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**MEMORANDUM**

**To:** David Reyes, Principal Planner/Zoning Administrator  
**From:** Jessica Kirchner, Impact Sciences  
**Subject:** Planning Commission Comments  
**Date:** September 27, 2012

**Job No.** 1136.01

**COMMENTS**

**Rose Bowl Planning Commission 9/19**

*Commissioner Hanson*

EIR needs a cultural resources section.

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*Farhat* – see attached comments

*Norton*

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The SOC and findings should be circulated for 90 days and adequate public comment should be provided prior to City Council. [There should be a limit on tailgating. [The project description is inadequate - must know the details of the contract. [An alternative exploring 2 or 3 years of use should be included to see if there would be fewer long term impacts. [There should be an analysis of other sources of revenue enhancement that do not have the impacts associated with NFL use.

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*Jones*

Historical resources should be included; public services impact needs to be addressed, project description is inadequate, additional alternatives should be explored.

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*Hickambottom*

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More public notice is needed; certain communities are missing from the meeting. [What are the spillover effects of recreational impacts to other parks to the east and north? There needs to be meaningful mitigation measures.

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OFFICES THROUGHOUT CALIFORNIA

*Pescio*

How was 75,000 picked for attendance when seating capacity is 88,000? Recreational impacts need to be analyzed – are there any counts for weekend users? What percent tailgate? Is the peak arrival/departure reduced or longer due to tailgating? Is it possible to limit tailgating?

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*Quirk*

Public notification needs to go beyond the minimum. The only benefit of the project is the financial benefit. Cultural resources should be addressed. Land use impacts due to more events. What is the baseline for public safety and services of neighborhoods? The traffic boundary should be extended? Alternative 2 is arbitrary, is it realistic? Would the NFL allow attendance of 55,000?

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*Nelson*

Cultural resources should be included. Traffic impacts are understated. Land use is inconsistent with the General Plan and Parks Element. Will Lot H areas be acceptable by the next day for AYSO games? Parsons parking may be lost, what would the effects of that be? What is the loss of revenue to the City by losing the ability to park/shop in Old Pasadena on game days? The Planning Commission should be reviewing the project as a matter of right.

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*Hansen*

Reducing the five years – at what point do impacts become irreversible? What are the deal points with the NFL? Mitigation measures must be reasonable and be supported. There needs to be a baseline study for the arroyo, factual is better than estimated. How many recreational users are at the Bowl and where do they come from? What are the effects of garbage and chemical waste? In Table 3.3.1 the project is inconsistent with the majority of the policies.

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*Hall*

Where does the 75,000 number come from? The public services impact should be further studied. Cultural resources should be included. The traffic study did not sufficiently study traffic on residential streets.

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**Letter No. 12: Rose Bowl Planning Commission Meeting September 19, 2012**

Rose Bowl Planning Commission Meeting  
September 19, 2012

**Response 12-1**

Refer to **Topical Response 2** regarding historic resources.

**Response 12-2**

Refer to **Response 7-1**, regarding circulation of Statement of Overriding Considerations.

**Response 12-3**

Please see **Response 8-44** for a discussion on tailgating.

**Response 12-4**

Please see **Topical Response 1** for a discussion on the adequacy of the Project Description.

**Response 12-5**

The comment suggests an alternative exploring a shortened time frame of two to three years rather than five years. First, it is certainly possible that the project will result in occupancy of the Rose Bowl by an NFL team for no more than two to three years. Second, analyzing an alternative that would limit the maximum time for temporary occupancy by an NFL team to two to three years would not offer substantial environmental advantages over the project or other alternatives that were presented in the EIR. The impacts identified in the EIR as significant and unavoidable are event specific. For example, traffic and air quality impacts exceed the thresholds at each individual event, while recreation impacts occur due to the displacement of users on event days. Reducing the timeframe of the use of the Rose Bowl by the NFL would possibly reduce the number of occasions on which significant impacts would occur, but those impacts would remain significant and unavoidable. Thus, this alternative would reduce impacts in the same manner as Alternative 3, which would reduce the number of displacement events that could occur in any one year. Both under the suggested alternative and alternative 3, the same number of intersections would be significantly impacted and recreational users would be displaced on event days. However, under both alternatives, the number of occasions on which the impacts occur would be reduced.

**Response 12-6**

Alternative 3 analyzes an alternative project that does not involve NFL use of the Rose Bowl.

