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MEMORANDUM

To: David Reyes, Principal Planner/Zoning Administrator
From: Jessica Kirchner, Impact Sciences
Subject: Parks and Recreation Committee Meeting
Date: October 9, 2012

Job No. 1136.01

COMMENTS

Parks and Recreation Committee Public Comment

October 4, 2012

Michael Duran

How many additional patrons will be advantaged by having the NFL here versus the current number of users? How is this beneficial? Do we know how many and who uses the recreational facilities in the arroyo? If we don't how can we conduct a cost/benefit analysis and decide it would be better to have the NFL than not have the NFL? How is it possible to restore the damage done by parking at Brookside within one day if the NFL game follows a UCLA game, or there is a rain storm? What is the beneficial impact of NFL games as recreational opportunities? The fact that the document asserts these are equivalent is incredible. The recent Star News article that discussed the recreational loop flies in the face of the assertion that the recreational loop will be maintained even during a game day.

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Jonas Peters

In Pasadena it rains in December and January, does the EIR adequately assess the damage to the grassy fields such as Lot H? The EIR does not provide a fair assessment. The EIR does not discuss the accumulated waste that would accumulate on these fields that are used for adults and children to play on. Also, the accumulated chemical waste of having 100,000 visitors to these areas and what happens to the soils, are kids exposed to these wastes such as oil and gasoline leaking from cars. The waste gets into the soil and can then

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get mobilized into the groundwater. What is the socio-economic and racial demographic of people that use the parks now? Those people that will be displaced versus the demographic that will replace them. It should be discussed in the EIR.

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Bill Francis

There is no proposal from the NFL. This is potentially a financial windfall to the city. The City should try to work through the process.

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Ken VanWaggonon

The publicity about this project has been disappointing. The last proposal was widely disapproved. There are many reasons residents of the City don't want this project. The project is not wanted. The parking is impossible.

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Nina Chomsky

The project description is inadequate because it only describes a phase of the project. What is the deal with the NFL, what are the real impacts? The DEIR is missing required baseline data in the Central Arroyo. There is no specific analysis. Recreation impacts cannot be adequately understood without a baseline study of all current actual arroyo recreational users. The mitigation measures are minimal and fail to accomplish anything. Mitigation 3.6-2 is false and cannot be implemented and should be removed from the EIR. All references in the DEIR to enhanced recreation and beneficial impacts must be removed. Where are all the recreational users going to be relocated? How are they going to get there? What is the plan? The EIR does not take into account all of the layers of land use plans supporting recreation which deemphasize commercialism. The ASPLO, and other plans all recognize that Pasadena is under parked and recreation spaces are a high priority. The EIR is in error by asserting the proposed project does not conflict with recreational plans.

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Lee Zanterson

The ULI report identifies the central arroyo as declining from overuse and lack of investment. What would be the actual physical results on the arroyo of the further degradation of the central arroyo due to overuse by the NFL. What is the tipping point where the arroyo cannot be restored? What will be the cumulative impacts from continued use? The failure of the DEIR to include a historic resources section is a gross inadequacy. The EIR fails to identify cumulative degradation over the current baseline degradation. The EIR

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should include a comprehensive written plan for central arroyo restoration, including specific recommendations in the ULI report. LVAA is concerned about conflicts with tournament of roses, kidspace, the aquatic center. How can tournament of roses and NFL both be accommodated in December? The EIR does not provide detailed plans for relocating and mitigating the NFL impacts on central arroyo activities.

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Norm Parker

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Mitigation 3.6-1 should be removed, it is infeasible, the turf areas cannot be repaired in one day. Nearly tripling the number of events might triple the cumulative effect and require real mitigation, which means a written plan, including time tables, discussion with the golfers and an analysis of the costs of repairing and preserving the golf course. Why doesn't the DEIR similarly address repairing all grassy areas such as Brookside Park and lot H? A real plan must also include specific measures with rainy day parking measures, that is the unavailability of the golf course for parking on rainy days. Rainy days are not adequately considered in the EIR. When the golf course is unavailable, patrons are parked in the neighborhoods. The EIR does not mention this. Unlike UCLA fans, NFL fans cannot be parked in the neighborhoods. The neighborhoods will not tolerate it. NFL fans will be consuming alcohol before, during and after games. The DEIR must include mitigation specifically addressing relocation of NFL fan parking in the event of rain.

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Don Orsey

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The EIR compares an NFL game to an average UCLA game which is incorrect. NFL crowds cannot be compared to college, there is increased alcohol. The EIR does not include a mitigation measure that the Raiders will not be permitted as an NFL team in Los Angeles. The EIR should include mitigation limiting alcohol consumption in the central arroyo and the stadium within the same limits as UCLA. The EIR should include a mitigation prohibiting or limiting entry into the central arroyo by cars or shuttles without a ticket to the game. The EIR ignores the problem of ticketless patrons. The section on recreation concludes with a statement saying no mitigation is required and the residual impacts are beneficial. That does not make sense.

