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MEMORANDUM

To: David Reyes, Principal Planner/Zoning Administrator Job No. 1136.01

From: Jessica Kirchner, Impact Sciences
Subject: Planning Commission Comments

Date: September 27, 2012

COMMENTS

Rose Bowl Planning Commission 9/19

Nina Chomsky

The project description is inadequate and should describe the project scope. The project scope should include the term sheet or contracts, lease, and financial agreement. Could Lot H, ingress and egress, installation of retail outlets, etc. change based on the conditions with the NFL? The project objectives as stated focus on revenue, without the financial agreement can the objectives be met? Every effort must be made to mitigate impacts.

Norman Parker

Mitigation measures are inadequate; maintaining access to the central arroyo during events is false and cannot be implemented. Currently access is closed 6.5 hours prior to the event. The fans are different for each team. The DEIR needs to include a mitigation measure that the Oakland Raiders will not be permitted. Fans without tickets should not be allowed into the central arroyo. The mitigation measure regarding the golf course should also address the cumulative effects of damage of the course. The LVAA disagrees with the assessment that emergency services are adequate and City emergency plans should not be relied on.

Lee Zanterson

Baseline data on recreation is missing – need to define current users and who will be displaced as well as address the cumulative impact to recreation. All recreational activities need to be addressed including

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impacts on the lower arroyo and the Hahamonga. EIR does not take into account all potential land use 8 policies addressing the central arroyo, for example, the ASPLO bans commercial activity in the arroyo. Pasadena is under parked. Public services should include a consideration of the City resources that will be required to serve the project and the potential burden to the city. Leland Skylar Rose Bowl is not like other stadiums. There is total gridlock on the streets which are essentially one-way 10 during games. Police should come into the neighborhoods. The kids that direct traffic do not help and the police do not show up when called. It is a quality of life issue. Bob Snodgrass 11 The City does not know how many people are really using the loop. There are no other options for exercise (jogging strollers) that are similar to the exercise loop. Mitigation measure to keep the loop open is a fraud. 12 The project is not a recreational benefit (Impact 3.6.3). 13 Ionas Peters 14 The City should have distributed more information to all residents. There is no meaning to the term "significant" in the document. The document does not address hazards such as terrorism or violent crimes 15 and does not provide how people would be medical care. The cumulative impact of chemical waste on ground water, leaking trash bins into the arroyo seco should be discussed. 16 Diane Newnan 17 Questions how the process was put forward (EIR selection, traffic consultant). Is there a conflict of interest? 18 The air quality analysis does not address the Wilson site and specific contaminants on children, asthma. What City services would be benefited by the project? The EIR is vague and uncompelling. 19 Ken Van Waggoner If this project is approved it is against the wishes of the City. The project has been put to a vote previously and was voted down. Nobody wants the project; the EIR is a waste of money. It is an unreasonable inconvenience for the residents.

Mike Duran

NFL events are different from college events. Farmer's field bans tailgating, without a ban on tailgating resources at the Rose Bowl would be overwhelmed. The increases in crime, noise, violence will create 21 challenges to public order. Many tailgaters come without tickets and watch the game on TV. Wes Ruderman Health should be considered, the public health impacts of taking away an active recreational resources should be addressed. Six hours of tailgating before games is excessive and there is little DUI enforcement. Some facilities allow 3 hours of tailgating. Ron Taylor San Rafael neighborhood association is opposed to the use of the Rose Bowl for the NFL. There are safety 24 concerns since there is no fire station currently serving the area. It takes 8 minutes for the fire department to arrive. The intersection of San Rafael and the 134 Freeway already experiences gridlock. IT's a quality of life issue with tailgating, DUI's etc. Bill Urban 25 The impact to recreational users is understated. The Rose Bowl loop is closed 8 hours before the game, the effects on the rest of recreational users in the arroyo is not addressed. Traffic is understated since UCLA has 26 fewer attendees. What are the cumulative effects of 710 construction? FEIR should be submitted to Planning Commission before City Council. Lori Gassus 28 What are the lighting impacts on the eastern side of the stadium during cleanup? During the five month 29 period of the project the Rose Bowl will be a 24-7 activity. Are other stadiums constructed in high-end communities? What are the noise impacts from unticketed patrons? What about the loss of the benefits to the 30 recreational users? The project ignores people who pay taxes. Additional clarification on the public services threshold is needed. 31

