

April 12, 2012

Via Hand Delivery & Email
David Sinclair
Planning Department
175 North Garfield Avenue
Pasadena, California 91109
email: dsinclair@cityofpasadena.net

Re: Draft Environmental Impact Report (EIR) on Temporary Use of the Rose Bowl Stadium
by the National Football League (NFL)

Dear Mr. Sinclair:

The Board of Directors of the West Pasadena Residents' Association (WPRA) is closely monitoring developments as the City of Pasadena considers the possibility of an NFL team temporarily using the Rose Bowl while a permanent stadium is built. Thank you for this opportunity to submit written comments on the scope and content of the upcoming draft EIR.

WPRA's current focus is making sure the City follows its own rules and applicable laws in developing the upcoming Draft EIR. WPRA will insist on an EIR that fully and accurately studies all the potential environmental impacts of NFL at the Rose Bowl. As discussed in the attached Exhibits 1 and 2, our EIR scoping comments concern the following general categories: (1) the impact of NFL games on recreational users of the Arroyo; (2) the impact of NFL games on residential neighborhoods adjacent to the Rose Bowl; (3) traffic, circulation, and parking; (4) security and safety; and (5) public disclosure during the EIR process of all NFL-related lease documents and economic studies.

Most of WPRA's present concerns are consistent with the comments and concerns we expressed when permanent use of the Rose Bowl by NFL was considered by the City in 2005. The 2005 draft EIR was woefully deficient. We are concerned that the draft EIR being prepared now will also be inadequate. Our comments on the 2005 draft EIR are attached hereto as Exhibit 1. The comments and concerns expressed in Exhibit 1 are expressly incorporated herein as comments on the scope and content of the upcoming draft EIR. All the concerns expressed therein are still valid, except those relating to Loss of Trees (pages 5 and 6) and those individual issues directly related to construction. We request that the City address each and every comment contained in Exhibit 1 in the upcoming draft EIR.

WEST PASADENA RESIDENTS' ASSOCIATION
POST OFFICE BOX 50252 • PASADENA, CA 91115

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WPRA Concerns Regarding 2012 Draft EIR on Temporary NFL Use of Rose Bowl

Exhibit 2 contains additional comments regarding the upcoming draft EIR. These comments focus on the currently contemplated temporary use of the Rose Bowl by an NFL team, and expand on our concerns about traffic and safety. We request that the City address each and every comment contained in Exhibit 2 in the upcoming draft EIR.

Again, thank you for this opportunity to submit written comments on the scope and content of the upcoming draft EIR. WPRA will be vigilant in representing West Pasadena residents throughout the EIR process.

Very truly yours,



William Urban
Vice-President WPRA

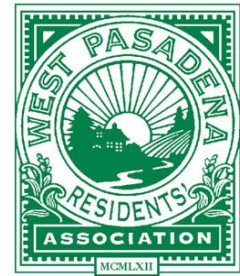


Fred Zepeda
WPRA

cc: City Manager Michael Beck (mbeck@cityofpasadena.net)
Mayor Bill Bogaard (bbogaard@cityofpasadena.net)
Councilman Steve Madison (smadison@cityofpasadena.net)
District 7 Field Representative Takako Suzuki (tsuzuki@cityofpasadena.net)

Attachments:

- Exhibit 1: WPRA Comments Regarding 2012 Draft EIR on Temporary NFL Use of Rose Bowl dated April 12, 2012
- Exhibit 2: West Pasadena Residents' Association's Response to the Rose Bowl Stadium Renovation Project Draft Environmental Impact Report (State Clearinghouse No. 2004101073) dated March 21, 2005



March 21, 2005

John Spaulding
Consulting Planning Manager
City of Pasadena
Planning and Development Department
175 North Garfield Avenue
Pasadena, CA 91109-7215

RE: West Pasadena Residents Association's Response to the Rose Bowl Stadium Renovation Project Draft Environmental Impact Report (State Clearinghouse No. 2004101073)

The West Pasadena Resident's Association (WPRA) is pleased to take this opportunity to submit its final comments on the Rose Bowl Stadium Renovation project (Project) which seeks to accommodate the needs of a National Football League (NFL) team as a long-term tenant in the Rose Bowl.

WPRA has polled citizens in the neighborhood and has found them to be gravely concerned about the proposed Project. Citizens are concerned that the DEIR considers that attending an NFL game, which is a passive recreational opportunity, supersedes the active recreational activities that are at the heart of the Central Arroyo Seco. They are further concerned that the DEIR only discusses displacement of organized activities on game days, barely mentioning unorganized recreational activities that take place daily by crowds of participants in a community with rapidly shrinking parkland.

An analysis of the Draft Environmental Impact Report (DEIR) demonstrates that there are significant, unavoidable, adverse impacts of the proposed Project which WPRA believes should give rise to a finding that the DEIR is inadequate and must be revised before being considered for certification.

Furthermore, WPRA asks that the Planning Commission be given an opportunity to review the final Environmental Impact Report (EIR) before it is submitted to the Council for review, as is normal for projects of this scope.

WPRA believes that it is imperative that the City very carefully analyze not only the environmental issues presented in the DEIR, but also the economic issues surrounding the decision to consider bringing a new commercial use to a residential

neighborhood and treasured parkland. It is also critical that the Council carefully review elements of the DEIR as they apply to the City's General Plan and various ordinances, as codified at the behest of Pasadena citizens.

WPRA has identified additional significant issues with the Project which must be analyzed in the final EIR if it is to be found adequate. Significant issues include impacts in the major categories as described in this document.

Areas of Controversy and Issues to be Resolved

In the Executive Summary (p xv), the DEIR points to the *"...requirement for compliance with Section 15123(b)(2) and 15123(b)(3) of the California Environmental Quality Act (CEQA) Guidelines"* that the lead agency (City of Pasadena) must identify issues to be resolved and areas of controversy.

There are only 3 *"...areas of controversy and potential issues to be resolved..."* according to the DEIR which were identified by *"...oral and written comment received during the public review period for the IS/NOP..."*. It is ludicrous that City planners failed to take note of public comment regarding 1) the reduced use of the Central Arroyo Seco for recreation; 2) increased commercial usage of parkland; and 3) impacts on residential property values surrounding a stadium used for professional football.

Additional analysis required: Why weren't more of the public comments taken into consideration when compiling this environmental impact report? Why does the lead agency believe that reduced usage of a large portion of the city's parkland to recreational users is not an area of controversy? Does this make the DEIR inadequate? If CEQA considers it important to define areas of controversy, why does the DEIR fail to consider **all** areas of significant controversy?

Recreational Use and Open Space

The impact to Pasadena residents using the recreation facilities and areas within the Rose Bowl foot print and the potential irreversible impact to the inventory of open space are monumental.

WPRA finds that little thought has been provided in the DEIR to the thousands of residents using the Rose Bowl each year. *DEIR Impact 3.8-1* found that *"The proposed project would not be incompatible with adjacent land uses or cause a substantial adverse change in existing land use patterns"* was *"less than significant"*.

The loss of use will be staggering with an NFL team in the Rose Bowl. Residents and other users will not be able to use the greens for soccer, the golf course, swimming pool and tennis courts, or the three mile track around the rose bowl for biking, running, walking, skating, while construction is underway. Others may not be able to use the area for passive enjoyment such as picnics. The lost use of this area for recreation is constantly cited throughout the NFL EIR to equal 25 calendar days per year yet the DEIR fails to address the additional periods of non-use.

