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MEMORANDUM

1136.01

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

From: Jessica Kirchner, Impact Sciences

Subject: Transportation Advisory Committee Comments

Date: October 4, 2012

COMMENTS

TAC Comments September 27, 2012

Michael Duran

Opposed to the NFL project. Assuming staffing at barricades at NFL events will be equivalent to UCLA games, these barricades do not serve the function they are alleged to serve. Most people at barricades are young and not supervised. Barricades do not offer real mitigation. What is the expected area NFL fan would travel from? The farther they would come, the more impacts from traffic and pollution. What data was relied on to conclude the threshold increases in traffic volume will be five percent or greater? Doesn't the phase "or greater" render the whole phase meaningless, is it seven percent is it 10 percent or more? The use of freeway signs is not mitigation; people still want to get to the same location. Mitigation Measure 3.7-1, 3.7-2, according to the draft EIR results in significant and unavoidable impacts and likewise 3.7.4 dealing with freeway segments. The DEIR admits no feasible way to mitigate to less than significant. Page 2.6 of the staff report includes a typo should say unavoidable. The only way to avoid a traffic nightmare is to decline to extend an invitation to the NFL. To ignore these points will expose the City to costly litigation. The project ignores the views of neighbors around the arroyo.

Bob Snodgrass (see comment letter)

DEIR gives no quantification and guesses at things. Air quality measurements are taken at a single site at CalTech not in the arroyo where particulates are likely to remain. There are no measurements from UCLA games; instead there are theoretical calculations which are above threshold. That is not satisfactory, should

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know how bad the impact is and should measure pollutants and measure them in the arroyo because the AQMD station at Caltech does not see a lot of the pollutants produced in the arroyo. That is a serious deficiency. Another deficiency relates to recreation. The largest group of users is those using the loop, estimated at 1.5 million visits per year. The City does not know about users of the loop, how many are Pasadena residents and how many come only on the weekends? The City says they can be handled at City parks and lists the Gamble house as a place to handle people exercising. There is a very offense mitigation which says recreation is being improved by bringing more events. This confuses passive spectator sports with healthful recreation The EIR does say there are consequences that cannot be avoided but gives no idea of the magnitude.

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There is an attempt to give data on peak traffic on weeknights, but there is nothing about duration of congestion. Weeknight events are qualitatively different. Congestion lasts a long time and the EIR does not consider that. There is also a difference between Monday night and Thursday night. Monday traffic is greater than Thursday night traffic. Monday would be a worse night than a Thursday but the EIR does not mention this. Weeknight games would be good for the NFL and disastrous for the City of Pasadena. There should be an alternative that disallows weeknight games.

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Devil's gate sedimentation project will take many years to remove silt from the area. Trucks will come across the 210 Freeway by the northern part of the arroyo six days a week. It will produce noise, congestion and pollutants. The analysis may not be able to quantify that but it is not mentioned as a factor. The analysis says there is a problem and it is above threshold but the City says there are goodies but you need to know how big the "baddies" are. The Parsons project involves construction of four buildings when it starts weekday traffic coming to a weekday game will encounter trucks coming out of the Parsons site. The Parsons site will be less available and it is not mentioned as a consideration. There needs to be a quantitative understanding of the magnitude of the problems, particularly with air quality, cannot just say it is above threshold and these are the theoretical calculations, it has to be measures. Particulates are bad for people's health.

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Nina Chomsky

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This EIR jumps to statements of overriding consideration because the effort has not been put in to study and mitigate and factually analyze. Statements of overriding consideration cannot be used as a shield, all effort should be put in to study all impacts and all facts, to look at all feasible and creative and in-depth mitigations and only then go to a statement of overriding considerations.

