed and I'm unable to retrieve the document.

I write this is a former director of the California Department of Transportation (Caltrans), who happens also to be the person who cut the ribbon after Caltrans finished building the last segment of I-5. Most of my comments in this e-mail relate to I-5, a four-mile segment of which is within the project's transportation study area.

1. **IMPORTANCE OF I-5.** The DEIR treats I-5 basically as a local/regional route for cars and light trucks. In fact, I-5 is an extremely important part of the Interstate Highway System, designed specifically to handle long-distance travel not only by car and light truck but by heavy trucks engaged in interstate commerce with substantial freight loads. The freeway runs not only the full length of California but also through Oregon and Washington and to Mexico and Canada. It is constructed to the highest engineering standards and has the highest speed limits allowed in California.

Such impacts as may occur from construction of the ESC project will affect not just local traffic but long-distance, including interstate and international traffic, as well. The DEIR should discuss the character of I-5 and the impacts of the ESC project above and beyond congestion and inconvenience suffered by local commuters and other drivers.

2. **LEVELS OF SERVICE.** Current Levels of Service (LOS) on the four-mile segment of I-5 within the service area studied are, as laid out in the DEIR, very poor. Several sections are at LOS F, meaning traffic is basically gridlocked or stop-and-go at certain times of day. While the LOS information in the DEIR is revealing, it presents a rather circumscribed picture of conditions on the freeway. LOS D and LOS E, as well as LOS F, involve bad congestion. The prevalence of these only-somewhat-better-than-F conditions should be discussed.

Additionally, a footnote repeated at the bottom of several tables in the DER points out that the model used to come up with traffic flows does not take account of back-up queues due to bottlenecks ahead, at ramps for example. The footnotes state that such back-ups and queueing was obvious from field observations, and that the LOS designations on the freeway now and predicted for the future are probably worse than reported in the DEIR. Surely this point is worth more than a footnote or two.

One further point. Information provided on the off-ramp at J and 3rd Street shows that, delays which will develop at this location when the ESC project is built will amount to 879.3 seconds during the pre-event peak. The text of the DEIR says this delay will amount of 10 minutes, which is of course very high. However, by my calculation 879.3 seconds amounts to nearly 15 minutes, a truly horrendous situation deserving a G or worse LOS, were there such a thing

3. **PROJECT IMPACTS AND MITIGATION.** The DEIR mentions in different parts of the document (some found in the material on air quality) various projects which supposedly will be constructed, some of which will

have the effect of mitigating the very serious impacts of the ESC project on the freeway. On page 4.10-77 for example, the statement is made that "the cumulative analysis assumes a variety of reasonably foreseeable planned roadway improvements in the study area..." A list of these "reasonably foreseeable" improvements is provided.

.Information more definitive than the above-mentioned list should be put together. There should be presented a consolidated list of all projects in the pipeline which will affect (presumably favorably) the freeway. For each project there should be a description, a date of construction, cost, status of funding commitment, who will pay the cost (federal, state or government or private entity. At the very least, this listing should include all relevant projects in Caltrans' multi-year highway program

4. VEHICLE MILES TRAVELLED. Since a specific "vehicle miles travelled" (VMT) goal must be met for the ESC project to come under the favorable provisions of SB748, the treatment of VMT data in the DEIR is very important. VMT data, of course, results from the pattern of trip origins and destinations. To this reader, the foundation for the VMT data used in the DEIR is shaky at best.

On page 4.10-41, the following statement is made: "Cell phone data show that 10 percent [sic] Kings pre-game trips originate from the Central City. To account for greater ticket sales in Central City, the pre-game percentage was increased from 10 to 13 percent [sic]." The statement goes on to say no similar change was made to post-game trips. No logical foundation is provided for the selection of a 3 per cent change in trip origins (as opposed, say, to 2 per cent, or 5 per cent, or for that matter any particular number that might prove useful in shaping VMT numbers calculated to meet the qualifying provision in SB748.)

The issue of the location of trip origins is treated quite differently later in the DEIR. On page 4.10-78 reference is made to "lack of a supportable methodology upon which to estimate this future redistribution of future event attendees." Adding to the confusion, this same paragraph states that the analysis in question makes exactly the kind of assumption for which, according to the earlier language, no supportive methodology exists.

I appreciate this opportunity to provide input on the environmental consequences of the proposed ESC project.

Sincerely,

Adriana Gianturco.