

October 5, 2012

David Sinclair, Planner City of Pasadena Planning Department 175 North Garfield Avenue Pasadena, California 91101

Dear Mr. Sinclair,

Thank you for attending the September 27, 2012 meeting of the Transportation Advisory Commission. What follows are my written comments related to the draft environmental impact report for the temporary use of the Rose Bowl Stadium by the NFL.

Page 3.7-35, Table 3.7-6

Another relevant Mobility Element policy is de-emphasizing certain streets. Why aren't deemphasized streets, such as South Orange Grove Blvd., identified in the EIR? The EIR should explain why traffic should be added to a de-emphasized street when the policy clearly states the City will not intentionally add traffic to de-emphasized streets.

Page 3.7-35

Many residents adjacent to the project say traffic impacts begin long before event start times and extend well after events conclude. Why are LOS impacts measured only for the peak hour before and after an event? Is this a fair evaluation of impact of LOS impacts in fact extend far longer than 60 minutes? Also, why are LOS impacts based only on stadium capacity (ticketholders) and employees? Football events routinely have many ticketless fans who tailgate and who impact traffic volumes.

Page 3.7-36

The EIR should show a specific statistical comparison between UCLA football event spectators and NFL football event spectators in terms of trips to and from the Rose Bowl. The language in the EIR is vague.

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<u>Page 3.7-37</u>	
Is there sufficient available capacity on the Gold Line to handle NFL crowds? The Gold Line been operating at or near capacity during weekday peak hours, so the assumption NFL spectators would be able to use it to access the Rose Bowl may be invalid.	ne has 4
Does the EIR study bicyclist or pedestrian safety? If bike and walk modes are to be encount then safety should be evaluated in the EIR and, if necessary, possible mitigation should be detailed. Routes are dark at night, road are narrow and attendees exiting an event are ofto cautious drivers.	
Does the EIR consider the establishment of special game day transit routes to be used dur NFL events to encourage fewer vehicle trips to the Rose Bowl?	ring 6
In general, I believe the EIR has insufficiently studied alternate transit modes, including mass transit, bicycling and walking. Assumptions have been made about transit usage that are not substantiated with facts proving available capacity. And, assumptions have been made about riding and walking that do not consider the perception of unsafe routes as a significant det to using those travel modes.	ot ut bike
Page 3.7-41	
Are the environmental and transportation impacts of the shuttle trips factored into the transportation study? Should the EIR stipulate that shuttles be low-emission and low-noise vehicles?	affic 8
Figure 3.7-7	
Why doesn't the study include trips coming from the 710 Freeway, especially since the stusiasty says 30% trips are assumed to be coming from the south?	udy 9
Page 3.7-49	
Why are there no future/related projects included in the study?	
Page 3.7-53	
For how many minutes or hours per event day are levels of service adversely affected by to project?	the 11
Page 3.7-88	
The study should have considered pre-paid parking as an additional TDM measure.	
Were any studies done to determine if the mitigation measures mentioned will have any pimpact? Is there any evidence from similar venues of the additional measures mentioned successfully and measurably having a positive impact on reducing vehicle trips?	positive 13

Page 3.7-93

Riding a bike at night on streets around the Rose Bowl is dangerous because it is very dark, the streets are narrow and drivers are often anxious to arrive or depart quickly creating safety hazards. What is the justification for saying, "no impacts associated with safety hazards due to design features would be expected"?

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Page 3.7-95

The EIR should include information from Metro regarding its ability to meet projected demand because without this information, it is impossible to conclude the transit impacts are valid.

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Page 3.7-102

Were shared parking options considered beyond those listed, the Parsons, public and One Colorado lots? Shared parking should be studied further given the projected parking deficit.

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Page 3.7-103

Since the Parsons property has a new owner who has expressed an intent to redevelop the property, should the EIR consider any impacts of constructions or loss of existing parking? What happens if the re-development of this site begins during the NFL's use of the Rose Bowl venue?

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Page 4.0-3

Since traffic impacts are a significant concern, the EIR should have considered a reduced on-site parking alternative instead of the improbably reduced attendance alternative #2. Why wasn't a reduced on-site parking alternative considered?

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Alternative #3 assumes non-NFL attendees behave the same as NFL attendees. I am not sure this is true. The NFL should demonstrate how they are similar if that is the case.