The project description is inadequate and in error and illegal because it just describes a phase of the project, that is to amend the arroyo seco public lands ordinance. The entire project would include the deal, the contracts, the franchise agreement, and the finance agreement with the NFL so the benefits of the project could be judged as compared to the impacts that cannot be mitigated. What is the gross or net economic benefit of the NFL to the City? There isn't one piece of information that states that. It's just speculation that they will come here and dump millions and millions of dollars to save us from the renovation economic disaster. To jump to the conclusion that we can have these overriding considerations has problems on both ends and the middle.

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All these people being displaced for days on end, weeks on end, weekends on end, Saturday and Sunday games. Where are they going? It's not the Gamble House. They are going to other sources of recreation in the City, other parks maybe, neighborhoods, they'll start walking the neighborhoods, how are they getting there? How are they parking? Who are they displacing once they get there? There is no analysis of that. Intersections and streets are omitted from the study area. Why does the DEIR fail to include intersections on Arroyo Boulevard south of California, the intersection of Arroyo Boulevard and Seco Street, any streets east of arroyo parkway such as Marengo and Los Robles? We are operating under the 2004 Mobility Element not the 1994 Element.

"Complete streets" applies to all new projects in the City, but the traffic study ignores it. The traffic study is inadequate and needs to go back and start over. Where is the alleged traffic management plan? The plan that we have now is unreliable from game to game. The police reserve the right to change parking and resources as necessary and whatever this management plan is, is it in writing, is it going to have public review. What is the process? What the administrative burden in terms of police and fire that to the City? How many more

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Alcohol is limited at UCLA games – at NFL games alcohol will be sold throughout the game. How will the police manage the drunk drivers existing?

police are going to be necessary with the NFL? How many more police and fire will have to be hired?

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Susan McClemmons

DEIR is inadequate related to transportation for the following reasons:

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The DEIR speculates as to the percentage of fans who would arrive in the hour before the game and who would leave in the hour immediately after the game. Fans start arriving six hours before, and the Rose Bowl encourages fans to come within the six hour period before the game. After the game it is a full two hours

that the fans are exiting and clogging the streets. There's no substantiation to the claim that a certain percentage arrives an hour before. There is a ripple effect on all of the impacts about traffic, barricades, etc.

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All of the discussion in the DEIR talks about the number of ticketholders and the number of seats in the stadium as the estimate for how many fans will be attending the game. There are also a number of ticketless fans who come to the venue to enjoy the celebration, the NFL event. This could add thousands of people coming into the arroyo on a game day. The report is inadequate because it does not identify the impact of the ticketless fans, their impact on the traffic, how they will be lured into using the shuttle systems as alternative transportation. Will they be kept from parking in the neighborhoods?

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In the DEIR there's speculation that it's 2.7 occupants per car, but there is no substantiation of that.

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The estimate of the number of shuttle trips in the hour before and the hour after an NFL game presented in the report are not substantiated. There's no mention of the time required for each round trip. Assuming it takes 20 minutes for a complete trip, for the 211 shuttle trips in the report that would require 70 shuttles running at the same time. The report should include a specific mitigation plan for the shuttle trips and should give information about what the shuttles can achieve and how they would be used.

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The EIR assumes that NFL fans will be content to park away from the stadium and shuttle into the venue. Tailgating is an integral part of the NFL experience, this will impact on site parking, and how effective alternative transportation will be. The report does not adequately explore how likely is that that people will be enticed to use alternative transportation? The report needs to provide specific facts that shuttles and alternative transportation will be effective.

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Brookside golf course is not available when it is raining or two to three days after rain. The report does not take into account the impact of the loss of the Brookside golf course when grounds are wet. It is likely that people will then park in the neighborhoods.

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There is no restriction on alcohol sales at an NFL event. As more people park in the neighborhoods that will increase the impacts of drunk driving issues, police protection, on the streets and in the communities around the bowl.

