RESOLUTION NO. 05-R-

RESOLUTION OF THE CITY COUNCIL OF THE CITY OF PASADENA CERTIFYING THE ENVIRONMENTAL IMPACT REPORT FOR THE ROSE BOWL STADIUM RENOVATION PROJECT; MAKING ENVIRONMENTAL FINDINGS PURSUANT TO THE CALIFORNIA ENVIRONMENTAL QUALITY ACT; ADOPTING A STATEMENT OF OVERRIDING CONSIDERATIONS; AND ADOPTING A MITIGATION MONITORING PROGRAM

THE CITY COUNCIL OF THE CITY OF PASADENA HEREBY FINDS AND RESOLVES AS FOLLOWS:

Section 1. The City Council is considering a proposal to renovate the Rose Bowl Stadium (the "Stadium") in connection with a lease of the Stadium to the National Football League (the "Project"). The City Council has been presented with a conceptual design for the renovation of the Stadium and a term sheet of the principal terms for the lease with the National Football League. A Draft Environmental Impact Report dated February 2, 2005 (the "Draft EIR") was prepared for the Project. In accordance with the California Environmental Quality Act ("CEQA") (Cal. Pub. Res. Code §21000 *et seq.*) and the State CEQA Guidelines (the "Guidelines") (14 Cal. Code Regs. §15000 *et seq.*), the City analyzed the Project's potential impacts on the environment.

Section 2. Pursuant to Section 15063 of the Guidelines, the City prepared an Initial Environmental Study (the "Initial Study") for the Project. The Initial Study concluded that there was substantial evidence that the Project might have a significant environmental impact on several specifically identified resources and governmental services, including aesthetics, biological resources, hazards and hazardous materials, land-use and planning, aesthetics, transportation/circulation, air quality, noise, cultural resources, geology and soils,

population and housing, public services and utilities, hydrology and water quality, and recreation.

Section 3. Pursuant to Guidelines Sections 15064 and 15081, and based upon the information contained in the Initial Study, the City ordered the preparation of an environmental impact report for the Project. The City contracted with an independent consultant for the preparation of the environmental impact report and, on October 18, 2004, prepared and sent a Notice of Preparation of the Draft EIR to responsible, trustee, and other interested agencies and persons in accordance with Guidelines Section 15082(a).

Section 4. The City circulated the Draft EIR, together with technical appendices (the "Appendices"), to the public and other interested persons between February 2, 2005 and March 21, 2005, for a 45-day public comment period. During the public comment period, a public hearing was held to solicit comments on the Draft EIR and various commissions held public meetings concerning the Draft EIR and provided comments on the document.

Section 5. During the public comment period the City received written and oral comments on the Draft EIR. The City prepared written responses to all written comments and many oral comments received on the Draft EIR and made revisions to the Draft EIR, as appropriate, in response to those comments. The City distributed written responses to comments on the Draft EIR in accordance with the provisions of Public Resources Code Section 21092.5. The written responses to comments were also made available for public review before the commencement of the hearing on the certification of the Draft EIR. After reviewing the responses to comments and the revisions to the Draft EIR, the City concluded that the

information and issues raised by the comments and the responses thereto did not constitute new information requiring recirculation of the Draft EIR.

Section 6. The City Council held a duly noticed public hearing on the EIR and the Project on May 9, 2005 (the "Hearing"). In response to comments on the Draft EIR from the public and City commissions, staff has presented in its report to the City Council an additional mitigation measure (the "design mitigation") that would reduce impacts to aesthetics and cultural resources. In general, the design mitigation would involve a change to the design of the Project to preserve the character defining elements of the north end of the Stadium, including the historic berm, and the view of the exterior of the Stadium from the north. The change would also better preserve the view to the north from the interior of the Stadium and would reduce the aesthetic impact to the view of the Stadium from the east by including a new berm at the plaza level which would reference the historic berm to be removed. As demonstrated in the EIR, the environmental impacts of the design mitigation are no greater than the environmental impacts of the Project, as originally proposed and mitigated and the design mitigation would reduce impacts in two impact areas.

Section 7. The Final Environmental Impact Report (the "EIR") is comprised of: the Draft EIR, including Appendices, dated February 2, 2005; the Comments and Responses to Comments on the Draft EIR, including revisions to the Draft EIR, contained in Volume 2 and dated April 28, 2005; and Errata to the Final Environmental Impact Report for the Rose Bowl Stadium Renovation Project dated May 9, 2005 which includes an analysis of the design mitigation.

Section 8. The findings made in this resolution are based upon the information and evidence set forth in the EIR and upon other substantial evidence that has been presented at the Hearing and in the record of the proceedings. The documents, staff reports, technical studies, appendices, plans, specifications, and other materials that constitute the record of proceedings on which this resolution is based are on file and available for public examination during normal business hours in the Department of Planning and Development and with the Director of Planning and Development, who serves as the custodian of these records.

Section 9. The City Council finds that agencies and interested members of the public have been afforded ample notice and opportunity to comment on the EIR and that the comment process has fulfilled all requirements of State and local law.

Section 10. The City Council has independently reviewed and considered the contents of the EIR prior to deciding whether to approve the Project. The City Council hereby finds that the EIR reflects the independent judgment of the City and the City Council. The City Council further finds that the additional information provided in the staff reports, in the responses to comments received after circulation of the Draft EIR, and in the evidence presented in written and oral testimony presented at the Hearing, does not constitute new information requiring recirculation of the EIR under CEQA. None of the information presented to the City Council after circulation of the Draft EIR has deprived the public of a meaningful opportunity to comment upon a substantial environmental impact of the Project or a feasible mitigation measure or alternative that the City has declined to implement.

Section 11. The City Council finds that the comments regarding the Draft EIR and the responses to those comments have been received by the City; that the City Council

received public testimony regarding the adequacy of the EIR; and that the City Council, as the decision-making body for the lead agency, has reviewed and considered all such documents and testimony prior to acting on the Project. Pursuant to Guidelines Section 15090, the City Council hereby certifies that the EIR has been completed in compliance with CEQA.

Section 12. Based upon the EIR and the record before the City Council, the City Council finds that the Project will not cause any significant environmental impacts after mitigation except in the areas of Aesthetics, short-term Air Quality impacts during construction, Cultural Resources, Land Use, Noise, Recreation, and Traffic. Explanations for why the impacts other than those identified in this Section were found to be less than significant are contained in the Environmental Findings set forth in Exhibit A to this resolution and are more fully described in the EIR and the Initial Study (included as Appendix A to the EIR).

Section 13. Based upon the EIR and the record before the City Council, the City Council finds that the Project will create significant unavoidable impacts to Aesthetics, short term Air Quality during construction, Cultural Resources, Land Use, Noise, Recreation, and Traffic. All feasible mitigation measures for these impacts have been adopted. These significant impacts are further described in the "Findings and Facts In Support of Findings" set forth in Exhibit A, which is attached hereto and is incorporated herein by reference, and in the EIR. The changes or alterations required in, or incorporated into, the Project with respect to these impacts, and a brief explanation of the rationale for this finding with regard to the identified impacts, are contained in Exhibit A. Further explanation for these determinations may be found in the EIR.

Section 14. The EIR describes, and the City Council has fully considered, a reasonable range of alternatives to the Project. These alternatives include "Alternative 1 – the No Project Alternative," "Alternative 2 – the Increased Displacement Events Alternative," "Alternative 3 – the Alternate Design Alternative," and "Alternative 4 – the Historic Restoration Alternative." With respect to each of the alternatives analyzed in the EIR, the City Council hereby makes the findings set forth in Exhibit A. The City Council expressly finds that each of the alternatives identified in the EIR either would not sufficiently achieve the basic objectives of the Project, would do so only with unacceptable adverse environmental impacts, or is not feasible. Accordingly, and for any one of the reasons set forth in Exhibit A, attached hereto and incorporated herein by this reference, or set forth in the record, the City Council finds that specific economic, social, or other considerations make infeasible each of the Project alternatives and each is hereby rejected. The City Council further finds that a good faith effort was made to incorporate alternatives into the preparation of the EIR, and that all reasonable alternatives were considered in the review process of the EIR and the ultimate decision on the Project.

Section 15. For the impacts identified in the EIR, or otherwise in the record, as "significant and unavoidable," the City Council hereby adopts the "Statement of Overriding Considerations" set forth in Exhibit B, which is attached hereto and is hereby incorporated by reference. The City Council finds that each of the overriding benefits, by itself, would justify proceeding with the Project despite any significant and unavoidable impacts identified in the EIR or asserted to be significant in the record of proceedings.

Section 16. The City Council hereby adopts the mitigation measures set forth in Exhibit C, attached hereto and incorporated herein by this reference as well as the design mitigation described above and set forth in the Errata pages of the EIR, and imposes each

mitigation measure as a condition of Project approval. The City Council further adopts the "Mitigation Monitoring and Reporting Program" which is presented as Exhibit C, attached hereto and incorporated herein by reference. City staff shall implement and monitor the mitigation measures as described in Exhibit C.

Section 17. The City Clerk shall certify to the adoption of this resolution, and shall cause this resolution and her certification to be entered in the Book of Resolutions of the Council of this City.

Adopted at the meeting of the City Council on the day of May 2005, by the following vote:

AYES:
NOES:
ABSENT:
ABSTAIN:

Jane L. Rodriguez
City Clerk

APPROVE AS TO FORM:

Michele B. Bagneris
City Attorney

EXHIBIT A

Findings and Facts In Support Of Findings

Section I. Introduction.

The California Environmental Quality Act ("CEQA") and the State CEQA Guidelines (the "Guidelines") provide that no public agency shall approve or carry out a project for which an environmental impact report has been certified which identifies one or more significant effects on the environment that will occur if a project is approved or carried out unless the public agency makes one or more of the following findings regarding the potential mitigation of these impacts:

a. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects identified in the EIR.

b. Such changes or alterations are within the responsibility or jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

c. Specific economic, social, or other considerations make infeasible the mitigation measures or project alternatives identified in the EIR.

Pursuant the requirements of CEQA, the City Council hereby makes the environmental findings set forth below. These findings are based upon evidence presented in the record of proceedings, both written and oral, the EIR, and staff and consultants' reports prepared and presented to the City Council.

Section II. Project Objectives.

As set forth in the EIR, the objectives of the Project include:

- To facilitate long term economic viability of the Rose Bowl Stadium by attracting a long-term tenant;
- To provide modern, state-of-the-art amenities to enhance the patron experience and upgrade safety features
- To improve traffic and parking conditions in the Arroyo;
- To preserve the setting and integrity of the Arroyo Seco;
- To maintain the National Historic Landmark status of the Rose Bowl without impairing the ability to make the improvements necessary for long term continued use.

Section III. Potentially Significant Environmental Impacts

The following environmental impact issue areas were examined in the EIR: (1) Aesthetics; (2) Air Quality; (3) Biological Resources; (4) Cultural Resources; (5) Geology/Soils; (6) Hazards and Hazardous Materials; (7) Hydrology/Water Quality; (8) Land Use/Planning; (9) Noise and Vibration; (10) Public Services; (11)

Recreation; (12) Traffic, Parking, and Circulation; and (13) Utilities and Service Systems. The findings, impacts, and mitigation measures that are applicable to the Project are set forth below.

A. Aesthetics

Impact 3.1-1	**The proposed project could result in a substantial adverse effect on a scenic vista.**

There are no designated scenic vistas in the Arroyo Seco designated in the City of Pasadena Comprehensive General Plan, nor is the Arroyo Seco visible from the Angeles Crest Highway, the nearest designated scenic highway. However, the open space corridor provided by the Arroyo Seco, which runs from the upper reaches in the Angeles National Forest south to the City's southern boundary, is considered to be one of the most scenic areas in the region. The City of Pasadena Comprehensive General Plan contains a scenic highway diagram that depicts Linda Vista Avenue and the Foothill Freeway as Los Angeles County Recommended Scenic Highways (unofficial). Linda Vista Avenue and the Foothill Freeway extend the length of the Upper Arroyo Seco, the Central Arroyo Seco and the northern portion of the Lower Arroyo Seco. The Stadium is approximately 0.25 mile from the Foothill Freeway. There are limited views of the Stadium from the Foothill Freeway, and, therefore, the proposed project would not significantly affect views from this recommended scenic highway.

The proposed project would alter the views of the San Gabriel Mountains from both inside the Stadium and looking down on the Stadium from both sides of the Arroyo. The new structure would be greater in mass than the existing Stadium, and the increased height would interfere with scenic vistas from various viewpoints.

Mitigation Measures: The following mitigation measures will be required to lessen the impact.

MM 3.1-3 *Consistent with the implementation methods MM3.3-2a (see Section 3.3 Biology) and the provisions of the Tree Protection Ordinance, the City of Pasadena shall also require that any Replacement Tree Canopy Coverage (for removed or damaged trees) be concentrated on the east side of the Stadium. Also, replacement plantings (24 in. box minimum) of one tree for every one lost or removed shall be installed along the edges of existing hardscape parking lots within the Arroyo. In addition, vines shall be planted to grow to be permanently secured to vertical building wall surfaces on the east side of the Stadium. At retaining walls, vines and shrubs shall be installed and spaced so as to completely cover walls when mature. All plantings shall be implemented in accordance with a City approved landscape plan. Planting off site within the Arroyo shall be done under the direction of the City.*

MM 3.1-3 (a) *The project operator shall prepare a landscape plan for improvements to the perimeter areas of Parking Lots B, D, F, I, J-East, J-West, K, and M for City approval prior to the issuance of grading permits. The landscape improvements shall include the planting of trees (minimum of 24 in. box, planted 30 feet on center or equivalent as determined by the City) with complementary ground cover and supporting irrigation system. The improvements shall be completed prior to issuance of occupancy permits to the tenant.*

MM 3.1-3 (b) *The project operator shall prepare a hardscape plan for improvements to Parking Lots J-East and J-West for City approval prior to the issuance of grading permits. The improvements shall include the installation of a hard drivable surface that remains permeable (such as turf block) and developed to industry standards. The improvements shall be completed prior to issuance of occupancy permits to the tenant.*

In addition to the mitigation measures identified in the EIR, the City Council has also adopted the design mitigation that will further reduce the impacts described above. However, even with implementation of these mitigation measures, significant and unavoidable impacts related to scenic views and the Stadium viewing experience would remain.