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Thank you for taking public comment on this project. I look forward to reading the responses to my questions and comments.

Sincerely,

Jennifer Higginbotham

Chair, Transportation Advisory Commission

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Letter No. 6: Transportation Advisory Commission

Transportation Advisory Commission City of Pasadena Jennifer Higginbotham, Chair October 5, 2012

Response 6-1

Per City of Pasadena General Plan Mobility Element (2004), Orange Grove Boulevard is designated as a de-emphasized street. The Mobility Element states that no capital or operational transportation improvement can be made to increase traffic on de-emphasized streets.

The traffic distribution for the proposed was developed in conjunction with Pasadena Department of Transportation and based on discussions with Pasadena Police Department (PPD) and Rose Bowl operations staff regarding key routes to/from Rose Bowl. Since, Orange Grove Boulevard is one of the key routes and currently advertised as such on the SR-110; project traffic is anticipated to utilize this street to travel to/from Rose Bowl. However, the project is not proposing any new capital or operational transportation improvements to increase traffic on Orange Grove Boulevard.

Response 6-2

The scope of work for the traffic analysis was developed in conjunction with Pasadena Department of Transportation (PDOT) and follows the City of Pasadena's adopted traffic study guidelines. Per the guidelines, the analysis focuses on the peak traffic hour prior to an event and the peak traffic hour post-event. This analysis represents the timeframes when congestion is expected to be at its worst level. Hours outside of these timeframes are expected to experience less project traffic, and therefore will have fewer project impacts.

As discussed in the letter provided by CSC and provided in **Appendix F3.0** of the Final EIR, a relatively small number of fans generally arrive at the stadium in hopes of receiving a free ticket or purchasing a reduced price ticket. While some persons may remain in the parking lots during the game if they are unsuccessful in obtaining a ticket, in the experience of CSC this has not constituted a significant problem. In addition, many stadiums, including the Rose Bowl, patrol the parking lots during the game to request that ticketless patrons leave the premises. For these reasons, it is not anticipated that ticketless fans would congregate in the parking lots to tailgate during the game or in neighborhoods surrounding the Rose Bowl merely to be close to the Stadium. As per current RBOC policy, tailgating is required to shut down after kickoff and thus there is little incentive for ticketless fans to come to the stadium area/vicinity. Therefore, given the aforementioned disincentives for ticketless patrons to travel to the stadium or/and stay in the stadium's vicinity, ticketless tailgaters are expected to be a small number and to conduct a quantitative analysis for the ticketless patrons is considered speculative.

Response 6-3

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision makers for their consideration prior to taking any action on the Project. A statistical comparison between UCLA spectators and NFL spectators would not provide additional information concerning the environmental impacts of the proposed project.

Response 6-4

During large events at the Rose Bowl, Metro Gold Line runs three-car trains at peak hour headways, which is every 6 minutes, or 10 trains per hour. Per information obtained from Metro, each car has a capacity of 144 passengers per car for a total of 4,320 passengers per hour in each direction. Using the transit ridership factors described above, a total of 5,850 weekday and 4,350 weekend spectators were estimated to travel by transit. These riders will typically be spread over a span of multiple hours prior to start of a game or after the game is over. However, since a higher percentage travel to/from the Rose Bowl during the peak 1 hour prior to the event and post-event, the Draft EIR identifies a significant transit impact.

Response 6-5

The EIR addresses whether the project would result in significant impacts to the pedestrian/bicyclist environment. The traffic study acknowledges that a small number of patrons may arrive to the NFL event on a bicycle or on foot. The traffic operations plan proposed as part of the project includes deployment of traffic control officers and traffic control equipment (including delineators, signs, etc.), which will facilitate an orderly flow of vehicular traffic and reduce conflict between vehicles and bicyclists/pedestrians. On event days, not all bicycle lanes/routes will be open within the immediate vicinity of the Rose Bowl. Bicyclists will likely have to walk with their bicycles when within the immediate vicinity or inside the parking lots of the Rose Bowl. Free bicycle parking is available at Brookside Park across from the Aquatic Center. To incentivize use of bicycles as a mode of travel to the NFL games, the traffic study recommends providing a bicycle valet at Parsons. This will provide bicyclists a secure place to park their bicycles and take a shuttle to/from Rose Bowl.