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Diane Newman (see comment letter)

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Comments related to the air quality section included a consultation with Dr. John Seinfeld. Dr. Seinfeld's email states: the analysis of the air quality section appears to follow standard practice. The report includes

analysis of Carbon Monoxide, however, from the standpoint of human health impacts, emissions of particulate matter need to be considered as well. In summary the report concludes that projected emissions would exceed SCAQMD significance thresholds and no feasible mitigation measures exist. The logical conclusion from Dr. Seinfeld's email is this project should be a no-go. What could be a more important question than how will bringing the NFL to the Rose Bowl affect the air we breathe and human health? The EIR under represents the potential harms because it fails to measure or model particulate matter in close proximity on game days. The measurements that are made are made at a distance both at Caltech and Burbank. There are standard models that can be used to make measurements that are more relevant within the basin being considered. This was done for CO it was not done for particulate matter. The increase in particulate matter if the NFL comes will be damaging. The effects of particulate matter should be made aware to the public as part of the analysis of the costs and benefits. The EIR states bringing the NFL to the Rose Bowl would negatively impact air quality. If the City proceeds it will be doing so in conflict with regional and national air quality legislation designed to protect human health.

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Jonas Peters

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(See full letter)

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Leland Skylar

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Concerns about what was in the report, regarding the police saying this will be okay. Maybe things will be okay around the perimeter of the bowl, but by six am for a noon game there is already traffic on Rosemont. There are issues with the streets being made one way and people are making streets one way and nearly getting into accidents. This stadium is the least equipped to move traffic in and out, most stadiums have almost a freeway line built that directs traffic in and out in multiple lanes. Rosemont is a two lane street and is gridlocked with one car parked on it. The kids manning the barricades walk to other barricades to hang out with their friends. People move barricades and start tailgating in front of the homes, they throw trash in the yards. People sell food with no license. This will bring a huge element into the area that doesn't even know the area exists and a lot of them are here to case the neighborhood. There was an article in the Huntington Press about increasing violence at NFL games. People come out of the games drunk. The fire and police say it is okay, maybe along the perimeter, there are scalpers getting into altercations with people, garbage, and parking. The quality of life for residents in this area is diminished during these events.

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Ken Van Waggoner

Public awareness for this project has been dismal. Distribution of a pamphlet to people within 500 feet of the Rose Bowl barely gets off the lawn. There was no big, effective, media blitz because they don't want to have a thousand angry people here. The vast majority of residents rejected the NFL at the Rose Bowl. The Rose Bowl is not designed for the NFL and the residents do not want it. The City commissioned a \$400,000 EIR when the project has been rejected by residents. The EIR was exposed at the Planning Commission and systematically exposed and filled with poorly justified assumptions. There are glaring, unbelievable holes in the arguments.

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Felicia Williams

The traffic mitigation measures are inadequate because the EIR is focused on managing cars and not removing them. The General Plan objective is to have city where people can circulate without a car, yet the Rose Bowl gets an exemption because the contractors make a ton of money off the parking. This EIR won't touch it because it is a conflict of interest to affect the parking revenues at the Rose Bowl. The EIR includes measures such as carpooling and social media but how do those help parking? The point is to get cars away from the Rose Bowl. There need to be incentives and should include a true TDM plan that removes cars instead of just managing them to get the revenues. The conflict of interest needs to be addressed over the long term. There are no bike racks at the Rose Bowl – there is a long term conflict of interest and a true EIR should address this conflict and manage it so cars are removed.

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Jerome Whittiker

There will be weekends where there will be two major events. The EIR only looks at the impacts from one game on a given day and nothing else beyond that. What is the cumulative impact when you have two games on a weekend, both in air quality and traffic?

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Lauren Gassus

Most residents who live near the arroyo have chosen to move to this community for the services, habitat, educational opportunities, not for the NFL. The scope of the EIR has been limited due to the cost being much less than the Farmer's Field EIR. Most of the issues are ignoring the tax payers, division of a community, the western residents on the weekends will not be spending tax dollars in Pasadena. Huntington Hospital will be impacted due to the problems residents will suffer through toxic substances. The compression of the events, 25 events in four months, there will be a number of weekends where there will be two games. Two games back to back every weekend would double the impact, whether the golf

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course on a rainy day, or other areas. Is it reasonable to put the compression of the events on the citizens here?