Finding: **Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen some of the significant environmental effect as identified in the Final EIR, but the impact resulting from substantial degradation of the visual quality and character related to the Stadium viewing experience and scenic views remain significant and unavoidable.**

Impact 3.1-2	**The proposed project could substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a scenic highway.**

The project site does not contain rock outcroppings, and effects on the historic Stadium are addressed in Section 3.4 (Cultural Resources); this analysis addresses other scenic resources, specifically trees. The project site contains over 250 trees of varying size and type within the project boundaries. Some of these trees would require removal with construction of the proposed project. As described in Chapter 2 (Project Description), and as modified by the design mitigation, a portion of the landscaped berms around the Stadium would be removed. Much of the area adjacent to the Stadium would be enhanced with pedestrian amenities, allowing access around the entire Stadium via a concentric path beyond the security fence that would mimic the elliptical seating bowl. Plazas and entries would be landscaped with trees and plantings matching those that are on site.

While the project would comply with the City Tree Protection Ordinance, (see Section 3.3, Biology), the effect of removing and/or relocating these trees is identified here also as a potentially significant impact on visual resources. While construction phases would be expected to result in short-term impacts to scenic resources during construction, there would be no significant long-term impacts in conjunction with related projects in the vicinity of the Arroyo Seco.

Mitigation Measures: The following mitigation measures will be required to lessen the impact. MM 3.1-3 would address tree removal/relocation and would reduce this impact to less than significant. MM 3.1-1 and MM 3.1-2 would address short-term construction impacts and would reduce this impact to less than significant.

MM 3.1-1 *The City of Pasadena shall require construction contractors to strictly control the staging of construction equipment and the cleanliness of construction equipment stored or driven beyond the limits of the construction work area as a means of minimizing temporary degradation of the visual character of surrounding areas and the associated impact to aesthetics. Prior to completion of final plans and specifications, the City of Pasadena shall review the plans and specifications to ensure that all construction vehicles and equipment shall be parked in designated staging areas when not in use. Vehicles shall be kept clean and free of mud and dust before leaving the project site. Completion of this measure shall be monitored and enforced by the City of Pasadena.*

MM 3.1-2 *The City of Pasadena shall require construction contractors to provide temporary screening from the public view, around construction work areas, for all improvements that require grading during construction and enhancement, as a means of minimizing the temporary effects to the visual character of the surrounding area and the associated impacts to aesthetics.*

MM 3.1-3, MM 3.3-1, and MM 3.3-2 would also apply.

Finding: **Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the final EIR.**

Impact 3.1-3	**The proposed project would result in new sources of increased light and glare from new lighting systems.**

New lighting systems include field lighting and scoreboard lighting. To address spill illumination and environmental glare from proposed field lighting systems, the project would include high performance sports light fixtures that improve the efficiency of the light beam from each sports fixture to 55 percent compared to the older style sports fixtures of 22 percent. The illumination is focused on the field and does not spill light outside the seating bowl. Data has shown that less than 3 foot-candles can be achieved one thousand feet from the Stadium and less than 1 foot-candle of illumination three thousand feet from the Stadium. (Three and 1 foot-candle is comparable to normal street lighting in most residential streets in most cities.) As originally proposed and as modified by the design mitigation, the scoreboard would be oriented in such a way as to minimize light and glare impacts on the surrounding land uses. The project will also include new fixture technology that has developed a black interior trim to reduce and eliminate 80 to 90 percent of the glare from lighting that could occur at night.

Lighting would be placed along the east and west roofs of the new suite level structures; therefore, it is expected that light that would escape the confines of the Stadium would be somewhat reduced. Since the heights of the east and west structures would be the same, each structure would be anticipated to

essentially block the view of the light blocks on the opposite side from view outside the Stadium. With design features intended to reduce light spill from the Stadium and implementation of MM 3.1-4 through MM 3.1-8, this impact would be reduced to a less-than-significant level and effects on the nighttime environment from new lighting would be minimized.

Glare could occur from building materials utilized in the new structures and could affect recreational users of the site and vicinity and drivers on local roadways such as Linda Vista Avenue, West Drive, Rosemont Drive, and Arroyo Boulevard. Construction materials would include glass, concrete, stucco, wood, core-ten steel, and other materials compliant with City design guidelines and architectural standards. To ensure that glare from the new structure would not adversely affect recreational users or drivers to the site and vicinity, MM 3.1-9 has been identified. Implementation of MM 3.1-9 would reduce impacts related to increased glare to less than significant.

Mitigation Measures: The following mitigation measures will be required to lessen light and glare impacts from new lighting systems.

MM 3.1-4 *Security lighting for the project shall be designed to minimize light migration in accordance with this measure. The City of Pasadena shall specify the lighting type and placement on the project site to ensure that the effects of security lighting are limited as a means of minimizing night lighting and the associated impacts to aesthetics. Prior to completion of final plans and specifications, the City of Pasadena shall review the plans and specifications to ensure that all light fixtures will use glare-control visors, arc tube suppression caps, and will use a photometric design that maintains 70 percent of the light intensity in the lower half of the light beam. Completion of this measure shall be monitored and enforced by the City of Pasadena.*

MM 3.1-5 *Prior to opening the Stadium with the newly proposed lighting, the Applicant shall test the installed field-lighting system to ensure that lighting meets operating requirements in the Stadium and minimizes obtrusive spill lighting in the Stadium facility. Testing would include light-meter measurements at selected locations in the vicinity to measure spill lighting from field-lighting fixtures, permit adjustment of lighting fixtures, and confirm that spill-lighting effects would not exceed 3 foot-candles 1,000 feet from the Stadium perimeter and no more than 1 foot-candle 3,000 feet from the Stadium perimeter.*

MM 3.1-6 *Stadium lighting and advertising (including signage) shall be oriented in such a manner to reduce that amount of light shed onto sensitive receptors and incorporate "cut-off" shields as appropriate to minimize any increase in lighting at adjacent properties.*

MM 3.1-7 *All interior floodlights, exterior parking lot, and other security lighting shall be directed away from sensitive receptors and towards the specific location intended for illumination. State-of-the-art fixtures shall be used, and all lighting shall be shielded to minimize the production of glare and light spill onto both existing and proposed residential units on the adjacent hillsides. A lighting design plan shall be submitted to the City for approval at plan check.*

MM 3.1-8 *Landscape illumination and exterior sign lighting shall follow the City's Municipal Code guidelines and be accomplished with low-level unobtrusive fixtures.*

MM 3.1-9 *All facilities shall emphasize the natural setting and use of natural materials. Building color shall be warm and earth-toned. Non-reflective materials shall be used on the exterior surfaces. Where appropriate, arroyo stone shall be incorporated into the design.*

Finding: **Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final EIR.**

Impact 3.1-4	**The proposed project could result in new sources of increased light and glare from the new scoreboard and advertising systems.**

Some oblique views of the scoreboards would be apparent to the residences on the east and west sides of the Stadium. The video board technology that would be used would ensure that reflection and glare from the scoreboards and advertising media would be directed towards the viewing stands and interior of the Stadium. These oblique views are not likely to reflect more light than the existing scoreboard. Although the new scoreboards would be larger than the existing scoreboards, their design would help to shield views of the scoreboards from the outside of the Stadium, would direct their lighting, and therefore, this impact would be considered less than significant with implementation of MM 3.1-6, above. Furthermore, implementation of the design mitigation will relocate the scoreboards to minimize impacts on views from inside and outside the Stadium.

Finding: **Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final EIR.**

Impact 3.1-5	**Implementation of the proposed project would substantially adversely impact the visual character or quality of the existing architectural features of the Rose Bowl Stadium.**

The proposed structure and new site layout would significantly alter the design character of the existing Stadium. The proposed new structure would have included east and west side luxury suites that would mirror each other as well as a roofline that would reach to 105 feet. The evenness and regularity of the new structure design is contrary to the elliptical shape, uneven height (with the Press Box), and low-intensity design of the existing Rose Bowl Stadium. In addition, the open concourse that surrounds the Stadium would become enclosed with the 105-foot-tall structure removing the current "setback" and pulling the Stadium flush into the surrounding vegetation. These changes are considered to constitute a significant and unavoidable impact. Implementation of MM 3.1-9, above, as well as the design mitigation would reduce this impact, although not to less-than-significant levels.

Finding: **Changes or alterations have been required in, or incorporated into, the project that substantially lessen the significant environmental effect as identified in the Final EIR, although the degradation of the existing visual quality and character of the Rose Bowl would remain significant and unavoidable.**

Impact 3.1-6	**Implementation of the proposed project would substantially adversely impact the existing visual character or quality of the viewing experience from within the Stadium.**

Views to the south, west, and north as currently seen from within the Stadium would be altered. Existing views of treetops and rugged hillsides and ridgelines would be mostly obstructed with construction of the 105-foot-tall concourse and suite levels, lighting structures, and other components of the project. This is a significant and unavoidable impact of the project. Implementation of the design mitigation would reduce this impact by reducing the bulk of the structure on the east side and restoring views to the north from within the Stadium. However, impacts would not be reduced to a level of insignificance.

Finding: **The project would significantly eliminate views of treetops, hillsides, and ridgelines as seen from within the Stadium. This impact is significant and unavoidable, as no feasible mitigation would reduce this impact to a level of insignificance.**

B. Air Quality

Impact 3.2-1	**The proposed project would be consistent with the AQMP, and would not interfere with attainment of air quality standards.**

The 1997 Air Quality Management Plan (AQMP) was prepared to accommodate growth, to reduce the high levels of pollutants within the areas under the jurisdiction of the South Coast Air Quality

Management District (SCAQMD), to return clean air to the region, and to minimize the impact on the economy. Projects that are considered to be consistent with the AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. The project is consistent with all adopted land use designations for the site. Therefore, the proposed project would be consistent with the AQMP employment forecasts for the Arroyo Verdugo and San Gabriel Valley subregions, and it would not jeopardize attainment of State and federal ambient air quality standards.

Finding: **As proposed, the project would have less-than-significant impacts on air quality standards and no mitigation would be necessary.**

Impact 3.2-2	**Project implementation is not anticipated to significantly affect local air quality.**

The simplified CALINE4 screening procedure was used to predict future CO concentrations at the study-area intersections in 2008, when all cumulative development in the area of the project is expected to be completed. The results of these calculations for special events held on weekdays and weekends show that future CO concentrations near these intersections would not exceed federal or State ambient air quality standards. CO hotspots are not predicted to exist near these intersections in the future and the contribution of project traffic-related CO at these intersections would not be considered significant.

Finding: **As proposed, the project would have less-than-significant impacts on local air quality and no mitigation would be necessary.**

Impact 3.2-3	**Project implementation would not release significant amounts of toxic air contaminants.**

Toxic or carcinogenic air pollutants are not expected to occur in any meaningful amounts in conjunction with operation of the proposed land uses within the project site. During construction, incidental amounts of toxic substances such as oils, solvents, and paints would be used. These substances would comply with all applicable SCAQMD rules for their manufacture and use. When completed and operational, only common forms of hazardous or toxic substances typically used, stored, or sold in conjunction with normal operation and maintenance of the proposed uses would be present in small quantities. Based on the common uses expected on the site and anticipated construction operations, potential impacts associated with the release of toxic air contaminants would be less than significant.

Finding: **As proposed, the project would have less-than-significant impacts related to toxic air contaminants and no mitigation would be necessary.**

Impact 3.2-4	**Project implementation would not create objectionable odors affecting nearby sensitive receptors.**

The project does not propose, and would not facilitate, uses that are significant sources of objectionable odors. The most likely potential sources of odor associated with the proposed project would result from

construction equipment exhaust during construction activities or the storage of operation-related solid waste. Given the short-term and temporary nature of construction activities, as well as the standard construction requirements imposed on the applicant, impacts associated with construction-generated odors would be less than significant. Any project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the City's solid waste regulations, and operational waste would not be significantly greater in amount than under current conditions.

Finding: **As proposed, the project would have less-than-significant impacts related to objectionable odors and no mitigation would be necessary.**

Impact 3.2-5	**Site preparation and construction activities would contribute to an existing air quality violation (NOx and PM_{10} only).**

Construction emission calculations, which assume that appropriate dust control measures would be implemented during each phase of development as required by SCAQMD Rule 403—Fugitive Dust, indicate construction-related activities would generate daily emissions of NO_x during the demolition and grading phase that exceed SCAQMD significance thresholds, while PM_{10} emissions would exceed SCAQMD significance thresholds during the grading phase. Therefore, with respect to NO_x and PM_{10} emissions, this impact, while short-term in nature, contributes to an existing air quality violation and would be significant and unavoidable. MMs 3.2-1 and 3.2-2 would lessen the severity of this impact, but not to a less-than-significant level.