Response 6-6

A majority of transit riders are expected to use the Gold Line to travel to/from the NFL event. The Draft EIR on Page 3.7-88 recommends that Metro increase transit service to meet the increased demand on event days. It also recommends that the City of Pasadena provide information to Metro in order to determine the level of transit service adequate to meet game day demands. The traffic study also recommends that the Rose Bowl solicit interest in charter bus service from season ticket holders, groups, and other potential users to provide charter bus service from locations such as downtown and

neighboring cities in response to demand. Together, the aforementioned recommendations are aimed at reducing vehicle trips to the area.

Response 6-7

The traffic study analyzes the alternate modes including transit, bicycling and walking per City of Pasadena traffic study guidelines. Transit usage assumptions were determined based on surveys and review of historical information related to large events held at Rose Bowl, other large event venues in Southern California and available information on various NFL venues throughout the nation. This information is summarized below:

Travel Mode Choice Data				
Stadium	Source of Information	Auto	Transit	Bike/Walk
Farmers Field, Downtown Los Angeles	Convention and Event Center Project EIR, 2012 (Weekday)	73%	20%	7%
	Convention and Event Center Project EIR, 2012 (Weekend)	82%	15%	3.5%
Qualcomm Stadium, San Diego	Farmers Field EIR	n/a	18–20%	n/a
CenturyLink Field, Seattle	Farmers Field EIR	n/a	25–30%	n/a
Candlestick Park, San Francisco	Farmers Field EIR	n/a	8%	n/a
Petco Park, San Diego	Farmers Field EIR	n/a	8–15%	n/a
AT&T Park, San Francisco Adjacent	Farmers Field EIR	n/a	34–41%	5-8%
Target Field, Minneapolis	Farmers Field EIR	n/a	30%	n/a
Rose Bowl Renovation	Rose Bowl Stadium Renovation Project EIR, 2005	n/a	5%	n/a
Pasadena Rose Bowl	EIR for the Temporary Use of the Rose Bowl Stadium by the NFL (Weekday)	92%	7%	1%
	EIR for the Temporary Use of the Rose Bowl Stadium by the NFL (Weekend)	94%	5%	1%

As shown in the aforementioned table, the transit mode share ranges from 5 percent to 41 percent and is largely dependent on access to available and reliable transit service options. For the purpose of traffic analysis, a lower (5 percent) transit ridership was assumed for weekend games versus weekday games, for which transit ridership was assumed at 7 percent. A lower ridership is expected on the weekends because people are more likely to come from their homes in their private automobiles. On weekdays, some patrons are expected to travel to the game from their place of employment. This will allow them a greater opportunity to use transit to/from Rose Bowl.

In response to comment regarding available capacity on transit, during large events at the Rose Bowl, Metro Gold Line runs three-car trains at peak hour headways, which is every 6 minutes, or 10 trains per hour. Per information obtained from Metro, each car has a capacity of 144 passengers per car for a total of 4,320 passengers per hour in each direction. Using the transit ridership factors described above, a total of 5,850 weekday and 4,350 weekend spectators were estimated to travel by transit. These riders will typically be spread over a span of multiple hours prior to start of a game or after the game is over. However, since a higher percentage travel to/from the Rose Bowl during the peak 1 hour prior to the event and post-event, the Draft EIR identifies a significant transit impact.

In response to the comment regarding safe bicycle and pedestrian routes, the traffic operations plan proposed as part of the project includes deployment of traffic control officers and traffic control equipment (including delineators, signs, etc.), which will facilitate an orderly flow of vehicular traffic and reduce conflict between vehicles and bicyclists/pedestrians. On event days, not all bicycle lanes/routes will be open within immediate vicinity of the Rose Bowl. To incentivize use of bicycles as a mode of travel to the NFL games, the traffic study recommends providing bicycle valet at Parsons. This will provide the bicyclist a secure place to park their bicycles and take a shuttle to/from Rose Bowl. Historic experience with football games at the Rose Bowl has proven that pedestrians are willing to walk to the Rose Bowl from certain locations.

Response 6-8

As shown in Tables 3.7-11 through 3.7-13 and described on page 3.7-41 of the Draft EIR, shuttle trips were estimated for the project. The shuttle trips were converted to vehicle trips, assigned to the current route used for UCLA games and the impacts of the overall increase in traffic was quantified.

