



**CITY OF PASADENA  
175 NORTH GARFIELD AVENUE  
PASADENA, California 91101-1704**

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**INITIAL STUDY**

In accordance with the Environmental Policy Guidelines of the City of Pasadena, this analysis, the associated "Master Application Form," and/or Environmental Assessment Form (EAF) and supporting data constitute the Initial Study for the subject project. This Initial Study provides the assessment for a determination whether the project may have a significant effect on the environment.

**SECTION I – PROJECT INFORMATION**

1. Project Title: Temporary Increase in Rose Bowl Displacement Events
2. Lead Agency Name and Address: City of Pasadena, 175 North Garfield Ave, Pasadena, CA 91101
3. Contact Person and Phone Number: David Sinclair (626) 744-6766
4. Project Location: 1001 Rose Bowl Drive, Pasadena, CA 91103
5. Project Sponsor's Name and Address: Rose Bowl, 1001 Rose Bowl Drive, Pasadena, CA 91103
6. General Plan Designation: Open Space
7. Zoning: Open Space
8. Description of the Project: The Rose Bowl currently holds approximately 12 displacement events (greater than 20,000 attendees) per year, primarily on weekends. The number of displacement events is restricted by the Pasadena Municipal Code, which currently allows for 12 displacement events annually. The proposed project would amend the Municipal Code, Chapter 3.32, to temporarily increase the number of displacement events to 25 per year. Currently, seven events are contractually reserved for the University of California Los Angeles (UCLA) football games, as well as up to two post-season collegiate games including the Rose Bowl. Up to 13 proposed events would be reserved for the National Football League (NFL). Given the scheduling of the NFL, it is anticipated that no more than three games per year would be held on a weeknight. No NFL games would be held on the same day as a college football game. The NFL is currently in negotiations with the owners of two potential stadium sites in or near the City of Los Angeles to house the NFL in a permanent location. The use of the Rose Bowl would be temporary until a new NFL stadium is selected and built in the Los Angeles area, or until the completion of the football season (including playoffs) in 2018,

whichever comes first. The Rose Bowl would also continue to host other displacement events such as concerts and additional sporting events, with the total number of events not to exceed 25 annually.

In addition to displacement events, the monthly swap meet and flea market would continue to be held, as would soccer and other games held in Lot H outside the stadium. There would be no change to the number of minor events that could be held. Approximately 25 events with attendance between 2,000 and 20,000 are held on an annual basis.

The proposed project does not include any physical changes to the Rose Bowl Stadium or any of the surrounding features. It would not increase or decrease the seating available at the stadium, or associated parking. It does not include any ground disturbing or excavation activities, any interior or exterior renovation to the Rose Bowl, or any new structures on the project site.

9. Surrounding Land Uses and Setting: Surrounding land uses include Brookside Golf Course immediately to the north of the Rose Bowl stadium and the Brookside Park to the south. Single-family residential units are located near the stadium on the slopes of the Arroyo Seco. The residential neighborhoods surrounding the Central Arroyo are primarily zoned single-family residential and within a hillside development district. The southeast edge of the Central Arroyo along Arroyo Terrace contains some small areas zoned for multi-family residential uses.
10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement): The project will require amendments to the Arroyo Seco Public Land Ordinance, which is codified in the Pasadena Municipal Code at Chapter 3.32. Amendments would be required to temporarily increase the number of displacement events from 12 to 25.

Commissions involved in the entitlement process include, but are not limited to the following:

- Rose Bowl Operating Company
- City Council for review/approval of the amendment to the Arroyo Seco Land Ordinance

Additional approvals from the following local, regional, or state agencies may be required for implementation of the proposed project:

- South Coast Air Quality Management District – air quality permits, if needed

**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

	Aesthetics		Geology and Soils		Population and Housing
	Agricultural Resources		Hazards and Hazardous Materials	X	Public Services (parks)
X	Air Quality(including Greenhouse Gas Emissions)		Hydrology and Water Quality	X	Recreation
	Biological Resources	X	Land Use and Planning	X	Transportation/Traffic
	Cultural Resources		Mineral Resources		Utilities and Service Systems
	Energy	X	Noise	X	Mandatory Findings of Significance

**DETERMINATION:** (to be completed by the Lead Agency)

On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	
I find that, although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described on an attached sheet have been added to the project. A MITIGATED NEGATIVE DECLARATION will be prepared.	
I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.	X
I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment., but at least effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.	
I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.	

Impact Sciences  
Prepared By/Date

*Susan Tebo* 3/13/12  
Reviewed By/Date

Susan Tebo  
Printed Name

Negative Declaration/Mitigated Negative Declaration adopted on: \_\_\_\_\_

Adoption attested to by: \_\_\_\_\_  
Printed name/Signature Date

## EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect is significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Unless Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less than Significant Impact.” The Lead Agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section 21, “Earlier Analysis,” may be cross-referenced).
- 5) Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. See CEQA Guidelines Section 15063(c)(3)(D). Earlier analyses are discussed in Section 21 at the end of the checklist.
  - a) Earlier Analysis Used. Identify and state where they are available for review.
  - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c) Mitigation Measures. For effects that are “less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier documents and the extent to which address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) The explanation of each issue should identify:
  - a) The significance criteria or threshold, if any, used to evaluate each question; and
  - b) The mitigation measure identified, if any, to reduce the impact to less than significant

## SECTION II - ENVIRONMENTAL CHECKLIST FORM

**1. BACKGROUND.**

Date checklist submitted: March 13, 2012

**2. ENVIRONMENTAL IMPACTS.** (explanations of all answers are required):

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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**3. AESTHETICS.** Would the project:

a. *Have a substantial adverse effect on a scenic vista?* ( )

                                                                

**WHY?** The proposed project would apply to the Rose Bowl stadium, which is located in the bed of the Central Arroyo Seco, one of the most scenic open space corridors in the region. The proposed project would not result in the modification of any of the physical components of the Rose Bowl or surrounding scenic resources such as nearby Linda Vista Avenue or the Foothill Freeway (located approximately 0.25 mile from the project site). The proposed project would result in a temporary change in the number of events to be held at the Rose Bowl annually. There is no construction proposed or physical changes to the stadium. The project would not in any way obstruct the views of any of these scenic resources. Therefore, the project would have no impact to scenic vistas.

b. *Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?* ( )

                                                                

**WHY?** The only designated state scenic highway in the City of Pasadena is the Angeles Crest Highway (State Highway 2), which located north of Arroyo Seco Canyon in the extreme northwest portion of the City. The project site is not within the viewshed of the Angeles Crest Highway, and not along any scenic roadway corridors identified in the City's General Plan documents. Therefore, the proposed project would have no impacts to state scenic highways or scenic roadway corridors.

However, the project site is within 0.25 mile of the Foothill Freeway (I-210), and approximately 1,500 feet (at its closest point) to Linda Vista Avenue, both the Foothill Freeway and Linda Vista Avenue were identified in the 1987 Environmental Quality Element of the City's General Plan as a Los Angeles County Recommended Scenic Highway. Although the project site is within a locally recognized scenic roadway corridor, the proposed project would not damage any scenic resources, and would not otherwise affect the visual quality of the roadway corridor. The project would not negatively affect any historic structures, landscape features, or vegetation that

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contributes to the views along the corridor. Therefore, the proposed project would not significantly impact any locally recognized scenic roadway corridors.

c. *Substantially degrade the existing visual character or quality of the site and its surroundings?* ( )

                        
 
                         
 
                         

**WHY?** The proposed project does not include any physical changes to the Rose Bowl Stadium. It would not change the scale or massing of the stadium or any dominant features of the stadium that contribute to the visual character of the site such as the neon Rose Bowl sign, the horizontal structure and tower of the Press Box, the elliptical shape of the stadium bowl, the low-rise even height of the stadium rim, the flat paved open concourse surrounding the stadium, and the Arroyo stone berm retaining walls and landscaping. The approval of the proposed project will increase the amount of displacement events held annually from 12 events to 25 for a period of up to five years. There are no changes to the stadium, parking, or outer surrounding areas proposed. The project will therefore not lead to any demonstrable negative aesthetic impact.

d. *Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?* ( )

                        
 
                         
 
                         

**WHY?** The proposed project would increase the number of displacement events that could be held at the Rose Bowl from 12 to 25 per year (for a period of up to five years). The majority of the 13 new events would likely be NFL games. Given the NFL schedule, it is anticipated that approximately three games per year would be weeknight games, additional games could be held on Sunday evenings, but it is anticipated that the majority of the games would be Sunday day games.

The existing field lighting system consists of five poles spread around the field (each with 27 fixtures), two poles at the north end (each with nine fixtures), and 14 banks of light fixtures (each bank consisting of 12 light fixtures) on top of the Press Box. The light poles currently reach a height of 30 feet above the rim of the stadium. The bank of lights atop the Press Box reaches a height of 10 feet above the roofline. When illuminated at night, the stadium is visible from the surrounding area. The proposed project does not include any changes to the field lighting system and therefore would not create a new source of light or glare. Although the frequency of events would increase, less than half of the proposed 13 events would be night events, and it is estimated that approximately three to four night events would occur per year. Further, the use of the Rose Bowl by the NFL would be temporary only. The project approval would allow the additional events for a period of up to five years only to accommodate a new permanent stadium that will be constructed. The increase in the number of nighttime events of three to four games per year for up to five years would not be a material change to existing conditions. No changes to the lighting will be made. Therefore, impacts would be less than significant.

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**4. AGRICULTURAL RESOURCES.** In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:

- a. *Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?* ( )

                        
 
                         
 
                         

**WHY?** The City of Pasadena is a developed urban area surrounded by hillsides to the north and northwest. The western portion of the City contains the Arroyo Seco, which runs from north to south through the City. It has commercial recreation, park, natural and open space. The City contains no prime farmland, unique farmland, or farmland of statewide importance, as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency.