MM 3.2-1 *The project builder(s) shall develop and implement a construction management plan, as approved by the City of Pasadena, which includes the following measures recommended by the SCAQMD, or equivalently effective measures approved by the City of Pasadena:*

- *Configure construction parking to minimize traffic interference*
- *Provide temporary traffic controls during all phases of construction activities to maintain traffic flow (e.g., flag person)*
- *Schedule construction activities that affect traffic flow on the arterial system to off-peak hours to the degree practicable*
- *Consolidate truck deliveries when possible*
- *Maintain equipment and vehicle engines in good condition and in proper tune as per manufacturers' specifications and per SCAQMD rules, to minimize exhaust emissions*
- *Use methanol- or natural gas-powered mobile equipment and pile drivers instead of diesel to the extent commercially practical*
- *Use propane- or butane-powered on-site mobile equipment instead of gasoline to the extent commercially practical*

MM 3.2-2 *The project builder(s) shall implement all rules and regulations by the Governing Board of the SCAQMD that are applicable to the development of the Project (such as Rule 402—Nuisance and Rule 403—Fugitive Dust) and that are in effect at the time of development. The following measures are currently recommended to implement Rule 403—Fugitive Dust. These measures have been quantified by the SCAQMD as being able to reduce dust generation between 30 and 85 percent depending on the source of the dust generation:*

- *Water trucks will be utilized on the site and shall be available to be used throughout the day during site grading and excavation to keep the soil damp enough to prevent dust from being raised by the operations*
- *Wet down the areas that are to be graded or that are being graded and/or excavated, in the late morning and after work is completed for the day*
- *All unpaved parking or staging areas, or unpaved road surfaces shall be watered three times daily or have chemical soil stabilizers applied according to manufacturers' specifications*
- *Enclose, cover, water twice daily, or apply approved soil binders to exposed piles (i.e., gravel, sand, and dirt) according to manufacturers' specifications*
- *The construction disturbance area shall be kept as small as possible*
- *All trucks hauling dirt, sand, soil, or other loose materials shall be covered or have water applied to the exposed surface prior to leaving the site to prevent dust from impacting the surrounding areas*
- *Wheel washers shall be installed where vehicles enter and exit unpaved roads onto paved roads and used to wash off trucks and any equipment leaving the site each trip*
- *Streets adjacent to the project site shall be swept at the end of the day if visible soil material is carried over to adjacent roads*
- *Wind barriers shall be installed along the perimeter of the site*
- *All excavating and grading operations shall be suspended when wind speeds (as instantaneous gusts) exceed 25 miles per hour over a 30-minute period*
- *A traffic speed limit of 15 miles per hour shall be posted and enforced for the unpaved construction roads (if any) on the project site*

Remediation operations, if required, shall be performed in stages concentrating in single areas at a time to minimize the impact of fugitive dust on the surrounding area

Finding: **As proposed, the project would have significant and unavoidable impacts related to construction emissions.**

Impact 3.2-6	**Project implementation would exceed daily operational emissions thresholds.**

The analysis of operational emissions from the project was prepared utilizing the URBEMIS 2002 computer model recommended by the SCAQMD. The results of calculations for additional special events show that operational emissions associated with those events would exceed SCAQMD thresholds. Although MM 3.2-1 and MM 3.2-2 would be required for the project, these measures would not be sufficient to reduce impacts to less than significant levels. There are no other feasible mitigation measures that could reduce operational air emissions from the project, and impacts would be significant and unavoidable.

Finding: **The project would result in significant and unavoidable impacts related to operational emissions.**

C. Biological Resources

Impact 3.3-1	**Project implementation would impact a relatively small area of primarily developed and/or landscaped ground that has limited wildlife movement function.**

The proposed project would alter the landscaped areas and enlarge the developed areas directly adjacent to the bowl. These actions would not alter the Arroyo channel, or include significant amounts of fencing or other structures that would significantly reduce the movement of wildlife through or across the site from the current levels. Although the proposed project would result in increased usage and human presence of the project area, it is unlikely that the design components of the proposed project would significantly interfere with any known migratory wildlife corridors, impede the use of native wildlife nursery sites, or significantly alter the current disturbance regime. Therefore impacts to wildlife movement would be less than significant.

Finding: **As proposed, the project would have less-than-significant impacts related to wildlife movement.**

Impact 3.3-2	**Implementation of the proposed project would not impact non-sensitive wildlife species.**

As the majority of the proposed project site is developed and ornamental vegetation, the amount of habitat for wildlife that would be affected by implementation of the proposed project is quite small. The majority of the site is landscaped and thus many of the wildlife species that do occur on site are highly mobile and will be able to temporarily relocate from the relatively small area of impact to the adjoining

larger areas of land. Other, less mobile individuals in the impact areas will be lost during project implementation. As the golf course water hazard is artificial in structure and hydrology, and is subject to high levels of disturbance and pollutants from the golf course, it is unlikely that wildlife would utilize this as habitat. The project impacts to non-sensitive wildlife species would be less than significant, as the loss of these species would not do the following:

- Cause a substantial reduction of the habitat of a wildlife species
- Produce a drop in a wildlife population below self-sustaining levels
- Eliminate a plant or animal community
- Cause a reduction or restriction of the number or range of a rare or endangered plant or animal
- Have a substantial affect on a rare or endangered species of animal or plant or the habitat of the species

As such, impacts to non-sensitive wildlife species would be less than significant.

Finding: As proposed, the project would have less-than-significant impacts related to non-sensitive wildlife species.

Impact 3.3-3	**Construction and operation of the proposed project could have direct and indirect effects upon the hydrology and aquatic habitat quality of the Arroyo Seco.**

Grading for construction of the project has the potential to increase erosion and subsequent deposition of soil particles into the Arroyo Seco channel. Additionally, surface water runoff containing excess fertilizers or other chemicals could alter the aquatic community or the water quality of the Arroyo Seco by altering the nutrient regime. Toxics contained in herbicides, insecticides, and fungicides used to maintain landscaping could also result in direct kill of aquatic and riparian plants and animals within the channel.

Runoff produced during and after construction is subject to National Pollution Discharge Elimination System Regulations, (NPDES) as well as local water quality and runoff standards. Therefore, the Applicant will be required to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP). California Stormwater Best Management Practices (BMPs) for Construction Activity, as prepared by the California State Stormwater Quality Task Force, will also need to be incorporated into the construction plans. BMPs for Municipal Activities would be incorporated into a long-term site management program which, when implemented, would reduce operation-related impacts from sedimentation and contaminant loading to an insignificant level. Implementation of NPDES and County BMPs and compliance with state and federal clean water regulations would ensure that the impacts of construction and operation of the proposed project would be less than significant.

Finding: **Due to State and federal pollution prevention requirements, the project would have less-than-significant impacts on the hydrology and aquatic habitat quality of the Arroyo Seco.**

Impact 3.3-4	Implementation of the project would not result in impacts to special status or sensitive plant species.

No endangered, rare, threatened, or special status plant species (or associated habitats) designated by the U.S. Fish and Wildlife Service, California Department of Fish and Game, or California Native Plant Society were known to occur or found within the project site. In addition, focused surveys for sensitive species identified under the Arroyo Seco Master Plan failed to identify any occurrence within the site; thus, there would be no impact to special status plant species or sensitive habitats.

Finding: **The project would not impact special status or sensitive species.**

Impact 3.3-5	Implementation of the project would not, through habitat modifications, result in a potential loss of special-status bat species breeding/roost in the project vicinity.

Although not observed during any of the surveys, two species of bats—the pallid bat *(Antrozous pallidus)* and California mastiff bat *(Eumpos perotis californicus)*, which are listed as California Species of Special Concern—have the potential to forage within the project area. No breeding or roosting habitat suitable for these species exists on the site. While foraging habitat in the vicinity of the project is present for bats, the lack of roosting habitat in the vicinity would be expected to keep their population densities very low, though population numbers for bats in the area are unknown. Due to the probable low population numbers of foraging bats in the area and the very low probability of project-related impact to foraging bats, impacts would be less than significant.

Finding: The project as proposed would not impact special-status bat species.

Impact 3.3-6	Implementation of the project could, through habitat modifications, result in a potential reduction in nesting opportunities for resident and migratory avian species of special concern, including raptors or the loss of an active avian nest.

Some sensitive species, such as the white-tailed kite, and migratory avian species and other raptors, such as the red tailed hawk *(Buteo jamaicensis)*, may use portions of the site and adjacent areas during breeding season; these species are protected under the Migratory Bird Treaty Act. Project implementation and construction-related activities including, but not limited to, grading, materials lay down, facilities construction, and construction vehicle traffic may result in the disturbance of nesting and/or wintering special status species such as the loggerhead shrike and white-tailed kite which each have a moderate or greater probability of occurring within the proposed project area. The loss of a special status species, an occupied nest, or substantial interference with roosting and foraging opportunities for migratory species of special concern or raptors as a result of construction or demolition activities, would constitute a

potentially significant impact. However, this impact would be reduced to a less-than-significant level through the implementation of MM 3.3-1.

Mitigation Measures: The following mitigation measure will be required to reduce potential impacts on nesting birds.

MM 3.3-1 *To ensure that avian species of concern, protected migratory species and raptor species are not injured or disturbed by construction in the vicinity of nesting habitat, the following measures shall be implemented:*

- *When feasible, all tree removal shall occur between August 30 and February 15 to avoid the breeding season of any raptor species that could be using the area, and to discourage hawks or bats from nesting/roosting in the vicinity of an upcoming construction area. This period may be modified with the authorization of the CDFG; or if it is not feasible to remove trees outside this window then, prior to the beginning of mass grading, including grading for major infrastructure improvements, during the period between February 15 and August 30, all trees and potential burrowing owl habitat within 350 feet of any grading or earthmoving activity shall be surveyed for active raptor nests or burrows by a qualified biologist no more than 30 days prior to disturbance. If active raptor nests are found, and the site is within 350 feet of potential construction activity, a fence shall be erected around the tree at a distance of up to 350 feet, depending on the species, from the edge of the canopy to prevent construction disturbance and intrusions on the nest area. The appropriate buffer shall be determined by the City in consultation with CDFG.*

- *No construction vehicles shall be permitted within restricted areas (i.e., raptor protection zones), unless directly related to the management or protection of the legally protected species.*

- *In the event that a nest is abandoned, despite efforts to minimize disturbance, and if the nestlings are still alive, the developer shall contact CDFG and, subject to CDFG approval, fund the recovery and hacking (controlled release of captive reared young) of the nestling(s).*

- *If a legally protected species nest is located in a tree designated for removal, the removal shall be deferred until after August 30th, or until the adults and young of the year are no longer dependent on the nest site as determined by a qualified biologist.*

Finding: **Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the potentially significant environmental effect on nesting birds.**

Impact 3.3-7	**Implementation of the proposed project could be inconsistent with Pasadena's Tree Ordinance in that the proposed project would cause the loss of native and/or specimen trees.**

Implementation of the proposed project could result in the removal of approximately 250 public trees, which would be a potentially significant impact, as removal of or damage to the public trees could violate

the Pasadena Tree Ordinance. The project developer would be required to submit a tree replacement and relocation plan to the City for approval prior to issuance of a grading permit. Strict adherence to Best Management Practices and successful implementation of a comprehensive mitigation and monitoring plan, as outlined in MM 3.1-3 (above), MM 3.3-2a, MM 3.3-2b, and MM 3.3-2c would reduce potential impacts to these protected tree species to less-than-significant levels. In addition, the design mitigation will reduce the number of trees subject to removal and relocation.

Mitigation Measures: The following mitigation measures will be required to reduce potential impacts on protected trees.

MM 3.3-2(a) *The Applicant, prior to being issued a grading permit, shall submit a tree report prepared by a certified arborist that meets the requirements of the Pasadena City Tree Ordinance identifying trees to be removed and trees to be saved. It shall specifically identify, by number according to the tree inventories prepared in March 2004 and March 2005, all trees that are candidates for relocation as well as the best and most feasible locations where the trees shall be replanted. It shall also include the preparation and submission of a tree protection and replacement plan. The tree replacement plan shall include replanting for increased canopy and include a minimum replacement ratio for removed or damaged trees of 1:1. Native plant species shall be used to the maximum extent feasible. The plan shall be prepared and approved by the City prior to grading or construction and shall include the following:*

- *Identification of specific Best Management Practices for those trees to be relocated, including specific removal and replanting procedures to maximize successful relocation.*
- *The details and procedures required to prepare the restoration site for planting (i.e. grading, soil preparations, soil stocking, etc.).*
- *The methods and procedures for the installation of the plant materials.*
- *Guidelines for the maintenance of the mitigation site during the establishment phase of the plantings. The maintenance program shall contain guidelines for the control of nonnative plant species and the replacement of plant species that have failed to recolonize.*
- *The revegetation plan shall provide for monitoring to evaluate the growth of the trees. Annual monitoring of the replacement trees shall occur for the first five years after which it shall be performed on the seventh and tenth year. Specific success criteria for replaced trees shall include the following:*
- *For a replacement ratio greater than 1:1: 90 percent or more of the transplanted/replacement trees surviving 10 years after transplantation with overall no net loss of trees*
- *For a replacement ratio of 1:1: 100 percent survival*
- *Contingency plans and appropriate remedial measures shall also be outlined in the replacement plan should the plantings fail to meet designated success criteria and planting goals.*

- *When construction activities occur near protected tree species that are proposed to be saved, Best Management Practices (BMPs) to avoid damage to the trees shall be implemented, and verified by the developer. The BMPs will include, but are not limited to (1) installing protective fencing prior to and during construction, using wire mesh or plastic barrier fencing placed at 2.25 times the canopy of the tree; (2) avoiding disturbance and trenching within the tree drip line; (3) maintaining the surface grade around the tree; and (4) prohibiting the placement of paving or landscaping requiring summer irrigation in the vicinity of trees.*

MM 3.3-2(b) *A drainage plan shall be designed in such a way as to avoid changes to hydrology in the vicinity of the protected trees.*

MM 3.3-2(c) *Construction staging areas shall be designated on the construction plans and parking, loading, and grading during all construction activities prohibited within the root zone of the protected trees.*

MM 3.1-3 also applies to this impact.

Finding: **Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the potentially significant environmental effect on protected trees.**

Impact 3.3-8	**Increases in nighttime illumination could disturb nighttime activities of local wildlife species, and alter local species composition.**

Nighttime illumination is known to adversely impact animals in natural areas. It can disturb or disrupt resting, foraging, nesting, and breeding behavior and cycles. Project operation would increase the number of nighttime light sources on site. If unchecked, this light, where proximal to natural areas, could adversely impact the wildlife of the area.

