2.0 CORRECTIONS AND ADDITIONS

The following corrections and additions are set forth to update the Temporary Use of the Rose Bowl by the NFL Draft Environmental Impact Report (Draft EIR) in response to the comments received during and after the public review period. Changes to the Draft EIR are listed by section and page number and new text is provided in underline with strikeout of deleted text.

The following additions and corrections have been reviewed in relation to the standards in Section 15088.5(a) and (b) of the *California Environmental Quality Act (CEQA) Guidelines* on when recirculation of a Draft EIR is required prior to certification. The additions and corrections to the Revised Draft EIR document do not constitute new significant information requiring recirculation of the Draft EIR.

Sections 15088.5(a) and (b) of the State CEQA Guidelines state,

- (a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term "information" can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. "Significant new information" requiring recirculation include, for example, a disclosure showing that:
 - (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
 - (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
 - (3) A feasible project alternative or mitigation measure considerably different from other previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponent decline to adopt it.
 - (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.
- (b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

CORRECTIONS AND ADDITIONS

Changes to the Draft EIR are identified below by the corresponding Draft EIR section and subsection, if applicable, and the page number. Additions are in <u>underline</u> and deletions are shown in <u>strikethrough</u> format.

Executive Summary

The Executive Summary of the Draft EIR is replaced by **Section 1.0 Summary**, as contained in the Final EIR document.

Project Description

The first sentence of the last paragraph on page 2.0-16 has been revised as follows:

Currently, the Central Arroyo can accommodate approximately 20,280 21,518 vehicles.

The fourth sentence of the first paragraph on page 2.0-17 has been revised as follows:

Based on information provided by RBOC, approximately 20,280 21,518 total parking spaces are made available on both paved and turf areas.

The following text has been added to the bottom of page 2.0-17:

Although they would not reduce any impacts associated with the project, the following measures have been included to respond to concerns expressed in comments on the Draft EIR:

MM 2.0-1

RBOC shall be responsible for removal of all trash and debris associated with NFL events. Clean up shall commence within 24 hours of an NFL event and shall including all areas where patrons are directed to park within the Central Arroyo. Clean up shall be conducted to the satisfaction of the Department of Public Works. The RBOC shall provide funding as necessary.

MM 2.0-2 After each NFL event at the Rose Bowl, RBOC shall be responsible for visually inspecting parked areas for signs of oil, fluids, or other potentially harmful substances within 24 hours of an NFL event. In the event such substances are discovered, the soil shall be removed and disposed of in accordance with applicable regulations. RBOC shall provide the City of Pasadena Department of Public Works with a written summary of the visual inspection and any necessary soil removal.

The second point in the list under Section 3.32.270(A) on page 2.0-18 has been revised as follows:

2. The revenue generating potential form from the additional event justifies its consideration.

Project 7 (300 W Green Street) in Table 2.0-1, Pending and Approved Project in the City of Pasadena on page 2.0-21 of the Draft EIR has been revised as follows

Residential (39 units) 248 Senior/Life Care Units, 70 condominiums and the remodel/retention of an existing 46 multi-family residential units

3.1 Air Quality

The following text has been added to page 3.1-21 before the subheading Summary of Emissions:

Emissions from tailgating have also been included as on-site emissions. The figures presented are based on a total of 24,518 parking spots available on-site.

Table 3.1-6 has been revised as follows:

Table 3.1-6
Estimated Unmitigated Operational Emissions

	Emissions in Pounds per Day					
Emissions Source	VOC	NOx	CO	SOx	PM10	PM2.5
Operational (Mobile) Sources	490.31	1,254.26	5,387.56	7.76	885.01	60.40
Natural Gas	0.18	4.00	0.67	0.00	0.01	0.01
Tailgating	<u>1.02</u>	<u>13.20</u>	<u>7.62</u>	<u>1.71</u>	0.51	0.20
Event Emissions Total	4 <u>91.51</u> 90.49	1,2 <u>71.46</u> <u>58.26</u>	5,3 <u>95.85</u> 88.23	9.47 7.66	885. <u>53</u> 02	60. <u>61</u> 41
SCAQMD Threshold	55	55	550	150	150	55
Exceeds Threshold?	YES	YES	YES	NO	YES	YES

Source: Impact Sciences, Inc. Emissions calculations are provided in Appendix 3.1.