Additional analysis required: Why doesn't the DEIR include documentation of the numbers of users of the area surrounding the Rose Bowl? This must be included as an impact for this DEIR.

Additional information needed: Please include counts of the numbers of casual and passive users of the Rose Bowl area during weekend days. This must be provided if there is to be a valid analysis of the impact of the Project on recreations usage of the Central Arroyo.

The EIR states (p 3.11-13) that there is ample park space in Pasadena for those uses displaced by the project. *This is absolutely false.* Pasadena knows and has known that we lack adequate park and recreational space and facilities and has significant efforts underway to address this need. Recent findings by City agencies have determined that the acreage of available parkland per capita has diminished over the years to an unacceptable low. In fact, the City has recently imposed a significant residential impact fee on new development to address this issue.

Additional information needed: Please document the location and availability of current park space available for displaced recreational users during construction and game days and pre- and post- game days when the area surrounding the Rose Bowl is unavailable.

On Page 5-5, in Section 5.2.6 Recreation, the NFL EIR states that the Brookside Park Diamond and park areas will also be used for parking, and unavailable during displacement events. The NFL EIR is inadequate for failing to provide Brookside Park/Central Arroyo displacement data for the entire period of the scheduled major events, including the proposed use of the Rose Bowl by the NFL.

Additional analysis required: Please provide the total number of days including weekend days where local recreational use of Central Arroyo amenities will be curtailed by major events at the Rose Bowl (to include NFL and UCLA schedules) as well as the percentage of play lost to parking on Brookside Golf Course. Please provide this data for the days prior to and following football games in which setup and cleanup times will curtail usage of the area surrounding the Rose Bowl to these other recreational users.

The DEIR states: *"With the availability of other golf courses in the City advance notice of event dates, the impact of the proposed project on increased closure of the golf courses would be less than significant."* There are no other golf courses *"in the City."* It is difficult to obtain weekend tee times on any high quality course in Southern California. Cutting back days at Brookside would have a permanent impact because an indeterminate number of golfers will not play on some weekends.

Additional information needed: Please explain what golf courses will be available in Pasadena. What is the usage of Brookside on an average weekend? Where will these golfers find courses in Pasadena? Why does the DEIR make this assumption that golfers can find public courses in Pasadena when none others are in existence?

Additional analysis required: How will the impacts to the golf course be mitigated, due to increased usage for parking?

Page 110, 3.12-6, the construction activities show that resources will be employed at the Rose Bowl for two years for the *"renovation"* project. Large workforces will be employed; 3000 cubic yards of dirt will be removed by 54 trucks per day for 5 months. The construction will occur six days a week from 7am to 9pm. Construction parking will be provided at the Rose Bowl.

Additional analysis required: Please provide data relating to the numbers and types of recreational users who will be displaced during the construction that will curtail usage of the area surrounding the Rose Bowl.

On Page 3.11-13, Section 3.11.6, the NFL EIR states all impacts related to the construction have been fully analyzed and the effects have been not found to be significant.

Additional information needed: How does the City of Pasadena justify the loss of two years recreation use as not significant?

Additional analysis required: Please address assumptions in the DEIR which fail to consider the requirements for use of the Rose Bowl area during construction. There is a lack of recreation areas for residents to use during construction for an extended period of time which could significantly impact the health and well-being of current users. Are plans discussed to mitigate the health risks and recreation opportunities of current users? If so what are the alternative recreation areas being provided? How will the City notify residents of any alternatives?

In Pasadena, construction of new residential town homes, condominiums, houses and etc have enabled population growth in Pasadena. This trend is expected to continue. With limited park space in Pasadena (The National Recreation and Parks Association (NRPA) claims the national standard of 10 acres of parkland for every 1,000 people is deficient in today's recreation and open space environment, Pasadena falls well below that) there will be increased need for that space. This will also compete with an increased commercial use of the space.

Additional information needed: The EIR needs to identify the impact of insufficient open space and/or parkland on residents and determine what the impact of increased usage will be on all areas of the proposed project.

WPRA residents and neighbors have identified additional significant issues with the Project which include the alteration of any part of the Rose Bowl structure which might cause it to lose its historic status, the dismantling of the Arroyo Stone walls and the elimination of the mature trees, including those protected by the Pasadena Tree Protection Ordinance [Ord. 6896, amending Chapter 8.52 of the Municipal Code]. The amount of trees effected would be about 250 city trees.

Mitigation Measures and Residual Impacts on Land Use

Mitigation Measures for impacts on land use are Inadequately described in the DEIR (Section 3.8.8); these measures need more explanation/evaluation.

MM 3.8-1 states: *"If the parking areas that currently accommodate the monthly Flea Market are unavailable due to construction of the proposed project, the RBOC shall make an alternate location available, and shall notify the Flea Market operators in writing at least 90 days in advance of any such unavailability as well as to advise of the alternative location."*

MM 3.8-2 states: *"During project operation, if the event schedule conflicts with the monthly Flea Market held on the third Sunday of each month in the parking area at the south end of the stadium, the RBOC shall make an alternative location available to the Flea Market or schedule an alternate day for the Flea Market, and shall provide the operators of the Flea Market at least 90 days' written notice of the*

unavailability of the parking area and the location and date of the scheduled Flea Market operation."

Additional information needed: Where will the alternative location(s) for the Flea Market and its parking be during construction and on game days. The proposed relocation site(s) needs to be disclosed and the impact in THAT area needs to be evaluated as a part of this EIR.

Additional information needed: Store and museum (and possible restaurant/bar?) are not fully described. Plans for a store, museum and other retail amenities are ignored in the DEIR. What are the hours of operation planned for these? What is the impact on parking and traffic? If the shops and museum remain open after a game, the egress of patrons will be delayed. What plans are made for their safe egress from the stadium? It may take longer for all the traffic to clear out so that traffic posts can be relieved and neighborhood streets can be reopened. Is it possible these will be opened on Friday and Saturday nights? Is it reasonable to assume that Parsons will continue to make parking available for NFL games? For example, what if Parsons doesn't want to participate because of liability issues or future development? Is there an alternative parking plan in the vent Parsons does not provide parking?

Additional information needed: The EIR only studies shuttles from Parsons and the Memorial Park Gold Line station. Should the EIR study shuttle access to and from other Gold Line stations? Would shuttle access to and from other Gold Line stations reduce traffic impacts on de-emphasized streets and residential neighborhoods?

Loss of Trees

Additional issues include the impact to the environment and to the quality of life enjoyed by citizens by protecting and maintaining mature and healthy trees, especially those public, landmark, native and specimen trees in its parkland area, as set forth in the City's Tree Protection Ordinance [Chapter 8.52.060 of the Municipal Code (Ord. 6896 § 2 (part), 2002)].

The DEIR proposes to eliminate trees, but fails to provide a definitive inventory, including description of type, of the trees that are to be removed. The amount of trees affected would be about 250 city trees.

Additional information needed: Reviewers and decision makers must be able to understand the magnitude of the project impacts under the law i.e. siting, size, type of trees. There is no mention to the impact to the project if removal is not allowed.

Additional information needed: What is the inventory of trees that currently reside in the area surrounding the Rose Bowl? What determination has been made of the impact to removing public, landmark, native and specimen trees? This must be included as an impact for this DEIR.

On Page 5-5, in Section 5.2.6 Recreation, the NFL EIR states that the Brookside Park Diamond and park areas will also be used for parking. What is the effect that might be made on trees due to increased use of land surrounding them by vehicles?