Any potential disruption to breeding, foraging, or resting cycles, as well as alteration of the behavior of wildlife species remaining on site as a result of increased nighttime lighting and glare would be considered a significant impact. As such, implementation of MM 3.3-3 would be required to reduce these impacts to less-than-significant levels.

Mitigation Measure: The following mitigation measure will be required to reduce potential impacts from nighttime illumination.

MM 3.3-3 *All lighting along the perimeter of natural areas such as the channel shall be downcast luminaries with light patterns directed away from natural areas, as coordinated with a certified lighting engineer and project biologist.*

Finding: **Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the potentially significant environmental impacts from nighttime illumination.**

D. Cultural Resources

Impact 3.4-1	**Construction activities associated with implementation of the proposed project could cause a substantial adverse change in the significance of an archaeological resource.**

Archaeological materials have been recovered or recorded in the vicinity of the project site, and Native American activity is considered likely to have occurred adjacent to the flow channel, in the area now occupied by the Stadium. Consequently, ground-disturbing activities associated with construction of the proposed project would have the potential to damage or destroy archaeological resources. However, because the development under the proposed project would occur on a previously developed site (within the footprint of the existing Stadium and associated development) that has already been subject to disturbance for existing structures or infrastructure, the likelihood of encountering archaeological resources on the project site is considered very low. Nevertheless, MM 3.4-1(a) and MM 3.4-1(b) require implementation of provisional measures in the event that archaeological resources are identified, which would reduce this impact to a less-than-significant level. Implementation of MM 3.4-1(a) and MM 3.4-1(b) would further reduce less-than-significant impacts on archaeological resources by requiring an instructional program to assist construction personnel in identifying archaeological resources and requiring the scientific recovery and evaluation of any archaeological resources that could be encountered, which would ensure that important scientific information that could be provided by these resources regarding history or prehistory is not lost.

Mitigation Measures: The following mitigation measures will be required to reduce potential impacts on archaeological resources.

MM 3.4-1(a) *Prior to site preparation or grading activities, the Applicant shall retain a qualified (ROPA-listed) archaeologist to inform construction personnel of the potential for encountering unique archaeological resources and the regulatory framework of cultural resources protection. All construction personnel shall be instructed to stop work within 50 feet of a potential discovery until a qualified (ROPA-listed) archaeologist assesses the significance of the find and implements appropriate measures to protect or scientifically remove the find. Construction personnel shall also be informed that unauthorized collection of archaeological resources is prohibited.*

MM 3.4-1(b) *The Applicant shall retain a qualified archaeologist to provide spot-checks—on a schedule approved by the City—during grading and excavation activity and to be available on-call in the event of a discovery. In the event of a discovery, the archaeologist shall first determine whether an archaeological resource uncovered during construction is a "unique archaeological resource" under Public Resources Code Section 21083.2(g). If the archaeological resource is determined to be a "unique archaeological resource," the archaeologist shall formulate a mitigation plan in consultation with the City that satisfies the requirements of Section 21083.2.*

If the archaeologist determines that the archaeological resource is not a unique archaeological resource, the archaeologist shall record the site and submit the recordation form to the California

Historic Resources Information System South Central Coastal Information Center, and no further investigation of the particular find would be required.

The archaeologist shall prepare a report of the results of any study prepared as part of a mitigation plan, following accepted professional practice. Copies of the report shall be submitted to the City and to the California Historic Resources Information System South Central Coastal Information Center.

Finding: **Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the potentially significant environmental impacts on archaeological resources.**

Impact 3.4-2	**Construction activities associated with implementation of the proposed project could directly or indirectly result in damage to, or the destruction of, unique paleontological resources on the site.**

Nearby area rock units have the potential to yield significant paleontological specimens that contributed to scientific understanding of the distant past, and are considered paleontologically sensitive. Fossils from these units could be considered unique resources due to the potential to yield information important in history or prehistory. Although extensive disturbance of the soils underlying the Stadium occurred as a result of construction of the Stadium, paleontological resources could still be present in areas deeper than where initial excavation occurred, as Older Alluvium is initially observed at depths of about 5 feet. Therefore, construction-related, earth-disturbing activities resulting from implementation of the proposed project could reach a depth sufficient to damage or destroy fossils in these rock units. Because fossils that could be present could be considered unique archaeological resources, due to their scientific value, this damage or destruction would be considered a potentially significant impact. However, MM 3.4-2(a) and MM 3.4-2(b) require spot monitoring of earth-disturbing activities, as well as additional provisional measures if paleontological resources are identified. Implementation of MM 3.4-2(a) and MM 3.4-2(b) would reduce potentially significant impacts on paleontological resources to a less-than-significant level by requiring an instructional program to inform construction personnel regarding paleontological resources and the laws protecting the resources, as well as by requiring the scientific recovery and evaluation of any paleontological resources or unique geologic features that could be encountered, which would ensure that important scientific information that could be provided by these resources regarding history or prehistory is not lost.

Mitigation Measures: The following mitigation measures will be required to reduce potential impacts on paleontological resources.

MM 3.4-2(a) *Prior to site preparation or grading activities, the Applicant shall retain a qualified paleontologist to inform construction personnel of the potential for encountering paleontological resources and the regulatory framework of cultural resources protection. All construction personnel shall be*

instructed to stop work within 50 feet of a potential discovery until a qualified paleontologist assesses the significance of the find and implements appropriate measures to protect or scientifically remove the find. Construction personnel shall also be informed that unauthorized collection of paleontological resources is prohibited.

MM 3.4-2(b) *The Applicant shall retain a qualified paleontologist to provide spot-checks—on a schedule approved by the City—during grading and excavation activities and, in the event of a discovery, shall first determine whether a paleontological resource uncovered during construction meets the definition of a "unique archaeological resource" under Public Resources Code Section 21083.2(g). If the paleontological resource is determined to be a "unique archaeological resource," the paleontologist shall formulate a mitigation plan in consultation with the campus that satisfies the requirements of Section 21083.2.*

If the paleontologist determines that the paleontological resource is not a unique resource, the paleontologist shall record the site and submit the recordation form to the Natural History Museum of Los Angeles County, and no further investigation of the particular find would be required.

The paleontologist shall prepare a report of the results of any study prepared as part of a mitigation plan, following accepted professional practice. Copies of the report shall be submitted to the City and to the Natural History Museum of Los Angeles County.

Finding: **Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the potentially significant environmental impacts on paleontological resources.**

Impact 3.4-3	**Construction activities associated with implementation of the proposed project could result in the disturbance of human remains, including those interred outside of formal cemeteries.**

No formal cemeteries are known to have occupied the project site; however, inhumations have been associated with archaeological contexts in the Arroyo Seco. As described above in Environmental Setting, although the presence of additional archaeological resources within the bowl footprint is considered unlikely, the potential exists for such resources to be present and for excavation during construction activities to disturb these resources. As required by law, provisional measures must be implemented if human remains are discovered on the project site: In the event of the discovery of a burial, human bone, or suspected human bone, all excavation or grading in the vicinity of the find must halt immediately and the area of the find must be protected. The Los Angeles County Coroner must be immediately notified of the find and must comply with the provisions of P.R.C. Section 5097 with respect to Native American involvement, burial treatment, and re-burial, if necessary. Measures required by the Public Resources Code would ensure that this impact remains less than significant by ensuring appropriate examination, treatment, and protection of human remains. No mitigation is required.

Finding: **Due to applicable regulations, the project would have less-than-significant impacts on human remains.**

Impact 3.4-4	**Implementation of the proposed project could result in the physical demolition, destruction or substantial material alteration of some character defining features of the Rose Bowl, a historical resource, and could result in a substantial adverse change in the historic significance of the bowl.**

The project as originally proposed would result in a significant effect on the Stadium because it would demolish character-defining features on the east side—including the arroyo stone retaining walls—and would materially alter in an adverse manner the east, north, and west elevations. The Stadium would continue in its capacity to house the Rose Bowl annual football game and would retain its association with the Tournament of Roses Association and Rose Parade, but the modified bowl would convey neither the historic appearance of the Stadium nor its design by Myron Hunt. This substantial adverse change in the significance of the Stadium would constitute a significant impact on this historical resource.

MM 3.4-3 (a)–(c) provide for design review and construction monitoring to ensure proper incorporation of contributing elements into the final design to the degree possible, protection of contributing elements to remain during construction activities, documentation of the existing condition of character-defining features that would be altered or demolished as a result of the proposed project, and appropriate replacement of the arroyo stone berms within the project footprint. However, implementation of these measures would only protect the character-defining features of the bowl that would remain under the proposed project, and would not reduce to a less-than-significant level the impact associated with the proposed demolition or substantial material alteration of other character defining features. Additionally, the design mitigation would further mitigate impacts associated with alteration of the Stadium by preserving portions of the historic arroyo stone berms, and preserving the character defining elements and views of the north side of the Stadium. Nevertheless, the impact would remain significant and unavoidable. A Historic Restoration Alternative to the project, described below, would reduce this impact to less than significant. However, this alternative is rejected as infeasible below.

Mitigation Measures: In addition to the design mitigation, the following mitigation measures will be required to reduce potential impacts on the historic integrity of the Stadium.

MM 3.4-3(a) *Compliance with the* Secretary of the Interior's Standards for Treatment of Historic Properties. *MM 3.4-3(a) only applies to the existing character defining features of the Rose Bowl that are proposed for retention and does not apply to the new construction. The scope of work is currently conceptual and will be defined further as the project progresses. All work on elements of the Stadium to be retained shall be designed for maximum possible compliance with the* Secretary of the Interior's Standards for Treatment of Historic Properties. *This shall be accomplished through the oversight of an independent historic preservation consultant and City staff, as described below.*

Historic Preservation Consultant. The City shall retain the services of a qualified historic preservation consultant with experience in architectural preservation. The historic preservation consultant shall review structural designs and construction activities that could potentially affect character-defining features as identified in this EIR and the Historic Structure Report. All reviews by the historic preservation consultant shall be carried out by a person or persons meeting the Secretary of the Interior's Professional Qualification Standards. Knowledge of historic architecture, materials, surface finishes, and historic restoration techniques is required. This consultant shall have a structural engineer and conservator available for consultation. The consultant's main responsibility shall be to monitor and advise the City regarding compliance with the Secretary of Interior's Standards with respect to elements of the Stadium that would be retained, as well as approved design criteria. Through a series of development, design, and specification review meetings, as well as construction monitoring, the historic preservation consultant shall work in conjunction with City and with the Applicant's project and construction management teams. In addition, the consultant shall review the historic record and photo documentation, protection of historic fabric, mock-ups, and test panels of treatments to historic fabric. In consultation with other experts, the consultant shall approve the materials and replica designs used in the restoration, rehabilitation and new construction related to the historic resources.

Construction Monitoring. On-site construction monitoring by a historic preservation consultant shall be undertaken throughout the construction phase to ensure protection of historic fabric and compliance with the Standards and approved design and construction documents. Monitoring will be scheduled based on potential construction impacts and specific scope of work and will vary between daily and weekly visits upon approval by the City. In addition, all submittals, mock-ups, and change orders that affect historic fabric shall be reviewed by the historic preservation consultant. On-site changes that might affect historic fabric shall be undertaken in consultation with the historic preservation consultant. If the historic preservation consultant determines that construction does not substantially conform to the approved criteria, the historic preservation consultant will immediately notify the City. The City will require any contractors, vendors etc. to take all reasonable measures to avoid or minimize harm to the property until the issue is resolved. The historic preservation consultant, design team, and construction management will work cooperatively and diligently to resolve issues in a timely manner.

MM 3.4-3(b) *Documentation. A Historical Resource Documentation Report shall be prepared for the Rose Bowl. The resources shall be described and photographed in a manner that conforms to Historic American Buildings Survey/Historic American Engineering Record (HABS/HAER) Level I documentation standards, as well as the HABS/HAER Guidelines for HABS Historical Reports. The documentation shall amend the photographic content of the existing HABS report for the Rose Bowl in the Library of Congress collection, focusing on those areas that would be directly affected by the proposed project. The documentation shall be donated to suitable repositories selected by the City, one of which shall include the main branch of the Pasadena Public Library.*

MM 3.4-3(c) *The arroyo stone berms and landscaping on the south side shall be photographed and recorded before removal and replaced in kind, replicating the original intent, look, and function.*

Finding: **Changes or alterations have been required in, or incorporated into, the project that lessen some of the significant environmental effect as identified in the Final EIR, but the impact on the historic integrity of the Rose Bowl remain significant and unavoidable.**

Impact 3.4-5	**Implementation of the proposed project could result in direct and indirect effects to historical resources in the project vicinity, specifically, the Arroyo Seco (proposed) Cultural Landscape.**

The Project as originally proposed would result in significant and unavoidable impacts to the integrity of the Lower Arroyo Seco Cultural Landscape. The Lead Agency has identified this area as a potential historical resource for the purposes of CEQA. The Stadium itself is a contributing feature of the Arroyo Seco Cultural Landscape, and significant changes on the Stadium would result in significant changes on the cultural landscape. This alteration would also substantially affect the appearance and historical significance of the cultural landscape and would, therefore, be considered a significant impact.

MMs 3.4-3(a)–(c) above provide for adherence to the Secretary of the Interior's Standards to the degree possible after adverse modifications to the structure have occurred, as well as for documentation of the existing condition of character-defining features that would be altered or demolished as a result of the proposed Project. Additionally, the design mitigation reduces the changes to the Stadium and the impact on the cultural landscape. However, implementation of mitigation would not reduce this impact to a less-than-significant level. A Historic Restoration Alternative to the project, described above, would sufficiently reduce this impact to less than significant. However, this alternative is rejected as infeasible below.

Finding: **Changes or alterations have been required in, or incorporated into, the project that lessen some of the significant environmental effect as identified in the Final EIR, but the impact on the historic integrity of the Arroyo Seco Cultural Landscape remain significant and unavoidable.**

E. Geology/Soils

Generally, the Project will decrease earthquake damage and life-safety hazards to employees and Stadium patrons presented by the current Stadium structure and would represent a beneficial impact.