Totals in table may not appear to add exactly due to rounding in the computer model calculations.

The following text has been added to page 3.1-24 following the first sentence of the second paragraph:

In addition to on-site operations such as food preparation and other services, the proposed project would allow tailgating by event attendees. Further, since the majority of air pollutant emissions would result from traffic, vehicle emissions within a quarter mile from the Rose Bowl have been included in the LST analysis. It should be noted that mobile emissions are not typically included in an LST analysis. However, as the proposed project is somewhat unusual and mobile emissions represent the primary source of pollutants for the proposed project, they have been included in the interest of a conservative and comprehensive analysis.

The following text has been added to page 3.1-22 before the heading "Residual Impacts"

The following mitigation measures are also proposed in response to concerns express in comments on the Draft EIR, although they will not result in any material reduction in the emissions projected in the draft EIR:

- MM 3.1-1 Any RFP for vendors to serve NFL events shall specify that the vendor must utilize 2010 or later diesel trucks or alternatively fueled delivery trucks or demonstrate practices that will provide equivalent reduction of air emissions compared to a typical vendor who does not use such equipment.
- MM 3.1-2 Any maintenance vehicles or forklifts purchased to serve NFL events at the Rose Bowl shall be electric or use alternative fuel, provided that electric or alternative fuel equipment is available.
- MM 3.1-3 Prior to the hosting of an NFL game at the Rose Bowl, the RBOC shall provide electrical outlets in Lot I or nearby in Brookside Park to allow for electric barbecues to be used by those who choose to tailgate and use portable electric barbecues.
- MM 3.1-4 The RBOC shall ensure that cleaning products used to clean the Rose Bowl and surrounding areas after NFL games are water based or low VOC cleaning products

Table 3.1-7 on page 3.1-24 has been revised as follows:

Table 3.1-7 Localized Significance Thresholds Analysis

	On-Si	On-Site Maximum Emissions (pounds per day) ¹		
Significance Threshold	NOx	CO	PM10	PM2.5
Operation				
Maximum Daily On-site Emissions	4.00	0.76	0.01	0.01
Vehicle Emissions within 1/4 Mile	<u>26.13</u>	<u>112.24</u>	<u>18.44</u>	<u>1.26</u>
Tailgating	<u>13.20</u>	<u>7.62</u>	<u>0.51</u>	<u>0.20</u>
<u>Total</u>	<u>43</u>	<u>121</u>	<u>19</u>	<u>1.5</u>
LST Screening Criteria	166	4,119	21	7
Exceeds Threshold?	NO	NO	NO	NO

Source: Impact Sciences, Inc. Emission calculations are provided in Appendix 3.1.

¹ The NOx thresholds contained in the SCAQMD lookup tables are based on emissions of NOx and assume gradual conversion to NO₂ based on the distance from the project site boundary.

3.2 Greenhouse Gases

The third paragraph on page 3.2-1 has been revised as follows:

The proposed project is estimated to emit maximum net emissions of approximately 8,555 6,940.51 metric tons of carbon dioxide equivalents (MTCO₂e) per year, or 2.14 1.7 MTOC₂e per service person (SP) per year, without the implementation of GHG reducing project design features and mitigation measures.

3.3 Land Use

The last sentence of the second paragraph under the heading Hahamongna Watershed Park Master Plan has been revised as follows:

The HMP does not include an implementation plan for specific projects in the HMP area and therefore does not include any goals or policies that are relevant to the proposed project.

The following text has been added to the top of page 3.3-12:

Section 3.32.260 addresses general regulations and provides the following:

C. No portion of lands within the Arroyo Seco shall be used for any commercial, industrial, or institutional purposes other than those which existed at the effective date of the ordinance codified in this chapter.

