5.0 OTHER CEQA CONSIDERATIONS

Section 15126.2 of the *California Environmental Quality Act* (*CEQA) Guidelines* requires that the EIR include a discussion of significant environmental effects of the proposed project; significant environmental effects which cannot be avoided if the proposed project is implemented; significant irreversible changes which would be involved in the proposed project should it be implemented; and growth-inducing impacts of the proposed project. Sections 15126.4 and 15126.6 of the *State CEQA Guidelines* require that mitigation measures be proposed to minimize significant effects and alternatives to the proposed project are considered and discussed. Cumulative impacts are discussed under each environmental issue area in **Section 3.0** pursuant to Section 15130 of the *State CEQA Guidelines*. Alternatives are analyzed in **Section 4.0** of this document.

The following discussion will focus on a summary of significant environmental effects, growth-inducing impacts, and mitigation measures for the proposed project.

Significant, Irreversible Environmental Changes

The EIR must also examine irreversible changes to the environment. More specifically, *State CEQA Guidelines* require the EIR to consider whether "uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely" (*State CEQA Guidelines* section 15126.2(c)). "Nonrenewable resource" refers to the physical features of the natural environment, such as land, waterways, etc.

The proposed project does not involve any construction activities that would entail the commitment of energy and human resources, including construction materials, electricity, water, and natural gas. However ongoing maintenance of the project and project events would require the permanent commitment of energy resources in the form of natural gas and electricity. Impacts would also result from the incremental increase in vehicular traffic, and the associated air pollution. This commitment would not be a long-term obligation as the increase in displacement events would occur for a period of five years. As discussed in the greenhouse gas analysis for the proposed project, the impacts of increased energy usage would not be significant. Nonetheless, although the proposed project would be temporary, the resources utilized for the project over a five-year time frame would be permanently committed to the project and therefore irreversible.[1]

[1] Because an existing football team would be relocating to the Pasadena area, global GHG emissions will be offset by the fact that football games will not be occurring in another city as a result of a team moving to the Rose Bowl.

Significant Unavoidable Impacts

Recreation

Due to an additional maximum of 13 displacement events at Rose Bowl stadium, Lot H, Brookside Park, Brookside Golf Course, the recreational loop, and Rose Bowl Aquatics Center would be unavailable or practically inaccessible for recreational use by the public for significant portions of up to an additional 13 days per year. These 13 days of unavailability due to the proposed project would be in addition to the existing 12 days of unavailability as a result of UCLA football home game stands, for a total maximum unavailability during a significant portion of 25 days per year. Lot H would still continue to host soccer games and other recreational activities on a pay-per-event basis, but would be parked during displacement events and, thus, unavailable to recreational users during major stadium events. Brookside Park ball diamond and park areas as well as Brookside Golf Course would also be parked and unavailable to the public for recreation during displacement events. In addition, the Rose Bowl Aquatics Center would be unavailable, since major event stadium parking would overflow into this facility's parking inventory. The reduced availability of passive recreational uses, in particular, the recreational loop would result in a significant and unavoidable impact to recreation within the Central Arroyo.

Traffic, Circulation and Parking

The proposed project would generate additional traffic by adding up to 13 displacement events at the Rose Bowl Stadium. Sixty-six intersections were analyzed for potential impacts during weekday and weekend events. Two scenarios (Existing with Project and Future with Project) were analyzed to determine the potential effects of the proposed project. Under both the Existing with Project and Future with Project scenarios, 60 of the 66 studied intersections would be significantly impacted. Mitigation measures and a transportation demand management program were included in the project to help reduce potential impacts. After applying the appropriate adjustments to the v/c and LOS calculation to account for **MM 3.7-2**, it was determined that the proposed mitigation will reduce the project related incremental v/c resulting in partial mitigation of the project's traffic, however, the reduction in v/c will not be enough to reduce the impact to a less than significant level at any of the significantly impacted intersections.

Twenty-seven street segments were also studied. Given the limited number of roadways that access the Arroyo, there is no mitigation measure for significantly impacted street segments that would reduce the project impact to less than a 5 percent increase in capacity. Therefore, the impacts at these locations for both weekday and weekend events were determined to be significant and unavoidable.