Additional analysis required: Reviewers and decision makers must be able to understand the magnitude of the project impacts under the law i.e. siting, size, type of trees.

Tree protection is a significant issue in Pasadena – The community of Pasadena has long been concerned with protecting the characteristics that make the city unique. If you ask a resident, “what makes your city special?”, the answer will often be a resounding, “its trees”. As recently as 2002, citizens passed its Tree Protection Ordinance (Chap 8.52) to protect the trees of Pasadena. The purposes are stated in Section 8.52.015:

"Pasadena is graced by the presence of thousands of mature trees that contribute long-term aesthetic, environmental, and economic benefits to the city. Aesthetically, trees offer dimensions in the form of color, shape, texture, scale and variety. Mature trees are often integral components of many historic sites and their presence contributes to the site's cultural and historic significance.

Environmental benefits derived by trees include the filtering of air pollutants; increasing atmospheric oxygen levels; stabilizing soils; reducing heat convection; decreasing wind speed; and reducing the negative effects of solar glare. The biological diversity of wildlife and plant communities is enhanced by the favorable conditions created by trees.

The economic benefits derived from trees include increased property values, and additional revenue generated by businesses, visitors and new residents attracted to the urban forest image of the city. Trees are a major capital asset to the city and like any valuable asset they require appropriate care and protection."

Additional analysis required: Please explain why priority is not being given to protecting, preserving and maintaining the trees in the Arroyo Seco, as required by City ordinance.

Equestrian Use

The DEIR assures that the trails surrounding the Rose Bowl will remain open during events but does not discuss how this will be accomplished.

The DEIR states that: *"Equestrians and hikers following the eastern trail must pick their way through the parking lots adjacent to the Rose Bowl to access the trail on the east side of Rosemont Avenue opposite the Brookside Clubhouse."*

Additional analysis required: How will equestrians will be able to “pick” their way through the pedestrian traffic and gathering that can be expected on the south side of the Rose Bowl with the new design?

Additional analysis required: The equestrian trail, although unmarked, currently crosses in front of the Rose Bowl at the south auto gate and continues along the paved driveway between the Rose Bowl and parking lots B & D. With large crowds and vehicular traffic this many times a year, the trail will be virtually unusable. What relocation options will be available? These have not addressed these at all in the DEIR. There is also no statement about guaranteed access to the equestrian

corral ion the north end of Lot D during events. This corral is the only source of water in the area for horses.

Additional analysis required: The DEIR fails to address how **SAFE** use of the trails will be guaranteed along West Drive, which is where the "tailgating" motor homes park. Participants come onto the trail with their trash, tents and BBQ's, forcing horses out into the street. With the increased number of displacement events and possible weekends with two days of football, an enforcement plan must be articulated to show how the trail will be maintained clear and safe for equestrian travel. What measures have been planned for this?

Aesthetic, Historical and Cultural Resources

Pasadena citizens have long sought to protect and enhance Pasadena's urban forest and streetscape by encouraging beautification and sustainable landscapes, both public and private. The Rose Bowl is one of the most important cultural landmarks in Pasadena. The architecture is unique and nationally recognized and a defining feature of the Central Arroyo. The surrounding Arroyo stone retaining walls, built in the early 1900's, are a part of this historical area. Altering this site and putting this landmark stadium into a high-use, commercial service area will not only destroy the aesthetic beauty of the area but will also the significantly impact the enjoyment of the area by residents.

The current Rose Bowl Position Statement from Pasadena Heritage states: "*The Arroyo Seco is Pasadena's largest public park and provides a great variety of recreational opportunities for our community in a natural setting of unparalleled beauty. The Arroyo's historically significant features and natural setting must be respected, and its current uses must not be adversely impacted by use of the Rose Bowl for a National Football League event.*"

The renovation proposes to modify the Historic Rose Bowl Facility and has a goal to retain landmark status yet the DEIR fails to identify what renovations are possible to do without jeopardizing the landmark status.

Additional information needed: In order to ensure the Landmark Status is not jeopardized along with any tax credits provided to the city, the EIR needs to provide more information on the acceptable level of renovation that can occur to the Rose Bowl stadium.

The project proposes to hold up to twenty-five events per year from August to January. These events are hosted on weekends. The EIR sites that there is no significant impact to residents yet for 25% of all weekends, when people aren't working and want to exercise or relax, residents won't be able to use the area to run, bike, swim, skate, walk, play soccer or golf.

Additional information needed: The EIR needs to clearly provide the impacts for residents use of the Rose Bowl. Not only does the impact of the weekends need to be taken into stated but also the impacts related to construction, set-up, and practice games need to be identified and stated.

An additional significant concern is the intensification of land use of the existing stadium (described in Section 5.2.4) which states that the proposed project "...introduces a large, visibly modern facility into a setting that is primarily park-like and contains a large residential component representative of traditional Pasadena

architecture." The DEIR goes on to state that the project "... *would result in an adverse impact to the Central Arroyo because of the substantial intensity of the proposed development. This would be a significant and unavoidable impact, with no feasible mitigation measures identified.*" These elements of the project bring forth many questions about the process and project.

- *Impact 3.1-5* states that the proposed project would substantially adversely impact the visual character or quality of the existing architectural features of the Rose Bowl Stadium and that the residual impact is significant and unavoidable. This impact could be avoided with an alternate project that doesn't alter the architectural features.

Additional analysis required: The DEIR fails to provide a feasible alternative that both achieves the project's stated goal and also doesn't substantially impact the historical status of the building and the surrounding area. Such an alternative is discussed under Section 4.6, but concludes that "...*this alternative would not, without a change in the NFL's position, meet the project objective of facilitating the long-term economic viability of the Rose Bowl through attraction of a long-term tenant.*" There is no economic analysis of this fact in the DEIR. Please ask the lead agency to provide economic justification for this analysis.

- *Section 3.1.3 Regulatory Framework: City of Pasadena, General Plan* quotes elements of the general plan which are impacted by the proposed project. However, missing from this purpose is any recognition of the General Provisions of the City of Pasadena's Arroyo Seco Public Lands Ordinance [Ord. 6403 §2 (part), 1990] which includes in its purpose (§3.32.020) "...*to establish regulations for preservation, enhancement and enjoyment of the Arroyo Seco as a unique environmental, recreational and cultural resource of the city....such resource and the neighborhoods must be preserved, protected and properly maintained.*"

Additional analysis required: Please address assumptions in the DEIR which fail to consider the General Provisions of the Arroyo Seco Public Lands Ordinance which requires the resource that is the Arroyo Seco "...*be preserved, protected and properly maintained*". There is not another NFL stadium in the United States that is located in a residential parkland setting. Why have the provisions in this long-standing City ordinance been ignored in the DEIR? Does the City anticipate seeking a change to the Arroyo Seco Public Lands Ordinance? If so, what are the anticipated changes? How will the City notify residents of any considered changes?

- Does the Central Arroyo Seco Master Plan (CAMP) apply to the NFL project and to the removal of the original Arroyo Stone Walls? If the CAMP applies, why was it not addressed? What is the City doing to certify the CAMP? What is the status of the CAMP and Rose Bowl Use Plan (in the Arroyo Seco Master Plan)?

Additional analysis required: Please discuss the adequacy of the DEIR because it fails to analyze this significant plan for the Central Arroyo area?