Table 3.3-1 Project Consistency with Existing Land Use Plans, on page 3.3-15 has been revised as follows:

Plan	Goal/Policy	Project Consistency
City of Pasadena General Plan Land Use Element	Objective 12 – Fiscal Health – Encourage a business climate that contributes to the City's fiscal well-being.	Consistent. The proposed project will generate revenue for the City which may be used to pay off the cost of the Rose Bowl renovation project, a project which is critical to the City's ability to maintain the historic Rose Bowl and continue to be a premier tourist destination.
	Policy 12.3 Pay your own way: Ensure that new development pays its own way rather than burdens existing businesses and residents with increased costs for services and infrastructure needs.	Consistent. See additional discussion in Section 3.5 Public Services . The proposed project would not require additional City services such as police and fire protection.
	Objective 17 Recreation – Provide adequate recreation opportunities to all residents of the City	Consistent. The project site would continue to be accessible to residents. With implementation of the proposed project, additional residents could be exposed to the amenities at the site through game attendance.
	Policy 17.1 Accessible neighborhood parks: preserve, enhance and acquire parks with adequate recreational facilities in residential areas, including planning for, and locating parks within walking distance of multi-family housing.	Consistent. Rose Bowl parks would remain accessible for residents.

Plan	Goal/Policy	Project Consistency
	Policy 17.2 Shared facilities: Promote the shared use of public school recreational land and facilities for City recreational uses and/or community centers.	Consistent. The proposed project would not interfere with the joint use of facilities.
	Policy 17.4 Urban Open Space: Encourage and require, where feasible, the incorporation of publically accessible open spaces, including parks, courtyards, water features, gardens, passageways, and plazas, into public improvements and private projects.	Consistent. The proposed project does not include construction activity; however, the project site would continue to provide open space amenities.
	Objective 20 – Land Use Transportation Relationship – promote the relationship of land use and transportation	Consistent. The proposed project includes off-site parking and coordination with Metro for expanded rail services.
	Objective 2 – Preservation and Protection of the Arroyo Seco and Adjacent Open Space Areas: Recognize the importance to Pasadena of the history, cultural resources, and unique character of the Arroyo Seco, and conserve and enhance these assets.	Consistent. The proposed project will temporarily promote Pasadena as a premier destination with an NFL team and more importantly provide funding to allow for successful completion of the Rose Bowl renovation project that will preserve and maintain the historic resource that is the Rose Bowl.
	Policy 2.1 – Arroyo Seco Planning: Fully implement all master plans and design guidelines for the Arroyo. This includes the Lower Arroyo Master Plan, the Hahamongna Watershed Park Master Plan, and the Central Arroyo Master Plan.	Consistent. The proposed project would not interfere with implementation of the Arroyo Seco Master Plan.
	Policy 2.4 – Promote multi-faceted use of the Arroyo: Through implementation of the Arroyo Seco Master Plans, continue to maintain and enhance the area as a prime resource for quality of life of Pasadena residents.	Consistent. The proposed project promotes the multi-faceted use of the Rose Bowl by adding new events and would lead to long-term preservation of the Rose Bowl through funding of the renovation project.
	Objective 4: Natural Open Space And Passive Recreation Preservation And Acquisition: Use traditional and creative strategies to preserve and acquire open spaces in order to enhance the quality of life of all Pasadenans.	Consistent. The proposed project would not interfere with the preservation of open space in Pasadena.
	Policy 4.5 – Open Space Zoning: Provide adequate land resources with the City's OS (Open Space) zone to meet the outdoor recreation needs of the present and future residents in the region. Ensure careful planning within the City's OS zones	Consistent. The proposed project will temporarily disrupt access to recreational uses at the Rose Bowl during the five-year time frame of the project. In addition, the project will disrupt recreational access an additional 13 days per year. Nonetheless, the project site will continue to provide open space to the residents of Pasadena.
Pasadena Green Space, Recreation, and Parks Element and Master Plan	Objective 10 – Park And Green Space Design: Park and open space projects should be planned so that recreational facilities reinforce the historic nature of Pasadena's parks as well as Pasadena's character, heritage, and neighborhoods.	Consistent. The facilities at the Rose Bowl would not be modified with implementation of the proposed project and will continue to reflect Pasadena's character and heritage and the project provides funding to complete the renovation project that directly reinforces the historic nature of the Bowl.
	Policy 10.3 – Quality: Pasadena's green spaces should have a quality appearance that instills pride in the surrounding neighborhood and the City at large.	Consistent. The proposed project provides funding to complete the renovation project of the historic Rose Bowl preserving the quality appearance of the Bowl and the surrounding green space.