Impact 3.5-1	**Buildings and infrastructure associated with the implementation of the proposed project would be subject to potentially damaging seismically induced ground shaking during the life of the project.**

From the review of regional and local geo-seismic conditions, it is probable that the project area will be subjected to at least one major earthquake during the useful economic life of the Project. The design earthquake for the project area is estimated to be an M_w 7.0 earthquake on the Sierra Madre Fault,

creating peak horizontal ground accelerations as high as 0.7 g. The resulting vibration could cause damage to structural members of residential facilities and their associated infrastructure (primary effects), and could cause ground failures such as landslides in the hills or liquefaction and/or dynamic settlement in alluvium and poorly compacted fill (secondary effects). As stipulated in the Pasadena Municipal Code, buildings and infrastructure are required to reduce the exposure to potentially damaging seismic vibrations through seismic-resistant design, in conformance with California Building Code Seismic Zone 4 requirements (the most stringent in the state). Adherence to the Building Code ensures the maximum practicable protection available for users of buildings and infrastructure and their associated trenches, slopes, and foundations.

MM 3.5-1 would require the use of site-specific ground motion criteria, as described in the current Pasadena Building Code Chapters 16, 18, and A33, and reviewed by the City's California-registered geotechnical and/or structural engineer, to be incorporated in the design of trenches, slopes, foundations and structures for the project. The Building Code requires implementation of this measure. As outlined below, this measure would assure the City that the potential impacts of ground shaking would be less than significant.

Mitigation Measure: The following mitigation measure will be required to reduce potential impacts related to seismically induced ground shaking.

MM 3.5-1 *The renovation shall incorporate site-specific ground motion criteria, as described in the current Pasadena Building Code Chapters 16, 18, and A33, and reviewed by the City's California-registered geotechnical and/or structural engineer, in the design of trenches, slopes, foundations, and structures for the project. Implementation of this measure is required by the Building Code and includes the following provisions:*

- *The minimum seismic-resistant design standards for all proposed facilities shall conform to the California Building Code Seismic Zone 4 Standards*
- *Additional seismic-resistant earthwork and construction design criteria shall be incorporated in the project as necessary, based on the site-specific recommendations of a California Certified Engineering Geologist in cooperation with California-registered geotechnical and structural engineering professionals*
- *During site preparation, the registered geotechnical professional shall be on the site to supervise implementation of the recommended criteria*
- *The California Certified Engineering Geologist consultant shall prepare an "as built" map/report, to be filed with the City, showing details of the site geology, the location and type of seismic-restraint facilities, and documenting the following requirements, as appropriate*

- *Engineering analyses shall demonstrate satisfactory performance of compacted fill or natural unconsolidated sediments which either forms part or all of the support for any structures, especially where the possible occurrence of liquefiable soils exists*
- *Access roads, foundations, and underground utilities in fill or alluvium shall be designed to accommodate settlement or compaction estimated by the site-specific geotechnical investigations of the geotechnical consultant*

Finding: Building Code requirements and implementation of required MM 3.5-1 will avoid significant impacts related to seismic ground shaking.

Impact 3.5-2	**The use of expansive, weak or slide-prone soils for foundation or roadway support without prior treatment could create unstable soil conditions at the construction site, thus threatening the integrity of completed construction.**

The existence of expansive, compressible, and corrosive soils does not appear to be a major occurrence in the project area. Slide-prone soils are not common on the project site. Nevertheless, the creation of building pads or access road bases using unsuitable or unstable soils for fill has the potential to create future problems of foundation settlement and road or utility line disruption if the soils are not specifically engineered for stability.

MM 3.5-2 would require site-specific soil suitability analysis and stabilization procedures, as well as design criteria for foundations during the design phase for each site where the existence of unsuitable soil conditions is known or suspected. This mitigation would be included in construction drawings and specifications prior to approval of final project plans and issuance of building permits, and would ensure that the impact of weak soils would be less than significant.

Mitigation Measure: The following mitigation measure will be required to reduce potential impacts related to expansive, weak, or slide-prone soils.

MM 3.5-2 *Site-specific soil suitability analysis and stabilization procedures, and design criteria for foundations and road bases (described in the current Pasadena Building Code Chapters 16, 18, and A33) shall be required, as recommended by a California-registered soil engineer, during the design phase for each site where the existence of unsuitable soil conditions is known or suspected. During the design phase, where the existence of unsuitable soil conditions is known or suspected, the developer's registered soil engineering consultant shall provide documentation to the City that:*

- *Site-specific soil suitability and stability analyses have been conducted in the area of the proposed foundations and road bases to establish the design criteria for appropriate foundation or road base type and support*
- *The recommended criteria have been incorporated in the design of foundation*
- *During grading, the registered soils professional shall be on the site to do the following:*

- *Observe areas of potential soil unsuitability or instability*
- *Supervise the implementation of soil remediation or reconstruction programs*
- *Verify final soil conditions prior to setting the foundations*
- *The registered soils engineering consultant shall prepare an "as built" map/report, to be filed with the City, showing details of the site soils, the location of foundations, retaining walls, sub-drains, clean-outs, etc., and the results of suitability/stability analyses and compaction tests.*

Finding: Implementation of required MM 3.5-2 will avoid significant impacts related to expansive, weak, or slide-prone soils.

Impact 3.5-3	**Construction activities on the project site would not result in increased potential for short- or long-term increases in erosion.**

Because the project would involve grading of an area greater than one acre, it is required to apply for a National Pollutant Discharge Elimination System (NPDES) permit from the Regional Water Quality Control Board. The NPDES permit will be required to cover infrastructure installation. Displacement of soil will be controlled by the City's grading ordinances (CBC Chapters 18 and A33 as adopted in Chapter 14.04.010 of the Pasadena Building Code) relating to grading and excavation. Soil erosion after construction will be controlled by implementation of an approved landscape and irrigation plan. Standard engineering techniques and implementation of MM 3.5-3 would ensure that impacts would be less than significant.

Mitigation Measure: The following mitigation measure will be required to reduce potential impacts related to erosion.

MM 3.5-3 *The following actions shall be taken:*

To the extent practicable, project site grading shall be scheduled for the dry season (April through September). In addition, NPDES permit requirements shall be fulfilled prior to issuance of building permits. The developer shall submit a soil erosion and sedimentation control plan for the project to the City of Pasadena prior to grading, subject to the following recommendations:

- *The Erosion and Sediment Transport Control Plan (as part of the overall SWPPP) shall be submitted, reviewed, implemented, and inspected as part of the approval process for the grading plans*
- *The Plan shall be designed by the developer's erosion control consultant, using concepts similar to those formulated by the State of California, as appropriate, based on the specific erosion and sediment transport control needs of the site where grading, excavation, and construction is to occur. Those concepts include some that apply generally to the entire project area and some that would be appropriate only for specific sites. The possible methods are not necessarily limited to the following items:*

- *Confine grading and activities related to grading (demolition, excavation, construction, preparation and use of equipment and material storage areas and staging areas) to the dry season, whenever possible*
- *Locate staging areas outside streams and drainage ways*
- *Keep the lengths and gradients of constructed slopes (cut or fill) as low as possible*
- *Discharge grading and construction runoff into small drainages at frequent intervals to avoid buildup of large potentially erosive flows*
- *Prevent runoff from flowing over unprotected slopes*
- *Keep disturbed areas (areas of grading and related activities) to the minimum necessary for demolition or construction of the project*
- *Keep runoff away from disturbed areas during grading and related activities*
- *Stabilize disturbed areas as quickly as possible, either by vegetative or mechanical methods*
- *Direct runoff over vegetated areas prior to discharge into public storm drainage systems, whenever possible*
- *Trap sediment before it leaves the site with such techniques as check dams, sediment ponds, or siltation fences*
- *Use interceptor ditches, drainage swales, or detention basins to prevent storm runoff from transporting sediment into drainage ways and to prevent sediment-laden runoff from leaving any disturbed areas*
- *Install silt fences to prevent sedimentation in areas adjacent to grading and down gradients into drainage ways. Design fences using the Universal Soil Loss Equation to calculate their proper storage capacity. The contractor shall implement installation prior to mass grading and other soil disturbing construction activities on site*
- *The contractor shall be responsible for the removal and disposal of all project-related sedimentation in off-site retention ponds*
- *Use landscaping and grading methods that lower the potential for down-stream sedimentation. Modified drainage patterns, longer flow paths, encouraging infiltration into the ground, and slower stormwater conveyance velocities are examples of effective methods*
- *Control landscaping activities carefully with regard to the application of fertilizers, herbicides, pesticides, or other hazardous substances. Provide proper instruction to all landscaping personnel on the construction team*
- *During the installation of the erosion and sediment transport control structures, the erosion control professional shall be on the site to supervise the implementation of the designs, and*

the maintenance of the facilities throughout the demolition, grading, and construction period.

Finding: **Building Code and NPDES requirements and implementation of required MM 3.5-3 will avoid significant impacts related to erosion.**

F. Hazards and Hazardous Materials

Impact 3.6-1	**Implementation of the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.**

Hazardous materials would be used in varying amounts during construction and operation of the proposed project. Construction workers and attendees could be exposed to hazards associated with accidental releases of hazardous materials, which could result in adverse health effects. Hazardous materials regulations, which are codified in Titles 8, 22, and 26 of the CCR, and their enabling legislation set forth in Chapter 6.95 of the Health and Safety Code, were established at the State level to ensure compliance with federal regulations to reduce the risk to human health and the environment from the routine use of hazardous substances. These regulations must be implemented by employers/businesses, as appropriate, and are monitored by the State (e.g., OSHA in the workplace or DTSC for hazardous waste) and/or local jurisdictions (e.g., the Pasadena Fire Department). Compliance with applicable federal and State laws and regulations that are administered and enforced by the Pasadena Fire Department would reduce impacts associated with the routine use, storage, and transportation of hazardous materials at the Project to a less-than-significant level.

Finding: **No significant impact will result, and no mitigation is required.**

Impact 3.6-2	**Implementation of the proposed project would require the demolition of several existing structures that could contain lead-based paint, asbestos, PCBs, or other types of hazardous materials. If not properly handled, the demolition process could result in the release of hazardous materials to the environment, potentially affecting the health and safety of workers and the public.**

Due to the age of the Stadium, some components could contain hazardous materials that may require special handling. Such materials include lead, asbestos, polychlorinated biphenyls (PCBs), or other hazardous substances. Construction workers involved in demolition activities could also come into contact with fixtures containing PCBs or other hazardous materials. In addition to human contact, improper removal of these substances could result in accidental releases that could contaminate soil or result in improper disposal. Various State and federal regulations and guidelines pertaining to abatement of, and protection from, exposure to asbestos and lead have been adopted for demolition activities. These requirements include SCAQMD Rules and Regulations pertaining to asbestos abatement,

Title 8 of the California Code of Regulations pertaining to lead and asbestos, the Code of Federal Regulations pertaining to asbestos, and lead exposure guidelines provided by the U.S. Department of Housing and Urban Development (HUD). PCBs are regulated under the federal Toxic Substances Control Act, and any PCB-containing materials must be disposed of as hazardous waste. In California, asbestos and lead abatement must be performed and monitored by contractors with appropriate certifications from the State Department of Health Services. In addition, the California Occupational Safety and Health Administration (Cal/OSHA) has regulations concerning the use of hazardous materials, including requirements for safety training, availability of safety equipment, hazardous materials exposure warnings, and emergency action and fire prevention plan preparation. Compliance with these regulations would ensure that construction workers and the general public would not be exposed to any unusual or excessive risks related to hazardous materials during construction activities. As such, impacts associated with the exposure of construction workers and the public to hazardous materials during demolition activities would be less than significant.

Finding: **Due to applicable regulations, no significant impact will result, and no mitigation is required.**

Impact 3.6-3	**Implementation of the proposed project would not emit hazardous emissions or hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.**

Chandler School, which is an independent kindergarten through eighth grade school, is located within ¼ mile of the project site. However, the Stadium has operated on the project site, within ¼ mile of the Chandler School, since the school was founded in 1950, and the Project would generally represent the continuation of an existing condition. Renovation of the Stadium would not introduce new hazardous materials. No significant hazardous materials (e.g., paints, solvents, cleaning products, pesticides, and herbicides) are used on the site and no significant increase in the use of these materials would occur with implementation of the Project; the renovation would not introduce additional types of hazardous materials that are not currently used on the Project site. Compliance with applicable regulations and policies would minimize any potential risk associated with the increased use of hazardous materials under the construction and operation of the Project. This impact would, therefore, be considered less than significant.

Finding: **No significant impact will result, and no mitigation is required.**

Impact 3.6-4	**Construction and operation of the proposed project would not expose workers or visitors to a safety hazard from helipad operations.**

Both the Los Angeles County Fire Department and Pasadena Police Department each operate a helipad near the Hahamongna Watershed Park, which is located north of the Stadium. During construction activities, workers could be exposed to a safety hazard from helipad operations. In addition, during

Project operation, the increase in event attendees would place additional people at risk to this existing safety hazard. However, any potential safety hazard to existing area residents from helipad operations would otherwise remain unchanged from current conditions, as the Project would not increase the frequency of or alter helipad operations. The likelihood of an accident occurring at the same time as a Stadium event is considered remote. While the Project could result in an increase in event attendees, thus exposing more persons to potential safety risks posed by helipad operations, the infrequency of helicopter arrivals and departures, along with the low rate of helicopter accidents nationwide and compliance with all FAA regulations related to aircraft and pilot safety, such as pilot training, aircraft inspection and certification, and air traffic control, would ensure that this impact is less than significant.

Finding: **No significant impact will result, and no mitigation is required.**

Impact 3.6-5	Implementation of the proposed project would not interfere with response and/or evacuation requirements in the case of an emergency.