Letter No. 15: East Arroyo Neighborhood Preservation Committee

East Arroyo Neighborhood Preservation Committee Bob Snodgrass October 8, 2012

Response 15-1

The comment includes two topics, the first being the "bunching of events" and the second being the use of temporary structures. Regarding the occurrence of two events in one weekend, it is unlikely that such an occurrence would happen more than once or twice per year due to the need to have optimal turf conditions for an NFL event. However, the impacts of the project are event specific. There would not be a cumulative effect of two events on consecutive days. In other words, impacts related to traffic, air quality, noise, or recreation would not be any greater due to an event on the day before the game. In such a case, it is possible that full cleanup of the site may not occur between a UCLA game on Saturday and an NFL game on Sunday, and repairs to Brookside may not be made. However, Brookside Golf Course would be used for parking during the NFL event and therefore would not be playable on an NFL game day following a UCLA game. Further, as required by Mitigation Measure MM 3.6-1, the golf course would be returned to a playable condition within one day of an NFL event.

Refer to **Response 7-8** and **Response 8-23** for additional discussion of temporary structures with NFL events.

Response 15-2

Please see **Topical Response 1** related to the adequacy of the Project Description.

Response 15-3

The comment includes introductory statements to comments contained later in the letter. See specific responses below.

Response 15-4

The comment includes general introductory comments and indicates specific comments are discussed later in the letter. See responses to the individual comments below. The comment also states Impact 3.6-3 "betrays arrogance and ignorance." This impact has been removed from the Final EIR.

Response 15-5

It is standard practice, accepted by the various air districts in California including the SCAQMD, to use the nearest air quality monitoring station for data on ambient air quality. These stations have been carefully sited by the air districts to provide quality data for the area in which they are located. They are also carefully calibrated and maintained, and collect data over long periods of time to provide an accurate measure of ambient air quality that is largely independent of statistical outliers. Taking ambient air quality measurements locally and only during displacement events at the Rose Bowl would provide results that are not a true reflection of ambient air quality. This would also likely result in baseline pollutant levels much higher than generally experienced in the area, which would be counter to the conservative analysis typical of a CEQA assessment.

CalEEMod includes output sheets detailing construction calculations regardless of whether any such calculations were performed. Construction was not included in this analysis as none will be performed, but CalEEMod does not allow the option of only including operational calculation outputs.

Default values were used in CalEEMod where data specific to the project is not available. Idling vehicles are primarily an issue with regards to CO hotspots, which were analyzed for this project with no exceedances found even under extremely conservative meteorological conditions. CO hotspots were analyzed using the standard simplified Caline analysis, as described in the EIR.

Additionally, the CalEEMod is not used to determine localized air quality impacts, including potential impacts on health in the immediately surrounding area. As discussed in **Response 2-6**, the project does not exceed the localized significance thresholds (LSTs) recommended by the SCAQMD. If a project does not exceed the LSTs, then the project is not expected to cause an exceedance of the most stringent applicable federal or state ambient air quality standard and therefore is not expected to have any significant health impact on nearby residents or other sensitive receptors.

Response 15-6

Emissions from grills during tailgating at displacement events has now been included in the final EIR and would be relatively small. Banning the use of charcoal would indeed decrease emissions but the decrease would be immaterial and would not mitigate any significant localized air quality impact because no significant localized impact is anticipated.

As discussed in **Response 2-6**, the project does not exceed the localized significance thresholds (LSTs) recommended by the SCAQMD. If a project does not exceed the LSTs, then the project is not expected to cause an exceedance of the most stringent applicable federal or state ambient air quality standard and therefore is not expected to have any significant health impact on nearby residents or other sensitive receptors.