Shuttle trips were incorporated into the air analysis in that they had an effect on the number of vehicle trips used in the air quality and greenhouse gas analysis. Shuttles and buses would tend to reduce air quality emissions due to the greater efficiency provided. Shuttles do not exacerbate an air quality impact.

The traffic distribution was developed in conjunction with Pasadena Department of Transportation and based on discussions with Pasadena Police Department (PPD) and Rose Bowl operations staff regarding key routes to/from Rose Bowl. The traffic study includes project trip distribution from the south traveling on Freemont Avenue and Fair Oaks Avenue to/from the Rose Bowl. This traffic represents patrons using the I-710 freeway and taking surface streets to the Rose Bowl. However, the majority of the motorists traveling on the I-710 Freeway are expected to use other connecting freeways such as the I-5 Freeway to the SR-110 Freeway to reach the Rose Bowl.

Response 6-10

As stated on Page 3.7-49 of the Draft EIR, "Future No Project traffic forecasts include the effects of specific cumulative development projects, also called related projects, expected to be built in the vicinity of the proposed project site. Figure 3.7-9 of the Draft EIR shows the location of the related projects." Table 10 of the Traffic Study shows a detailed list of related projects included as part of the analysis.

Response 6-11

The scope of work for the traffic analysis was developed in conjunction with Pasadena Department of Transportation (PDOT) and follows the City of Pasadena's adopted traffic study guidelines. Per the guidelines, the analysis focuses on the peak traffic hour prior to an event and the peak traffic hour post-event. This analysis represents the timeframes when congestion is expected to be at its worst level. Hours outside of these timeframes are expected to experience less project traffic, and therefore will have fewer project impacts. A project impact is considered significant if the impact exceeds the threshold of significance during the peak hour.

Response 6-12

As shown on Page 3.7-88 of the Draft EIR, a pre-paid parking program was considered as part of Additional Measure 3.7-2.1.

Response 6-13

The mitigation measures recommended in the traffic study include: (1) additional operational improvements over and above the changes currently proposed as part of Project's traffic operations plan; (2) Transit mitigation measures; and (3) transportation demand management strategies. Although, all recommended mitigation measures have the potential of providing benefits such as increased traffic flow at intersections, higher transit ridership, and reduction in vehicle trips; the EIR traffic analysis did not assume that transit and transportation demand management measures would be successful. No mitigation credit was taken for these measures. Only the operational improvements were quantitatively evaluated and summarized in the traffic study.

Most, if not all, of the recommended mitigation strategies are known to reduce vehicle trips at event venues. However, the level of benefits from these mitigation strategies will vary from one venue to the other depending on a number of variables such as access to available and reliable alternative modes of travel, site location, etc.

Response 6-14

The traffic operations plan proposed as part of the project includes deployment of traffic control officers and traffic control equipment (including delineators, signs, etc.). The purpose of this plan is to facilitate

an orderly flow of vehicular traffic and reduce conflict between vehicles and bicyclists/pedestrians. On event days, not all bicycle lanes/routes will be open within immediate vicinity of the Rose Bowl. Bicyclist will likely have to walk with their bicycles when within the immediate vicinity or inside the parking lots of Rose Bowl.

Response 6-15

Currently Metro runs peak period headways (every 6 minutes) during large events at the Rose Bowl. As stated in Comment 3-1 from the Los Angeles Metropolitan Transportation Authority, "for weekday events Metro may be unable to increase rail capacity to the level required to meet patron demand and instead may have to supplement rail service with additional bus service during Metro's peak operating periods." Additionally, "any additional Metro rail/bus service required to accommodate patron demand would be subject to MTA Board approval as part of MTA's annual operations budget."

For these reasons and because transit service is not under the control of the City of Pasadena, transit impacts as a result of the proposed project are considered significant and unavoidable.

Response 6-16

The parking provided at the Rose Bowl and Parsons campus is sufficient to address the needs of the project. No other shared parking options were considered as of the parking analysis. Additionally, when more parking spaces have been required, the RBOC has been able to accommodate the vehicles in various garages, surface lots, and structures throughout the City. An example, but not exhaustive list, of the parking supply and location includes: Old Pasadena, Jet Propulsion Laboratory, Elks Club, and Sierra Madre Villa Gold Line station. While it is acknowledged that the proposed parking will be sufficient to address the demand of the project, RBOC has consistently and regularly demonstrated the ability to secure auxiliary parking when needed on an event-by-event basis.