- The NFL project appears to conflict with the Pasadena General Plan's second guiding principle, which affirms that change will be harmonized to preserve Pasadena's historic character and environment. The principle goes on to state that "...*open spaces and streets should be as carefully designed and preserved*

as buildings. The city's public spaces are as important to its citizens as its buildings. Priority should be given to updating the Open Space Element. It will become the Green Space Element of the General Plan, addressing urban open spaces, urban forestry, parks, and natural areas and reflecting the concerns and desires of the residents."

Additional analysis required: Please explain why the DEIR might be considered adequate when it fails to analyze the areas where the project conflicts with the city's stated goals. How will the City justify a decision to ignore stated goals?

- Section 3.4.4, page 24 states that, "*The city shall retain the services of a qualified Historic Preservation Consultant to review structural designs and construction activities.*" The Pasadena City Council has committed to Pasadena Residents that it will **not** be paying for the renovation of the Rose Bowl. Who will be paying for this consultant? Also, if the qualified Historic Preservation Consultant were employed in the concept and design phases would this mitigate the adverse modification of the Rose Bowl Structure? Is the EIR inadequate in failing to identify costs associated with this project, including hiring of this additional resource and in failing to identify all potential mitigation activities?
- Page A-8. There is a reference stating that the initial construction of the Rose Bowl had to be modified due to the existence of large boulders underneath the current stadium.

Additional analysis required: Will the new stadium floor need to be blasted to get the desired level of extraction? If so, has an environmental impact study been done to determine the impact of blasting on the neighborhood? Have the noise levels associated with potential blasting been analyzed? Where is this information related to this mitigation effort?

Traffic Issues Must be Fully Evaluated

Traffic is the number one issue for residents (this is not only generally accepted, but also confirmed by the WPRA survey, which is included in Appendix B: EIR Scoping Comments).

Traffic is a major concern of Pasadena residents because of the latest growth spur and failure of EIRs of past projects to complete holistic environmental impact evaluations to assess traffic impacts across multiple projects, i.e. cumulative impacts, as required by the California Environmental Quality Act (CEQA).

WPRA finds significant inadequacies in Section 3.12 Transportation/Traffic of the Rose Bowl DEIR. This section is flawed and fails to accurately measures the full impacts of the NFL traffic.

Rose Bowl neighborhoods are impacted by traffic during all large events. According to the DEIR, the NFL would generate nearly 38,000 new vehicle trips over a 24-hour weekday period. Since the Rose Bowl is nestled into parkland and surrounded by residential neighborhoods, all traffic to and from the Rose Bowl must travel on neighborhood streets. Several issues are self-evident:

- If the NFL comes to Pasadena, neighborhood streets will be inundated with cars and shuttle buses every weekend from August through January.

- NFL games at the Rose Bowl will mean that freeways will get backed-up. When freeways get congested, drivers get off and look for alternate routes on neighborhood streets.
- The NFL plan calls for almost a million square feet of new space around the Rose Bowl, including a museum, luxury boxes, restaurants and other amenities. These new businesses will be open all week long, causing traffic congestion in the Arroyo seven days a week.

In the DEIR, traffic is ignored between the 110 Freeway and California Boulevard – The DEIR does not study any intersections or street segments south of California Boulevard and does not include the 110 Freeway. (DEIR, pp. 13-14; Traffic Study, pp. 35-36.) The DEIR assumes NFL fans will not use the 110 Freeway because it purportedly is not a “*regional access point*” to the Rose Bowl. This assumption ignores what residents know to be true: Orange Grove Boulevard and Arroyo Boulevard between the 110 Freeway and California Boulevard experience greatly increased traffic congestion during UCLA football games.

Additional analysis required: Why hasn’t a full analysis of traffic been made at intersections south of California Boulevard to the City limits been made? Please examine critical intersections below California Boulevard, such as Bellefontaine and California, Columbia and California, Saint John and Bellefontaine, Columbia and Glenarm, and Arroyo Parkway and Glenarm. Please also examine intersections of Arroyo Boulevard and La Loma and Arroyo Boulevard at the Grand Avenue split.

In omitting the 110 Freeway, the EIR also fails to address the fact that South Orange Grove and portions of California Boulevard are classified as “*de-emphasized streets*” in the General Plan Mobility Element.

Additional analysis required: Please explain how increased traffic anticipated to occur on a “*de-emphasized street*” is compatible with the City’s General Plan Mobility Element.

Additional information needed: Why does the DEIR ignore known regional access routes to the Rose Bowl? Why was the 110 Freeway not considered a regional access route to the Rose Bowl? Why were citizen’s requests for complete traffic analyses ignored?

Additional information needed: Please prepare a new traffic study in a supplemental EIR to address these issues. If this is not done, please explain why it is not necessary to understand the answers to the questions raised by WPRA in order to provide the City Council with an adequate basis for a decision regarding certification of the DEIR.

The DEIR assumes neighborhoods will only be impacted by traffic during a one hour time period – the DEIR only studies impacts from 17,318 so-called “*peak*” one-hour passenger vehicle trips and studies “*peak*” inbound and outbound traffic by assuming that 45% of vehicles will go into the Arroyo during peak hours. The other 55% of vehicles driving into the Arroyo are excluded. These assumptions are grossly flawed. Residents along access routes to the Rose Bowl find signs posted along their streets prohibiting parking for 8 – 10 hours on UCLA game days.

Additional analysis required: Why does the DEIR wrongly assumes that residential neighborhoods only will be impacted by traffic during the one-hour “peak” time period? Further analysis is required to adequately evaluate impacts.

Additional information needed: Does the DEIR under-represent potential traffic impacts due to the fact that it ignores a significant number (55%) of the vehicles entering the Arroyo on a game day? Please explain why the DEIR fails to study traffic impacts for the entire period of increased traffic, and only studies “peak” traffic impacts. Why does the DEIR assume that the NFL would impact neighborhood streets for only one hour on game days, when UCLA traffic impacts the neighborhoods for 8 – 10 hours?

The DEIR fails to adequately address parking in the Arroyo Seco and surrounding neighborhoods – there is a financial incentive for the NFL to have maximum parking in the Arroyo Seco, which conflicts with General Plan principles that stress non-auto forms of transportation and neighborhood protection. The DEIR process does not allow the public to know the financial terms of the NFL transaction.

The DEIR assumes the Rose Bowl can supply up to 24,310 total parking spaces on paved and turf areas for large events. According to the DEIR parking plan, 72% of parking would occur on grass (turf and golf course).

The EIR does not address certain General Plan neighborhood protection objectives. In general, insufficient consideration was given to the impacts of traffic on neighborhoods or the impacts of attending a Rose Bowl game in the rain. All too often, all residents within the WPRA territory are trapped within the West Pasadena triangle while game seekers drive to or exit from games. Avenue 64 is clogged, Orange Grove is clogged, Arroyo Boulevard is clogged, leaving residents little ability to drive around their city. Off-site parking and other traffic mitigation measures do not help residents use their city infrastructure.

Additional information needed: Where will people park on rainy days? When it rains, according to the DEIR, the Rose Bowl would implement so-called “Plan C,” which calls for parking cars in adjacent residential neighborhoods *“in a systematic manner so as to maximize the number of vehicles that can be parked as quickly, efficiently, and as close to the stadium as possible.”*

Additional information needed: Which residential neighborhood streets will be used for parking under “Plan C”? What is the “systematic manner” that is to be used? Please support this with data supplied by the Pasadena Police Department to ensure that neighborhoods can be accessed by emergency vehicles in the event of “Plan C” being implemented.