Response 15-7

Significance thresholds, emissions guidelines, and rules provided by the SCAQMD are designed for the protection of all residents, with particular attention to sensitive receptors. The presence of even a single

3.0 Responses to Comments

sensitive receptor in the area triggers consideration of such receptors, regardless of their relative density

in the area of the proposed project.

Response 15-8

The Draft EIR found that impacts from air pollutant emissions would be significant. No statement is

made denying that nearby residents will not be affected.

Response 15-9

The comment relates to the use of the Arroyo for recreational purposes. The comment states the Draft EIR

does not include information related to the number of users at the loop. Page 3.6-24 includes a graphic

depicting the number of estimated users of the loop. The counts were taken in 2008. In addition, the City

conducted additional counts at the loop on Sunday October 21, 2012 from 11:15 AM to 12:15 PM to

supplement the 2008 counts. These counts were taken at the entrance to Gate C and are as follows:

Walk/jog: 232

Bicycle: 65 (non-Peloton)

Skate/Scooter: 3

Motor Vehicle: 234

The numbers of users are generally similar to the number of users observed by the commenter on

August 4, 2012. Both counts are lower for walk/jog and bicycle counts than the counts obtained by Crain

and Associates, and included in the Draft EIR, on a weeknight in September. Excluding the bike counts

(many of the bicyclists were likely counted up to 10 times as they completed a lap around the loop), the

Crain and Associates found a total of 510 walk/joggers (296 clockwise and 214 counter clockwise) which

is double the numbers observed on the weekends of August 4 and October 21, 2012. Nonetheless, the

analysis in the EIR presents a conservative scenario by evaluating the potential displacement of these

users.

City staff also conducted surveys of the various users of the Rose Bowl in October and November of 2010.

These surveys were conducted to assess improvements to the loop that occurred in February 2010. The

findings of the survey were presented to the City Council in February 2011 in the form of a memo. The

memo is included in Appendix F3.0 of this Final EIR. The survey results indicated that approximately

half (51 percent) of the users of the loop were Pasadena residents and the majority of responders

(75 percent) used the loop for walking/running.

3.0-181

The commenter suggests the City should obtain golf course revenues for days of minor events to determine the effect of "minor" events on the recreational use of the Rose Bowl. This comment seems to relate to the loss of revenue from golfers and raises issues that do not appear to relate to any physical effect on the environment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 15-10

The comment states the Draft EIR ignores users of the lower arroyo. The Draft EIR appropriately focuses on the loss of recreational facilities in the Central Arroyo, specifically the loop, Brookside Park and Golf Course and the Aquatic Center. The lower arroyo will be available to the public on days when a displacement event occurs at the Rose Bowl. While some users may be dissuaded from using the Lower Arroyo due to increased traffic on event days, other users may find it easier to access these facilities than those located in the Central Arroyo and choose to recreate in the Lower Arroyo.

The loss of the use of Brookside Golf Course is discussed in Section 3.6 of the Draft EIR and is addressed through Mitigation Measure MM 3.6-1. The comment suggests the City should survey the golfers to determine what additional facilities they would like in the clubhouse. Such a survey would not be clearly connected to the environmental impact of the inability to golf at Brookside an additional 13 times per year. Nonetheless, the City acknowledges your input and comment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 15-11

The comment states that destruction of existing parks will occur as a result of the project. The comment also states the Draft EIR does not include data to support the assertions that the project would not damage neighborhood or regional parks. The Draft EIR includes a discussion of the number of users that typically use the Rose Bowl facilities (additional information on the number of users is provided in **Response 15-9**, above) and a description of nearby facilities. Section 3.6 Recreation of the Draft EIR includes a discussion of potential displacement of users of the Central Arroyo on game days. Regarding the physical impacts of displacement, page 3.6-22 states the following, "It is possible that on event days, typical users of the Rose Bowl would choose a different recreational area within the City resulting in a slight increase in use at nearby parks..." The commenter references the number 750,000 as an approximate number of the users of the Rose Bowl who would be displaced. Assuming 750,000 visitors use the facilities at the Rose Bowl per year, that would be approximately 2,055 users per day (750,000/365). These 2,055 users would be displaced on 13 occasions as a result of the proposed project