- b. *Conflict with existing zoning for agricultural use, or a Williamson Act contract?* ( )

                        
 
                         
 
                         

**WHY?** The City of Pasadena has no land zoned for agricultural use other than commercial growing areas. Commercial Growing Area/Grounds is permitted in the CG (General Commercial), CL (Limited Commercial), and IG (General Industrial) zones and conditionally in the RS (Residential Single-Family), and RM (Residential Multi-Family) districts and within certain specific plan areas. The project site is zoned and has a General Plan Land use designation of Open Space. Consequently, there are no project conflicts to existing zoning for agricultural use or a Williamson Act contract.

- c. *Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220 (g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104 (g))?*

                        
 
                         
 
                         

**WHY?** There is no timberland or Timberland Production zone in the City of Pasadena; therefore the proposed project would not result in the loss of forestland, timberland, or Timberland Production areas.

<b>Potentially Significant Impact</b>	<b>Significant Unless Mitigation is Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
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d. *Result in the loss of forest land or conversion of forest land to a non-forest use?*

                        
 
                         
 
                         

**WHY?** There is no forestland in the City of Pasadena; therefore the proposed project would not result in the conversion or loss of forestland.

e. *Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use? ( )*

                        
 
                         
 
                         

**WHY?** There is no known farmland in the City of Pasadena; therefore the proposed project would not result in the conversion of farmland to a non-agricultural use.

**5. AIR QUALITY.** Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

a. *Conflict with or obstruct implementation of the applicable air quality plan? ( )*

                        
 
                         
 
                         

**WHY?** The City of Pasadena is within the South Coast Air Basin (SCAB), which is bounded by the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east, and the Pacific Ocean to the south and west. The air quality in the SCAB is managed by the South Coast Air Quality Management District (SCAQMD).

The SCAB has a history of recorded air quality violations and is an area where both state and federal ambient air quality standards are exceeded. Because of the violations of the California Ambient Air Quality Standards (CAAQS), the California Clean Air Act requires triennial preparation of an Air Quality Management Plan (AQMP). The AQMP analyzes air quality on a regional level and identifies region-wide attenuation methods to achieve the air quality standards. These region-wide attenuation methods include regulations for stationary-source polluters; facilitation of new transportation technologies, such as low-emission vehicles; and capital improvements, such as park-and-ride facilities and public transit improvements.

The most recently adopted plan is the 2007 AQMP, adopted on June 1, 2007. This plan is the South Coast Air Basin's portion of the State Implementation Plan (SIP). This plan is designed to achieve the 5 percent annual reduction goal of the California Clean Air Act.

The SCAQMD understands that Southern California is growing. As such, the AQMP accommodates population growth and transportation projections based on the predictions made by the Southern California Association of Governments (SCAG). Thus, projects that are consistent with employment and population forecasts are consistent with the AQMP.

In addition to the region-wide AQMP, the City of Pasadena participates in a sub-regional air quality plan – the West San Gabriel Valley Air Quality Plan. This plan, prepared in 1992, is intended to be a guide for the 16 participating cities, and identifies methods of improving air quality while accommodating expected growth.

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The project is consistent with the growth expectations for the region, as it does not include any additional housing or commercial uses that would result in an increase in population or stationary sources of pollution. The proposed project is therefore consistent with the AQMP and the West San Gabriel Valley Air Quality Plan.

*b. Violate any air quality standard or contribute to an existing or projected air quality violation? ( )*

                                                                

**WHY?** Due to its geographical location and the prevailing off shore daytime winds, Pasadena receives smog from downtown Los Angeles and other areas in the Los Angeles basin. The prevailing winds, from the southwest, carry smog from wide areas of Los Angeles and adjacent cities, to the San Fernando Valley and to Pasadena in the San Gabriel Valley where it is trapped against the foothills. For these reasons, the potential for adverse air quality in Pasadena is high.

Pasadena is located in a nonattainment area, an area that frequently exceeds national ambient air quality standards. Due to potential for increased traffic associated with the proposed project and induced air pollutants, the project may violate an air quality standard or contribute to an existing or projected air quality violation. Therefore, the project has the potential for a significant impact, and this topic will be discussed in the EIR.

*c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)? ( )*

                                                                

**WHY?** The City of Pasadena is within the South Coast Air Basin (SCAB), which is an airshed that regularly exceeds ambient air quality standards (AAQS) – i.e., a non-attainment area. The SCAB is designated a non-attainment area for respirable particulate matter (PM10), fine particulate matter (PM2.5), and ozone (O<sub>3</sub>). The SCAB is currently designated an attainment area for the remaining criteria pollutants, which include carbon monoxide (CO), nitrogen oxides (NO<sub>x</sub>), and sulfur dioxide (SO<sub>2</sub>).

As described in **Section 5.b**, the proposed project could exceed the SCAQMD’s Thresholds for Significance. The SCQAMD established its thresholds in consideration of cumulative air pollution in the SCAB. Thus, projects that exceed the SCAQMD’s thresholds may significantly contribute to cumulative air quality impacts. Since the proposed project could exceed the SCAQMD’s thresholds, the project could result in a cumulatively considerable net increase of a criteria pollutant. Therefore, the project has the potential for a significant impact, and this topic will be discussed in the EIR.

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d. Expose sensitive receptors to substantial pollutant concentrations? ( )

                                                                

**WHY?** Land uses surrounding the project site include the Brookside Golf Course immediately to the north of the Rose Bowl stadium, and the Brookside Park to the south. Single-family residential units are located near the stadium on the slopes of the Arroyo Seco. The residential neighborhoods surrounding the Central Arroyo are primarily zoned single-family residential and within a hillside development district. The southeast edge of the Central Arroyo along Arroyo Terrace contains some small areas zoned for multi-family residential uses. Chandler School, an independent kindergarten through eighth grade school, is located within 0.25 mile of the project site. However, the Rose Bowl stadium has operated on the project site, within 0.25 mile of the Chandler School since the school's founding in 1950.

The proposed project is anticipated to result in an increase in air quality emissions due to traffic associated with events. Due to the proximity of nearby sensitive receptors, this potential impact will be discussed in the EIR.

e. Create objectionable odors affecting a substantial number of people? ( )

                                                                

**WHY?** The proposed project is generally a continuation of an existing use. With implementation of the proposed project, the site would remain in use as a recreational event space. This type of use is not shown on the 1993 SCAQMD's CEQA Air Quality Handbook Figure 5-5 "Land Uses Associated with Odor Complaints." Any project related refuse would be stored in covered containers and removed at regular intervals. Therefore, the proposed project would not create objectionable odors, and would have no associated significant impacts.

**6. BIOLOGICAL RESOURCES.** Would the project:

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? ( )

                                                                

**WHY?** The majority of the project site is developed with the Rose Bowl Stadium and ancillary uses that are not likely to support special status species or habitat. However, the surrounding Arroyo Seco is recognized as an important regional wildlife corridor because it connects the San Gabriel Mountains to the Los Angeles River and Pacific Ocean. The central portion of the arroyo has undergone extensive modifications to both the landscape and the channel. Native, natural plant communities and species are almost exclusively restricted to the east and west-facing side slopes of the project area, as well as the entire Central Arroyo. Therefore, the confinement of terrestrial natural communities to the sidewalls of the arroyo has limited the natural habitat available for animals to use for food, shelter, cover, and movement. Furthermore, the central portion of the site experiences substantial daytime and nighttime recreation and illumination that would tend to inhibit wildlife movement across developed areas. The proposed project would

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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modify the number of displacement events allowed at the stadium and does not propose any new construction or physical changes to the site or surrounding area. The project would not affect habitat or special status species through physical modifications of the site. Therefore, the proposed project would have a less than significant effect on wildlife and habitat.

*b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? ( )*

                        
 
                         
 
                         

**WHY?** As discussed above, the majority of the project site is developed with recreation and similar uses. As recently as 2007, no endangered, rare, threatened, or special status plant species (or associated habitats) designed by the U.S. Fish and Wildlife Service, California Department of Fish and Game, or California Native Plant Society were known to occur or found within the project site. Surveys and literature reviews for sensitive species conducted as recently as 2007 did not identify the occurrence of any endangered, rare, threatened, or special status plant species within the site. There is no new construction proposed or physical changes to the site or surrounding area. Consequently, the proposed project would have a less than significant effect any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

*c. Have a substantial adverse effect of federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? ( )*

                        
 
                         
 
                         

**WHY?** Drainage courses with definable bed and bank and their adjacent wetlands are “waters of the United States” and fall under the jurisdiction of the U.S. Army Corps of Engineers (USACE) in accordance with Section 404 of the Clean Water Act. Jurisdictional wetlands, as defined by the USACE are lands that, during normal conditions, possess hydric soils, are dominated by wetland vegetation, and are inundated with water for a portion of the growing season. The Arroyo Seco flood control channel is located just west of the stadium. The proposed project does not propose any physical changes to the project site, nor would it directly modify the channel, which is considered a jurisdictional water (e.g., “other waters”) of the United States and therefore subject to regulation under Section 404 and 401 of the Clean Water Act. Consequently, the project would not create any significant impacts to federally protected wetlands.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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d. *Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?* ( )

                        
 
                         
 
                         

**WHY?** As discussed above, the Arroyo Seco is recognized as an important regional wildlife corridor because it connects the San Gabriel Mountains to the Los Angeles River and Pacific Ocean. However, the central portion of the arroyo has undergone extensive modifications to both the landscape and the channel. Native, natural plant communities and species are almost exclusively restricted to the east and west-facing side slopes of the project area. Therefore, the confinement of terrestrial natural communities to the sidewalls of the arroyo has limited the natural habitat available for animals to use for food, shelter, cover, and movement. Furthermore, the central portion of the site experiences substantial daytime and nighttime recreation and illumination that would tend to inhibit wildlife movement across developed areas. Thus wildlife movement is generally restricted to the sidewalls or the channelized portion of the stream. The proposed project would not result in any physical or permanent changes to the project site. Therefore, the proposed project would have a less than significant effect on wildlife and habitat.

e. *Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?* ( )

                        
 
                         
 
                         

**WHY?** The only local ordinance protecting biological resources in the City of Pasadena is Ordinance No. 6896 "City Trees and Tree Protection Ordinance," codified at Pasadena Municipal Code Chapter 8.52 All trees within the project boundary would be subject to the Tree Protection Ordinance, as they are considered public trees (located on property under ownership or control of the City). Some of the trees on site may also be protected as landmark, specimen, or native trees as defined in the Ordinance. Implementation of the proposed project would not result in the removal or damage of any public trees, as no physical changes would occur as a result of the proposed project. Therefore, there would be no related significant impacts.