The DEIR discusses displacement of parking from the Rose Bowl to City-owned parking lots and private parking at hotels, office buildings and other commercial development lots.

Additional analysis required: The DEIR does not appear to address whether there is sufficient parking supply to accommodate NFL, and what impact this could have on non-NFL parking requirements for businesses in Old Pasadena. Please provide information so that decision-makers can assess the adequacy of parking.

Use of Old Pasadena parking structures – serious concerns have been expressed about the use of the parking structures in Old Town. Football will be at its busiest

during the Thanksgiving to New Years time frame. Football patrons will clog the structures on Sundays, reducing the amount of parking available for movie theater attendees and Christmas shoppers. There are already times when these lots fill up.

Additional analysis required: What are the impacts on parking facilities in Old Town on game days? What measures will be provided to insure that shoppers and visitors to Pasadena who are ***not attending a game*** have parking available to them?

Where will game attendees park for Monday night games? Monday's are business days, and there are many businesses that lease space from Parsons, making this structure unavailable. What facilities will attendees use on Monday nights?

The DEIR ignores environmental impacts from NFL-related retail and other NFL events – the NFL Rose Bowl stadium design calls for a 57,000-square foot retail area, a museum and team store open weekdays and weekends year-round. The NFL's 57,000 square feet of new retail space is roughly equivalent to the square footage of the Crate & Barrel store and Sushi Roko restaurant located in Old Pasadena. The DEIR assumes the NFL's new retail space will be open all seven days of the week.

Additional analysis required: The DEIR assumes that traffic from the NFL's new retail outlets will be "*ancillary*" to games days and that a renovated Rose Bowl would not be a "*popular destination point*." Please provide rationale for this evaluation, and show analysis of traffic impacts for a seven-day a week operation of new retail activities in the Rose Bowl.

The DEIR's "*Traffic Impact Analysis Scenarios*" fail to address pre-game activity (including traffic), or what other, non-game events NFL would host at the Rose Bowl. At this time, there is no maximum number of NFL events defined in DEIR.

Additional analysis required: Please provide additional analyses of all activities anticipated to be hosted by the NFL in the Rose Bowl. How many actual days will the NFL be using the Rose Bowl? Why wasn't this evaluated in the DEIR?

The DEIR does not appear to study the cumulative traffic impacts of an NFL presence in the Rose Bowl which include UCLA, the Tournament of Roses, the monthly flea markets, Aquatic Center, Kidspace, etc.

Additional analysis required: The Traffic Study only measured traffic from one UCLA game. What are the cumulative traffic impacts of all the activities in the Central Arroyo Seco?

DEIR Less-Than-Significant Impacts (Page 3.12-105): The DEIR describes many impacts known to residents to be major as "*less than significant*"!

Impact 3.12-1: Construction activities associated with the project are less than significant. The project proposes to maintain a construction crew over two years that will work more than twelve hours per day, seven days per week to complete the project on time. In addition, construction crews will park on site and trucks will remove dirt and construction debris as well as bring construction materials to the site. Construction traffic will occur from 7 am to 9 pm for two years. During excavation, 79 to 89 trucks per day will be traversing neighborhood streets. 800 – 1,000 daily workers may be required for major concrete pours. The central arroyo is only accessed through neighborhoods. If there is a schedule delay, two years can

be extended. (Statistically, significantly fewer than 50% of construction projects actually come in on time)

Additional analysis required: Please indicate the full impact of construction traffic including parking, service vehicles, etc and include the total construction time in the impact. This construction not only impacts neighborhoods where residents are going to work, bringing children to school and other extracurricular activities, but also impacts those people wanting to use the area for recreation.

Additional analysis required: What impact will construction truck traffic have on residents' quality of life? What impact will it have on air quality? The DEIR fails to address these issues.

Impact 3.12-7 Implementation of the proposed project would result in significant adverse impacts on traffic and circulation at the study intersections during both weekday and weekend special vents at the Rose Bowl Stadium.

Additional analysis required: This project will provide significant impacts to neighborhood traffic. Describe how emergency vehicles will get to residents in a timely manner, how police will be able to respond quickly to neighborhoods with emergencies. Explain how first responders (doctors etc) who live within the Rose Bowl perimeter will be able to get out of their neighborhoods to help their patients.

Impact 3.12-8 Parson's will be utilized for off-site parking.

Additional analysis required: It is clear that Parson's parking lot is economically valuable due to it's Old Town location. If long-term contracts are not used to tie up this property for the complete term of the NFL, there is a strong likelihood that market demands will take off-site parking leaving the City in a bind to provide parking in other areas. Please provide contract information or options for other sites. Has Parsons committed in writing to the City of Pasadena to allow usage of its parking facilities for the duration of the NFL contract?

Additional information needed: What alternative sites will the City commit to the NFL for parking if Parson's lot becomes unavailable for Rose Bowl parking?

Project Inconsistent with 1994 General Plan Documents

Mobility Element

A guiding principle of the 1994 General Plan is that Pasadena will target the type and location of new growth *"without increasing traffic or intruding on neighborhood quality of life."* The Rose Bowl stadium is located in a single family residential neighborhood. The DEIR concludes that NFL would generate 37,968 net new daily vehicle trips over a 24-hour special event weekday period (DEIR, p. 49), but the DEIR fails to address how the Rose Bowl can be renovated to accommodate NFL *"without increasing traffic or intruding on neighborhood quality of life."*

Additional analysis required: Please describe specifically how an NFL team using Rose Bowl will encourage non-auto transit. The DEIR merely concludes, without any discussion, that NFL would increase the use of public transportation and decrease reliance on the automobile. Please explain how this will occur.

The 1994 Mobility Element of the General Plan also classifies South Orange Grove and portions of California Boulevard as *"de-emphasized streets."* As discussed above, however, the EIR does not study any Orange Grove intersections or street

segments south of California Boulevard. (DEIR, pp. 13-14; Traffic Study, pp. 35-36.)

The DEIR also fails to study whether an NFL team in the Rose Bowl will be consistent with the objectives and policies contained in the City's recently-updated Mobility Element. In April 2003, the City Council conceptually approved the new Mobility Element, more than a year before the DEIR Initial Study was prepared. In November 2004, the City Council approved the final version of the new Mobility Element as part of the Council's certification of the General Plan environmental impact report. The City Council finalized the General Plan before the City conducted scoping sessions on the Rose Bowl DEIR.

The new Mobility Element continues the 1994 General Plan's commitment to protecting residential neighborhoods from traffic. For example, the new Mobility Element continues to classify South Orange Grove as a "*de-emphasized street*" and states that "*efforts will be made to limit increases in travel*" and "*[m]easures that would increase traffic in [de-emphasized] streets will not be planned or implemented.*" (Mobility Element, Policy No. 3.11, p. 20) The new Mobility Element also retains the concept of the "*environmental capacity*" of local streets. Indeed, the new Mobility Element contains fourteen (14) specific policies under the general objective entitled "*Protect Neighborhoods.*" (Mobility Element §3.2.3, pp. 18-20)

Additional analysis required: The DEIR fails to address any of the neighborhood protection policies set forth in the new Mobility Element. Please specifically explain how NFL at the Rose Bowl would encourage non-auto transit. Why does the EIR analyze only two transit objectives from the 1994 Mobility Element? What objectives and policies from the 1994 Mobility Element were excluded from the EIR? Why does the DEIR exclude these 1994 objectives and policies?