**Response 12-7**

Refer to **Topical Response 2** regarding historic resources.

**Response 12-8**

Refer to **Response 11-3** regarding adequacy of notice.

**Response 12-9**

Section 3.6 Recreation of the Draft EIR describes the surrounding recreational opportunities including nearby local and regional parks. Due to the wide diversity of users at the Rose Bowl and the Central Arroyo, it would be speculative to try to determine where each of the users might go on an NFL event day. For example, some families may choose to picnic in nearby parks, while hikers may choose Eaton Canyon, golfers may choose Griffith Park or Santa Anita Golf Courses, cyclists would choose still a different location, and so forth. Section 3.6-1 of the Draft EIR analyzes the impact on recreational facilities from the displacement of Central Arroyo users on game days and concludes that there would not be a significant impact on such facilities.

The comment includes a suggested mitigation measure to provide for a written Central Arroyo Recreational Displacement Plan which “fully takes account of all lost recreation, relocation of lost recreation and...measures required to fully mitigate...impacts.” It is important to note that the proposed project, the temporary use of the Rose Bowl by the NFL, would displace users of the Rose Bowl no more than 13 times per year. The suggested mitigation measures would not restore the recreational opportunities lost due to the increased number of displacement events and would not mitigate any significant impact identified in the Draft EIR. However, the Final EIR includes Mitigation Measure **MM 3.6-5** which was suggested during the comment period. Although not necessary to mitigate an environmental impact, this measure requires the City to evaluate the use of City parks and provide funding for additional maintenance and improvement of facilities as necessary.

**MM 3.6-5** Prior to approval of any lease agreement with the NFL, the City shall develop a plan for monitoring park use during event days and develop a strategy for repairing or improving parks and recreational areas as necessary to address increased usage on event days. The City shall be responsible for funding those repairs and/or improvements.

**Response 12-10**

Attendance of 75,000 is consistent with the typical capacity of an NFL stadium. Therefore, 75,000 was chosen as an appropriate attendance number to host an NFL team without imposing on the community the full impacts of maximum attendance at the Rose Bowl.

**Response 12-11**

Refer to **Response 15-9** for additional counts for recreational users. Tailgating at NFL games is expected to occur to the same extent as tailgating at college football games played at the Rose Bowl and the

experience with tailgating is expected to be similar. As discussed in the letter provided by CSC and provided in **Appendix F3.0** of the Final EIR, The duration of tailgating on the West Coast is somewhat limited because patrons are not allowed to arrive at the parking lot until a certain time, and the evening West Coast games begin earlier in the day (in order to maximize national viewing of all games). Thus, the earlier kick-off times of evening West Coast games reduces the duration of pre-game tailgating. In addition, West Coast games often do not have games televised immediately afterward, which minimizes tailgating after the game. Thus, there are inherent limits on the duration of tailgating for West Coast games. Also, per current RBOC policy, tailgating is required to shut down after kickoff. To the extent that tailgating encourages vehicles to arrive before the peak hour, this would reduce the most significant traffic and noise impacts, which occur during the peak hour.

**Response 12-12**

*[The commenter (Planning Commissioner Pescio) questions if the peak arrival/departure is reduced or longer due to tailgating.]*

Please refer to **Response 12-11**, regarding duration of tailgating expected at the proposed NFL displacement events.

Information pertaining to the percentage of tailgaters is not available and may vary from game to game and to a large extent, depends on the policies for tailgating at the venue. The peak arrival period is based on the assumption that 50 percent of spectators arrive in the hours before a weekday game and 75 percent depart in the hour immediately after the weekday game is over. On a weekend, 40 percent of spectators arrive in the hour before a game and 60 percent of spectators depart in the hour after game. It is possible that a percentage of these spectators may tailgate during the hours prior to the event or post event. To the extent that tailgating encourages vehicles to travel outside the peak hour, this would reduce the most significant traffic and noise impacts, which occur during the peak hour. Limiting tailgating would be at the discretion of the Pasadena Police Department and the Rose Bowl. Tailgating is currently prohibited during games. Further limiting the times of tailgating would not be anticipated to reduce any significant environmental impacts identified in the Draft EIR.

**Response 12-13**

Refer to **Response 12-8**.

**Response 12-14**

Please see **Topical Response 2**, regarding cultural resources. Land use impacts and addressed in Section 3.3 of the Draft EIR. The existing public services conditions (baselines) are described in Section 3.6 of the Draft EIR.