f. *Conflict with the provisions of an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or state habitat conservation plan?*  
( )

                        
 
                         
 
                         

**WHY?** Currently, there are no adopted Habitat Conservation or Natural Community Conservation Plans within the City of Pasadena. There are also no approved local, regional, or state habitat conservation plans. Therefore, no impact would occur.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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**7. CULTURAL RESOURCES.** Would the project:

a. *Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5?* ( )

                        
 
                         
 
                         

**WHY?** There are five historical resources that are currently listed in the California Register in the Arroyo Seco area, all of which are also listed on the National Register. These include the Rose Bowl, Prospect Historic District, Louise C. Bentz House, Holly Street Livery Stable and Millard House, and La Miniatura. Additionally, the Lower Arroyo Seco and La Casita Del Arroyo are designated by the City as landmarks. Several other resources are currently or have previously been under consideration for some form of historic designation or recognition by the City of Pasadena. Significant effects upon historical resources are evaluated by determining the historic status of the resources, the basis for its importance and then determining the potential for development to affect the characteristics that convey its historic significance. Significant effects generally include demolition or materially altering a resource in an adverse manner such that the physical characteristics of that resource are no longer conveyed. Character defining features of the Rose Bowl include the boundary of the Rose Bowl, including the perimeter fence, the rock wall, the open underside of the bowl and exposed unpainted concrete surface, the vegetation pattern, particularly roses and large palm trees, the open bowl of the stadium with tiered seating, including gently sloped tiers of seating punctuated by regularly spaced access tunnels with aisles that radiate straight downward to the field and upward above, and the scoreboards. None of these features would be relocated, altered, demolished, or otherwise modified as a result of the proposed project. There are no physical changes to the stadium or surrounding area proposed as part of this project. The only change is the number of displacement events permitted to occur annually (temporarily for a period of up to five years). Therefore, the proposed project would not cause a substantial adverse change in the significance of a historical resource, and the project would have no related impacts.

b. *Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?* ( )

                        
 
                         
 
                         

**WHY?** The arroyo environment surrounding the Rose Bowl has been extensively modified by construction of the Bowl, the surrounding golf course, parking lots and roads. Few areas of exposed ground surface are located within the project area, due to extensive paving and landscaping. Boulders present in the open area indicate that high energy water flow occurred in the arroyo at times, suggesting it would have been a poor place for long-term human habitation, and that any cultural materials left behind in the arroyo were probably washed away by flooding. During construction of the Rose Bowl in 1923, earth was taken from within the Bowl and was used to create the berm supporting the Bowl. Subsequent construction of parking lots and the golf course required further grading and filling in the active arroyo channel, and this probably disturbed any prehistoric cultural resources that might have been present in the vicinity of the Rose Bowl. The Central Arroyo Master Plan indicates the floor of the Arroyo Seco has a low potential for archeological resources. This is particularly true in areas extensively disturbed by construction of the stadium. As the proposed project would not involve any construction or

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physical changes to the site (including ground-disturbing activities that could potentially uncover buried archeological resources) no impact would occur.

c. *Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?* ( )

                        
 
                         
 
                         

**WHY?** The Arroyo Seco is a broad flood channel, the floor of which is filled with recent alluvium that generally represents too dynamic a geological environment for the formation of fossils and has a low potential to contain fossil resources. The vicinity of the Rose Bowl is inset in pleistocene-age older alluvium, which may be present in the Arroyo Seco at depths of five more feet and is also exposed in the hills adjacent to the arroyo. Some older alluvium has a high potential to contain vertebrate fossils; however, construction of the concrete flow channel and the Rose Bowl likely disturbed these underlying sentiments. Beneath the alluvial soils, the bedrock is quartz diorite, which has no sensitivity for paleontological resources. Because paleontological resources generally lie at depths below those of archeological resources, there is the potential for intact paleontological resources to be present on the site. However, the proposed project does not include any construction or physical changes to the site or surrounding area (including ground disturbing or earth moving activities that could result in the discovery of paleontological resources). Therefore, no impact would occur.

d. *Disturb any human remains, including those interred outside of formal ceremonies?* ( )

                        
 
                         
 
                         

**WHY?** There are no known human remains on the site. The project site is not part of a formal cemetery however; inhumations have been associated with archeological contexts in the Arroyo Seco. Although the presence of additional archeological resources within the Bowl footprint is unlikely due to the disturbed nature of the site, the potential exists for such resources to be present. However, the proposed project would not include any ground disturbing activities, such as excavation that could disturb such resources. Therefore, no impact would occur.

**8. ENERGY.** Would the proposal:

a. *Conflict with adopted energy conservation plans?* ( )

                        
 
                         
 
                         

**WHY?** The proposed project is the continuation of an existing use that currently operates in compliance with adopted energy conservation plans. It is acknowledged that the increase in the number of displacement events will also increase the demands for energy on the City's utility infrastructure. The City of Pasadena (through its Water and Power Department) is the utility provider for the site and is currently able to serve all football game-related power demands from the site. The long-term impact from increased energy use by this project is not expected to be significant in relationship to the number of customers currently served by the electrical and gas utility companies and energy use by the City of Pasadena or the Rose Bowl Stadium. The site is served by existing gas and electric utilities. Currently, the Rose Bowl hosts 12 displacement events and several smaller events during the course of the year. The Rose Bowl also requires energy for routine maintenance that would not change as a result of the proposed project. It is anticipated that there will be increased demand for energy on the additional event days.

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Although the frequency of these events would increase, the intensity of the energy demand on the site during a game would not change from that which is currently demanded and provided during current games. As a result, the current infrastructure can adequately serve energy on additional game days, and the additional demand on new game days can be provided by the City within the supply available to or produced by the City on a daily basis.

The Rose Bowl Stadium is currently undergoing a renovation that will greatly improve its energy and water efficiency for future operations. These improvements will be in place by the time these additional displacement events would occur.

Furthermore, the City's newly adopted Open Space and Conservation Element (January 2012), outlines a number of provisions addressing energy use reduction, wherein the "Preferred Resource Plan" component of the City's Integrated Resource Plan is summarized and includes key elements which will require PWP to take specific actions to begin reconfiguring its existing energy portfolio over the next several years to have fewer adverse environmental effects without reducing the amount of power available across the City.

Therefore, no potentially significant energy impacts would occur from the additional displacement events, and additional displacement events would not conflict with the City's Open Space and Conservation Element or its Integrated Resource Plan.

*b. Use non-renewable resources in a wasteful and inefficient manner? ( )*





**Why?** The proposed project is essentially the continuation of an existing use and would not create a high enough demand for energy to require development of new energy sources. The only change on site is the number of displacement events that would be permitted to occur annually for a period of up to five years. Further, the proposed project does not include any construction activities that would require consumption of oil-based energy products. Therefore, the proposed project will not cause a significant reduction in short-term available supplies.

The long-term impact from increased energy use by this project is not expected to be significant in relationship to the number of customers currently served by the electrical and gas utility companies and energy use by the City of Pasadena or the Rose Bowl Stadium. The site is served by existing gas and electric utilities. Currently, the Rose Bowl hosts 12 displacement events and several smaller events during the course of the year. The Rose Bowl also requires energy for routine maintenance that would not change as a result of the proposed project. It is anticipated that there will be demand for energy on the additional event days. Although the frequency of these events would increase, the intensity of the uses on the site would not change. Further, the Rose Bowl Stadium is currently undergoing a renovation that will greatly improve its energy and water efficiency for future operations. These improvements will be in place at the time these additional displacement events would occur. As the same types of events would occur as under present conditions, and only the frequency would increase, the increased demand for energy use would not be substantial in comparison to the current demand and no significant impact would occur.

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**9. GEOLOGY AND SOILS.** Would the project:

- a. *Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:*
  - i. *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. ( )*

                        
 
                         
 
                         

**WHY?** According to the 2002 adopted Safety Element of the City of Pasadena’s General Plan, the San Andreas Fault is a “master” active fault and controls seismic hazard in Southern California. This fault is located approximately 21 miles north of Pasadena.

The County of Los Angeles and the City of Pasadena are both affected by Alquist-Priolo Earthquake Fault Zones. Pasadena is in four USGS Quadrants, the Los Angeles, and the Mt. Wilson quadrants were mapped for earthquake fault zones under the Alquist-Priolo Act in 1977. The Pasadena and Condor Peak USGS Quadrangles have not yet been mapped per the Alquist-Priolo Act.

These Alquist-Priolo maps show only one Fault Zone in or adjacent to the City of Pasadena, the Raymond (Hill) Fault Alquist-Priolo Earthquake Fault Zone. This fault is located primarily south of City limits, however, the southernmost portions of the City lie within the fault’s mapped Fault Zone. The 2002 Safety Element of the City’s General Plan identifies the following three additional zones of potential fault rupture in the City:

- The Eagle Rock Fault Hazard Management Zone, which traverses the southwestern portion of the City;
- The Sierra Madre Fault Hazard Management Zone, which includes the Tujunga Fault, the North Sawpit Fault, and the South Branch of the San Gabriel Fault. This Fault Zone is primarily north of the City, and only the very northeast portion of the City and portions of the Upper Arroyo lie within the mapped fault zone.
- A Possible Active Strand of the Sierra Madre Fault, which appears to join a continuation of the Sycamore Canyon Fault. This fault area traverses the northern portion of the City as is identified as a Fault Hazard Management Zone for Critical Facilities Only.

The project site is not in a known Earthquake Fault Zone, as defined by the Alquist-Priolo Earthquake Fault Zoning Act of 1972, nor is it in an Earthquake Fault Management Zone, according to the City of Pasadena’s General Plan Safety Element. Further, the proposed project does not include the construction of any new structures such as housing or commercial use that could be subject to ground rupture. Therefore, the proposed project would not expose people or structures to potential substantial adverse effects caused by the rupture of a known fault. Consequently, no related significant impacts would result from the proposed project.