Additional information needed: Is it possible to renovate the Rose Bowl to accommodate the NFL "*without increasing traffic or intruding on neighborhood quality of life?*" Why does the EIR fail to study whether NFL would be consistent with the objectives and policies contained in the new Mobility Element? Is it possible to renovate the Rose Bowl to accommodate NFL in light of the fourteen (14) specific policies under the "*Protect Neighborhoods*" objective of the new Mobility Element? Why or why not?

Additional analysis required: Explain why the DEIR is not inadequate because it fails to study whether NFL would be consistent with the objectives and policies contained in the new Mobility Element. Please consider whether the City should prepare a new traffic study and supplemental EIR that addresses these issues.

The Pasadena community consistently frames regulations to protect the Arroyo Seco. *Section 3.1.3 Regulatory Framework: City of Pasadena, General Plan* quotes elements of the general plan which are impacted by the proposed project. However, missing from this purpose is any recognition of the General Provisions of the City of Pasadena's Arroyo Seco Public Lands Ordinance [Ord. 6403 §2 (part), 1990] which includes in its purpose (§3.32.020) *"...to establish regulations for preservation, enhancement and enjoyment of the Arroyo Seco as a unique environmental, recreational and cultural resource of the city....such resource and the neighborhoods must be preserved, protected and properly maintained."*

Additional analysis required: Please address assumptions in the DEIR which fail to consider the General Provisions of the Arroyo Seco Public Lands Ordinance which requires the resource that is the Arroyo Seco *"...be preserved, protected and properly maintained"*. There is not another NFL stadium in the United States that is located in a residential parkland setting. Why have the provisions in this long-standing City ordinance been ignored in the DEIR? Does the City anticipate seeking a change to the Arroyo Seco Public Lands Ordinance? If so, what are the anticipated changes? How will the City notify residents of any considered changes?

Green Space and Open Space Elements of the General Plan

In the 1994 General Plan, the public was promised that the Green Space Element, which was a critical element to the character and livability of Pasadena, would be **first** in the General Plan timetable, anticipating completion within two years.

However, as the Open Space and Conservation Elements DEIR states:

"The City currently does not have a specific parks and recreation threshold or standard . . . In the absence of a City standard, specifically for this EIR, the National Recreation and Parks Service standard of 3 acres of parkland per 1,000 residents . . . will be used to determine the level of impact resulting from implementation of the project."

Furthermore,

1. The city's draft Land Use Element states that it is a city policy (9.4) *"...to provide an adequate total quantity and equitable distribution of public or publicly accessible open spaces throughout the City."* (p, 15)
2. The city's initial inventory on the Green Space Element (7/27/04) describes the national parks standard as 3.66 acres of local parkland per 1,000 residents.
3. The National Recreation and Parks Association (NRPA) claims the national standard of 10 acres of parkland for every 1,000 people is **deficient** in today's recreation and open space environment.
4. Objective 9 of the Draft Land Use Element Update states: **"OPEN SPACE PRESERVATION AND ACQUISITION: *Preserve and acquire open space in Pasadena in order to enhance the quality of Pasadena life.*"**
5. *Section 3.1.3 Regulatory Framework: City of Pasadena*, Guiding Principle #2 states that *"...change will be harmonized to preserve Pasadena's historic character and environment."* Open spaces and streets should be as carefully designed and preserved as buildings. The city's public spaces are as

important to its citizens as its buildings. Priority should be given to updating the Open Space Element. It will become the Green Space Element of the General Plan, addressing urban open spaces, urban forestry, parks, and natural areas and reflecting the concerns and desires of the residents.

Additional analysis required: Please explain why priority is not being given to updating the Open Space Element prior to preparing an EIR to renovate a stadium that sits in an open area. Please address the conflicts with the General Plan and the Land Use Element that Conflict with the NFL plan. Please also provide mitigation plans to provide open space elements to replace current areas in use.

Cumulative Impacts

Cumulative impacts are not fully divulged in the DEIR. There is a section in the DEIR that states (Section 3.8.9 Cumulative Impacts): *"Even though the proposed project would have a significant impact on land use intensification, because no changes in land use elsewhere in the Arroyo are expected to occur, there would be no cumulative impact of the proposed project from a land use perspective."*

Additional analysis required: Please explain why the project would not have a significant impact on land use intensification, when there are land use changes in the Master Plan for the upper Arroyo, in particular, numerous multiuse playing fields. Please explain why this project has not been included in the Arroyo Seco Master Plan and the MEIR, since it directly impacts the Rose Bowl Use Plan, which has been completely ignored by the NFL DEIR.

The DEIR fails to study the accumulated environmental impacts of NFL-related events and retail that generate fewer than 20,000 attendees, including the impacts on parking and traffic. The EIR assumes that traffic from the NFL's new retail outlets will be *"ancillary" to games days and that a renovated Rose Bowl would not be a "popular destination point."* (EIR, p. 51.) Similarly, the DEIR's *"Traffic Impact Analysis Scenarios"* do not address pre-game activity (including traffic), or what other, non-game events NFL would host at the Rose Bowl. (DEIR, pp. 54 & related tables.) At this time, there is no maximum number of NFL events defined in the DEIR.

The DEIR also does not appear to study the cumulative traffic impacts of NFL, plus UCLA, Tournament of Roses, flea market, Aquatic Center, Kidspace, etc. The Traffic Study only measured traffic from one UCLA game. (DEIR, p1 & footnote 1)

Additional information needed: Why would the NFL operate the Hall of Fame and Team Store weekdays and weekends year-round, if they are not intended to be *"popular destination points"*? Why does the DEIR fail to study environmental impacts of NFL-related retail and events that generate fewer than 20,000 attendees? What would be the traffic and parking impacts from the anticipated year-around NFL-related retail and non-game events? Why does the DEIR assume that a renovated Rose Bowl would not be a popular destination point? What are the impacts to the neighborhood of pre-game activities? What will be the traffic impacts? What will be the lack of available parking impacts be on residences? What are the cumulative impacts of the NFL retail outlets on the neighborhoods, flea markets, Aquatic Center, Kidspace and etc. on non-game days?

Alternatives to the Project

The DEIR Fails to identify reasonable alternatives. During EIR scoping, it was requested that the DEIR include a Project alternative that only allows access via shuttle buses or other non-auto forms of transportation and with extremely limited auto access for Rose Bowl events.

Additional analysis required: Why doesn't the DEIR analyze a reduced-parking, non-auto Project alternative? Moreover, although the NFL parking plan calls for 18,000 parking spaces, the EIR states that the Rose Bowl can supply up to 24,310 spaces. Will the City's agreement with the NFL stipulate that NFL can never park more than 18,000 vehicles?

Alternative projects need to be identified that achieve the goals of the Rose Bowl project which have less significant impacts. No suitable alternatives were provided.

Arroyo Seco Public Lands Ordinance Ignored

Over the years, our community has framed regulations to protect the Arroyo Seco. *Section 3.1.3 Regulatory Framework: City of Pasadena, General Plan* quotes elements of the general plan which are impacted by the proposed project. However, missing from this purpose is any recognition of the General Provisions of the City of Pasadena's Arroyo Seco Public Lands Ordinance [Ord. 6403 §2 (part), 1990] which includes in its purpose (§3.32.020) "...to establish regulations for preservation, enhancement and enjoyment of the Arroyo Seco as a unique environmental, recreational and cultural resource of the city....such resource and the neighborhoods must be preserved, protected and properly maintained."