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Susan McClemons

The DEIR does not study the impact of NFL related plastic pollution and other trash and the impacts on the Central Arroyo, Lower Arroyo and the Arroyo Stream. The report states the RBOC has a standard trash removal plan, but fails to recognize that the plan is inadequate. After games plastic zip ties, bottles, caps, grocery bags, cans, bottles, and charcoal are left for days. The trash is degrading the arroyo and finds its way into the arroyo stream which feeds into the Pacific Ocean. There are sensitive areas under the Colorado Street Bridge and in the lower arroyo. The City and nonprofits have worked on restoring those areas but

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they are clogged with trash. The current plan does not address what will happen if there is 75,000 plus the ticketless patrons tailgating and picnicking. How many more tons of trash will be in the arroyo stream? It is not addressed in the report.

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Fred Zepeta

The EIR is deficient because there is no specific proposal instead there are assumptions and estimates. The EIR uses college games and has not done any checking to find out the difference between college and NFL games. The EIR for Farmer's Field would be a baseline. The project description differs between the project and the alternatives. The EIR says the project is consistent with General Plan objectives 2 and 17 and policies 17.3 and 17.2 but yet there is a significant recreational impact. The EIR does not include any baseline studies of actual recreational activities in the arroyo. The omission of factual data raises concern as to the accuracy of any of the impacts being measured. The EIR concludes there would be a slight increase in the use of nearby parks. They don't measure the impacts to those parks. This EIR should have all the questions asked the description of the overriding concerns should be made public for 90 days.

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Bill Christian

Requests a delay to provide additional time for comments. There is no analysis of alternative sources of revenue. There is no guarantee the NFL stadium will be built in five years, the EIR should look at longer term use by the NFL, 10 years. On game days people are prevented from any part of the loop or trails, it is only going to get more restrictive with the NFL. People of color use that facility and the analysis should focus on the socioeconomic effects of displacing those people from the rose bowl. The air quality and traffic impacts are not mitigable, the committee should think hard about whether or not to do this.

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Loring Guessous

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(see comment letter)

Elizabeth Borth

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The disruptive activities will affect float building. If there will be a practice field it should be addressed as should equipment storage and uniform storage. The aesthetics would be disturbed and that has not been addressed. The trails are essentially closed to equestrian users while activities are going on. The existing agreement with the Santa Monica Mountains Conservancy guarantees the trails will remain open 365 days a year. There could be impacts upstream, and other projects such as the sediment removal need to be

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addressed. That will also have a tremendous effect on air quality and water quality. The project would contribute to obesity problems and remove opportunities for people who cannot afford a gym membership. The opportunity for kids to be outdoors also needs to be considered.

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**Letter No. 17: Public Comments from the Transportation Advisory Commission Meeting
September 27, 2012**

Transportation Advisory Commission
September 27, 2012

Response 17-1

The traffic management plan implemented by the PPD is designed to protect residential neighborhoods and facilitate the flow of traffic into and around the Rose Bowl. It is considered to be a dynamic plan, where adjustments can be made, if barricades are not working in the manner they are proposed.

Response 17-2

The project trips generated by an NFL game are expected to come from all geographic directions with the majority arriving by freeway. The study area 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 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.

Response 17-3

The data used to forecast traffic increases on street segments was developed using mode split and average vehicle occupancy estimates. The trips were then assigned to the street system and in some cases resulted in increases of more than 5 percent over existing traffic volumes. The increase in traffic volumes are indicated in Table 3.7-18 on page 3.7-91 of the Draft EIR.

Use of changeable message signs on the freeway as mitigation is aimed at facilitating ingress/egress on game days. These do not fully mitigate the additional trips generated by the project but help improve access to the Rose Bowl area.

Response 17-4

The comment points out a typographical error contained in the staff report included in the agenda for the meeting and expresses opinions related to traffic associated with the proposed project. The Draft EIR addresses traffic in Section 3.7 and concludes that traffic impacts will be significant and unavoidable. 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 17-5

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. For a discussion of localized air quality impacts please see Draft EIR impact discussion 3.1-4 and **Response 2-6**.

Response 17-6

The comment relates to the displacement of recreational users. Refer to **Response 15-9** and **Response 15-10**.

Response 17-7

The comment relates to recreational uses. Refer to **Response 15-11**. The comment also states the EIR does not state the magnitude of impacts. The purpose of the environmental document is to disclose the potential for environmental impacts associated with the project. CEQA does not provide a means to rank or otherwise indicate that impacts are greater or lesser other than to indicate they are significant.

Response 17-8

Refer to **Response 15-16**.