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ii. Strong seismic ground shaking? ( )

**WHY?** See 9.a.i. Since the City of Pasadena is within a larger area traversed by active fault systems, such as the San Andreas and Newport-Inglewood Faults, any major earthquake along these systems will cause seismic ground shaking in Pasadena. Much of the City is on sandy, stony, or gravelly loam formed on the alluvial fan adjacent to the San Gabriel Mountains. This soil is more porous and loosely compacted than bedrock, and thus subject to greater impacts from seismic ground shaking than bedrock. Further, the proposed project does not include the construction of any structures such as housing or commercial uses that could be subject to strong seismic ground shaking. Consequently, no related significant impacts would result from the proposed project and seismic ground shaking.

iii. Seismic-related ground failure, including liquefaction as delineated on the most recent Seismic Hazards Zones Map issued by the State Geologist for the area or based on other substantial evidence of known areas of liquefaction? ( )

**WHY?** Liquefaction typically occurs in areas where the groundwater is less than 50 feet from the surface and where soils are composed of poorly consolidated, fine- to medium-grained, younger alluvial sands. According to the City of Pasadena Safety Element of the General Plan and the State of California Seismic Hazards Zone Map for the Pasadena Quadrangle, the project site is within an area potentially subject to liquefaction caused by ground shaking or seismic-related ground failure. However, the proposed project does not include the construction of any new housing or commercial uses that could potentially expose people to the risk of injury as a result of seismic related ground failure, including liquefaction. Consequently, no related significant impacts would result from the proposed project and liquefaction potential.

iv. Landslides as delineated on the most recent Seismic Hazards Zones Map issued by the State Geologist for the area or based on other substantial evidence of known areas of landslides?  
( )

**WHY?** Landslides are movements of relatively large landmasses, either as nearly intact bedrock blocks or as jumbled mixes of bedrock blocks, fragments, debris, and soil. The project site is on a relatively level canyon floor terrain and, as such, is not subject to landslides. Because the project site is in the Arroyo Seco, surrounding canyon slopes could be subject to landslides. According to the City of Pasadena Safety element of the General Plan and the State of California Seismic Hazards Zone Map for the Pasadena Quadrangle the canyon slopes surrounding the project site are in areas subject to potential slope instability caused by ground shaking or seismic related ground failures. Landslide hazards associated with these canyons are classified by the City of Pasadena General Plan Safety Element as "Moderate" because of the steepness of the slopes and proximity to drainage swales. Although the potential exists for landslides to occur in the arroyo canyons, the proposed project does not include the construction of any new structures, such as housing or commercial uses that could expose

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people to potential landslides. Consequently, no related significant impacts would result from the proposed project and landslides.

b. *Result in substantial soil erosion or the loss of topsoil?* ( )

                                                                

**WHY?** The proposed project does not include any construction activities (including grading or excavation) that could utilize poor base soils, resulting in unstable foundations or other erosion related effect. There are no physical changes to the site or surrounding areas and no impact would occur.

c. *Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?* ( )

                                                                

**WHY?** According to the City of Pasadena Safety Element of the General Plan, and the State of California Seismic Hazards Zone map for the Pasadena Quadrangle, the project site is in an area potentially subject to liquefaction caused by ground shaking or seismic-related ground failures. In addition, the canyon slopes surrounding the project site are in areas subject to potential slope instability caused by ground shaking or seismic related ground failures. Landslide hazards associated with these canyon slopes are classified as Moderate in the City of Pasadena General Plan Safety Element because of the steepness of the slopes and proximity to drainage swales. Thus, soil slips and slumps on the steep slopes and in the drainage swales, small debris flows and small slides or rock falls could occur in these surrounding canyon areas; however, the potential for large deep-seated landslides in these areas surrounding the project site is considered low. The proposed project does not include any construction activities (grading or excavation) that could affect off-site landslides, lateral spreading, subsidence, liquefaction, or collapse. Therefore this impact is less than significant.

d. *Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?* ( )

                                                                

**WHY?** The project site is located on Ramona soils, which are slightly expansive and very slightly corrosive to uncoated steel or concrete. They are moderate to low in strength, with medium to low compressibility, and are slightly susceptible to seepage. However the project site is currently developed, and the underlying soil is not likely to become unstable as a result of the project, as the proposed project does not include any physical changes to the site, nor would it require any grading or excavation. Therefore, this impact is less than significant.

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e. *Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?* ( )

                        
 
                         
 
                         

**WHY?** The proposed project is the essentially the continuation of an existing use and as such is connected to the existing sewer system. Therefore, soil suitability for septic tanks or alternative wastewater disposal systems is not applicable in this case, and the proposed project would have no associated impacts.

**10. GREENHOUSE GAS EMISSIONS.** Would the project:

a. *Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

                        
 
                         
 
                         

**WHY?** The project will generate additional vehicle trips to the Rose Bowl to attend events and, therefore, will generate Carbon Dioxide, which is the primary component of Greenhouse gases (GHG). Therefore, this impact will be discussed in the EIR.

b. *Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?*

                        
 
                         
 
                         

**WHY?** The project will not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. The project would not be expected to conflict with AB 32 and the ARB Scoping Plan: <http://www.arb.ca.gov/cc/scopingplan/scopingplan.htm>. However, this impact will be analyzed in the EIR.

**11. HAZARDS AND HAZARDOUS MATERIALS.** Would the project:

a. *Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials?* ( )

                        
 
                         
 
                         

**WHY?** The project does not involve the use or storage of hazardous substances other than the small amounts of pesticides, fertilizers, and cleaning agents required for normal maintenance of the structure and landscaping. These materials are currently stored on site in accordance with Titles 8, 22, and 26 of the CCR and their enabling legislation set forth in Chapters 6.95 of the Health and Safety Code, were established at the state level to ensure compliance with federal regulations to reduce the risk to the human health and the environment from the routine use of hazardous substances. These regulations must be implemented by employers/businesses, as appropriate and are monitored by the state. As the proposed project is a request to increase the frequency of displacement events to allow for the temporary placement of an NFL team and not

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introducing a new use, these policies are currently in place and would remain in place for the additional events. The Rose Bowl must adhere to all applicable regulations regarding the use and storage of any hazardous substances and there would be no changes from current conditions. Therefore, there are no related impacts.

b. *Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?* ( )

                        
 
                         
 
                         

**WHY?** The proposed project is the request to increase the frequency of displacement events to allow for the temporary placement of an NFL team. There are no changes that involve hazardous materials. The proposed project does not include demolition of any structures that could contain asbestos or lead based paint or other hazardous materials, and no physical changes are proposed. Therefore, there is no significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions, which could release hazardous material and there are no related impacts.

c. *Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?* ( )

                        
 
                         
 
                         

**WHY?** The project site is in use as a recreational stadium for large events, which do not entail the use of hazardous materials, aside from those general maintenance products as described in **11a**, above. Chandler School, an independent kindergarten through eighth grade school, is located within 0.25 mile of the project site. However, the Rose Bowl stadium has operated on the project site, within 0.25 mile of the Chandler School since the school's founding in 1950. The proposed project would generally represent a continuation of existing conditions and therefore would not emit hazardous emissions within 0.25 mile of a school. Therefore, impacts would be less than significant.

d. *Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?* ( )

                        
 
                         
 
                         

**WHY?** The project site is not located on the State of California Hazardous Waste and Substances Sites List of sites published by California Environmental Protection Agency (CAL/EPA). The site has been in use as a recreational stadium since 1923, which is not a land use associated with hazardous materials. The site is not known or anticipated to have been contaminated with hazardous materials and no hazardous material storage facilities are known to exist on site. Therefore, impacts would be less than significant.

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e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area? ( )

                        
 
                         
 
                         

**WHY?** The project site is not within an airport land use plan or within 2 miles of a public airport or public use airport. The nearest public use airport is the Bob Hope Airport in Burbank, located approximately 10 miles from the project site. Therefore, the proposed project would not result in a safety hazard for people residing or working in the vicinity of an airport and would have no associated impacts.

f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? ( )

                        
 
                         
 
                         

**WHY?** The project site is not within the vicinity of a private airstrip, although a helipad is located north of the Rose Bowl near the Hahamongna Watershed Park. The helipad is operated by the Los Angeles County Fire Department and the Pasadena Police Department. The likelihood of an accident occurring at the same time as a Rose Bowl event is considered remote. Given that the helicopter operations currently exist and would not increase with implementation of the proposed project, it is anticipated that the helipad would not pose safety hazards to visitors. In addition, the Los Angeles County Fire Department and Pasadena Police Department will continue to comply with all regulations promulgated by the Federal Aviation Administration (FAA) for aircraft safety, which will further reduce potential safety hazards from emergency helicopter operations by using the flight path least impacting substantial concentrations of people, whenever feasible. While the proposed project could result in an increase in the frequency of event attendees, thus exposing more persons to potential safety risks posed by helipad operation, the infrequency of helicopter arrivals and departures, along with the low rate of helicopter accidents nationwide and compliance with all FAA regulations related to aircraft and pilot safety, such as pilot training, aircraft inspection and certification, and air traffic control, would ensure that this impact is less than significant. Therefore, the proposed project would not result in a safety hazard for people residing or working in the vicinity of a private airstrip and impacts would be less than significant.

g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? ( )

                        
 
                         
 
                         

**WHY?** The City of Pasadena maintains a Citywide emergency response plan, which goes into effect at the onset of a major disaster (e.g., a major earthquake). The Pasadena Fire Department maintains the disaster plan. In case of a disaster, the Fire Department is responsible for implementing the plan, and the Pasadena Police Department devises evacuation routes based on the specific circumstance of the emergency. The City has pre-planned evacuation routes for dam inundation areas associated with Devil's Gate Dam, Eaton Wash, and the Jones Reservoir.

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As required by law, the proposed project would continue to provide adequate access for emergency vehicles and appropriate evacuation routes, as well as regulate the storage of flammable and explosive materials and their transport within the project area. Additionally, the proposed project would comply with applicable Uniform Fire Code regulations for issues including fire protection systems and equipment, general safety precautions, water supplies and distances from structures to fire hydrants.