Additional analysis required: Please address assumptions in the DEIR which fail to consider the General Provisions of the Arroyo Seco Public Lands Ordinance which requires the resource that is the Arroyo Seco "...be preserved, protected and properly maintained". There is not another NFL stadium in the United States that is located in a residential parkland setting. Why have the provisions in this long-standing City ordinance been ignored in the DEIR? Does the City anticipate seeking a change to the Arroyo Seco Public Lands Ordinance? If so, what are the anticipated changes? How will the City notify residents of any considered changes?

Please also direct your attention to the current Rose Bowl Position Statement from Pasadena Heritage: *"The Arroyo Seco is Pasadena's largest public park and provides a great variety of recreational opportunities for our community in a natural setting of unparalleled beauty. The Arroyo's historically significant features and natural setting must be respected, and its current uses must not be adversely impacted by use of the Rose Bowl for a National Football League event."*

Economic Impacts Must be Evaluated

The title of the project itself, the *"Rose Bowl Stadium Renovation Project"* seems to be a bit of a misnomer. The DEIR does not truly analyze alternative types of "renovation", it **only** analyzes the environmental impacts of having an NFL team in the Central Arroyo Seco.

The DEIR states in the first line of the Project Description (DEIR p xiii) *"Renovations of the existing Rose Bowl stadium are proposed to extend the building's long-term use and financial viability by upgrading the stadium and placing the NFL as a long-*

term tenant with the ability to finance the renovation.”, yet no economic analysis is available that demonstrates the economic analysis for **long-term financial viability**. It is a **critical** study upon which the entire NFL project hinges, and must be done before the DEIR can be finalized and certified by the City Council.

Additional information needed:

- What are the economic benefits to Pasadena for having an NFL team in the Rose Bowl?
- Will the financial benefit to Pasadena of having the NFL in the Rose Bowl be **only** the renovation of the stadium, with all other financial benefits gained by a professional, for-profit organization?
- Will Pasadena be required to give up significant use of parkland for active recreational use to benefit spectator sport use?
- Who will benefit economically from the museum and other retail amenities proposed for the Rose Bowl?
- What are the specific economic costs associated with deterioration of the soccer fields and the golf course by increased parking?

Additional analysis required: In a project which has, in the first sentence of its description, “...*financial viability*...”, an economic analysis must be provided to demonstrate that the Project will result in this occurrence. Please provide the economic analysis to show what the true economic viability of this Project is and offer a viable alternative be along with this project to the City Council for review which also achieves the stated goals of the project.

Lack of Public Support

It is evident that the DEIR fails to address the lack of public support for either the renovation of the stadium or the acceptance of an NFL at the Rose Bowl. The public’s input must be taken into account during the NFL EIR process, with all comments and questions responded to, before the City Council can certify the NFL EIR. This is a tremendously significant issue, and far too important to residents for commissions to race through, because of the significant costs, risks, impacts to a residential area and so forth, that are associated with the proposed project. WPRA is concerned with making significant irreversible decisions that could significantly impact the enjoyment and use and the quality of life of residents enjoying the Central Arroyo Seco.

We ask that the City Council support the finding that this DEIR is inadequate and cannot be certified. We also request that the Planning Commission be asked to review this critical document prior to its being finalized submitted to the Council for a certification decision.

Additional analysis required: The DEIR must discuss the assumptions that fail to consider the provisions of the General Plan and the Arroyo Seco Public Lands Ordinance. There is not another NFL stadium in the United States that is located in a residential and parkland setting. Why is it a valid argument to enhance patron experience in a renovated stadium at the cost of displacing thousands of active recreational users?

Additional information needed: How many Pasadenans are anticipated to attend the NFL games? What will the ticket cost be? How many season tickets will be available to Pasadenans? How has this been compared to the loss of use of the parkland to thousand of recreational users that cannot afford to attend an NFL game? Why should Pasadena give up precious parkland so that attendees of NFL games can experience an *"enhanced experience"*? What is the justification for this?

To what extent will the NFL control the usage of the Rose Bowl for non-NFL events? What are the specific revenues that will come to the City coffers as opposed to the NFL's? If this question cannot be answered, how can the potential impact on the City possibly be determined?

WPRA acknowledges the time and expense that have been incurred in the preparation of the DEIR for the proposed NFL Project, but find that it fails to focus on the clear public preference for preserving, protecting and maintaining City parklands and historic buildings. WPRA looks forward to the City's responses to these comments before the City Council takes action on the proposed renovation of the Rose Bowl.

In conclusion, WPRA finds that the DEIR's summation that the NFL would *"...contribute to the quality of life in the City of Pasadena, and, thus, would constitute a beneficial impact."* (Beneficial Impacts, p xxxix) has not been shown to be evident in the Rose Bowl Stadium Renovation Project DEIR. The City has much work to do to make the DEIR adequate and to protect the precious asset that is known as the Arroyo Seco.

Sincerely,

Sent via email – signatures can be verified

David Romney
President

Joan Hearst
Vice President

Cheryl Auger
Communications Chair & NFL
Rose Bowl Committee Chair

Exhibit 2

WPRA Comments Regarding 2012 Draft EIR on Temporary NFL Use of Rose Bowl April 12, 2012

1. West Pasadena NFL Survey In December 2011, WPRA surveyed West Pasadena residents concerning the possible temporary use of the Rose Bowl by the NFL. We mailed a questionnaire to 5,700 households in the WPRA service area and emailed a link for an online version of the survey to nearly 1,000 subscribers to WPRA's weekly eNewsletter. We received more than 1,200 responses. The full results of the survey are available on our website, WPRA.net, and are presented below.

43% of survey respondents oppose NFL at the Rose Bowl under any circumstances. NFL opponents cite traffic and congestion, crowds, public drunkenness, disorderliness, crime, safety, security, reduced access to the Arroyo, pollution, trash, litter, and drunk driving as their chief reasons for objecting to the idea.

Only 19% of respondents believe the City should consider NFL at the Rose Bowl. Supporters most often cite the revenue and benefits NFL could bring to the Rose Bowl, and the jobs and positive exposure it could generate for Pasadena.

37% of survey respondents think the City should consider NFL at the Rose Bowl, but only if certain requirements are met. These conditions include the following:

- All revenues from the NFL should be used only for Rose Bowl renovation and to mitigate the effects of NFL use;
- All negative impacts (increased traffic, reduced access to the Arroyo) must be fully mitigated; and
- NFL's use of the Rose Bowl must be truly temporary, with 75% of respondents who cited this condition defining "temporary" as two or three years.

The draft EIR should address all the concerns expressed by West Pasadena residents in the WPRA's NFL survey, particularly how the City will protect residential neighborhoods from traffic and possible public safety threats. The draft EIR also must explain how the City plans to fully mitigate all negative impacts caused by the NFL's possible use of the Rose Bowl. Finally, the City must be transparent in disclosing to the public all proposed agreements with the NFL so residents can meaningfully evaluate whether City Hall has made an iron-clad guarantee to limit the NFL to only temporary use of the Rose Bowl.