Response 17-9

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.

Please see **Response 2-6** regarding localized air quality impacts on health

Response 17-10

The comment states the EIR jumps to statements of overriding considerations and does not fully mitigate impacts. The Draft EIR discloses potential significant impacts based on data, research, and technical expertise, and includes mitigation measures aimed at reducing those potential impacts. The unique nature of the proposed project, specifically the fact that it is temporary, limits the ability to include

permanent mitigation measures that would typically be used to mitigate traffic and noise impacts, such as constructing new turn lanes, or erecting noise barriers. Nonetheless, effective and innovative traffic measures have been included in the proposed project. Please also see **Response 8-7** regarding effective mitigation measures.

Response 17-11

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

Response 17-12

Refer to **Response 8-15** for a discussion of displaced users.

Response 17-13

Please refer to **Response 7-16** regarding the intersections on Arroyo Boulevard south of California, the intersection of Arroyo Boulevard and Seco Street and any streets east of Arroyo Parkway such as Marengo and Los Robles

Page 3.7-2 of the Draft EIR correctly refers to the City's 2004 Mobility Element. The reference in Table 3.7-6 is a typo and has been corrected to say "2004."

Response 17-14

Please refer to **Response 8-28**.

Response 17-15

Please refer to **Response 8-39**.

Response 17-16

Refer to **Response 16-9** regarding the administrative burden on the City.

Response 17-17

Refer to **Response 8-41**.

Response 17-18

The analysis presented in the EIR estimates that 50 percent of spectators will arrive in the hour before a game on a weekday and 40 percent on a weekend. This is based on a worst-case scenario and data from other studies and stadiums.

Response 17-19

Please refer **Response 6-2**.

Response 17-20

Please refer to **Response 6-3**.

Response 17-21

A specific mitigation plan is not included for the shuttles as they are considered in the overall assignment and distribution of vehicles on the circulation system. Mitigation measures have been developed to address traffic impacts where feasible and are described in the Draft EIR. Also, please also refer to **Response 8-33**.

Response 17-22

Please see **Response 8-35**.

The mode share for the project concludes that 8 percent and 6 percent of spectators will use an active (transit, bike, and walk) mode of transportation on a weekday and weekend respectively. Additionally, 20 percent of employees are expected to use an active mode of transportation on weekdays and weekend.

Traffic congestion is likely to play a large role in encouraging patrons of the Rose Bowl to use an active transportation mode.

Response 17-23

Refer to **Response 8-12**.

Response 17-24

Refer to **Response 17-17**, above.

Response 17-25

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. For a discussion of localized air quality impacts please see Draft EIR impact discussion 3.1-4 and **Response 2-6**.

Response 17-26

Refer to responses to comment **Letter No. 48**.

Response 17-27

The comment restates information contained in the Draft EIR 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 17-28

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.

Response 17-29

The comment raises issues that do not appear to relate to any significant environmental impacts that were not discussed in the Draft EIR. 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 17-30

Refer to **Response 12-8**.

Response 17-31

The Draft EIR includes a TDM plan as an Additional Measure (AM 3.7-2.1). This includes ways to incentivize carpooling, the use of alternative transportation modes and the use of social media to communicate information regarding potential modes of travel other than passenger vehicles to/from the Rose Bowl (rail/bus/shuttle routes, timetables, etc.). The goal of the TDM plan is to reduce automobile trips.

The comment on the bicycle racks 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. Free bicycle parking is available at Brookside Park across from the Aquatic Center (www.visitPasadena.com) and the Draft EIR recommends bicycle valet parking at the Parsons site in order to encourage use of bicycles and discourage vehicle use.

Response 17-32

Refer to **Response 15-1**.

Response 17-33

The comment suggests the scope of the EIR has been limited compared to Farmer's Field due to the cost to prepare the EIR. Regarding the difference in scope between the Draft EIR and the Farmer's Field EIR, the Farmer's Field project includes construction of a new multi-purpose stadium, new convention space, and two parking structures. Although both projects include the use of a stadium by the NFL, the scope of the Farmer's Field project is far greater than the use of an existing stadium by the NFL. As such, there are vast differences in scope of the two documents. Therefore the treatment of issues within the Draft EIR is appropriately different from treatment of issues in the Farmer's Field EIR.

The comment states Huntington Hospital will be impacted due to the health effects of the project on residents. Refer to **Response 2-6** for a discussion of localized air quality effects associated with the project. Refer to **Response 11-19** regarding chemical seepage. Based on the analysis in the Final EIR there is no evidence to suggest the proposed project would result in adverse health effects to the extent that local hospitals would be affected.

Response 17-34

The comment states that two games on a weekend would double the impact associated with the project. Refer to **Response 15-1** which relates to impacts associated with two events in a weekend.