If a large accident or natural disaster were to occur during an event, up to 75,000 event attendees could be present. Similar to existing conditions, the substantial concentration of people would result in a risk of accidents or conditions requiring police, fire, and/or medical emergency response services, as compared to times when there are no events. Such a situation could result in the need to methodically and expeditiously evacuate people from the premises and/or provide emergency medical care. Any evacuation process would need to occur in an orderly departure onto the nearby pedestrian and roadway network. If on-site emergency personnel require additional support from off-site emergency personnel, congestion on the surrounding roadway network could cause delays in emergency response or other logistical problems. This would be of particular concern immediately prior to and after event(s) when vehicles are queued on local streets. The pedestrian circulation system could be overwhelmed. Event-related congestion on local roadways could also impede emergency response to other locations not associated with the proposed project.

However, the City has prepared an Emergency Plan for the Rose Bowl that is designed to provide specific guidelines in the event of a major emergency at the stadium during which it is occupied. It is designed to be general in content to allow operational flexibility by command personnel in the various scenarios, which could present themselves. The plan identifies the key responsibilities of various departments and agencies and the location of key operational areas. The Emergency Plan identifies a range of issues including operational procedures such as staging areas, medical operations, and access routes; pre-evacuation procedures and associated responsibilities; mass casualty incident procedures; bomb threats; dam failures; and emergency traffic management. Implementation of the proposed project would not interfere with the Emergency Plan for the Rose Bowl, or other emergency response plans and would not create significant impacts.

*h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? ( )*

                        
 
                         
 
                         

**WHY?** As shown on Plate P-2 of the 2002 Safety Element, the project site is not in an area of moderate or very high fire hazard. In addition, no wildlands are located in the immediate project vicinity, and the entire Central Arroyo is located within a low wildland fire hazard area. Although the surrounding San Rafael Hills contain large areas of native chaparral and other vegetation and are considered a high-fire risk zone, the project site is currently developed and does not contain any overgrown or untended vegetation that would be likely to be ignited by a spark or heat related incident. There are no physical changes to the site or surrounding area proposed. The project is the request to allow a temporary increase in the number of displacement events that can occur annually at the Rose Bowl. Therefore, impacts would be less than significant.

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**12. HYDROLOGY AND WATER QUALITY.** Would the project:

a. *Violate any water quality standards or waste discharge requirements?* ( )

**WHY?** Section 303 of the federal Clean Water Act requires states to develop water quality standards to protect the beneficial uses of receiving waters. In accordance with California's Porter/Cologne Act, the Regional Water Quality Control Boards (RWQCBs) of the State Water Resources Control Board (SWRCB) are required to develop water quality objectives that ensure their region meets the requirements of Section 303 of the Clean Water Act.

Pasadena is within the greater Los Angeles River watershed, and thus, within the jurisdiction of the Los Angeles RWQCB. The Los Angeles RWQCB adopted water quality objectives in its Stormwater Quality Management Plan (SQMP). This SQMP is designed to ensure stormwater achieves compliance with receiving water limitations. Thus, stormwater generated by a development that complies with the SQMP does not exceed the limitations of receiving waters, and thus does not exceed water quality standards.

Compliance with the SQMP is ensured by Section 402 of the Clean Water Act, which is known as the National Pollution Discharge Elimination System (NPDES). Under this section, municipalities are required to obtain permits for the water pollution generated by stormwater in their jurisdiction. These permits are known as Municipal Separate Storm Sewer Systems (MS4) permits. Los Angeles County and 85 incorporated Cities therein, including the City of Pasadena, obtained an MS4 (Permit # 01-182) from the Los Angeles RWQCB, most recently in 2001. Under this MS4, each permitted municipality is required to implement the SQMP.

In accordance with the Countywide MS4 permit, all new developments must comply with the SQMP. In addition, as required by the MS4 permit, the City of Pasadena has adopted a Standard Urban Stormwater Mitigation Plan (SUSMP) ordinance to ensure new developments comply with SQMP. This ordinance requires most new developments to submit a plan to the City that demonstrates how the project will comply with the City's SUSMP.

The project consists of temporarily increasing the number of displacement events allowed at the Rose Bowl from 12 to 25. The proposed project does not include any new construction and would therefore not generate significant water pollutants. Thus, no quantifiable water quality standards apply to the project. Events at the Rose Bowl would be expected to add typical, urban, nonpoint-source pollutants to storm water runoff. As discussed, these pollutants are permitted by the Countywide MS4 permit, and would not exceed any receiving water limitations. Furthermore, the proposed project does not require any construction or physical changes and therefore does not meet the City's SUSMP requirement thresholds. As such, water pollutants generated from the project are considered negligible. Therefore, the proposed project would not violate any water quality standards or waste discharge requirements, and would have no related significant impacts.

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- b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? ( )

                        
 
                         
 
                         

**WHY?** The project site is located within a larger unconfined groundwater aquifer called the Raymond Basin. The Raymond Basin aquifer is approximately 40 square miles in area and underlies much of the City of Pasadena. It is bounded to the north by the San Gabriel Mountains, to the south and east by the San Gabriel Valley, and to the west by the San Rafael Hills. The Monk Hill and greater Raymond Basin aquifers are composed largely of unconsolidated alluvial sediments (conveyed by runoff processes), ranging to a maximum thickness of approximately 1,100 feet. Groundwater basin is recharged by the Arroyo Seco, a tributary of the Los Angeles River, and by Eaton Canyon, Santa Anita Canyon and other streams in the watershed of the San Gabriel River. The Arroyo Seco stream contributes approximately one third of the natural replenishment of the aquifer.

The Rose Bowl currently uses the existing water supply system provided by the Pasadena Department of Water and Power. The source of some of this water supply is ground water, stored in the Raymond Basin. Thus, the project could indirectly withdraw groundwater. However, the proposed water usage would be negligible in comparison to the overall water service provided by the Department of Water and Power. This minor amount of water use would not result in significant impacts from depletion of groundwater supplies.

Over the past several years, Pasadena Water and Power (PWP) has been impacted by several factors that have restricted local and regional water supply. PWP's groundwater rights in the Raymond Basin have been curtailed in order to mitigate groundwater depletion experienced over the last half century. With respect to imported supplies, a decade-long drought has reduced the ability to replenish regional groundwater supplies; drought conditions in the American southwest have reduced deliveries of water from the Colorado River, and legal and environmental issues have resulted in reduced water deliveries through the State Water Project. The City accounted for these conditions in its current Water Integrated Resources Plan (adopted January, 2011) and Urban Water Management Plan (adopted June, 2011). As of April of 2011, the Metropolitan Water District (MWD) has lifted allocation restrictions as a result of improvements in Southern California's water reserves.

The Pasadena Municipal Code Chapter 13.10 establishes 13 permanent mandatory restrictions on wasteful water use activities. In addition, there are also statewide water demand reduction requirements such as the 20x2020 Water Conservation Plan (20x2020), and the current work being done by the California Department of Water Resources, the State Water Resources Control Board, and other state agencies to implement the Governor's 20x2020 Water Conservation Initiative Program.

In September 2008, Council directed PWP to develop a Comprehensive Water Conservation Plan (CWCP) with a variety of approaches and recommendations for achieving 10 percent, 20 percent, and 30 percent reductions in water consumption as well as an analysis of the financial impacts on the Water Fund if those conservation targets were achieved. On April 13, 2009, Council voted to approve the CWCP presented by PWP and to replace the Water

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Shortage Procedure Ordinance with a new Water Waste Prohibition and Water Shortage Plan Ordinance (PMC 13.10). As a long-term goal, the CWCP presupposes an initial target of reducing per-capita potable water consumption 10 percent by 2015 and 20 percent by 2020.

The new Water Waste Prohibitions and Water Supply Shortage Plan Ordinance (PMC 13.10) became effective on July 4, 2009 and established 13 permanent mandatory restrictions on wasteful water use activities. In addition, statewide water demand reduction requirements began in 2009, as a result of Governor Arnold Schwarzenegger's 20x2020 Water Conservation Plan from April 30, 2009 (20x2020), and the current work being done by the California Department of Water Resources, the State Water Resources Control Board, and other state agencies to implement the Governor's 20x2020 Water Conservation Initiative Program.

The proposed project would increase the frequency of events that occur at the stadium over current conditions, which as noted above, will increase the amount of water used. However, the types of events are similar in nature to those currently occurring at the site, and an additional 13 events per year for a period of up to five years can be served. The Stadium is currently undergoing a renovation that will be completed prior to the commencement of any additional events. These renovations include the installation of water efficient fixtures and equipment that will greatly improve the efficiency of facilities. In addition, much of the water consumed by the Rose Bowl is used for landscaping and field maintenance, which would occur regardless of the proposed project. Any increase in water demand that would occur as a result of the proposed project would be considered minimal and can be served by the Department of Water and Power. Therefore, impacts would be less than significant.

- c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on-or off-site? ( )

                        
 
                         
 
                         

**WHY?** The stadium is served by a 30-inch corrugated metal pipe storm main, which runs from a large inlet structure located on the southwest ramp and runs south to the Arroyo Seco flood control channel located just west of the stadium. The interior concourse area within the fence and gates surrounding the stadium all drains overland to collection points outside of the fence. The interior seating bowl drains out to the edges of the playing field through openings in the field wall. The playing field itself does not have an underdrain system; the surface drains by gravity to the perimeter gutter. The proposed project does not include any physical changes or modifications to the Rose Bowl Stadium that would alter the drainage patterns. Therefore, the proposed project would not result in significant erosion or siltation impacts from changes to drainage patterns.

- d. *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off-site?* ( )

                        
 
                         
 
                         

**WHY?** As discussed above, the project does not involve any physical changes to the project site and therefore would not affect the site's drainage patterns or course. Similarly, the proposed

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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project would not result in flooding as no changes to the site would be made and no impacts would occur.

- e. *Create or contribute runoff water, which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?* ( )

                
 
                 
 
                 

**WHY?** The proposed project would not change the amount of impermeable surface on site, as no physical changes would occur as a result of the proposed project. Storm water runoff rates would not change as a result of the proposed project. Therefore, the City’s existing storm drain system can adequately serve the proposed development project and no new impacts would be created.