Response 6-17

The Draft EIR adequately analyzed the potential environmental impacts associated with the development of the Parsons site. As shown in Table 10 of Appendix 3.7 - Traffic Study, the Parsons project was included as part of the cumulative traffic analysis for the proposed project. The cumulative traffic assumed to be generated during pre-event peak hour by the Parson's site upon completion is expected to be greater than the construction related traffic generated during the construction of the Parson's project. Thus, the Draft EIR adequately considered the impacts of the Parsons project by incorporating trips generated by that project into the cumulative traffic impacts analysis.

With respect to the potential parking impacts that may result from the development of the Parson's site, no parking related impacts are expected to occur because the parking demand for the stadium is

anticipated to be met. As discussed on page 3.7-105 of the Draft EIR, the peak hour parking demand for a weekday NFL game is anticipated to be 27,689 parking spaces. A lesser number of parking spaces, 25,633, are anticipated to be needed for weekend NFL games. The difference in weekday versus weekend parking demand is attributed to the higher Average Vehicle Occupancy on the weekend, as detailed on page 3.7-105 of the Draft EIR. While the worst-case scenario is a weekday game, this scenario is limited to no more than two events per year. Moreover, even the parking demand for a weekday game can be met, as described below.

The Draft EIR notes that with stacked parking, the Rose Bowl can accommodate 24,518 parking spaces on-site, which is 3,171 spaces less than the maximum anticipated number of parking spaces needed for weekday games, and 1,115 parking spaces less than the anticipated demand for weekend games. (See Draft EIR page 3.7-102) The Parsons site has hosted parking for Rose Bowl events (football and entertainment) for over 20 years and is anticipated to continue this tradition through the duration of the proposed Project. The Parsons site is currently improved with more than 3,171 parking spaces (non-tandem) which meets and exceeds the anticipated demand for the project for both weekend and weekday games. This number includes 2,241 parking spaces located in garages on the Parsons "Annex" site.

The commenter questions whether or not the potential development of the Parsons site would impact the project beyond that analyzed in the Draft EIR. It is anticipated that parking for Rose Bowl events will continue for the life of the project and beyond, however, it is acknowledged that a Predevelopment Plan Review (Concept Plan) has been submitted to the City for development of the site. This Concept Plan does not involve any changes to the 2,241 parking spaces on the Annex site, which are anticipated to be available regardless of whether or not the main Parsons site is developed. Thus, even with the possibility of simultaneous construction, the Annex parking garage can accommodate parking sufficient to cover weekend games.

With respect to the main site, development is anticipated to be phased. Under the proposed phased development, approximately 680 spaces would be available even during construction. Moreover, the development of the Parson's site could feasibly involve a construction staging plan whereby up to 250 additional parking spaces could be provided in a non-standard and tandem/aisle parking configuration. Under this scenario, even the projected peak parking demand, which would require 3,171 spaces outside of the Arroyo could be provided on-site at Parsons.

Finally, the concept plans for the Parsons site suggest that a total of 6,378 parking spaces would be available upon completion of the Parsons project, which is more than currently exist today. Thus, after construction is completed, the Parsons site would have a far greater number of parking spaces than the 3,171 spaces required by peak parking demand for weekday NFL games.

Even if the Parsons site, which has served the Rose Bowl for the last 20 years, were to become unavailable during the construction of the Parsons project, the RBOC has a demonstrated record of accommodating patron vehicles in various garages, surface lots, and structures throughout the City. An example, but not exhaustive list, of the parking locations that have been or could potentially be available include: Old Pasadena (6,000 spaces); JPL (1,000 spaces); Elks Club (200 to 300 spaces); and Sierra Madres Villa Gold Line station (950 parking spaces). The RBOC has consistently and regularly demonstrated the ability to secure auxiliary parking when needed on an event-by-event basis for events such as: the U2 concert in 2009 (attendance of approximately 97,000); World Cup Games (June 18-July 17, 1994 – eight events, average attendance of approximately 90,000 per event); the Rose Bowl game on an annual basis (average attendance of approximately 93,000 for last five years), the BCS Championship Game in 2010 (attendance of over 94,000) and the Super Bowl (1977, 1980, 1983, 1987, 1993 – average attendance of approximately 102,000). Therefore, while the Parson's site is anticipated to continue to be used for parking to accommodate the project, no parking impact is anticipated to occur if it were to become unavailable because alternative parking locations would be utilized, as has been historically demonstrated as feasible for the last 18 years.

