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MEMORANDUM

To: David Reyes, Principal Planner/Zoning Administrator Job No. 1136.01

From: Jessica Kirchner, Impact Sciences

Subject: TAC Comments

Date: October 2, 2012

COMMENTS

TAC Commission Comments October 2, 2012

Salzer

After listening to the comments, there are quality of life issues that concern everything that happens in the arroyo, if the City passes this EIR that might not be as comprehensive as we need it. Do we have a comprehensive, complete EIR for everything that happens: Rose Bowl, flea market, UCLA games, U2 concerns, motocross? If we do pass this EIR and it doesn't include everything that is happening in and around the Rose Bowl, it is a half assed EIR. It doesn't cover everything. Is this a complete EIR that covers everything at the Rose Bowl? Only the NFL is being discussed tonight but there are many other events that happen at the Rose Bowl and to answer concerns from residents, need to be sure every event is included. Does this EIR improve the quality of life of residents of the arroyo?

Acker

Some comments that stood out and should be incorporated by staff. Two events on a weekend seems that would be significant, the effect of rain on parking at Brookside, the effect of the ticketless patrons. Are the intersections listed all of the intersections that were considered? Are there other intersections or other areas of the city that were considered but not put into the report. That should be clarified. There are a lot of areas in east Pasadena that are impacted by events at the Rose Bowl, such as Mountain Street. The issue of parking management consistency is huge – that should be covered. The observations that residents on Rosemont

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OFFICES THROUGHOUT CALIFORNIA

mitigated? Adhami There should be more economic quantitative analysis. Based on other comments, getting out of the area can take hours, there is no discussion of circulation in the EIR. There is a direct correlation to pollution, did anyone look into that? Should be some evaluation of circulation and how it will affect the environment. If mitigation is being proposed, is there an alternative area for the cars to park, maybe on the other side of the 10 210 to bus people into the area. When there are two events, would any pollution be left over from Saturday that Sunday would add to it? A number of intersections and streets that will be mitigated by signal timing what will signal timing do? It doesn't mean anything when all directions are saturated with traffic. What will the traffic officers be doing? Burner The report identified significant impacts. The project is similar to existing events and impacts would be 12 similar to existing events although may be different due to NFL use. Report states impacts cannot be mitigated. There should be further exploration of incentives for alternative modes of traffic. This stadium is a neighborhood stadium, not similar to other stadiums. Segovia 13 An effective EIR would have a much more comprehensive and specific mitigation strategy. The vast majority of people are allowed to drive into the stadium creating negative effects. Let them park at parsons we can do better than that. Hollywood bowl has satellite parking facilities and bus in 20-30 miles. That

have made are terribly important. What is the benefit of the proposal if there are impacts that cannot be

Delgado

The EIR is adequate. This is a formal document. This EIR says significant and unavoidable, regardless of mitigation it cannot be fixed. The decision to go ahead is political. The document is a disclosure. This EIR is

approach could help. Typically when transportation changes are being recommended there is a Title VI review of the changes. It is worth considering the socio-economics of the area. Document compares NFL traffic to UCLA games and the strategies dealing with traffic are the same. The data in the study is not from those games, observing a game is not the same as taking data from a game, taking traffic counts. If relying on UCLA game strategies then should use UCLA data and measurements to craft the mitigation strategies.

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conservative. The City Council is responsible for certifying the document. Under state law economics is not considered in an EIR but decision makers can include that as another study.

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Booker

The EIR is inadequate in the lack of analysis and collection of date regarding a much wider arena that would contribute to an adequate study. A study is as good as the data it collects; the data has not been collected fully. There is a focus on cars, levels of service and a passing observation about pedestrians and cyclists. Many people walk and cycle in this area. The study could have considered a much wider source of information that would speak to the spirit of complete streets and taking into consideration of other modes than just automobiles. It could create creativity in terms of how to move people into the arroyo.