- f. *Otherwise substantially degrade water quality?* ( )

                
 
                 
 
                 

**WHY?** As discussed above, the proposed project is generally a continuation of an existing use and therefore the proposed project will not be a point-source generator of water pollutants. The only long-term water pollutants expected to be generated on site are typical urban stormwater pollutants that are currently generated on site. Continuation of compliance with the City’s SUSMP ordinance will ensure these stormwater pollutants would not substantially degrade water quality.

- g. *Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or dam inundation area as shown in the City of Pasadena adopted Safety Element of the General Plan or other flood or inundation delineation map?* ( )

                
 
                 
 
                 

**WHY?** No portions of the City of Pasadena are within a 100-year floodplain identified by the Federal Emergency Management Agency (FEMA). As shown on FEMA map Community Number 065050, most of the entire City is in Zone X. A few scattered areas are located in Zone D. Both Zone X and Zone D are located outside of the “Special Flood Hazard Areas Subject to Inundation by the 1 percent Annual Chance of Flood” (100-year floodplain) and no floodplain management regulations are required. Further, the proposed project does not involve the construction of new housing, and therefore would not place housing in a floodplain or dam inundation area. No impact would occur.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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h. *Place within a 100-year flood hazard area structures, which would impede or redirect flood flows? ( )*

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**WHY?** See **response g**, above. No portions of the City of Pasadena are within a 100-year floodplain identified by the FEMA. As shown on FEMA map Community Number 065050, most of the City is in Zone X with some scattered areas in Zone D, for which no floodplain management regulations are required. In addition, the proposed project does not include the construction of any structures. Therefore, the proposed project would not place structures within the flow of the 100-year flood, and the project would have no related impacts.

i. *Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam? ( )*

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**WHY?** Devil's Gate Dam is located north of the proposed project site. The dam, completed in 1920 for water storage and groundwater recharge but damaged in the 1971 Sylmar earthquake, no longer retains a reservoir on the Arroyo Seco. The County of Los Angeles rehabilitated the dam in 1997, restoring the ability of the dam to retain floods, but the basin remains dry most of the year. The dam is subject to periodic inspection by state authorities and the LADWP. The LADWP Reservoir Surveillance Section performs daily surveillance and periodic security inspections of all LADWP reservoirs and dam structures to ensure the safety of the structures and the water they contain. No unauthorized personnel are allowed at the reservoirs, access has been limited, and surveillance includes several helicopter flights per day over the LADWP reservoir structures. According to LADWP, tampering with the structures and water has not occurred, and such an event is considered remote.

A catastrophic failure of this structure could, under worst-case scenarios, result in flooding in the project area. Plate 2, in the City's Safety Element indicates that the Rose Bowl is located in a dam inundation zone. Further, the County of Los Angeles is currently working on an EIR to implement a short-term sediment removal project and a long-term sediment management program at the Devil's Gate Dam area north of the Bowl, thereby ensuring that such risks remain remote and speculative. Short-term removal of sediment in the Devil's Gate Dam has already taken place, eliminating short-term risk of failure. In addition the proposed project would not alter any hydrological conditions that would increase the risk of dam failure/site inundation over that which currently exists within the project site. Therefore, impacts would be less than significant.

j. *Inundation by seiche, tsunami, or mudflow? ( )*

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**WHY?** The City of Pasadena is not located near enough to any inland bodies of water or the Pacific Ocean to be inundated by a tsunami. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. The closest enclosed basin to the project site is the Devil's Gate Dam; however, according to the LADWP, no seiche at a LADWP facility has ever been recorded, even during the Northridge Earthquake,

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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and the LADWP does not consider seiches to be a potentially significant hazard. Nonetheless, sediment has been filled the Devil's Gate Dam, and short-term precautions have been taken to reduce the amount of sediment in the dam. Please see **12i**, above, for further discussion. As such, significant inundation by seiches, tsunami, or mudflow on the proposed project site would not be expected to occur, and, as the proposed project would not alter any conditions that would increase the risk of significant inundation by seiches tsunami or mudflow over that which currently exists within the project site, this impact would be less than significant.

**13. LAND USE AND PLANNING.** Would the project:

a. *Physically divide an existing community?* ( )

                        
 
                         
 
                         

**WHY?** The project will not physically divide an existing community, as it does not include any physical changes such as new roads or buildings that could affect the surrounding communities. No adverse impact will result.

b. *Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?* ( )

                        
 
                         
 
                         

**WHY?** The proposed project is not consistent with the Pasadena Municipal Code limits on displacement events for the site and would require amendments to the Arroyo Seco Public Land Ordinance, which is codified in the Pasadena Municipal Code at Chapter 3.32. The Pasadena Municipal Code currently allows for 12 displacement events. An amendment would be required to allow for 25 major events. This impact will be discussed in the EIR.

c. *Conflict with any applicable habitat conservation plan (HCP) or natural community conservation plan (NCCP)?* ( )

                        
 
                         
 
                         

**WHY?** Currently, there are no adopted Habitat Conservation or Natural Community Conservation Plans within the City of Pasadena. There are also no approved local, regional, or state habitat conservation plans. Consequently, there are no impacts to an HCP or NCCP and no further analysis is required.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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**14. MINERAL RESOURCES.** Would the project:

- a. *Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?* ( )

                        
 
                         
 
                         

**WHY?** No active mining operations exist in the City of Pasadena. There are two areas in Pasadena that may contain mineral resources. These two areas are Eaton Wash, which, was formerly mined for sand and gravel, and Devils Gate Reservoir, which was formerly mined for cement concrete aggregate.

The project is within the Devils Gate Reservoir area. However, the project does not involve grading or site preparation. The project does not include excavation activities or substantial export of earth materials. Therefore, the proposed project would not have significant impacts from the loss of a known mineral resource.

- b. *Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?* ( )

                        
 
                         
 
                         

**WHY?** The City’s 2004 General Plan Land Use Element does not identify any mineral recovery sites within the City. Furthermore, there are no mineral-resource recovery sites shown in the Hahamongna Watershed Park Master Plan; or the 1999 “Aggregate Resources in the Los Angeles Metropolitan Area” map published by the California Department of Conservation, Division of Mines and Geology. No active mining operations exist in the City of Pasadena and mining is not currently allowed within any of the City’s designated land uses. Therefore, the proposed project would not have significant impacts from the loss of a locally important mineral resource recovery site. See also **Section 14.a** of this document.

**15. NOISE.** Will the project result in:

- a. *Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?* ( )

                        
 
                         
 
                         

**WHY?** The proposed project has the potential to generate noise levels in the Central Arroyo, these noise levels are likely to vary but could exceed the standard established in the City of Pasadena Noise Regulations. Implementation of the proposed project would allow temporary use of the existing Rose Bowl by a NFL team. While the stadium would also continue to serve as the home field for the UCLA football team for up to five years and would also continue to host the annual Rose Bowl game, implementation of the proposed project would permit football games associated with the NFL to occur on Sunday afternoons and on some occasions, on weeknights during the regular season, for a limited duration of time. As is true for the college football games at the stadium, the primary source of noise would be crowd noise (yelling, applause, etc.) and the noise from the loudspeaker. The actual noise levels that would occur

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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would be extremely variable and would depend on factors such as attendance, the level of crowd excitement, and the volume of the speakers. The highest sound levels generated by the crowd noise and loudspeaker may last only for a few seconds or may last for much longer. While the NFL noise is anticipated to be similar to that of UCLA or other football games, this impact is considered potentially significant and will be discussed in the EIR.

b. *Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?* ( )

                        
 
                         
 
                         

**WHY?** The proposed project does not include construction activities that could expose persons to excessive groundborne vibration. There are no physical changes to the site or surrounding area proposed. The NFL games that would be permitted with the increase in displacement events would use the existing stadium facilities and would not install or use any equipment that would change the current vibration or groundborne noise levels and no related impacts would occur.

c. *A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?* ( )

                        
 
                         
 
                         

**WHY?** See **response 15.a.** Although the proposed project would increase the amount of days annually in which events occur due to the additional NFL games at the stadium, the effects would be temporary and similar in nature to the football games presently occurring. The site will be used as a temporary facility (for a period of up to five years) for the NFL while a new stadium is constructed in or near the City of Los Angeles. The NFL games would use the same stadium equipment and facilities as used by other games and events. The project requests the additional use of the stadium for a specified period of up to five years maximum. Therefore, the proposed project will not lead to a significant permanent increase in ambient noise.

d. *A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?* ( )

                        
 
                         
 
                         

**WHY?** The project would generate additional short-term crowd noise and other activities associated with an NFL football team as the project requests an increase in the amount of displacement events that could occur from 12 to 25 annually (for a period of up to five years). This could result in a substantial temporary increase in ambient noise levels. This impact will be discussed in the EIR.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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e. *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? ( )*

                        
 
                         
 
                         

**WHY?** There are no airports or airport land-use plans in the City of Pasadena. The closest airport is the Bob Hope Airport (formerly the Burbank-Glendale-Pasadena Airport), which is located more than 10 miles from Pasadena in the City of Burbank. Therefore, the proposed project would not expose people to excessive airport related noise and would have no associated impacts.

f. *For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? ( )*

                        
 
                         
 
                         

**WHY?** There are no private-use airports or airstrips within or near the City of Pasadena. However, as discussed previously a helipad is located north of the project site. However, the helipad has been in operation at its current location and would not change as a result of the proposed project. Therefore, the proposed project would not expose people to excessive noise levels as a result of proximity to the helipad.

**16. POPULATION AND HOUSING.** Would the project:

a. *Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? ( )*

                        
 
                         
 
                         

**WHY?** The project is in a developed area with all major infrastructure is in place. The project will not directly induce growth as it does not contain any housing or other infrastructure. Further, the project is temporary in nature and is therefore not expected to induce growth indirectly, for example by encouraging new similar or compatible uses to locate to the area.

b. *Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? ( )*

                        
 
                         
 
                         

**WHY?** The project site does not contain any existing dwelling units. Therefore, the proposed project would not displace any residents or housing, and would have no related impacts.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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c. *Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?* ( )

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**WHY?** No persons currently reside on the project site and the project site does not contain any existing dwelling units. Therefore, the proposed project would not displace any people, and would have no related impacts.