and would either chose not to exercise on that particular day or choose another location to exercise. Due to the wide variety of uses accommodated at the Rose Bowl, no one single facility could accommodate all 2,055 users, as no one facility can accommodate cycling, running, football, soccer, etc. Therefore, the 2,055 users would be further distributed across various facilities throughout the City and region. The Draft EIR lists 24 parks in the City of Pasadena (not including special facilities such as the Gamble House). If all 2,055 users were dispersed across only City of Pasadena parks, that would be approximately 85 people per park per day on 13 days per year as a result of the proposed project. However, from the survey conducted by the City, it is clear that nearly half of the users of the Rose Bowl loop are not Pasadena residents and therefore may choose to use a park closer to home. Based on the total number of users that would be expected to use nearby Pasadena parks on 13 occasions per year, it is unlikely that any one park would be degraded or that new facilities would need to be constructed as a result of the proposed project. Nonetheless, mitigation measure MM 3.6-5 described under Response 8-15, above, was suggested during the public comment period and therefore has been included in the Final EIR. Although impacts to local parks were found to be less than significant, this measure would ensure funds are appropriately used to maintain the quality of Pasadena parks and open spaces.

The comment states the repair of Brookside Golf Course within one day will be at a considerable cost. As described in Mitigation Measure MM 3.6-1, the RBOC will be responsible for the repair of the golf course, including any associated costs of repair.

The comment states maintaining access to the loop on event days is "absurd." In response to public input concerning the feasibility of mitigation measure **MM 3.6-2**, the mitigation measure has been revised.

The comment further states Impact 3.6-3 is "offensive." This impact has been removed from the Final EIR.

The comment lastly includes summary comments. The individual comments are addressed above.

Response 15-12

The comment relates to tailgating and alcohol use at NFL events and provides factual background information only and does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 15-13

The comment relates to drunk driving and fan behavior. The comment does not raise an environmental issue within the meaning of CEQA. The comment will be included as part of the record and made

available to the decision makers prior to a final decision on the proposed project. Please also note that based on information from CSC, which provides security services to NFL and college football games, NFL fan behavior at the Rose Bowl is not projected to be more unruly than the behavior of college football fans at the Rose Bowl.

Response 15-14

The parking demand estimates for the event can be satisfied through on-site parking at the Rose Bowl and off-site parking at the Parsons campus. The traffic management plan is designed to protect residential neighborhoods from off-site street parking. In addition residents could consider petitioning the City for a residential preferential parking program. Please see **Response 8-40** and **Response 8-41** related to public services impacts from tailgating and enforcement of laws against drunken driving. While tailgating is not expected to create a significant impact on public services, the Final EIR recommends mitigation measure MM 3.5.2-1 to limit tailgating to 3 hours prior to the event.

Response 15-15

Please refer to **Response 6-2.**

Response 15-16

The commenter states that from his work commute that Monday traffic is substantially worse than Thursday traffic, coming and going. The commenter states that the Draft EIR never states that the wished of the NFL often conflict with the interest of Pasadena citizens.]

The comment is noted and is 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 related to traffic conditions on a Monday versus Thursday, the scope of the traffic study was developed in conjunction with PDOT and follows the City adopted traffic study guidelines. Per typical industry practice and per requirements by some agencies within the Southern California region (e.g., City of Los Angeles, Los Angeles County, etc.), traffic counts are conducted on Tuesdays through Thursdays during non-Summer months. Generally, weekday evening peak hour traffic on Mondays and Fridays is considered to be slightly lower on City's streets than traffic on Tuesdays through Thursdays except for under special conditions where the PDOT requires counts on Mondays or/and Fridays. Therefore, traffic counts obtained on a Thursday are determined to be a reasonable approach to establish existing baseline traffic conditions within the study area.

