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FRED ZEPEDOK

West Pasadena Residents Association
DEIR Comments for Temporary Use of the Rose Bowl
By the National Football League (NFL)

October 1, 2012

Public Review and Comment:

Any proposed Statement of Overriding Considerations (SOC), together with proposed factual findings and all underlying economic impact studies, should be made available for public review and comment for 90 days and the City Council should not vote to certify the EIR until after the close of the public comment period.

1

The use of the Rose Bowl by the NFL is a land use issue and as such the Final EIR and ant proposed SOC should be reviewed by the Planning Commission before City Council Review.

Project Description:

There is no description of the specific terms and conditions of the NFL's use of the Rose Bowl. The DEIR describes the project as an amendment to the Arroyo Seco Public Land Ordinance (ASPLO). How can a complete and accurate evaluation be done for a project when only assumption is available in describing the project?

2

There is no description in the DEIR as to how long it will take to set up for an NFL game and then take everything down. So any impacts from this activity on other Arroyo uses or the neighborhood are not measured.

3

Inconsistent Project Objective:

Why are the "project objectives in the DEIR different from the project objectives in the DEIR's Analysis of the Project Alternatives?

4

Historical Resources:

The Arroyo Seco is listed in the National Register of Historical Places. The Rose Bowl is one of 23 contributing resource to the Arroyo. The DEIR should analyze the potential impacts to the contributing historical resources of the Arroyo.

5

Land Use Analysis:

Why does the DEIR finds that the land use policies in the Open Space Conservation Element (OSCE) and the Hahamongna Watershed Master plan (HMP) are not "directly relevant" to the project but cites them for recreational purposes. The DEIR should consider the Land Use Policies of the OSCE and the HMP

6

How can the DEIR proclaim the NFL at Rose Bowl is consistent with the General Plan Objective 2 & 17 and Policies 17.1 & 17.2 and also conclude that the project creates “significant & unavoidable” impacts to recreational users and would “significantly interfere” with recreation facilities in the Central Arroyo?

7

Since the DEIR does not describe the specifics of the NFL’s proposed use, It is unclear how an NFL event would differ from a UCLA event. The DEIR should investigate and differences between college and professional football events for the purpose of analyzing. The Farmers Field EIR could provide information.

8

Recreational Impacts:

The DEIR does not include any baseline studies of actual recreational activities in the Arroyo. It relies on estimates. The omission of factual data raises concerns as to the accuracy of other conclusions of the impacts the NFL use of the Rose Bowl will have on the other recreational uses in and around the Arroyo.

9

The DEIR concludes that there would be a “slight increase” in the use of nearby parks. It does not quantify the increases and any impacts these increases would cause. It does not recommend any mitigation measures.

Transportation:

What is the reason that the Traffic study does not include Arroyo Blvd intersections south of California and fails to include the intersection of Arroyo and Seco Street?

10

What is the reason that the Traffic Study does not include the street segments on South Orange Grove, Fair Oaks and Arroyo Parkway south of Green Street and Pasadena Ave. between California and Glenarm?

What is the reason that the Traffic Study does not include any streets east of Arroyo Parkway such as Marengo and Los Robles?

11

What is the reason that he Traffic Study cites the 1994 General Plan Mobility Element (GPME) instead of the 2004 GPME?

How were the public transportation “mode splits” assumptions determined? How do they compare with actual UCLA and NFL games? How do they compare to the Farmers Field EIR assumptions?

12

Letter No. 9: West Pasadena Residents Association

West Pasadena Residents Association
Fred Zepeda
October 1, 2012

Response 9-1

Refer to **Response 7-3**.

Response 9-2

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

Response 9-3

Refer to **Response 7-8**, above.

Response 9-4

Refer to **Response 7-6**, above.

Response 9-5

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

Response 9-6

The Hahamongna Watershed Master Plan includes recommendations for improvements related to the Hahamongna Watershed and specific projects proposed in the Hahamongna Park, such as stepping stones, habitat restoration, and park infrastructure. The statement that the HMP does not include policies relevant to the project is not intended to imply there is no connection between the Hahamongna and the Central Arroyo rather that the HMP includes an implementation plan and projects rather than general policies related to the Arroyo. Similarly, the General Plan Open Space and Conservation Element policies relate more to the acquisition of wilderness areas. Nonetheless, these policies have been added to Table 3.3-1 Project Consistency with Existing Land Use Plans, has been updated to include policies from the General Plan Open Space and Conservation Element.

Response 9-7

General Plan policies and objectives present broad concepts for development that are designed to guide growth within the City. These policies and objectives are general by nature. Objective 17 states “provide adequate recreation opportunities to all residents of the City” At the broad policy level, the project is consistent with this policy in that the recreational opportunities as a whole would continue to be adequate and the Central Arroyo would continue to be accessible to residents for the majority of the year. The recreational impact identified in Section 3.6 Recreation, is a site-specific impact that occurs. The

project therefore can be consistent with broad policy objectives while still resulting in a site-specific impact.

Response 9-8

The commenter is referred to the letter submitted by CSC which provides additional information relating to the similarities between college and NFL events. The letter is provided in **Appendix F3.0** of the Final EIR.

Response 9-9

Refer to **Response 7-10** regarding the need for a baseline study.

Response 9-10

Please refer to **Response 7-16**, which includes a detailed response on individual intersections and street segments mentioned in the comment.

Response 9-11

Please refer to **Response 7-14**.

Response 9-12

The public transportation “mode split” 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. Please refer to **Response 6-7** for detailed information on travel mode shares data from the aforementioned sources.