As required by law, the proposed project would continue to provide adequate access for emergency vehicles and appropriate evacuation routes, as well as regulate the storage of flammable and explosive materials and their transport within the project area. Additionally, the proposed project would comply with applicable Uniform Fire Code regulations for issues including fire protection systems and equipment, general safety precautions, water supplies and distances from structures to fire hydrants. Further, the proposed project would be required to provide sufficient water pressure and fire flows for the project area.

The City has prepared an Emergency Plan for the Stadium (1998), which is designed to provide specific guidelines in the event of a major emergency at the Stadium during which it is occupied. During construction of the Project, temporary road or lane closures, which could potentially block emergency access and/or evacuation routes, are not anticipated to occur. The proposed project site is located within an urbanized area in the Central Arroyo Seco in the City of Pasadena and multiple access points are available. The presence of multiple alternative routes around the Project site minimizes the potential for interference with emergency routes during construction. It should be noted that a part of Rose Bowl Drive (a dead-end street) will be modified on its west side and will be used for construction staging. Because no major streets with through traffic road closures are anticipated during construction activities, coupled with adherence to the existing Emergency Plan, implementation of the Project would not interfere with an adopted emergency response plan or emergency evacuation plan. This impact is considered less than significant, and no mitigation is required.

Finding: **No significant impact will result, and no mitigation is required.**

Impact 3.6-6	Operation of the proposed project would not expose people to a significant risk of loss, injury, or death involving wildland fires

The San Rafael Hills surround the Central Arroyo to the south and west, which contain large areas of native chaparral and other vegetation. Therefore, the surrounding areas are considered a high-risk fire zone. Implementation of the Project would place additional people at risk of loss, injury, or death as a result of wildland fires. However, although the Stadium is within a low fire hazard severity zone, the Project would be subject to existing fuel modification guidelines, which would substantially minimize the potential for both on-site and off-site fires to impact the Project property. Continued compliance with these guidelines greatly reduces the movement of a potential fire to the Project site. Thus, considering the Project site is located in a low wildfire hazard zone, coupled with the fact that renovation activities would not materially increase the risk of wildland fire and would improve evacuation capabilities in the event of such a fire, impacts are considered less than significant.

Finding: **No significant impact will result, and no mitigation is required.**

G. Hydrology/Water Quality

Impact 3.7-1	**Construction and operation of the proposed project would not violate any water quality standards, waste discharge requirements, or other water quality standards.**

The construction activities would result in land-disturbing activities such as demolition of existing structures, excavation, and trenching for utility infrastructure installation. When portions of the project site are excavated or otherwise disturbed by construction activities, the potential for mud and discharge from the site will substantially increase during a rainstorm. Post-construction project activities could also contain contaminants that would affect water quality in that operation of the Project would result in stormwater runoff from the site entering the local storm drain system, and then being discharged eventually into the Pacific Ocean. The Project will be subject to the provisions of the NPDES General Permit for Construction Activity. Under this permit, the developer will be required to eliminate or reduce non-stormwater discharges and to develop and implement a Stormwater Pollution Prevention Plan (SWPPP) that includes minimum control measures for stormwater. The proposed project would also need to comply with the various Standard Urban Stormwater Management Plan (SUSMP) requirements, which include, but are not limited to, measures to control peak runoff rates from the site, use of xeriscape on site, stenciling and signage on all storm drain inlets and catch basins within the project area to prohibit dumping, screening of trash container areas to prevent off-site transport of trash, the provision of a plan to ensure ongoing maintenance for permanent BMPs, and the inclusion of post construction structural or treatment control BMPs designed to mitigate the volume of runoff produced from a 0.75-inch storm event prior to its discharge to a stormwater conveyance system. City policies with regard to trash removal after Stadium events involves waste disposal immediately following all events. As such, with the obtainment of the required NPDES permits and implementation of local regulations prior to construction of the Project, continuation of City policies with regard to refuse and litter clean-up after Bowl events, and compliance with the Statewide General Construction Activity Stormwater Permit, construction and operation impacts associated with water quality would be less than significant. Furthermore, implementation of MM-3.7-1 and MM 3.7-2, which requires the incorporation of BMPs into the proposed project site design to minimize pollutants associated with stormwater quality, would further reduce this less-than-significant impact.

Mitigation Measures: The following mitigations measure will be required to reduce potential impacts on water quality.

MM 3.7-1 *Prior to the issuance of a grading permit, the project developer shall file a Notice of Intent (NOI) with the State and comply with the requirements of the NPDES General Construction Permit, including the preparation of a SWPPP and a SUSMP incorporating BMPs for construction and post-construction control of runoff. A Civil Engineer shall prepare the SWPPP and SUSMP for City review and approval. The plans shall reduce the discharge of pollutants, including sediment,*

to the maximum extent practical using management practices, control techniques and systems, design and engineering methods, and such other provisions that are appropriate. The plans shall include applicable post-construction measures such as the following:

- *Control of impervious area runoff, including installation of detention basins, retention areas, filtering devices, energy dissipaters, pervious drainage systems, porous pavement alternatives*
- *Implement regular sweeping of impervious surfaces such as streets and driveways*
- *Use of efficient irrigation practices*
- *Provision of infiltration trenches and basins*
- *Linings for urban runoff conveyance channels*
- *Vegetated swales and strips*
- *Protection of slopes and channels*
- *Landscape design such as xeriscape or other design minimizing use of fertilizers*

MM 3.7-2 *Prior to the issuance of a grading permit, the developer shall submit and obtain approval of construction drainage and erosion control plans in connection with site grading activities. The control measures contained in the plan shall be approved by the City of Pasadena prior to starting construction. The plans shall serve as the basis for the construction portion of the SWPPP and shall include the applicable measures such as the following:*

- *Diversion of off-site runoff away from the construction site*
- *Prompt revegetation of proposed landscaped areas*
- *Perimeter sandbagging and silt fences and/or temporary basins to trap sediment*
- *Regular sprinkling of exposed soils to control dust during construction*
- *Installation of a minor retention basin(s) to alleviate discharge of increase flows*
- *Specifications for construction waste handling and disposal, including wheel washing activities*
- *Erosion control measures maintained throughout the construction period*
- *Construction stabilized construction entrances to avoid trucks from imprinting debris on City roadways*
- *Construction timing to minimize soil exposure to storm events*
- *Training of subcontractors on general site housekeeping*

- *The SWPPP is a "live" document and shall be kept current by the person responsible for its implementation.*

Finding: **Due to applicable regulations and required mitigation, no significant impact will result.**

Impact 3.7-2	**The proposed project will not substantially degrade or deplete groundwater resources in the Raymond Basin.**

The proposed project site overlays the Raymond groundwater basin. Natural recharge to the basin is primarily from percolation of flow from the Arroyo Seco, a tributary of the Los Angeles River, and by Eaton Canyon, Santa Anita Canyon and other streams in the watershed of the San Gabriel River. The Arroyo Seco stream contributes approximately one third of the natural replenishment of the aquifer (City of Pasadena 2003). Natural recharge is augmented by the City of Pasadena's spreading of water through infiltration ponds in portions of the upper Arroyo Seco. The proposed project will not reduce flow to the Arroyo Seco or its recharge basins. Consequently, there will be no impact on groundwater recharge or depletion of groundwater supplies.

Finding: **No significant impact will result, and no mitigation is required.**

Impact 3.7-3	**The proposed project is not expected to substantially alter the existing drainage pattern of the site or area in a manner that would result in substantial erosion or siltation on or off site.**

During construction of the proposed project, drainage patterns and grading will alter surface drainage characteristics, which may temporarily increase erosion and sediment transport. The General Construction Permit requires preparation of a Stormwater Pollution Prevention Plan with construction BMPs to prevent erosion and off-site sediment transport. This, along with the incorporation of MM 3.7-1 and MM 3.7-2, will result in less than significant impacts during construction. Post construction activities would also be subject to terms and conditions of the applicable portions of the NPDES permit as wells as the SUSUMP BMPs which are designed to reduce operational discharges that would reduce water quality of receiving waters to less-than-significant levels. Thus impacts would be less than significant, and no further mitigation would be required.

Finding: **Due to applicable regulations, no significant impact will result, and no mitigation is required.**

Impact 3.7-4	**Implementation of proposed project would not substantially alter site drainage patterns, substantially increase the rate or amount of surface runoff, or result in flooding either on or off site.**

As stated above, no development would occur that would alter the Arroyo Seco channel, and the proposed drainage patterns associated with the project, including the replacement of permeable surfaces with impermeable surfaces, would not substantially increase runoff volume as implementation of the

proposed project is estimated to slightly increase impermeable surfaces due to removal of some landscaping and replacement with building structures. This incremental increase in flows is not considered substantial and would not, by itself, result in flooding or substantially alter site drainage patterns, particularly because, as described above, new flows would be directed to the upgraded storm drainage system that would be designed to meet the City's and county's standards. This impact would be less than significant and no mitigation is required.

Finding: No significant impact will result, and no mitigation is required.

Impact 3.7-5	**Implementation of the proposed project would not expose people or structures to a significant risk involving flooding due to the failure of Devil's Gate Reservoir.**

Devil's Gate Dam is located north of the proposed project site. While a catastrophic failure of this structure could, under worst-case scenarios, result in flooding in the project area, the possibility of failure due to seismic or other factors is considered by the Los Angeles Department of Water & Power (LADWP) to be extremely remote and speculative. In addition the proposed project would not alter any hydrological conditions that would increase the risk of dam failure/site inundation over that which currently exists within the Project site. This impact would, therefore, be less than significant. No mitigation is required.

Finding: No significant impact will result, and no mitigation is required.

Impact 3.7-6	**Implementation of the proposed project would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche.**

A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. The closest enclosed basin to the project site is the Devil's Gate Reservoir; however, according to the LADWP, no seiche at a LADWP facility has ever been recorded, even during the Northridge Earthquake, and the LADWP does not consider seiches to be a potentially significant hazard. As such, significant inundation by seiches on the proposed Project site would not be expected to occur, and, as the proposed project would not alter any conditions that would increase the risk of significant inundation by seiches over that which currently exists within the Project site, this impact would be less than significant. No mitigation is required.

Finding: No significant impact will result, and no mitigation is required.

Impact 3.7-7	**Development of the Rose Bowl Stadium Renovation Project would increase impervious surfaces in the project area, which would exceed the capacity of existing stormwater drainage systems and require expansion or construction of existing storm drainage facilities.**

Development of the Project would increase impervious surfaces in the Project area. The originally proposed Project would involve rehabilitation of the existing Stadium with improvements amounting to

approximately 816,000 square feet. Around the perimeter of the Stadium, many trees in the terraced planters would be removed. With the removal of some landscaping, the amount of impervious surfaces on the project site would increase. This increase in impervious surfaces within the project area is anticipated to increase stormwater runoff. Consequently, this increase in stormwater runoff as a result of project implementation could result in a potentially significant impact in terms of existing stormwater drainage systems capacity due to the current condition and capacity of the storm drain system.

MM 3.7-1 and 3.7-2 above would assist in the control of construction and post-construction stormwater runoff into the storm drains, minimizing the impacts to the storm drain system. In addition, implementation of MM 3.13-2 (see below) would address storm drain deficiencies for the proposed project, and would ensure adequate stormwater capacity. Impacts related to capacity of existing stormwater drainage systems would be reduced to a less-than-significant level by these measures.

Finding: Due to required mitigation, no significant impact will result.

H. Land Use

Impact 3.8-1	**The proposed project would not be incompatible with adjacent land uses or cause a substantial adverse change in existing land use patterns**

Because the Stadium would continue its current use, project implementation would not cause an adverse change in the existing land use pattern of the project area.

Finding: No significant impact will result, and no mitigation is required.

Impact 3.8-2	**The proposed project would be consistent with applicable land use plans.**

The Project elements are consistent with the City's current land use designation of Open Space under the Land Use Diagram, and zone OS (Open Space) as specified in the City of Pasadena Municipal Code. Additionally, for the reasons discussed in the EIR, the project is consistent with the General Plan.

Finding: No significant impact will result, and no mitigation is required.

Impact 3.8-3	**The proposed project could interfere with existing other uses of the immediate area.**

The Stadium parking area at the south end is utilized on a monthly basis for the Rose Bowl Flea Market, held the second Sunday of each month. Construction staging and other construction activities could interfere with this monthly event if provisions were not made for relocation of the Flea Market. This represents a potentially significant impact to operators of the Flea Market. However, MM 3.8-1 provides that an alternative location will be provided to accommodate the Flea Market if construction of the Project results in unavailability of the parking lot areas currently utilized for this purpose. With implementation of this mitigation measure, this impact would be reduced to a less-than-significant level.

During project operation, it is possible that an NFL game could be held on a second Sunday, parking for which could interfere with monthly Flea Market operations. However, MM 3.8-2 provides that the RBOC shall work with the NFL and other tenants to avoid scheduling events on the second Sunday of the month to avoid this impact.

Mitigation Measures: The following mitigation measures will be required to reduce potential impacts related to conflict with surrounding land uses.

MM 3.8-1 *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 *During project operation, if the event schedule conflicts with the monthly Flea Market held on the second 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, when feasible, 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 rescheduled Flea Market operation.*

MM 3.8-3 *The City and the NFL shall ensure, through provisions in the lease agreement, that the Tournament of Roses and Rose Bowl game activities will be accommodated in a manner consistent with traditional operating circumstances, needs, and locations. (This is the same as MM 3.11-3)*

Finding: **Due to required mitigation, no significant impact will result.**

Impact 3.8-4	**The proposed project would adversely affect adjacent neighborhoods.**

Surrounding communities experience increased automobile and bus congestion and associated noise immediately before and for one to two hours after games. The proposed project would result in an increase in displacement events annually, which would increase the potential for occurrence of these adverse impacts. MMs 3.12-1 and 3.12-2 below would be required but would not sufficiently reduce traffic-related impacts on land use compatibility. MM 3.7-1, MM 3.7-2, MM 3.10-1, and MM 3.10-2 also apply to this impact.