Plan	Goal/Policy	Project Consistency
	Objective 11 – Balance Special Events With Local Recreation Needs: It is important to balance the recreational and open space needs of and capacity for Pasadena residents with the status of many of the City's parks as popular venues for local and regional events such as music festivals, seasonal celebrations, and cultural activities, many of which also serve as key promotional activities for the City's regional and national image.	Consistent. The proposed project would increase the number of displacement events at the Rose Bowl per year and would provide additional opportunities to promote the Rose Bowl Stadium through NFL games. However, this increase would achieve a balance between special events and local recreation needs by limiting the duration of the increased number of special events while recognizing that the need for the funding that will come from the project is critical, but not permanent.
	Policy 11.1 – Protect Local Recreation Needs at Special Event Facilities: Through careful planning, continue to promote special events while providing access to recreational activities at City facilities. Provide adequate land resources to hold large special events while not unreasonably displacing recreational areas.	Consistent. The proposed project would promote special events at the Rose Bowl, specifically NFL games. Recreational users would be displaced for a portion of the day on a maximum of 13 additional days per year and for a temporary period (five years) balancing the recognition of the fact that the need for the funding that will come from the project is critical, but not required indefinitely.
	Policy 11.2 – Community Identity: Continue to promote special events and celebrations that reinforce Pasadena's community identity and provide incentives for organizers to use Pasadena's facilities.	Consistent. The proposed project would reinforce Pasadena's identity as the host of one of the premier football stadiums in the world. The funding from the project will also preserve the Rose Bowl and thereby directly reinforce a key component of Pasadena's community identity.
Arroyo Seco Design Guidelines	Temporary signage for events with a seasonal duration, or New Year's related events, or events lasting more than three days shall: • have a coordinated signage program that is reviewed by the Parks and Natural Resources Division and the Recreation and Parks Commission; • shall not conflict with the approved Comprehensive Signage Program.	Consistent. Signage associated with NFL events will be temporary. All signage will be coordinated with the City to ensure it does not conflict with the Comprehensive Signage Program.
Open Space and Conservation Element	Goal: Preserve, Acquire and Create Open Space - Preserve currently zoned open spaces, natural open spaces, hillsides, viewsheds, watersheds and recreational areas - Direct organized recreation to existing parks, fields, and school facilities and away from natural open spaces.	Consistent. The proposed project would not conflict with the preservation or acquisition of open space in Pasadena. The proposed project would not direct organized recreation to natural open spaces. The City would work with displaced users of Brookside Park to find appropriate space at existing parks.
	Develop Access & Connectivity for Wildlife and People - Develop open space and wildlife corridors and establish easement and acquisition programs. - Acknowledge, restore, and maintain Pasadena's connections with trails in the Angeles National Forest and regional trail systems. - Ensure that all Pasadena residents have access to information about where open spaces are located and the	Consistent. The proposed project would not conflict with open space or wildlife corridors, the restoration of trails in Angeles National Forest, or information on the availability of open spaces. The proposed project includes the multi-faceted use of the Rose Bowl by adding new events.
	transportation opportunities and options for getting to them.	