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Letter No. 16 Planning Commission Public Comments

City of Pasadena Planning Commission Meeting

Public Comments

September 19, 2012

Response 16-1

The comment relates to the adequacy of the Project Description. Please see Topical Response 1 regarding

the Project Description.

Response 16-2

Refer to **Response 8-13**, which addresses Mitigation Measure MM 3.6-2.

Response 16-3

Refer to Response 8-44, which addresses the inclusion of a Mitigation Measure to not permit the Oakland

Raiders as a team at the Rose Bowl.

Response 16-4

The comment suggests that patrons without tickets should not be allowed into the Central Arroyo. 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.

Response 16-5

Refer to **Response 8-11**.

Response 16-6

The comment states the Linda Vista Annandale Association disagrees with the assessment of public

services provided in the Draft EIR. Refer to Response 8-45 for a discussion of the appropriate method for

determining impacts related to public services under CEQA.

Response 16-7

Refer to **Response 8-8** regarding baseline data.

Response 16-8

The comment states the Draft EIR does not take into account all potential land use policies addressing the Central Arroyo. Refer to **Response 11-9** for a discussion of land use policies. Table 3.3-1 Project Consistency with Existing Land Use Plans, has been updated to include additional policies. Please also see **Response 8-23** related to the use of signage and commercial activity in the Arroyo.

Response 16-9

The comment states the discussion of public services should include a consideration of the City's resources that will be required to serve the project and the "potential burden to the City." CEQA requires a consideration of the potential impacts a project may have on public services such as police and fire protection services to determine if the project would result in the need for the construction of new facilities, the construction of which could have an impact on the environment. The proposed project would not meet this threshold as (1) the PPD has indicated to the City that they have adequate services to serve the proposed project (2) the PPD currently is budgeted for additional service positions that have not been filled but could be filled if the need arises (3) the project would be temporary and any demand on services would return to current levels once the NFL use of the Rose Bowl ends, and (4) PPD would be supplemented with private security patrols which would not place an administrative burden on the City.

Response 16-10

The comment raises a general concern regarding traffic and other issues that do not appear to relate to any physical effect on the environment. The Draft EIR addresses traffic issues in Section 3.7 Traffic, Circulation and Parking. 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. However, because the comment does not raise an environmental issue, no further response is required.

Response 16-11

Refer to **Response 15-9** regarding the number of users of the recreational loop.

Response 16-12

Refer to **Response 15-11** regarding Mitigation Measure **MM 3.6-2** and Impact 3.6-3.

Response 16-13

Refer to **Response 12-8.**

Response 16-14

Included in the Draft EIR is a subsection "thresholds of significance" which includes a discussion of the methodology for determining significance for each topic area. The comment states the Draft EIR does not

address hazards such as terrorism or violent crime. The commenter is referred to pages 3.5.2-4 through 3.5.2-7 of the Draft EIR which address PPD training and capability to respond to violent crimes and in the event of a terrorist attack.

Response 16-15

The comment states the Draft EIR does not address how people would get medical attention in the event of an emergency. The commenter is referred to pages 3.5.2-7 and 3.5.2-8 of the Draft EIR which address natural disasters and emergency response traffic.

Response 16-16

Refer to **Response 11-19** related to groundwater

Response 16-17

On March 12, 2012 the City Council authorized the City Manager to enter into contracts with Impact Sciences for the preparation of the EIR for this project and with Fehr & Peers to prepare the traffic impact study. Impact Sciences was selected based on the firm's experience in preparing EIRs for large and complex projects throughout Southern California. Fehr & Peers was selected for their experience in preparing traffic analyses for large and complex entertainment and sports venues in California.