**17. PUBLIC SERVICES.** Will the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

a. *Fire Protection?* ( )

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**WHY?** Implementation of the proposed project could increase demand for fire protection services due to an increase in the frequency of events at the Rose Bowl. However, as these would be planned events and similar in nature to the events that already occur at the site, it is anticipated that the Pasadena Fire Department (PFD) would have adequate time to prepare and could plan resources accordingly. Further, as the NFL use of the facility would be temporary, any increase in fire protection services would also be temporary and the PFD would not need new or expanded facilities to accommodate the proposed project.

b. *Libraries?* ( )

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**WHY?** The proposed project does not include additional housing and therefore would not increase the residential population. While visitor attendance at the Rose Bowl could increase in frequency and for individual events, this increase would not be considered significant and would occur only intermittently. Facilities that accommodate Rose Bowl patrons would be adequate to service visitors attending events after implementation of the proposed project. The increase in the frequency of events at the Rose Bowl would not affect libraries.

c. *Parks?* ( )

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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**WHY?** Implementation of the proposed project would not increase the population and would not result in the increased use of parks and recreational facilities. There would be no significant permanent increase in City population as a direct result of the proposed project that could contribute to an increased demand for neighborhood or regional parks or other recreational facilities. It is anticipated that visitor population would increase for events, and the proposed project would increase the frequency of events, thus possibly accelerating the physical

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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deterioration of on-site and proximate parks and recreational facilities. Surrounding open space/park areas within the Upper, Central, and Lower Arroyo present opportunities for various active and passive recreational uses. Thus, Brookside Park, Rose Bowl Aquatics Center, and Rose Bowl Park to the south as well as Brookside Golf Course to the north could experience additional usage. The Parks and Natural Resources Division oversees the development and maintenance of Pasadena's parks. While operationally distinct, maintenance efforts in the Arroyo Seco as well as those in all other City parks similarly strive to keep parks safe, functional, and attractive for residents and visitors. Visitor population could increase given the increase in event frequency, however; visitors would primarily utilize designated recreational areas and facilities provided as part of the Rose Bowl Stadium and immediately surrounding the site, such as Lot H, rather than other City recreational facilities.

Even though the proposed project would not contribute a permanent population increase, the increase in the frequency of events would result in overall more patron visits. Therefore, park usage and potential impacts will be discussed with Recreation in the EIR.

d. *Police Protection?* ( )

                        
 
                         
 
                         

**WHY?** Implementation of the proposed project could result in the need for additional police protection services as a result of an increase in the frequency of events at the Rose Bowl. The proposed project would increase the number of events held at the Rose Bowl annually for a period of up to five years. It is anticipated that the proposed project would impact police service levels provided by the Event Planning Section of the Pasadena Police Department (PPD). However, the proposed project would not impact day-to-day service to the Rose Bowl or the immediate area. In addition, the PPD will work with City staff to formulate a security plan that encompasses NFL events. Therefore, while additional police resources may be required on major event days, there would be no need for expansion of police facilities, and impacts to police services with regard to increased visitor population and number of events annually would be considered less than significant.

e. *Schools?* ( )

                        
 
                         
 
                         

**WHY?** The proposed project does not include the construction of housing or commercial uses that would be expected to increase the resident population in the City and nearby areas. Employment for the additional events would likely continue to be drawn from the existing Rose Bowl labor force. Further, the additional events would be temporary and no new permanent employment would be anticipated. As no significant increase in employment would occur, there would be no direct increase in resident or student population. Therefore there would be no increase in demand for schools as a result of the proposed project.

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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f. *Other public facilities?* ( )

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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**WHY?** The proposed project does not include additional housing and therefore would not increase the residential population. While visitor attendance at the Rose Bowl would increase in frequency and for individual events, this increase would not be considered significant and would occur only intermittently. Facilities that accommodate Rose Bowl patrons would be adequate to service visitors attending events after implementation of the proposed project.

**18. RECREATION.**

a. *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?* ( )

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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**WHY?** See also **response 17 c**, above. Implementation of the proposed project would not increase the population and would not result in the increased use of local parks and recreational facilities. There would be no significant permanent increase in City population as a direct result of the proposed project that could contribute to an increased demand for neighborhood or regional parks or other recreational facilities. It is anticipated that visitor population would increase for events, and the proposed project would increase the frequency of events thus, possibly accelerating the physical deterioration of on-site and proximate parks and recreational facilities. Surrounding open space/park areas within the Upper, Central, and Lower Arroyo present opportunities for various active and passive recreational uses. Thus, Brookside Park, Rose Bowl Aquatics Center, and Rose Bowl Park to the south as well as Brookside Golf Course to the north could experience additional usage. The Parks and Natural Resources Division oversees the development and maintenance of Pasadena's parks. While operationally distinct, maintenance efforts in the Arroyo Seco as well as those in all other City parks similarly strive to keep parks safe, functional, and attractive for residents and visitors. Visitor population would increase, but visitors would primarily utilize recreational areas and facilities immediately surrounding the stadium site, such as Lot H, rather than other City recreational facilities. Consequently, recreational usage and potential impacts will be discussed in the EIR.

b. *Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?* ( )

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**WHY?** The project does not propose recreational facilities and would not require the construction or expansion of recreational facilities. There are no physical changes proposed to the stadium or the surrounding area as a result of the project. Therefore, the proposed project does not involve the development of recreational facilities that would have an adverse effect on the environment, and would have no associated impacts.

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19. **TRANSPORTATION/TRAFFIC.** Would the project:

- a. *Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?*

**WHY?** The traffic control measures and traffic management strategies currently employed during displacement events at the Rose Bowl are effective in the movement of vehicles into and out of the stadium parking areas. As part of the proposed project, existing traffic management strategies would continue to be implemented. However, the overall impact of the proposed project on traffic and circulation beyond the Rose Bowl area could be potentially significant and this topic will be further analyzed in the EIR.

- b. *Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways? ( )*

**WHY?** As stated above in **19a**, the increased number of events and visitors could cause an increase in traffic at area intersections and result in exceedance of established significant impact thresholds. In addition, the operation of the proposed shuttle service to accommodate patrons utilizing alternative parking site could also adversely affect levels of service on area roadways. This impact is potentially significant and will be analyzed in the EIR.

- c. *Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks? ( )*

**WHY?** The project site is not within an airport land use plan or within 2 miles of a public airport or public use airport. As discussed previously in this document, operation of the helipad located at the north end of the Arroyo Seco would not be impacted by the proposed project. Consequently, the proposed project would not affect any airport facilities and would not cause a change in the directional patterns of aircraft. Therefore, the proposed project would have no impact to air traffic patterns.

- d. *Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? ( )*

**WHY?** The proposed project does not include any changes to traffic patterns at the project site or any permanent modifications to the existing roadway in or around the Rose Bowl. Further, the

<b>Potentially Significant Impact</b>	<b>Significant Unless Mitigation is Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
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proposed project does not include construction activities that could result in temporary lane closures that could obstruct access or cause confusion on local roadways. Consequently, there would be no project related impacts to increase in hazards due to a design feature and impacts are less than significant.

e. *Result in inadequate emergency access?* ( )

                                                                

**WHY?** The proposed project would not result in any permanent modifications to the existing roadway system or block access to the project area. Rather, the proposed project is generally a continuation of existing conditions and would only increase the frequency of displacement events at the Rose Bowl. There are no changes to the site that would increase attendance beyond current capacity and there are no physical changes to the stadium or parking areas proposed. Current emergency access routes would be maintained. Therefore, the proposed project would not result in inadequate emergency access.

f. *Result in inadequate parking capacity* ( )

                                                                

**WHY?** As discussed above, on-site parking would be maintained and alternate parking would be available in downtown and Old Pasadena, along with shuttle service. It is possible that the parking demand created by an NFL team would be greater than current parking supply resulting in demand for parking beyond current supply. Therefore, this potentially significant impact will be discussed in the EIR.

g. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

                                                                

**WHY?** Objective 3.2.2 of the City’s 2004 Mobility Element is to “Encourage Non-Auto Travel.” The proposed project would be supportive of this policy. Currently Rose Bowl events utilize a variety of public transit options including shuttle service from Old Pasadena. For NFL games, it is anticipated this service would be expanded to include a second Old Pasadena stop near the metro Gold Line light rail station. The EIR will include additional analysis and a discussion of consistency with adopted policies supporting public transportation.

**20. UTILITIES AND SERVICE SYSTEMS.** Would the project:

a. *Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?* ( )

                                                                

**WHY?** The City requires a wastewater discharge permit for industrial facilities and certain commercial facilities that plan to discharge industrial wastewater to the City’s sewage collection and treatment system. The purpose of the wastewater discharge permit program is to ensure

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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the City's compliance with the NPDES program, as administered by the RWQCB, for all facilities discharging to navigable waters of surface water of the state, including sewage treatment plants. The Rose Bowl Event Expansion project would comply with all provisions of industrial wastewater permits, if required, which regulates discharges. Through compliance with the City's wastewater discharge permit, which is administered subject to the requirements and limitations of the NPDES program and enforced by the Regional Water Quality Control Board, it can be assumed that the proposed project would not result in an exceedance of the Board's wastewater treatment requirements. Further, the NPDES permit system also regulates both point source discharges (a municipal or industrial discharge at a specific location or pipe) and nonpoint source discharges (diffuse runoff of water from adjacent land uses) to surface waters of the state (e.g., stormwater systems). For point source discharges, each NPDES permit contains limits on allowable concentrations and emissions of pollutants contained in the discharge. The Rose Bowl Stadium would continue to comply with all applicable wastewater discharge requirements issued by the SWRCB and RWQCB. Therefore, implementation of the proposed project would not exceed applicable wastewater treatment requirements of the Regional Water Quality Control Board with respect to discharges to the sewer system or stormwater system.