Plan	Goal/Policy	Project Consistency
	Preserve, Restore and Maintain the Eaton Canyon Corridor & the Arroyo Seco - Preserve, restore, and maintain the natural character of the Eaton Canyon Corridor and the Arroyo Seco as self- sustaining healthy ecosystems of plants and animals. Their natural character will continue to inspire people, as it has throughout time. - Promote responsible human interfaces with these unique natural environments in open space planning.	Consistent. The proposed project would not conflict with the preservation, restoration, or maintenance of Eaton Canyon or the Arroyo Seco. The proposed project will temporarily disrupt access to recreational uses at the Rose Bowl during the five-year time frame of the project. In addition, the project will disrupt recreational access an additional 13 days per year. Nonetheless, the project site will continue to provide open space to the residents of Pasadena.
	Welcome and Value the Importance of Citizen Participation - Citizen participation shall play a major role in all phases of open space planning. - The City shall provide the public with timely information regarding open space planning and decision making	Not applicable. This policy relates to open space planning; the proposed project does not include an open space component. Therefore, the policy is not applicable to the project.
	Define and Recognize the Benefits Derived from Open Space The opportunity to experience open space is vital to the physical and psychological well-being of Pasadena's residents. Account for impacts to "nature's services" and associated value when making decisions about open space. Open space is important for the health of the ecosystem and provides direct and indirect economic benefit to the City. Preserve, restore, and maintain Pasadena's natural amenities and recreation options which provide unique value to Pasadena's character and desirability as a place to live, visit, and conduct business.	Consistent. The proposed project will temporarily disrupt access to recreational uses at the Rose Bowl during the five-year time frame of the project. In addition, the project will disrupt recreational access an additional 13 days per year. Nonetheless, the project site will continue to provide open space to the residents of Pasadena.

3.4 Noise

The top of page 3.4-19 has been revised as follows:

Impact 3.3<u>4</u>-4

The second sentence of the third paragraph on page 3.4-19 has been revised as follows:

As shown in **Table 3.4-5**, noise level increases on area roadways would range from $\underline{1}9.4$ dB(A) to $\underline{1}69.8$ dB(A).

3.6 Recreation

Mitigation Measure MM 3.6-1 has been revised as follows:

MM 3.6-1 The RBOC or its designee shall ensure for the timely repair (repair shall occur within 24 hours) of be responsible for timely repair (within one day) of damaged Brookside Golf Course turf areas, and any other grassy areas (such as Lot H), that are damaged as a result of parking during-displacement NFL events. The RBOC shall ensure that all turf areas are returned to playable/usable condition within one day of an NFL event. Prior to commencement of the use of the Rose Bowl by the NFL, the RBOC shall approve a plan for maintenance of damaged turf areas. The plan shall be developed in coordination with the City and local golfers and include a timetable detailing estimated time of repair and methodology for the repair of the turf areas. RBOC shall be responsible for the costs of all repairs.

The fifth sentence of the last paragraph on page 3.6-28 has been revised as follows:

Implementation of Mitigation Measure **MM 3.6-2** would ensure access to the <u>existing westerly equestrian</u> <u>trails loop access</u> is maintained.

Mitigation Measure **MM 3.6-2** is revised as follows:

MM 3.6-2 In accordance with the provisions of the Santa Monica Mountains Conservancy trail agreement dated January 10, 1985 (SMMC Grant), the RBOC shall ensure access as required by the agreement. maintain access to the loop, trails and other recreational uses during NFL and other displacement events.

Mitigation Measure 3.6-5 has been added following **Mitigation Measure MM 3.6-4** on page 3.6-30 of the EIR.

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

On page 3.6-30, Impact 3.6-3 has been removed from the EIR:

Impact 3.6-3 The proposed project would expand recreational use at the Rose Bowl by

adding additional events, including NFL games.

By increasing to 25 the number of events with 20,000 or more patrons, the Rose Bowl stadium and associated facilities will be available to additional patrons. The City of Pasadena actively continues to maintain and enhance park and recreational facilities throughout the City, and the RBOC strives to promote Pasadena and Los Angeles County as a sports destination for local, regional, state, national, and international sports events. Therefore, each event that occurs at the stadium will enhance the area's image, provide entertainment and participatory opportunities, further one of the City's guiding principles of promoting Pasadena as a corporate, entertainment, and educational center of the region, and contribute to quality of life in the City of Pasadena, and, thus, would constitute a beneficial impact.

Mitigation Measures

No mitigation is required

Residual Impact

This would be a beneficial impact.

3.7 Transportation, Circulation and Parking

The source for Table 3.7-6 on page 3.7-35 has been corrected as follows:

Source: City of Pasadena General Plan, Mobility Element 20041994.