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Chair Higginbotham

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Page 3.7-34 why doesn't the study reference the Pasadena freeway coming in? Page 3.7-35 it references a couple of mobility element polices but does not refer to deemphasized streets and Orange Grove is a deemphasized street. Ticketless attendees should be considered. Page 3.7-36 need more documentation comparing college football fans to pro football fans, what are the similarities and differences? Page 3.7-37 talks about the gold line, but doesn't address capacity on the gold line for weekday games - the assumption in the EIR is that there is additional capacity. The EIR does not consider establishing special game day transit routes as a mitigation measure. The EIR does not study bike/pedestrian safety. In the evenings it is dangerous to walk or bike - should include mitigation measures to address safety. Figure 3.7-7 does not address trips coming from the 710 freeway EIR looks at peak hours - how many minutes or hours per event day is LOS affected by the event? The EIR states one hour but impact is actually over a longer period of time. Page 3.7-88 should explore requiring prepaid parking as mitigation and an alternative for reduced onsite parking. The reduced capacity alternative does not seem feasible as the NFL would not allow it. Reduced parking onsite may be more feasible, shared parking, etc, given that so much has to do with vehicles coming into the stadium Should the EIR consider the effects of construction or loss of parking at the Parson's site? The non-NFL events are there unique characteristics of NFL attendees what are the characteristics of non NFL attendees. Would behavior be significantly different? If not, assumption should be mentioned in the EIR that attendees would be that same, or if they would not.

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Letter No. 13: Transportation Advisory Commission

Transportation Advisory Commission September 27, 2012

Response 13-1

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

Response 13-2

Regarding the occurrence of two events in one weekend, it is unlikely that such an occurrence would happen more than once or twice per year due to the need to have optimal turf conditions for an NFL event and the time needed for set up and breakdown of UCLA and NFL events. However, if such an event were to occur, the majority of the impacts disclosed in the NFL are event specific, meaning that cars would drive to the event on Saturday and a new set of patrons would drive to the event on Sunday. Similarly, noise, air quality, and recreational impacts would occur on both Saturday and Sunday. There would not be a cumulative effect of the two events, meaning that impacts related to traffic, air quality, noise, or recreation would not be any greater due to an event on the day before the game. In such a case, it is possible that full cleanup of the site may not occur between a UCLA game on Saturday and an NFL game on Sunday, and repairs to Brookside may not be made. However, Brookside Golf Course would be used for parking during the NFL event and therefore would not be playable on an NFL game day following a UCLA game. Further, as required by Mitigation Measure MM 3.6-1, the golf course would be returned to playable condition within one day of an NFL event. Regarding recreational uses, if two events were to occur in one weekend, users would be displaced on both days. The loss of recreational use around the Rose Bowl was found to be significant and unavoidable because users would be displaced on 13 additional events per year (compared to existing conditions). The analysis evaluates the proposed project condition (NFL use of the Rose Bowl) with the current baseline condition (displacement during UCLA events) as required under CEQA. Therefore, the determination of significance includes displacement of users from the Rose Bowl during college events.

Response 13-3

Refer to **Response 8-12**.

Response 13-4

Please refer to **Response 6-2**.

Response 13-5

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. The study

area was determined in coordination with Rose Bowl Operations staff, PPD and PDOT. The agencies provided input based on their vast experience at the Rose Bowl events over the past 30 years, including ground and aerial observations of traffic during events. In addition, observations were taken at a UCLA/Cal football game from last season. Comments from the 2005 EIR were also taken into consideration. The traffic study area included all areas of potential significant impact based on historical experience. Therefore, the scope of the traffic analysis was considered suitable for this project.

Response 13-6

The Rose Bowl staff, PDOT and PPD has successfully been managing parking at the bowl for both large and small events for a number of years. There is a parking operations plan that will be used at NFL games to manage parking. Significant and unavoidable parking impacts are not anticipated as a result of the project.

Response 13-7

Under CEQA, the City Council is asked to weigh the benefits of the project against the potential environmental impacts and determine whether the benefits outweigh those impacts. A proposed statement of overriding considerations will be circulated for public review before this issue is considered by the City Council.

Response 13-8

The transportation section of the Draft EIR describes the key routes that patrons of the Rose Bowl are expected to take to an NFL game as well as existing levels of traffic on the circulation system. The traffic analysis also evaluates impacts based on the most congested periods before and after a game.

