



October 8, 2012

Mr. David Sinclair, Planner Planning Department 175 N. Garfield Avenue Pasadena, CA 91109

Re: Temporary Use of the Rose Bowl Stadium by the NFL Draft EIR

Dear Mr. Sinclair:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) for the Temporary Use of the Rose Bowl Stadium by the NFL. The Los Angeles County Metropolitan Transportation Authority (LACMTA) is responding in its capacity as a responsible agency with respect to the proposed project's potential impacts on existing and planned Metro and municipal transit services. The traffic impact mitigation measures contained in the Draft EIR should be revised to incorporate the following:

- As mentioned in the Draft EIR, transit patron demand generated by the proposed project may exceed capacity of current and future levels of Metro rail and bus service. With respect to Mitigation Measure 3.7-3 identified in the Draft EIR, the project sponsor should be required to commit to funding the full cost of any additional Metro rail/bus service and support necessary to accommodate patron demand. Moreover, be advised that any additional Metro rail/bus service required to accommodate patron demand would be subject to MTA Board approval as part of MTA's annual operations budget;
- Be advised that for weekday events Metro may be unable to increase rail capacity to the level required to meet patron demand and instead may have to supplement rail service with additional bus service during Metro's peak operating periods;
- 3) The Metro Gold Line Del Mar and Memorial Park Stations will likely experience high volumes of transit patrons making their way to and from Rose Bowl events. The EIR should include an analysis of the transit patron capacity at these stations and potential safety issues associated with accommodating these crowd surges. Moreover, any capital costs deemed necessary to improve safety or capacity should be incurred by the project sponsor;
- Placement of shuttle bus stops at the Metro Gold Line Del Mar and Memorial Park Stations should be considered;
- 5) Wayfinding signage will be required to guide people to and from the Gold Line Memorial Park/Del Mar Stations and shuttle bus locations. In addition to incurring the full cost of providing the wayfinding signage, the project sponsor will need to coordinate the development of the wayfinding signage with MTA's Creative Services Department;
- 6) The closure of streets to automobile traffic adjacent to and around the Metro Gold Line Memorial Park and Del Mar Stations on event days should be done in coordination with MTA:

1

- 7) Metro and/or law enforcement personnel needed for pedestrian and automobile traffic control/guidance during events should be fully funded by the project sponsor;
- 8) Due to potential impacts to existing transit service as well as the impending need for additional event-day service, Foothill Transit and Metrolink should be included in coordination efforts.

Congestion Management Program Statutory Requirements

In accordance with the State of California Congestion Management Program (CMP) statute, the Traffic Impact Analysis (TIA) contained in the Draft EIR identified several CMP arterial and highway monitoring stations which would be significantly impacted by the proposed project. Per the CMP TIA Guidelines published in the "2010 Congestion Management Program for Los Angeles County", Appendix D, section D.9, the following should be included in relation to CMP arterial and highway monitoring stations and associated mitigation measures as identified in the Draft EIR:

- 1) Criteria for Determining a Significant Impact. For purposes of the CMP, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity (V/C ≥ 0.02), causing LOS F (V/C > 1.00); if the facility is already at LOS F, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity (V/C ≥ 0.02). The lead agency may apply a more stringent criteria if desired.
- 2) Identification of Mitigation. Once the project has been determined to cause a significant impact, the lead agency must investigate measures which will mitigate the impact of the project. Mitigation measures proposed must clearly indicate the following:

□ Cost estimates, indicating fair share costs to mitigate the impact of the proposed project. If the improvements from a proposed mitigation measure will exceed the impact of the project, the TIA must indicate the proportion of total mitigation costs which is attributable to the project. This fulfills the statutory requirement to exclude the costs of mitigating inter-regional trips;

Implementation responsibilities. Where the agency responsible for implementing mitigation is not the lead agency, the TIA must document consultation with the implementing agency regarding project impacts, mitigation feasibility and responsibility.

Final selection of mitigation measures remains at the discretion of the lead agency. The TIA must, however, provide a summary of impacts and mitigation measures. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the mitigation monitoring requirements contained in CEQA.

3) Project Contribution to the Planned Regional Improvements. If the TIA concludes that project impacts will be mitigated by anticipated regional transportation improvements, such as rail transit or high occupancy vehicle facilities, the TIA must document:

 $\hfill\Box$ Any project contribution to the improvement, and

 $\ \square$ The means by which trips generated at the site will access the regional facility.