While these variations in the specific traffic patterns around parking facilities cannot be fully evaluated (because the exact parking locations are: (1) not anticipated to be used; and (2) unknown at this time), there would be no increase in net trips from using parking locations other than Parsons for 3,171 spaces a maximum of 13 times per year.

Response 6-18

Alternative 2, the Reduced Capacity Alternative analyzes a seating capacity of 50,000. According to *State CEQA Guidelines* Section 15126.6, an EIR must describe a "reasonable range" of alternatives that attain most of the project objectives but avoid or substantially lessen any of the significant impacts of the project. As described throughout the Draft EIR, many of the impacts (air quality, traffic, noise) are closely related to the number of vehicle trips. Therefore, an alternative that could lessen impacts would reasonably include a reduction in the number of vehicle trips. Existing NFL stadium capacities range from approximately 63,000 (Lucas Oil Stadium, Soldier Field) to 79,000 (FedEx Field), however, in 2012, several teams had average attendance numbers well below 63,000 including Miami (55,182), St. Louis (53,941) and Tampa Bay (52,074). As negotiations with the NFL are not underway, the ultimate attendance for the NFL team is unknown at this time. However, based on information known to the City at the time of preparation of the EIR, an attendance level of 50,000 appeared to be an appropriate "bookend" for a low level of attendance that could substantially lessen impacts while still potentially fulfilling the basic objectives of the proposed project because it did not vary significantly from the average attendance of several NFL teams.

A reduced on-site parking alternative, as suggested in the comment, would reduce many of the same impacts as Alternative 2 by reducing the number of vehicles traveling to the Rose Bowl. To achieve the reduction in impacts similar to Alternative 2, off-site parking would need to accommodate 9,259 vehicles (assuming the same 2.7 AVO used in the Draft EIR) for weekday events and 8,333 vehicles (assuming the same AVO of 3.0 as used in the Draft EIR) for weekend events. The most likely places for park and ride lots would be Santa Anita Racetrack (15,550 spaces); JPL (1,000 spaces); and Sierra Madres Villa Gold Line station (950 spaces). Assuming the City could negotiate parking at other lots to accommodate the remaining vehicles, the reduction in trips traveling to the Rose Bowl could be achieved. However, it is important to note that although trips to the Rose Bowl would be reduced, the total number of trips would remain the same as 75,000 patrons would still attend the event. Trips would be redistributed elsewhere in the region. Some trips lengths may be reduced as patrons would choose a park and ride lot closer to their home or work. The total number of automobile trips generated by the project would remain the same and additional bus emissions would be added to the project as shuttles take patrons to and from the park and ride lots. In some cases, the emissions associated with the shuttles could be more polluting than the automobile trips. Therefore, although a reduced on-site parking alternative would reduce impacts at local intersections, it would increase impacts at other intersections depending on the location of parking, and air quality impacts would likely remain significant and unavoidable. While the suggested alternative would reduce traffic in the immediate area of the Rose Bowl, it would not appear to offer significant environmental advantages over the project or Alternative 2.

Response 6-19

Alternative 3 – Reduced Non NFL Displacement Events would increase the number of events per year by nine and attendance would be 75,000. The Reduced Non NFL Displacement Event Alternative allows for any type of event, such as international soccer, or concerts. It would be speculative at this time to try to determine the exact type of event, as the type would likely vary from year to year. For instance one year there could be two international soccer matches and the next could be five international soccer matches. Sporting events such as international soccer would be expected to draw patrons who would act similar to NFL fans, in particular, it is expected that these fans would tailgate in the parking lots and police would be required for traffic management and crowd control. Festivals and concerts could also result in similar activities before the event depending on the artist or type of festival both of which are unknown at this time. Please refer to the letter submitted by CSC which states there are little differences in the behavior of soccer fans or concert attendees compared to NFL event attendees. The letter is provided in **Appendix F3.0** of the Final EIR.