Significant impacts were also identified related to the projects impact on the regional transit system and the project impacts on Congestion Management Program (CMP) intersections.

Noise

Traffic generated by attendees traveling to and from NFL games at the Rose Bowl Stadium would increase the ambient noise level in residential neighborhoods surrounding the project site. Traffic traveling to and from the proposed project was determined to generate noise levels that would exceed the City of Pasadena's Noise Ordinance 5 A-weighted decibel (dB(A)) threshold. Based on the traffic study prepared for the proposed project, sound levels for existing traffic volumes with and without the project, and future traffic volumes with the project, noise levels were found to be in excess of 5 dB(A) at five of the eight studied intersections.

Air Quality

The proposed project would generate total criteria pollutant emissions during operation that would exceed South Coast Air Quality Management District (SCAQMD) Regional Emissions Significance Thresholds. The proposed project would exceed the thresholds for volatile organic compounds (VOC), oxides of nitrogen (NOx), carbon monoxide (CO), particulate matter 10 microns or less in diameter (PM10) and particulate matter 2.5 microns or less in diameter (PM2.5). Nearly all air quality impacts associated with the proposed project result from vehicle traffic, with the overwhelming majority of these emissions coming from passenger vehicles. Transportation measures included in the project for significantly impacted intersections would also help to reduce air quality impacts, however, emissions would remain above significance thresholds for all pollutants with the exception of sulfur oxides (SOx).

Growth Inducing Impacts

Section 15126(d) of *State CEQA Guidelines* requires that this section discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Growth-inducing impacts are caused by those characteristics of a project that tend to foster or encourage population and/or economic growth. Inducements to growth include the generation of construction and permanent employment opportunities in the support sector of the economy. A project could also induce growth by lowering or removing barriers to growth or by creating an amenity that attracts new population or economic activity. The proposed project could result in the following types of growth-inducing impacts: (1) the creation of short-term employment opportunities to draw newcomers to the region and (2) increased visitor generation.

Employment Generation

Short-Term Employment Generation

Development of the proposed project would generate limited short-term employment opportunities, primarily through service jobs on the day of events. It is assumed that many of the employment opportunities would not be new opportunities but provide additional days (events) on which current workers such as food vendors and grounds staff would be retained for work. A small number of additional workers may also be required to staff events. However, given the availability of local workers, the proposed project would not be considered growth inducing from a short-term employment perspective.

Visitor Generation

The proposed project would attract the NFL to the stadium for a short term (five years) and increase the number of displacement events (attendance over 20,000) from twelve to twenty-five. The use of the stadium could encourage greater periods of activity in the area and could generate an additional demand for restaurants, bars, and retail establishments. Activity at existing commercial businesses would increase, and new businesses catering to football attendees would develop. Stadium attendees would be expected to patronize the local area before and after games. However, since the proposed project would not increase maximum attendance, existing commercial facilities would be adequate to accommodate the demand for commercial services such as restaurants, bars, hotels, and retail establishments. Additionally, given the short duration of the project, property owners are not expected to spend substantial resources on physical construction to meet any additional demand generated by the project. There would be little time to recoup the investment. Thus, the proposed project would not be expected to increase the intensity or change the type of future growth in Pasadena.

It is expected that event patrons would increase the frequency of nighttime activity in the area. However, as stated above, this increase in frequency of use of retail services could be accommodated by existing retail establishments. Attendance at events other than football games is not expected to increase substantially as a result of the project. Thus, while implementation of the proposed project would result in both direct and indirect increased visitor generation in the area, it would not be anticipated to have a growth inducing impact, as existing retail facilities could accommodate the increased visitor population.

Effects Not Found to be Significant

The Initial Study, included in **Appendix 1.0**, determined that several impacts were not found significant within the issue areas of Aesthetics, Agricultural Resources, Biological Resources, Cultural Resources, Geology/Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Mineral Resources, Population/Housing, Public Services, and Utilities and Service Systems. Please refer to **Appendix 1.0** (Initial Study) for a detailed explanation of the reasons these effects were not found to be significant.