2

Temporary Use of the Rose Bowl Stadium by the NFL Draft EIR October 8, 2012 Page 3 of 3

MTA looks forward to reviewing the Final EIR. If you have any questions regarding this response, please call Scott Hartwell at 213-922-2836 or by email at hartwells@metro.net. Please send the Final EIR to the following address:

3

MTA CEQA Review Coordination One Gateway Plaza MS 99-23-2 Los Angeles, CA 90012-2952 Attn: Scott Hartwell

Sincerely,

Muttu Nubous Martha Welborne, FAIA

Executive Director, Countywide Planning

Letter No. 3: Metro

Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012
Martha Welborne, FAIA, Executive Director, Countywide Planning
October 8, 2012

Response 3-1

- (1) The comments are noted and are hereby part of the Final EIR, and will be forwarded to the decision makers for their consideration prior to taking any action on the Project. Regarding transit mitigation measure MM 3.7-3, the traffic study recommends that Metro increase transit service to meet the demand of both commuter peak hour transit ridership, as well as the demand generated from the project. The study recognizes that the implementation of this mitigation measure is outside the purview of the City of Pasadena and Rose Bowl and under Metro's jurisdiction, it is recommended that City of Pasadena coordinate with Metro in order to determine the level of transit service needed to meet game day demand.
- (2) The Draft EIR also acknowledges that transit ridership will increase as a result of the project. While service frequencies (and transit capacity as a result) could increase to meet future demand, this is outside of the control of the City of Pasadena. It is acknowledged that the future rail capacity may be unable to meet patron demand and this might have to be achieved through increasing bus service levels.
- (3) The Memorial Park and Del Mar Metro Gold line Stations are routinely used to accommodate transit patrons making their way to similar sized events, such as a UCLA game, at the Rose Bowl with no safety impacts. Therefore, no safety issues are anticipated with the additional displacement events at the Rose Bowl.
- (4) Event patrons arriving at the Memorial Park Station on the Gold Line will be able to take a shuttle to Rose Bowl from the northwest corner of the intersection of Fair Oaks Avenue & Holly Street located approximately 600 feet west of the Station. It is not recommended that shuttle stops be placed at the Del Mar Station as this would provide a less attractive option for Rose Bowl patrons, and likely result in additional air quality and traffic impacts.
- (5) The City of Pasadena and RBOC will work together with Metro to install way-finding signage to guide patrons to/from the Gold Line Memorial Park Station and the shuttle bus pick-up/drop-off location. The Draft EIR also recommends the use of social media to communicate current information regarding directions to/from the Rose Bowl from regional freeways and roadways, preferred routes to various parking lots, and detailed information regarding potential modes of travel other than passenger vehicles to/from the Rose Bowl (rail/bus/shuttle routes, timetables, etc.).
- (6) No street closures are planned adjacent to or around the Metro Stations. In the event that there will be street closures around the Memorial Park and Del Mar stations, the City of Pasadena will coordinate with Metro.
- (7) Funding for traffic control officers and neighborhood protection personnel will be the responsibility of the City of Pasadena and not Metro.

(8) As recommended in Mitigation Measure 3.7-3, the City of Pasadena will coordinate transit service with Foothill Transit and Metrolink.

Response 3-2

The comments are noted and are hereby part of the Final EIR, and will be forwarded to the decision makers for their consideration prior to taking any action on the Project. Regarding the comment to include criteria in relation to CMP arterial and highway monitoring stations and associated mitigation measures per the CMP TIA Guidelines published in the "2010 Congestion Management Program for Los Angeles County," Appendix D, section D.9, the traffic impact analysis included the criteria for analysis and significant impact determination for both arterial and freeway monitoring stations.

Using the aforementioned criteria at arterial and freeway monitoring stations, significant impacts were identified at one arterial location and 20 freeway-monitoring stations. Mitigation measures were explored for both arterial and freeway impacted locations.

No feasible physical mitigation measures were determined to be available for significant impact identified at the Arroyo Parkway and California Boulevard monitoring station and therefore, the impact will remain and significant and unavoidable.

The traffic study proposed that deployment of two changeable message signs along the I-210 or/and SR-134 to help facilitate ingress/egress on game days. Rose Bowl will fund the permitting and deployment of two temporary changeable message signs (CMS) on days of the proposed displacement events. The cost of renting and deploying two CMS on 13 event days is estimated at \$15,000. For a five-year period, this cost is estimated at \$75,000.

The Rose Bowl Traffic Command Center shall coordinate with PPD, PDOT, and Caltrans to place these changeable message signs. However, given the volume of traffic that would utilize the freeways, there is no feasible operational mitigation measure that could fully mitigate the project's impacts.