[The commenter notes that the intersection data show that many intersections south of Colorado function poorly in the weeknight baseline data. The commenter notes that 30 percent of those attending NFL game will come from the south, including Orange and San Diego counties. The commenter states that most would use either the 110 or 710 freeways or some of those who use the 710 freeway may come north on streets east of Arroyo Parkway, such as Marengo and Los Robles Avenues, which were not monitored. The commenter states that asking these people to take the I-5 up to the 134 is not a solution for the weeknight games, because I-5 has very heavy traffic during the evening rush hour]

Regarding the comment about patrons using I-710 Freeway to travel to Rose Bowl on an event day, please refer to Response 6-9. The study intersections were selected in coordination with Rose Bowl Operations staff, PPD and PDOT as those most likely to be affected. 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. Also, with respect to the comment regarding some spectators travelling on streets east of Arroyo Parkway, such as Marengo Avenue and Los Robles Avenue, the proposed traffic control plan, and neighborhood protection plan focuses on keeping event traffic on streets intended for use during events. However, some event patrons may choose to travel on streets located east of Arroyo Parkway. These streets provide parallel north/south and east/west routes to Rose Bowl, but these patrons will eventually have to traverse through the analyzed intersections and streets segments to reach the Rose Bowl. Based on historic traffic patterns for displacement events at the Rose Bowl, project traffic on the streets located east of Arroyo Parkway is expected to be minimal and would not cause a significant impact. Any assignment of trips to these streets would be speculative and would divert trips from their more likely path of travel, reducing impacts at other intersections.

Response 15-17

The comment is noted and is 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. Parking in residential neighborhoods may interfere with the convenience and quiet of a neighborhood on game days, but is not a significant environmental impact.

Response 15-18

Devil's Gate Dam & Reservoir Sediment Removal Project (#27) and Parson's Mixed-Use Project (#28) are included in the analysis as related projects. Traffic projections for both sites are incorporated in the traffic analysis. Please refer to Table 10 of the Traffic Study for reference.

Response 15-19

Page 3.4-6 of the Draft EIR states, "Noise monitoring was conducted for a 24-hour period at four locations around the project site on June 17 and four different locations on June 24, 2012," and further specifies that

no formal events were occurring at the Rose Bowl Stadium on the days that noise measurements were taken. Noise measurements taken in the absence of any event provide a baseline level to which projected traffic and event noise can be added to determine whether thresholds for noise exposure would be exceeded. As stated on page 3.4-15 of the Draft EIR, noise levels for the 2003 UCLA football game were provided in the Rose Bowl Stadium Renovation Project EIR.

Regarding the methodology used to forecast future traffic noise, page 3.4-11 of the Draft EIR states:

Noise modeling procedures involved calculating existing and future vehicular noise levels along individual roadway segments in the vicinity of the proposed project site. This task was accomplished using the Federal Highway Administration Highway Noise Prediction Model (FHWA-RD-77-108). The model calculates the average noise level at specific locations based on traffic volumes, average speeds, roadway geometry, and site environmental conditions. The average vehicle noise rates (energy rates) utilized in the FHWA Model have been modified to reflect average vehicle noise rates identified for California by the California Department of Transportation).

This is a standard methodology for predicting traffic noise, and is adequate to evaluate whether the proposed project would result in substantial increases in noise levels.

Response 15-20

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

Response 15-21

The comment suggests an alternative that would allow 2 preseason games, only Sunday games during the regular season and up to three post-season games with additional post-season games played at a venue such as the Coliseum. Thus, this alternative would reduce the number of increased displacement events to 11. This alternative would not offer significant environmental advantages over Alternative 3, which would also reduce the number of increased displacement events at the Rose Bowl. It is acknowledged that eliminating weeknight displacement events would reduce traffic impacts slightly because due to the higher AVO on weekends, meaning fewer overall trips would occur on weekends compared to weeknights. However, traffic impacts would remain significant and unavoidable. Other impacts would be unchanged.

Response 15-22

The comment includes summary points addressed throughout the letter. The comment is noted. No further response is required given that the comment does not address or question the content of the Draft EIR.