Finding: **Changes or alterations have been required in, or incorporated into, the project that lessen some of the significant environmental effect as identified in the Final EIR, but the land use impact on the adjacent neighbors would remain significant and unavoidable.**

Impact 3.8-5	**Due to increased building area and frequency of use, the proposed project would substantially alter the type or intensity of development in the immediate area.**

The proposed project would add a net of approximately 816,000 square feet of use to the existing Stadium, and would create a more massive, taller, state-of-the-art, modern Stadium. Therefore, the

physical design of the Stadium would represent a substantial change in the intensity of development in the Central Arroyo. From a land use standpoint, the proposed project represents an intensification of use of the existing Stadium, and 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. Therefore, while the proposed project would not change the type of development in the area, as there are other recreational facilities in the Central Arroyo, it would result in an adverse impact to the Central Arroyo because of the substantial intensity (including nearly 1 million square feet of new building area, increased building height and massing, and increased frequency of large-scale events) of the proposed development. This would be a significant and unavoidable impact.

Finding: Changes or alterations have been required in, or incorporated into, the project that lessen some of the significant environmental effect as identified in the Final EIR, but the impact on development intensity would remain significant and unavoidable.

I. Noise

Impact 3.9-1	**Construction activities associated with the proposed project would not generate or expose persons off site to excessive ground borne vibration.**

Construction activities that would occur under the proposed project have the potential to generate low levels of ground borne vibration. Given that the residential properties nearest to the Stadium are located approximately 200 feet away from the nearest parking lot, based on vibration attenuation rates, vibration levels experienced by these residential uses would be less than 75 VdB. In addition, heavy trucks would also be used to transport materials to and from the project site when construction activities occur. Based on coordination with the City of Pasadena Department of Transportation, the construction haul route would include use of Seco Street, Mountain Street, and the I-210 (Foothill) Freeway. These trucks typically generate ground borne vibration velocity levels of around 63 VdB. These levels could reach 72 VdB where trucks pass over bumps in the road. In both instances, the resulting ground borne vibration velocity levels would be less than the Federal Railway Administration's 80 VdB vibration impact threshold for residences. Therefore, construction during the implementation of the proposed project would not expose off-site persons to excessive ground borne vibration or ground borne noise levels, and this impact would be less than significant.

Finding: No significant impact will result, and no mitigation is required.

Impact 3.9-2	**Mechanical equipment installed and operated at the proposed project site would not expose noise-sensitive land uses to noise levels that exceed City standards.**

Large HVAC systems associated with the Stadium could result in noise levels that average between 50 and 65 dBA L_{eq} at 50 feet from the equipment. The property lines of the nearest residential uses, which are located on North Arroyo Boulevard east of Rosemont Avenue, are located approximately 200 feet from the edge of the nearest Stadium parking lots (Lot B and D) and 600 feet from the edge of the Stadium. As

such, the new mechanical equipment installed and operated at the Stadium would not expose the nearby residential uses to noise levels that exceed the City's 70 dBA CNEL exterior standard for single-family residential uses. In addition, the noise levels from the new HVAC systems are not anticipated to be greater than the current noise levels generated by the existing HVAC systems. The new HVAC systems would be more state-of-the-art and energy efficient than the existing systems, and would be upgraded to exceed industry standards. Thus, the new systems would likely generate lower noise levels. As such, while implementation of the Project would increase the overall occurrence of noise from the Stadium's HVAC systems over the course of a year due to additional operation associated with the increase in displacement events that would be held at the Stadium, the noise levels generated from the new HVAC systems would be less per event than the existing systems because of improvements in their design. Therefore, this impact would be less than significant.

Finding: No significant impact will result, and no mitigation is required.

Impact 3.9-3	**The operation of advertisement-related aircraft at the project site during special events would not expose people residing or working in the project area to excessive noise levels that exceed City standards.**

The area west of the Stadium is noise sensitive to aircraft. While the operation of event-related aircraft (such as blimps or banner aircrafts) already occur over the project area during existing special events at the Stadium (e.g., UCLA games) the frequency of these flights by advertisement-related aircrafts may increase as a result of implementation of the Project. The noise levels generated from the operation of these aircraft over the Project area are not considered to be of unusual nature and would not be of long duration. As these aircraft would use the same flight paths as those used by aircraft for the existing displacement events at the Stadium, they would not introduce new sources of noise to the residential uses below. Also, commercial and private aircraft commuting to or from airports within the southern California region (no airports are within Pasadena) pass over the City. Noise from event-related aircraft would generate less noise than commercial airplanes, the operation of these aircraft during special events at the Stadium are not anticipated to result in the exposure of people residing or working in the Project area to excessive noise levels that would exceed City standards.

Meetings are held with the various users of the airspace, including media and commercial operators to work out operational concerns and noise sensitivity issues. The area west of the Stadium is noise sensitive to aircraft. This is addressed by having the aircraft, including law enforcement and news media fly at a higher elevation. Typically, the City assigns altitudes to the aircraft involved; law enforcement at 2,000 feet, news media at 2,500 feet. This allows for a safe separation of aircraft that have different missions and lowers the impact on the neighborhoods.

Finding: **No significant impact will result, and no mitigation is required.**

Impact 3.9-4	**Truck trips resulting from construction of the proposed project would not generate noise levels along Seco Street and Mountain Street that exceed the standards established in the City of Pasadena Noise Regulations.**

Noise levels generated by construction trucks could reach approximately 67.4 dBA L_{eq} at 50 feet. Residential uses located along Seco Street and Mountain Street would be exposed to noise levels below the City's standard. As such, impacts associated with truck trips during construction of the proposed project would be less-than-significant.

Finding: **No significant impact will result, and no mitigation is required.**

Impact 3.9-5	**Construction activities associated with the proposed project could generate noise levels that exceed the standards established in the City of Pasadena Noise Regulations.**

During each stage of project construction there would be a different mix of equipment operating, and noise levels would vary based on the amount of equipment in operation and the location of the activity. The uses nearest the Project site that are sensitive to construction noise are the single-family dwelling units that are located along residential street segments surrounding the general vicinity of the Stadium. The property lines of the nearest residential uses are located approximately 200 feet from the edge of the Stadium's nearest parking lots (Lot B and D) and 600 feet from the edge of the Stadium. Construction activities occurring at the parking area located immediately east of the Stadium could reach approximately 74 dBA L_{eq} during the daytime at the property lines of these residential uses. These noise levels would not exceed the City's standard. In addition, construction activities at the Project site would also be limited to the hours of 7:00 A.M. to 9:00 P.M. on Monday through Saturday in accordance with the City's Noise Ordinance. As such, the impact associated with construction noise would be less than significant.

Pile driving may occur during construction of the proposed project. According to the United States Environmental Protection Agency (EPA), peak noise levels resulting from pile driving could range between 95 to 107 dBA L_{eq} at 50 feet. As noise levels would diminish at a rate of approximately 6 dBA per doubling of distance, the potential noise level associated with pile driving would range from 77 to 89 dBA L_{eq} at 400 feet from the Stadium, and from 71 to 83 dBA at 800 feet from the Stadium. As such, the nearest residential uses that are located approximately 600 feet from the Rose Bowl Stadium could experience noise levels from pile driving that exceed the City's noise level standard. Implementation of MM 3.9-1 would require the use of site-specific noise attenuation measures, including the use of "quiet" pile driving technology, to reduce the noise levels generated from pile driving at the project site. In addition, implementation of MM 3.9-2 would also require the issuance of proper noticing procedures by the Project developer prior to the issuance of the building permit to inform the public of when pile driving activities

would occur. Furthermore, in accordance with the City's Noise Ordinance, the operation of pile driving equipment at the Project site would not occur between the hours of 9:00 P.M. of one day and 7:00 A.M. of the next day or between the hours of 9:00 P.M. of Saturday and 7:00 A.M. of Monday. With implementation of the mitigation measures and adherence to the City's Noise Ordinance pertaining to pile driving, this impact would be reduced to a less-than-significant level.

Mitigation Measures: The following mitigation measures will be required to reduce potential impacts related to construction noise.

MM 3.9-1 *To mitigate potential pile driving or other extreme noise-generating impacts, a set of site-specific noise attenuation measures shall be completed under the supervision of a qualified acoustical consultant. This plan shall be submitted for review and approval by the City to ensure that feasible noise attenuation is achieved to satisfy standards contained in the City of Pasadena Noise Ordinance. These attenuation measures shall include as many of the following control strategies as feasible and shall be implemented prior to any required pile driving activities:*

- *Implement "quiet" pile driving technology (e.g., cast-in-drilled hole piles, soil-mix wall technology, shielded pile drivers, vibratory pile driving or pre-drilled pile holes), where feasible, in consideration of geotechnical and structural requirements and conditions*
- *Erect temporary plywood noise barriers around the entire construction site*
- *Adjust the scheduling and duration of pile driving*
- *Monitor the effectiveness of noise attenuation measures by taking noise measurements during pile driving activities*

MM 3.9-2 *Prior to the issuance of each building permit, along with the submission of construction documents, the Project developer shall submit to the City a list of measures to respond to and track complaints pertaining to construction noise. These measures shall include the following:*

- *A procedure for notifying City staff*
- *A plan for posting signs on the project site pertaining to permitted construction days and hours, complaint procedures, and who to notify in the event of a problem*
- *A listing of telephone numbers (during regular construction hours and off hours)*
- *The designation of an on-site construction complaint manager for the proposed project*
- *Notification of residents within 800 feet of the proposed project construction area at least 30 days in advance of pile-driving along with the estimated duration of the activity*

Finding: **Due to required mitigation, no significant impact will result.**

Impact 3.9-6	**Operation of the proposed project could generate noise levels that exceed the standards established in the City of Pasadena Noise Regulations.**

The Project would result in the rehabilitation of the existing Stadium to allow use by a National Football League (NFL) team. While implementation of the Project would expose the nearby residential uses to noise generated from the Stadium's loudspeaker system on more occasions over the course of a year due to the additional displacement events that would be held at the Stadium, the volume generated from the loudspeaker system per event would be less because of acoustic improvements implemented in the design of the new system. However, to ensure that the noise level generated from the proposed loudspeaker system would meet the City's Noise Regulations, MM 3.9-3 would be implemented, which requires the periodic monitoring of Stadium noise levels, and, if deemed necessary, the subsequent modification of the sound system at the Stadium to reduce the noise levels. Implementation of MM 3.9-3 would reduce potential impacts from the Stadium sound system to a less-than-significant level.

Mitigation Measures: The following mitigation measures will be required to reduce potential impacts related to noise from events.

MM 3.9-3

(a) *Prior to installation of the new sound system, the project operator shall present noise analysis to the City that demonstrates that the new sound system will meet the City's Noise Regulations.*

(b) *Stadium noise level in the residential areas surrounding the project site shall be monitored periodically during the first year of operation by the operator in cooperation with the City.*

(c) *Based on the monitoring results, the operator shall modify operation of the loudspeaker system to reduce noise levels observed at the residential areas to meet City Noise Regulations. Modifications may include adjustments to volumes or relocation of individual loudspeakers and shall ensure any necessary modifications provide the maximum feasible reduction of noise to the surrounding community.*

(d) *Prior to the first special event associated with an NFL football game at the Stadium, the operator shall retain a qualified acoustical consultant to develop noise performance standards for the Stadium loudspeaker system to minimize noise effects at the residential areas surrounding the Rose Bowl. The performance standards shall specify a noise limit and may include suggestions for sound equipment orientation or other measures. The performance standards shall be subject to review and approval by the Director of Community Development.*

Finding: **Due to required mitigation, no significant impact will result.**

Impact 3.9-7	**Operation of the proposed project could expose nearby noise-sensitive land uses to substantial temporary or periodic increases in ambient noise levels from roadway operations.**

The ambient noise levels during a weekend event at the Stadium would increase at nearby residential locations. The Project would increase local noise levels by a maximum of 11.7 dBA during the weekend event peak traffic period. Overall, ten roadway segments would experience a significant increase of 5.0 dBA L_{eq} or more during the weekend peak traffic period. This impact is significant and unavoidable. Reducing this impact to a less-than-significant level would require a substantial reduction in the number of vehicles that are associated with the Project. No measures are considered feasible to accomplish this.

Finding: **Other than the mitigation for traffic that is described below, no feasible mitigation is available to reduce impacts related to roadway noise levels generated by vehicles, and this impact would remain significant and unavoidable.**

Impact 3.9-8	**The increase in local traffic volumes during weekdays resulting from implementation of the proposed project would cause a substantial periodic increase in roadway noise levels.**

The proposed project would increase noise levels at residential locations adjacent to roadways surrounding the project site. Weekday events would increase ambient noise levels. Roadways in the project vicinity include a mix of "rush-hour" traffic that is not typical of weekend traffic. With this added mix of rush-hour traffic combined with the traffic from a weekday event, noise levels for the weekday event would be similar if not identical to the weekend impacts discussed above. Reducing this impact to a less-than-significant level would require a substantial reduction in the number of vehicles that are associated with the proposed project. No measures are considered feasible to accomplish this.

Finding: **Other than the mitigation described below related to traffic, no feasible mitigation is available to reduce impacts related to roadway noise levels generated by vehicles, and this impact would remain significant and unavoidable.**

Impact 3.9-9	**The increase in local traffic volumes during weekdays and weekends resulting from implementation of the proposed project would cause a substantial periodic increase in roadway noise levels.**

The Project would increase local noise levels by a maximum of 7.1 dBA CNEL for weekday events (Salvia Canyon Rd. east of Linda Vista Ave. and N. Arroyo Blvd. east of Rosemont Ave.) and 11.5 dBA CNEL for weekend events (Salvia Canyon Rd. east of Linda Vista Ave.). The project EIR states that a permanent (i.e. long-term operational) increase of 5.0 dBA CNEL over ambient noise levels is substantial and significant.

MMs 3.12-1 and 3.12-2 (see below) would be required but would not sufficiently reduce traffic-related impacts on noise levels.