Mitigation Measure AM 3.7-2.1 on page 3.7-88 of the Draft EIR has been revised as follows:

AM 3.7-2.1. The RBOC, in conjunction with the tenant, shall implement a transportation demand

management program that shall incorporate the following elements to promote ride

sharing, alternative forms of transportation, and to maximize the efficiency of vehicle

travel.

Incentivize Carpooling

Develop and implement incentives for carpools of four or more persons per car, and

incentives for alternative fuel vehicles. Incentives may include, without limitation,

preferential parking, reduced parking costs, or other discounts.

2.0-10

Pre-paid Parking Program

Provide pre-paid parking options. The use of pre-paid parking passes could increase the throughput for vehicles at the Rose Bowl parking entrances by eliminating the need to collect parking fees at critical access points to the stadium from those vehicles with pre-paid parking, thus improving traffic operations.

Bicycle Valet at Parsons

Provide a bicycle valet parking service at the Parson's parking lot. Spectators may valet park their bicycles and ride on the shuttle bus to/from the Rose Bowl. This would incentivize the use of bicycles as a mode of travel to/from the event and help reduce the number of vehicular trips.

Charter Bus

Solicit interest in charter bus service from season ticket holders, groups and other potential users and provide charter bus service from locations such as downtown and neighboring cities in response to demand. The service will include the concept of "parkand-ride," which will encourage event patrons to leave their vehicles and transfer on to a charter bus for the remainder of the journey. Rose Bowl will encourage charter bus service by providing drop off for passengers in preferred areas close to the stadium.

Rideshare Program for Employees

The RBOC will implement a Rideshare program for employees.

Temporary Changeable Message Signs

The use of temporary changeable message signs is already employed at different locations around the Rose Bowl. Expand the use of temporary changeable message signs to include two changeable message signs along the I-210 or/and SR-134, depending on traffic demands, to help facilitate ingress/egress on game days.

Way Finding Signage for Transit Patron

The City of Pasadena and RBOC will work together with Metro to install way-finding signage to guide patrons to/from the Gold Line Memorial Park Station and the shuttle bus pick-up/drop-off location.

Use of Social Media

Use social media to communicate current information regarding directions to/from the Rose Bowl from regional freeways and roadways, preferred routes to various parking lots, and detailed information regarding potential modes of travel other than passenger vehicles to/from the Rose Bowl (rail/bus/shuttle routes, timetables, etc.).

Mitigation Measure MM 3.7-4 on page 3.7-102 of the Draft EIR has been revised as follows:

MM 3.7-4 The Rose Bowl Traffic Command Center shall coordinate with PPD, PDOT, and Caltrans to place two changeable message signs along the I210 or/and SR-134 to help facilitate ingress/egress on game days. However, given the volume of traffic that would utilize the freeways, there is no feasible operational mitigation measure that could fully mitigate the project's potential for impacts.

4.0 Alternatives

The statement of project objectives on page 4.0-2 has been revised as follows:

The alternatives to the proposed project ultimately selected for analysis in this EIR were developed to avoid or substantially lessen one or more of the significant environmental impacts associated with the proposed project, while still meeting many of the project's objectives. The following are objectives for the proposed project:

- Generate revenue to fund City services and offset the costs associated with the Rose Bowl renovation project.
- Promote economic development in the project area and greater Pasadena through increased event activity and tourism.
- Conserve resources and avoid environmental impacts by utilizing existing infrastructure and parking facilities.
- Utilize the existing parking supply and establish a parking management plan to distribute parking
 consistent with arrival and departure directions to efficiently disperse project traffic, facilitate access
 to and from the site, and reduce traffic in the immediate vicinity to minimize potential
 pedestrian/vehicular conflicts.
- Avoid the need for new infrastructure through a transportation management plan, including information systems to advise patrons of transportation options and preferred alternatives.
- Provide additional entertainment opportunities to Pasadena residents that are not currently provided in the community.

Appendix 1.0

All references to **Section 6.0** are corrected to refer to **Section 5.0**.