Response 13-9

Please refer to **Response 2-6**, the project's localized impact on air quality. As the project is not expected to significantly impact local air quality, no mitigation is required.

Response 13-10

As part of the traffic operation plan, PDOT will implement an event period traffic signal priority plan which is coordinated and monitored from the Traffic Management Center (TMC) for numerous intersections in the vicinity of the Rose Bowl. The optimized traffic signal timing plan will supplement the traffic operations plan and facilitate flow of traffic from freeway ramps to Rose Bowl during ingress and vice-versa during the egress period.

Response 13-11

As part of the proposed traffic operations plan and also mitigation measure at some intersections, traffic control officers will be positioned at key locations to prioritize event traffic flow.

Response 13-12

As shown on Page 3.7-88 of the Draft EIR, a travel demand management program was included as an additional mitigation measure **AM 3.7-2.1**. This is aimed at promoting ride sharing, alternative forms of transportation, and maximizing the efficiency of vehicular travel.

Response 13-13

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision makers for their consideration prior to taking any action on the Project.

Response 13-14

The EIR recommends a transportation demand management program that includes the following measure: "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 measure will be revised in the Final EIR to make clear that charter bus service includes the concept of "park and ride."

Title VI of the Civil Rights Act of 1964, prohibits discrimination based upon race, color, and national origin. Specifically, 42 USC 2000d states that "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." Title VI and the additional nondiscrimination requirements are applicable to federal programs in addition to programs receiving federal financial assistance due to the Civil Rights Restoration Act of 1987. The proposed temporary use of the Rose Bowl by the NFL is not a federally funded project and therefore, Title VI does not apply.

The comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision makers for their consideration prior to taking any action on the Project.

Response 13-15

The following information was collected during the UCLA vs. Cal game on October 29, 2011:

- Average Vehicle Occupancy
- Shuttle Boardings

- 24-hour street segment counts
- Turning movement counts
- Traffic saturation flow rates through intersections with and without a traffic control officer

The above information in addition to information available from other sporting venue in Southern California and NFL stadiums throughout the nation was used in the traffic study.

Response 13-16

The City acknowledges your input and comment. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 13-17

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.

A complete streets methodology has not been adopted by the City as part of its traffic study guidelines. Therefore, the traffic study does not use a complete street analysis methodology to analyze intersections and street segments for significant traffic impacts.

Response 13-18

The traffic study does reference the Pasadena Freeway (SR-110) as one of the freeway routes to the Rose Bowl. As shown in Figure 3.7-7 of the Draft EIR, a total of up to 30 percent of the project traffic is expected to use the Pasadena Freeway to travel to/from the Rose Bowl on event days. The traffic study analyzed a total of six freeway monitoring stations along the I-110/SR-110 Freeway. As summarized on Page 3.7-96, the proposed project will result in a significant impact at the following five CMP freeway monitoring stations out of the six analyzed:

- I-110 at Manchester Boulevard (northbound)
- I-110 at Slauson Avenue (northbound)
- I-110 south of US 101 (northbound)
- I-110 at Alpine Street (northbound)
- SR 110 at Pasadena Avenue (northbound)

Response 13-19

Please refer to **Response 6-1.**

Response 13-20

Please refer to **Response 6-2.**

Response 13-21

Please refer to **Response 6-3** and **6-7**. Also, the information provided on page 3.7-36 of the Draft EIR is based on observations from a UCLA event as well as NFL venues and other stadiums in Southern California.

Response 13-22

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.

For response to comments regarding establishing special game day transit route, please refer to Responses 6-6 and 8-36.

Response 13-23

Please refer to **Response 6-5**.

Response 13-24

Refer to **Response 6-11**.

Response 13-25

Refer to **Response 6-11**.

Response 13-26

In addition to the mitigation program described in the Draft EIR, a transportation demand management program is recommended as an Additional Measure (**AM 3.7-2.1**) on page 3.7-88 of the Draft EIR. This includes a pre-paid parking program.

Please refer to **Response 6-18**, regarding a reduced on-site parking alternative.

Response 13-27

Refer to **Response 6-17**.

Response 13-28

Refer to **Response 6-19**.