2. Game Day Conditions -- Traffic and Congestion

The concern most frequently cited by West Pasadena residents in our survey is traffic and resulting congestion in City streets. To address this concern, the draft EIR must:

- A. **Study all access routes.** There already is a major flaw in the planned analysis. The *Revised Notice of Preparation for Extended Scoping Period and Additional Scoping Meeting* dated April 4, 2012 says that “Regional access to the project site is generally provided by Interstate 210 (I-210, Foothill Freeway) and State Route 110 (SR 110, Pasadena Freeway).” The statement omits two other freeway access routes, SR 134 Ventura Freeway and the SR 710 Long Beach Freeway. This omission is curious since the draft EIR for NFL use of the Rose Bowl completed in 2005 did the reverse, including SR 134 and omitting SR 110 (*DEIR pp. 13-14; Traffic Study, pp. 35-36*). Both omit SR 710, Long Beach Freeway. It is imperative that the draft EIR analyze all access routes, including the following freeway access routes:

- SR 110 Pasadena Freeway
- SR 134 Ventura Freeway
- I-210 Foothill Freeway
- SR 710 Long Beach Freeway

In addition, the draft EIR must include all City street segments and intersections providing access to the Rose Bowl. Again, the 2005 draft EIR had major flaws in this area according to the City’s own Transportation Advisory Commission (see Transportation Advisory Commission letter dated March 21, 2005). Those flaws included omitting major access routes SR 110 and SR 710; and omitting 25 street segments and intersections, which are listed in the Transportation Advisory Commission letter dated March 21, 2005. Many of these street segments and intersections are severely impacted even by normal weekday commuter traffic.

- B. **Study the entire traffic impact period and with the maximum crowd (75,000).** The Draft EIR in 2005 studied only “peak” one-hour periods, even though conceding that this only accounts for 45% of the traffic (*DEIR pp 3.12-49, 3.12-50, and 3.12-113*). The upcoming draft EIR must fully analyze traffic and circulation impacts over all time periods, including:
- B.1. Fan arrival and departure times for at least two game conditions: (1) Fans stay to the end of a close game and all leave at once; (2) fans start leaving substantially before the end of the game and leave over a substantially longer period of time.
- B.2. Impacts, especially on the Arroyo, during the activities before and after a game, including pre-game preparation and post-game cleanup. These activities often occur on days before and after game day. If these are not analyzed and mitigated, then they must be forbidden.
- B.3. Impact of traffic from NFL-related retail businesses and non-game events, on both game days and non-game days. If these are not analyzed and mitigated, then they must be forbidden.
- B.4. Maximum expected crowd attendance of 75,000 people. From our understanding of previous studies, we anticipate the difficulties listed below. The City must explain how these difficulties will be addressed in the draft EIR:
- B.4.1. We know of no studies of peak game traffic since the 2005 Draft EIR. We know of one study of selected streets around the Rose Bowl done during a poorly attended UCLA game (we understand about 50,000 people or less). How

will the new EIR estimate traffic for a crowd 50% larger with varying arrival and departure intervals? We believe simply applying standard formulas and analogies is inadequate. The purpose of studies is to see if the situation is as predicted by standard formulas and analogies.

B.4.2. The 2005 draft EIR had major flaws, completely omitting major freeway access routes and at least 25 street segments and intersections, as discussed above. How will the new EIR address those flaws?

B.4.3. The Draft EIR must study impact of more than just the 75,000 people attending the games. There will be [people coming to the event for related](#) activities who will not be attending the game. They may tailgate, participate in game-day activities, visit related venues around the bowl, etc. There also will be staff people for the games and other activities, including players, coaches, staff, vendors, broadcasters, and security. In addition, unless everything else in the Arroyo is going to be closed, there will be people using the Rose Bowl area for other purposes, including walkers, swimmers, picnickers and others. All these requirements will add a substantial number of people and vehicles, which cannot be ignored.

C. Study Mitigation Measures That Will Insulate Affected Neighborhoods From Traffic Impacts. The draft EIR should study specific mitigation measures that will protect residential neighborhoods from traffic impacts. These mitigation measures should include but not be limited to:

- C.1. The complete elimination of event parking on residential streets through aggressive police enforcement and effective street barricades;
- C.2. The analysis of a “non-auto” circulation alternative that would emphasize shuttle buses and drastically limit on-site parking in the Arroyo;
- C.3. The creation of a citizens’ commission that would oversee traffic mitigation efforts and EIR compliance funding.
- C.4. The draft EIR should study a "carbon neutral" project alternative that will be planned in such a way as to have a net zero carbon footprint. This project alternative should achieve carbon neutrality with respect to carbon dioxide releases associated with traffic and congestion caused by NFL at the Rose Bowl.

D. Study Automobile Parking Alternatives to Protect the Arroyo Seco. The draft EIR must study alternatives that would discourage auto trips into the Arroyo Seco and preserve the Arroyo, particularly the golf course and picnic areas, from vehicle damage. These alternatives should include but not be limited to:

- D.1. A Project alternative that includes no parking structures or additional surface parking constructed in the Arroyo;
- D.2. A Project alternative that uses technology to manage parking (dynamic signage) and directs auto traffic to off-site parking and shuttle locations;
- D.3. A Project alternative that requires pre-assigned parking at off-site locations.
- D.4. A Project alternative that increases use of Gold Line and ARTS buses over the existing baseline for usage for current Rose Bowl events.

3. Security and Safety -- Neighborhood Protection

WPRA believes the City must thoroughly address all the neighborhood protection issues raised in our recent survey of West Pasadena residents. These conditions include, among others, the full mitigation of all negative impacts to the Arroyo and iron-clad contractual guarantees about "temporary" use, including number of events per year, size of events, and number of years. The area of study for these impacts must at least include Linda Vista-Annonale, San Rafael, East Arroyo and Downtown districts. Specific additional concerns that must be addressed include, but are not limited to,

- Pollution, trash, litter
- Noise, including from the stadium, the surrounding parking and tailgating areas, and fans roaming the neighborhoods.
- Lights
- Public drunkenness and disorderliness
- Drunk driving

4. Public Review of All NFL-Related Studies and Agreements

A. Economic Impact Study

Although we understand that the economic impact study is not part of the EIR process per se, the WPRA wants the economic impact study to be made available to the public with sufficient time for review and comment during the draft EIR comment period, so that residents can weigh the purported economic benefits against the environmental impacts. The economic impact study must be comprehensive. It must consider not only positive impacts, but also lost revenue to the golf course, Kidspace and other displaced Arroyo amenities caused by NFL at the Rose Bowl.

B. Adherence to City Master Plans and Arroyo Assessment

The draft EIR should provide a complete analysis as to how the Project will comply with the existing Arroyo Seco Ordinance and the Arroyo Seco Master Plan. The EIR also should address any impacts on the Arroyo Seco Watershed Sustainability Campaign's *Final Arroyo Seco Watershed Assessment* dated May 20, 2011.

C. Adhere to City Requirements the Projects use Pasadena Residents and Businesses

WPRA has seen that Pasadena normally requires that a certain portion of the City-sponsored work goes to Pasadena residents and businesses. There should be no exception here.

D. Proposed Agreements with the NFL

During the EIR process, the City must make available for public review and comment all NFL-related lease documents and other agreements. City Hall must be transparent in disclosing any and all agreements that would bind Pasadena in its dealings with the NFL. Full disclosure of all proposed agreements is essential so that Pasadena residents can evaluate the terms of any deal with the NFL.

E. Consecutive and Cumulative Annual Environmental Impacts of NFL's Temporary Use

The draft EIR must assess the total, cumulative impact of NFL use. Cumulative impacts to consider include, but are not limited to, physical changes to the Rose Bowl and Central Arroyo from temporary modifications and additional heavy use, because of both NFL games and NFL-related activities. The draft EIR must:

- Separately analyze the consecutive impacts for each year; year one, year two, year three, year four and year five.
- Then analyze the cumulative impacts year-by-year.