Response 16-18

The analysis in the Draft EIR addresses all air pollutants produced in substantial quantities by the proposed project, as well as their impact on all local sites and populations. Please also refer to **Response 2-6**.

Response 16-19

The comment raises issues that do not appear to relate to any physical effect on the environment. 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. However, because the comment does not raise an environmental issue, no further response is required.

Response 16-20

The comment raises issues that do not appear to relate to any physical effect on the environment. 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. However, because the comment does not raise an environmental issue, no further response is required.

Response 16-21

The comment asserts that NFL events are different from college events and suggests a ban on tailgating to reduce crime, noise, and violence. As indicated in the letter provided by Mr. Mark Glaser of CSC, NFL fans and college fans are generally similar in their behavior and tailgating habits. Currently, CSC provides security service to the Rose Bowl during college events where tailgating takes place. CSC deploys bicycle patrols throughout the parking areas to maintain order. It is expected that CSC would continue to provide security services during NFL events. The current and expected tailgating activity would not create a significant environmental impact within the meaning of CEQA. However, the comment further states the project would create a challenge to the public order and states many tailgaters come without tickets. 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. However, because the comment does not raise an environmental issue, no further response is required.

Response 16-22

The comment states health impacts associated with the loss of recreational use at the Rose Bowl should be evaluated. The Draft EIR discusses the loss of recreational opportunities in the Arroyo and concludes that the loss of recreational opportunities in the Arroyo on event days is a significant and unavoidable environmental impact. While recreational opportunities in general are important to a healthy community, the unavailability of a particular facility for active recreation on 13 days per year is not expected to have any measureable impact on health. 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 16-23

The comment states an opinion that 6 hours of tailgating prior to a game is "excessive." Please see **Response 8-44** regarding the potential public services impacts of tailgating.

Response 16-24

Refer to **Response 7-19**, which relates to fire protection services in the San Rafael area.

Response 16-25

The comment states the impact to recreational users is understated and the effects on the rest of the Arroyo are not addressed in the Draft EIR. Refer to **Response 7-10** through **Response 7-12**.

Response 16-26

The traffic generated for the project is based on a maximum of 75,000 spectators and 4,000 employees for an NFL game. The analysis conservatively assumes that up to 94 percent of the spectators and 80 percent of employees will arrive via an automobile.

Response 16-27

Refer to **Response 7-1.**

Response 16-28

The comment relates to lighting impacts related to clean up after events. Lighting would be used around the Rose Bowl to clean up after an event. It is anticipated that the duration of clean up would be similar to a college event and would result in similar lighting effects. Lighting associated with cleanup is minimal compared to lighting associated with events at the Rose Bowl. As no spillover effects of game lighting were found in the Initial Study and further discussed in **Response 8-2**, the minimal lighting associated with clean up would also not be anticipated to spill over into the adjacent properties. The comment also asks for information on other stadiums constructed in high-end communities. Staff is unaware of any other stadium that is constructed in a similar location to the Rose Bowl.

Response 16-29

Refer to **Response 16-4** for a discussion of ticketless patrons. Due to the inability of ticketless patrons to stay in the parking lots at the Rose Bowl after kickoff, it is not anticipated that noise associated with the minimal number of ticketless patrons would materially change the noise analysis presented in Section 3.4 Noise, of the Draft EIR.

Response 16-30

The comment relates to the loss of a recreational use due to the proposed project. The Draft EIR analyzes the potential for users to be displaced from the Rose Bowl on event days and determined this would be a significant and unavoidable impact.

Response 16-31

The comment asks for additional clarification on the threshold for public services impacts. CEQA requires the consideration of a project's impacts on the environment. As these relate to public services, the physical change in the environment is generally related to the need to construct new or expanded facilities. It is the construction of those new or expanded facilities that would result in a change in the physical environment and a significant impact under CEQA.