**Response 12-15**

The traffic boundaries as part of the scope of work for the traffic analysis was developed in conjunction with Pasadena Department of Transportation (PDOT) and follows the City of Pasadena's adopted traffic study guidelines. The study area was determined in coordination with Rose Bowl Operations staff, PPD and PDOT. The agencies provided input based on their vast experience at the Rose Bowl events over the past 30 years, including ground and aerial observations of traffic during events. In addition, observations were taken at a UCLA/Cal football game from last season. Comments from the 2005 EIR were also taken into consideration. The traffic study area included all areas of potential significant impact based on historical experience. Therefore, the traffic study area was considered suitable for this analysis.

**Response 12-16**

Refer to **Response 11-37** for a discussion of the appropriateness of Alternative 2.

**Response 12-17**

Refer to **Topical Response 2** regarding historic resources.

**Response 12-18**

Refer to **Response 6-17** for a discussion of Parson's parking availability.

The second part of the comment relates to consistency with the General Plan and Parks element. Refer to **Response 9-6**.

**Response 12-19**

Mitigation Measure **MM 3.6-1** has been revised and included in the EIR to address potential impacts to Lot H and other grassy areas around the Rose Bowl. Refer to **Response 7-11**.

**Response 12-20**

Refer to **Response 6-17**.

**Response 12-21**

Refer to **Response 7-1**.

**Response 12-22**

The comment suggests reducing the proposed five year term of the lease. Refer to **Response 12-5** for analysis of a reduced timeframe for the project. The comment asks at what point impacts associated with the project are "irreversible." Some impacts such as resources committed to the project would be irreversible. These irreversible effects are discussed in Section 5.0, Other CEQA Considerations, of the Draft EIR. With the exception of those impacts specifically listed as irreversible in Section 5.0, Other

CEQA Considerations, the remaining impacts are event specific and would not occur beyond the five year time frame of the project.

Please also see **Topical Response 1** regarding the adequacy of the Project Description.

**Response 12-23**

Refer to **Topical Response 1** regarding the Project Description.

Several mitigation measures have been revised in the Final EIR; refer to Section 2.0 Corrections and Additions.

Refer to **Response 8-10** regarding the need for a baseline study.

**Response 12-24**

Refer to **Response 8-22** for a discussion of trash. Refer to **Response 11-19** for a discussion of chemical waste.

**Response 12-25**

The comment indicates that the project is inconsistent with the policies listed on Table 3.3-1 of the Draft EIR. Table 3.3-1 lists each applicable policy and provides an explanation of why the project is consistent with the policy.

**Response 12-26**

Attendance at NFL games generally average between 60,000 and 80,000 depending on the team. Only five teams (Dallas Cowboys, New York Giants, New York Jets, Washington Redskins, and Denver Broncos) consistently average attendance above 75,000. Therefore, assuming average attendance of 75,000 allows for a realistic discussion of potential impacts. Additionally, the proposed ordinance limits the additional displacement events to a maximum attendance of 75,000 persons.

The comment also states impacts related to public services should be further studied. The Draft EIR includes a discussion of the anticipated demand on police and fire protection services that would be associated with the proposed project. As discussed in Section 3.5 Public Services, both the police and fire departments have indicated they have sufficient resources to handle the additional events at the Rose Bowl. Further, as stated on page 3.5.2-9 of the Draft EIR the operator of the project would be required to provide sufficient private security to offset any increased demand for police protection services as a result of the project.

Please also see **Response 8-40**, **Response 8-41**, **Response 8-45**, and **Response 11-20** for further discussion of the project's impacts on public services.

Refer to **Topical Response 2** related to historic resources.

**Response 12-27**

The selection of neighborhood street segments for analysis as part of the scope of work for the traffic analysis was developed in conjunction with Pasadena Department of Transportation (PDOT) and follows the City of Pasadena's adopted traffic study guidelines. The study area was determined in coordination with Rose Bowl Operations staff, PPD and PDOT. The agencies provided input based on their vast experience at the Rose Bowl events over the past 30 years, including ground and aerial observations of traffic during events. In addition, observations were taken at a UCLA/Cal football game from last season. Comments from the 2005 EIR were also taken into consideration. The study area of street segments included all areas of potential significant impact based on historical experience. Therefore, the scope of the street segment analysis was considered suitable for this project.