- b. *Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?* ( )

                        
 
                         
 
                         

**WHY?** Implementation of the proposed project would increase the number of displacement events held at the facility, which could result in the generation and discharge of additional wastewater requiring treatment at either Whittier Narrows or the Los Coyotes wastewater reclamation plants (WRPs). However, development of the proposed project would not generate wastewater that would exceed the capacity of either the Whittier Narrows or the Los Coyotes wastewater treatment system in combination with the provider's existing service commitments.

It is anticipated that the overall amount of wastewater generated would be increased over existing conditions from the additional displacement events that would occur at the Rose Bowl stadium. However, these additional events would result in an incremental change as the proposed project would not affect the overall intensity of land uses on the project site. Therefore, this impact would be less than significant.

- c. *Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects* ( )

                        
 
                         
 
                         

**WHY?** The project will not require the construction of new storm water drainage facilities or the expansion of existing facilities. The project is located in a developed urban area where storm drainage is provided by existing streets, storm drains, flood control channels, and catch basins. As discussed in **Section 12**, above, the project does not involve changes in the site's drainage patterns and does not involve altering any drainage courses or flood control channels.

Potentially Significant Impact

Significant Unless Mitigation is Incorporated

Less Than Significant Impact

No Impact

d. *Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? ( )*

**WHY?** As noted in **Response 8b**, above, in September 2008, Council directed PWP to develop a Comprehensive Water Conservation Plan (CWCP) with a variety of approaches and recommendations for achieving 10 percent, 20 percent, and 30 percent reductions in water consumption as well as an analysis of the financial impacts on the Water Fund if those conservation targets were achieved. On April 13, 2009, Council voted to approve the CWCP presented by PWP and to replace the Water Shortage Procedure Ordinance with a new Water Waste Prohibition and Water Shortage Plan Ordinance (PMC 13.10). As a long-term goal, the CWCP presupposes an initial target of reducing per-capita potable water consumption 10 percent by 2015 and 20 percent by 2020.

The Water Waste Prohibitions and Water Supply Shortage Plan Ordinance (PMC 13.10) became effective on July 4, 2009 and established 13 permanent mandatory restrictions on wasteful water use activities. In addition, statewide water demand reduction requirements began in 2009, as a result of former Governor Arnold Schwarzenegger's 20x2020 Water Conservation Plan from April 30, 2009 (20x2020), and the current work being done by the California Department of Water Resources, the State Water Resources Control Board, and other state agencies to implement the Governor's 20x2020 Water Conservation Initiative Program.

The proposed project does not propose a change of land uses on the project site, but would result in a change to the frequency of events held at the Rose Bowl. However, the majority of water that is consumed at the Rose Bowl is not consumed during events, but rather is used for overall maintenance of the site. As the project site has all necessary infrastructure in place and would not require any additional improvements, any change in water usage would be incremental. Therefore, impacts would be less than significant.

e. *Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? ( )*

**WHY?** As discussed in **Section 20.b**, above, of this report, the proposed project would increase the frequency of events at the Rose Bowl Stadium and as a result, would increase the demand for wastewater service. However, the proposed increase to wastewater service demand is negligible in comparison to the existing service area of the wastewater service purveyor. In addition, the facilities currently maintained by the service purveyor are adequate to serve the proposed increase in demand. Therefore, the project would not result in insufficient wastewater service, and would cause no related significant impacts.

<b>Potentially Significant Impact</b>	<b>Significant Unless Mitigation is Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
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f. *Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? ( )*

                        
 
                         
 
                         

**WHY?** The project can be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs. The City of Pasadena is served primarily by Scholl Canyon landfill, which is permitted through 2025, and secondarily by Puente Hills. As the proposed project does not include any construction activities, the only solid waste generated would be that generated during events. As of 2009, Scholl Canyon receives approximately 0.26 ton annually and has remaining capacity of 5.04 million tons. Therefore, the proposed project would be served by a landfill with sufficient capacity to serve the additional displacement events.

g. *Comply with federal, state, and local statutes and regulations related to solid waste? ( )*

                        
 
                         
 
                         

**WHY?** In 1992, the City adopted the "Source Reduction and Recycling Element" to comply with the California Integrated Waste Management Act. This Act requires that jurisdictions maintain a 50 percent or better diversion rate for solid waste. The City implements this requirement through Section 8.61 of the Pasadena Municipal Code, which establishes the City's "Solid Waste Collection Franchise System." As described in Section 8.61.175, each franchisee is responsible for meeting the minimum recycling diversion rate of 50 percent on both a monthly basis and annual basis. The proposed project is required to comply with the applicable solid waste franchise's recycling system, and thus, will meet Pasadena's and California's solid waste diversion regulations. Therefore, the project would not cause any significant impacts from conflicting with statutes or regulations related to solid waste.

**21. EARLIER ANALYSIS.**

Earlier analysis may be used where an effect has been adequately analyzed in an earlier EIR or negative declaration. See *State CEQA Guidelines* Section 15063(c)(3)(D).

Earlier Analysis Used. Background information on the Rose Bowl site was ascertained from the Rose Bowl Stadium Renovation Project Final EIR (2005) and the Rose Bowl Stadium Renovation project Supplemental EIR (2008). No tiering, or other process will be used for analysis of the project's environmental effects.

These documents are available for review at the Permit Center, 175 North Garfield Avenue between the hours of 8:00 AM and 5:00 PM on Monday through Thursday and from 8:00 AM to 12:00 PM every Friday and the City Clerk's Office Monday through Thursday from 7:30 AM to 5:30 PM and every other Friday during the same hours.

Potentially  
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Significant  
Unless  
Mitigation is  
Incorporated

Less Than  
Significant  
Impact

No Impact

**22. MANDATORY FINDINGS OF SIGNIFICANCE.**

- a. *Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? ( )*

**WHY?** As discussed in **Section 3** of this document, the proposed project would not have substantial impacts to Aesthetics. Also, as discussed in **Sections 6** and **12** of this document, the proposed project would not have substantial impacts to special status species, stream habitat, and wildlife dispersal and migration. Furthermore, the proposed project would not affect the local, regional, or national populations or ranges of any plant or animal species and would not threaten any plant communities. Similarly, as discussed in **Section 7** of this document, the proposed project would not have substantial impacts to historical, archaeological, or paleontological resources, and thus, would not eliminate any important examples of California history or prehistory. As discussed in **Sections 12** and **14** of this document, the proposed project would not have substantial impacts to Water Quality and Mineral Resources.

However, since the proposed project would have potentially significant air quality, land use and planning, noise, recreation, and traffic impacts. Therefore, an EIR will be required to analyze these impacts.

- b. *Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future project? ( )*

**WHY?** The proposed project has the potential to contribute to cumulative Air Quality, Greenhouse Gas Emissions, Land Use and Planning, Noise, Recreation, and Transportation/Traffic impacts. Cumulative impacts will be discussed in the EIR for the project.

Potentially  
Significant  
Impact

Significant  
Unless  
Mitigation is  
Incorporated

Less Than  
Significant  
Impact

No Impact

c. *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?* (      )

**WHY?** As discussed in **Sections 11, 12, and 19** of this document, the proposed project would not expose persons to the hazards of chemical or explosive materials, flooding, or transportation hazards. Although residents of the proposed would be exposed to typical Southern California earthquake hazards, modern engineering practices would ensure that geologic and seismic conditions would not directly cause substantial adverse effects on humans.

However, as discussed in **Sections 5 Air Quality; 10 Greenhouse Gas Emissions; 13, Land Use and Planning; 15 Noise, 18 Recreation and 19 Transportation/Traffic**, the project has the potential to indirectly cause substantial adverse effects on humans. Therefore, an EIR will be required to analyze these topic areas.

## INITIAL STUDY REFERENCE DOCUMENTS

- # Document
- 1 Alquist-Priolo Earthquake Fault Zoning Act, California Public Resources Code, revised January 1, 1994 official Mt. Wilson, Los Angeles, and Pasadena quadrant maps were released March 25, 1999.
  - 2 California Department of Water Resources DWR), 2004 California's Groundwater, Raymond Basin Groundwater Bulletin 118.
  - 3 California Geologic Survey. 1991. State of California Seismic Hazard Zones, Pasadena Quadrangle, Official Map, California Geological Survey Seismic Hazards Mapping Program [http://gmw.consrv.ca.gov/shmp/html/pdf\\_maps\\_no.html](http://gmw.consrv.ca.gov/shmp/html/pdf_maps_no.html)
  - 4 California Integrated Waste Management Board (CIWMB) 2009 Annual Report
  - 5 California Natural Diversity Data Base (CNDDB)
  - 6 CEQA Air Quality Handbook, South Coast Air Quality Management District, revised 1993
  - 7 County of Los Angeles Countywide Integrated Waste Management Plan *2009 Annual Report*, February 2011
  - 8 Land Use Element of the General Plan, City of Pasadena, adopted 2004
  - 9 Pasadena Municipal Code, as amended
  - 10 Rose Bowl Stadium Renovation Project, Final Environmental Impact Report, 2005
  - 11 Rose Bowl Stadium Renovation Project, Final Supplemental Environmental Impact Report, 2008
  - 12 Safety Element of the General Plan, City of Pasadena, adopted 2002
  - 13 Scenic Highways Element of the General Plan, City of Pasadena, adopted 1975
  - 14 Seismic Hazard Maps, California Department of Conservation, official Mt. Wilson, Los Angeles, and Pasadena quadrant maps were released March 25, 1999. The preliminary map for Condor Peak was released in 2002.
  - 15 State of California "Aggregate Resource in the Los Angeles Metropolitan Area" by David J. Beeby, Russell V. Miller, Robert L. Hill, and Robert E. Grunwald, Miscellaneous map no. .010, copyright 1999, California Department of Conservation, Division of Mines and Geology
  - 16 State Water Resources Control Board (SWRQB). 2001. *General Construction Activity Stormwater Permit*.
  - 17 Storm Water and Urban Runoff Control Regulations Pasadena Municipal Code Chapter 8.70 Ordinance #6837
  - 18 Tree Protection Ordinance Pasadena Municipal Code Chapter 8.52 Ordinance # 6896
  - 19 Zoning Code, Chapter 17 of the Pasadena Municipal Code
  - 20 Open Space and Conservation Element (January 2012)