Finding: Other than the mitigation described below related to traffic, no feasible mitigation is available to reduce impacts related to roadway noise levels, and this impact would remain significant and unavoidable.

J. Public Services

Impact 3.10-1	**When fully operational, the estimated increase in visitor population as a result of project implementation could increase the demand for fire protection services, but would not require the construction of new or physically altered facilities to accommodate the increased demand and maintain acceptable fire flows.**

The proposed project would not by itself require new, expanded, or altered fire protection services or facilities to maintain the current level of service. Due to the fact that the proposed project will significantly improve the fire and life safety features of the current site (i.e., provision of upgraded paramedic station on site) and at the same time reduce the overall occupant load of the Stadium, the Pasadena Fire Department anticipates a less-than-significant impact on their ability to deliver a quality fire and life safety response to the Project area.

The water pipeline system in the Project area would be upgraded as part of the proposed Project. In addition, all development plans are reviewed by the Fire Department prior to construction to ensure that adequate fire flows would be maintained (including localized pipe upgrades or connections that might be required to connect new buildings to the system), and that an adequate number of fire hydrants would be provided in the appropriate locations in compliance with the California Fire Code. As such, impacts associated with the provision of fire protection services are considered less than significant.

Finding: No significant impact will result, and no mitigation is required.

Impact 3.10-2	**When fully operational, the estimated increase in visitor population as a result of project implementation could impact police service levels within the Project area, but would not require the construction of new or physically altered police facilities to accommodate the increased demand.**

The Project would increase the number of events as well as average attendance. Review by the Pasadena Police Department suggests that the Project site, when fully operational, would impact police service levels provided by the Event Planning Section of the PPD. However, the Project would not impact day-to-day service to the Stadium or the immediate area. In addition, the Department will assist developers and City staff in formulating a security plan that encompasses all Stadium and associated facilities renovation. Therefore, while additional police resources may be required on major event days, there would be no need for expansion of police facilities, and impacts to police services with regard to increased visitor population and number of events annually would be considered less than significant. MM 3.10-1 requires

the developer to work with the Pasadena Police Department and the City to formulate a security plan for the Stadium renovation, while MM 3.10-2 requires the use of increased security features for the project, such as video surveillance systems. Implementation of MM 3.10-1 and MM 3.10-2 would reduce this less-than-significant impact to police services even further.

Mitigation Measures: The following mitigation measures will be required to reduce potential impacts related to police service.

MM 3.10-1 *Prior to issuance of a building permit, the City and the developer shall consult with the Pasadena Police Department to develop a security plan indicating detailed Crime Prevention Design and event security measures, including specific duties with regard to control and monitoring of tailgating activities in surrounding neighborhoods and on the recreational trails, and shall incorporate the department's recommendations into the Plan.*

MM 3.10-2 *The operator of the proposed project shall provide sufficient private-sector security (licensed, uniformed, and insured) and video surveillance camera systems to meet the Project's needs and include coverage for all of the project area in order to prevent crime and offset potential impacts to police services.*

Finding: **Due to required mitigation, no significant impact will result.**

K. Recreation

Impact 3.11-1	**Implementation of the Project would not increase the population and would not result in the increased use of parks and recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated.**

The Project is not expected to increase the City's population or, by itself, increase demand on parks. However, the increase in major (displacement) events at the Stadium may interfere with the use of the Arroyo by casual recreation users. Some of these users will engage in other activities due to the major event, others will alter their schedule to use the Arroyo at a different time and others might choose to engage in their same recreation activity, at the same time, but in a different location. Among those who choose to use a different location, those who use other park locations would be expected to be distributed over various facilities so that no one facility would be burdened such that substantial physical deterioration of the facility would occur or be accelerated.

Finding: **No significant impact will result, and no mitigation is required.**

Impact 3.11-2	**The proposed project would significantly interfere with or preclude use of existing recreational facilities in the Central Arroyo.**

Due to an additional maximum of thirteen displacement events at Rose Bowl Stadium (mostly occurring on weekends and in the Fall, which are both times of high demand), Lot H, Brookside Park, and Brookside Golf Course, would be unavailable and the Rose Bowl Aquatics Center would have limited

availability for recreational use by the public for specified hours for up to an additional 13 days per year. Lot H would still continue to host soccer games and other recreational activities, but would be parked during displacement events and, thus, unavailable to recreational users for major Stadium events. Brookside Park ball diamond and park areas as well as Brookside Golf Course would also be parked and unavailable to the public for recreation during displacement events. In addition, the availability of the Aquatics Center would be limited, since major event Stadium parking would restrict this facility's parking inventory. The increase in unavailability of Lot H, Brookside Park, Brookside Golf Course, and Rose Bowl Aquatic Center during major Stadium events due to parking needs would increase the number of days these facilities would be unavailable for use by the general public and would, therefore, result in a significant and unavoidable impact to recreational access within the Central Arroyo.

The North Brookside Golf Course would remain open for normal play during construction of the proposed project. In order to keep the South course at par 72 during construction, the 18th hole will be modified to include a shortened fairway (from 450 yards to 150 yards) and lowered par (4 to 3). The South course will remain open for play during construction. However, with other golf courses available in the area, this loss of recreational access would be temporary and, therefore, less than significant. During project implementation, the golf courses would be closed more frequently due to the increased number of displacement events and attendance parking requirements. Hiking/equestrian trails (i.e., Arroyo Seco Trail, also know as Rim of the Valley Trail) and pedestrian/bicycle paths (i.e., the streets adjacent to the Brookside Golf Course and Rose Bowl that operate as a recreation loop) that traverse the Central Arroyo would be significantly affected by such major Stadium events due to heavy vehicle and pedestrian Stadium traffic crossing these paths. Implementation of MM 3.11-1 and MM 3.11-2 would reduce recreational access impacts to hiking/equestrian trails and pedestrian/bicycle paths within the Central Arroyo to a less-than-significant impact.

The scheduling of the events in Central Arroyo would be adjusted to accommodate the use of the area by the NFL. The only exception to this NFL priority would be related to the Tournament of Roses uses, which would require use of the Stadium for the Rose Bowl game and Stadium parking areas for activities related to the Rose Parade. Implementation of MM 3.11-3 would ensure that NFL scheduling would not interfere with this century-old celebration.

Mitigation Measures: The following mitigation measures will be required to reduce potential impacts related to hiking/equestrian trails and pedestrian/bicycle paths and scheduling of Arroyo Seco events.

MM 3.11-1 *The RBOC shall ensure that the Arroyo Seco Trail (also known as the Rim of the Valley Trail) and the Recreation Loop shall remain open during construction and operation of the proposed project.*

MM 3.11-2 *Notification of major Stadium events shall be posted by the RBOC along the Arroyo Seco Trail and Recreation Loop at least thirty (30) days prior to the events; notice for playoff games may be less than 30 days and shall be posted as soon as possible*

MM 3.11-3 *The City and the NFL shall ensure, through provisions in the lease agreement, that the Tournament of Roses and Rose Bowl game activities will be accommodated in a manner consistent with traditional operating circumstances, needs, and locations.*

MM 3.11-4 *The project operator or its designees shall be responsible for timely repair of damaged turf areas as a result of parking during displacement events.*

Finding: Required mitigation would adequately reduce recreational impacts related to hiking/equestrian trails and pedestrian/bicycle paths and scheduling of Arroyo Seco events to a level of insignificance. However, no feasible mitigation would reduce to insignificance impacts related to decreased availability of certain facilities in the Arroyo Seco, and this impact would remain significant and unavoidable.

L. Transportation/Traffic

Impact 3.12-1	**Construction activities associated with the proposed project may temporarily obstruct access to the project site, but would not eliminate emergency access to the project site.**

The Project, as required by law, would continue to provide adequate access for emergency vehicles and appropriate evacuation routes within the project area. In addition, the City has prepared an Emergency Plan for the Stadium (1998), which provides specific guidelines in the event of a major emergency at the Stadium during which it is occupied. Furthermore, during construction of the Project, temporary road or lane closures that would potentially block emergency access and/or evacuation routes are not anticipated to occur. The Project site is located within an urbanized area in the Central Arroyo Seco in the City of Pasadena and multiple access points are available, including major access routes such as Orange Grove Boulevard, Rosemont Avenue, Seco Street, and Interstate 210. The presence of multiple alternative routes around the project site minimizes the potential for interference with emergency routes during construction. Although a part of Rose Bowl Drive (a dead-end street) will be modified on its west side for use as a construction staging area, all of the construction staging and improvements would occur off-street. Thus, no alteration to existing access roads would occur from construction activities associated with the proposed project. Since no major streets with through traffic road closures are anticipated during construction activities, coupled with adherence to the existing Emergency Plan for the Stadium, implementation of the Project would not interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, this impact would be less than significant, and no mitigation is required.

Finding: No significant impact will result, and no mitigation is required.

Impact 3.12-2	**Implementation of the proposed project would not substantially increase hazards associated with a design feature or incompatible uses.**

Implementation of the Project entails the renovation of the existing Stadium. The Project would not involve the construction of new roads, alteration of the existing street network, or the introduction of a

new land use. During an NFL game at the Stadium, the special event traffic management strategies currently used for UCLA Football events would also be utilized, which includes the use of reversible lane operations and the diversion of traffic onto different routes. These traffic management strategies would continue to be implemented under the direction of the Pasadena Police Department, and varying strategies would be employed based on the anticipated attendance figures. As these traffic control measures are currently being used at the Project site and have not created hazardous conditions, their use for the Project would not represent an increase in hazards associated with a design feature. Therefore, this impact would be less than significant.

Finding: No significant impact will result, and no mitigation is required.

Impact 3.12-3	**The proposed project would provide adequate parking for a weekday and weekend sold-out special event at the Rose Bowl.**

The provision of 18,000 parking spaces will be adequate to accommodate a maximum attendance of 75,000 persons at the Stadium during a weekday or weekend sold-out special event given the availability of 3,125 spaces at the Parsons complex. The Project parking scheme has been designed to minimize off-site parking impacts beyond what typically occurs under the existing special event conditions. Impacts related to event parking would thus be less than significant.

Finding: No significant impact will result, and no mitigation is required.

Impact 3.12-4	**Parking supply associated with the Tournament or Roses operations in the City of Pasadena would not be adversely affected by the proposed project.**

Based on a review of current plans and information on file at the RBOC pertaining to the annual Tournament of Roses/Rose Bowl Family Event Festival, it was determined that a total of approximately 940 parking spaces are utilized for the activities associated with this annual event (e.g., Kick-off/VIP Luncheon (Tournament VIP Tailgate Party), Corporate Hospitality & President's Parties, Float Decorating, etc.). In addition, the traffic study for the Project indicated that based on comments received throughout the public scoping process, a large scale event would not be scheduled during Tournament of Roses main operations/activities (e.g., from main set-up to take down). While some float decorating does occur in early December at the northern side of Parking Lot I, this area is limited to a 100-foot by 270-foot structure tent (approximately 90 parking spaces), with viewing taking place only on the four days prior to the Rose Parade. In the event that a home game or another special event is scheduled during this period (the second or third week in December) ample parking would be available with an expected attendance of 65,000 persons. As a major event would not coincide with the Tournament of Roses main operations/activities (e.g., from set-up to take down), significant impacts to existing Tournament of Roses operations (i.e., use of adjacent parking areas) are not anticipated to occur. This would be a less-than-significant impact.

Finding: **No significant impact will result, and no mitigation is required.**

Impact 3.12-5	**The proposed project would not conflict with adopted policies supporting alternative transportation (e.g., bus turnouts, bicycle racks).**

The Project would not substantially increase the demand for alternative transportation services except temporarily during high-attendance events, and would not interfere with existing or planned transit routes. A specific evaluation of the existing shuttle operation and a review of potential route alternatives determined that none of the shuttle route alternatives were superior to the existing route in that additional significant impacts to the surrounding street system would be expected and many of the roadways would not be suitable for shuttle buses due to either width, design, or grade issues. The current shuttle route has been in use for UCLA football games and other selected large scale special events at the Stadium for a period of time, use of this shuttle operation by the Project would not conflict with any other existing or planned transit routes, and would also not conflict with game traffic. Furthermore, Project implementation is anticipated to be consistent with local policies related to transportation, including the SCAG Regional Comprehensive Plan and Guide and the City of Pasadena General Plan Mobility Element. Therefore, this impact would be less than significant.

Finding: **No significant impact will result, and no mitigation is required.**

Impact 3.12-6	**Construction activities associated with the proposed project would not result in significant adverse impacts on traffic and circulation in the project vicinity.**

Renovation of the Stadium would generate traffic from construction worker travel, as well as the arrival and departure of trucks delivering construction materials to the site and the removal of debris generated by on-site demolition activities. With required City approvals, as well as the construction management practices, impacts due to construction activity would be minimized to the extent feasible. This impact would be less than significant.

Finding: **No significant impact will result, and no mitigation is required**

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 events at the Rose Bowl Stadium.**

The proposed project is expected to create significant impacts at 20 of the 26 study intersections under the weekday special event evening arrival and/or departure peak hours; at 18 of the 26 study intersections under the weekend special event A.M. arrival and/or P.M. departure peak hours; and at 13 of the 26 study intersections under the weekend special event A.M. arrival and/or P.M. departure peak hours. While implementation of MM 3.12-1 would reduce the significant impacts at some of the impacted study intersections during both the weekday and weekend special events to a less-than-significant level, most of the impacted study intersections would remain significantly impacted per the City's significant impact

criteria. As such, impacts on traffic and circulation at the study intersections during both weekday and weekend special events at the Stadium associated with the Project would be significant and unavoidable.

Mitigation Measure: The following mitigation measure will be required to reduce potential impacts related to intersection traffic flow.

MM 3.12-1 *The traffic control measures and traffic management strategies currently employed during large-scale events at the Stadium (i.e., UCLA football games) shall continue to be implemented along with new strategies during the weekday and weekend special events associated with the Project to effectively move vehicles into and out of the Rose Bowl Stadium parking areas. These traffic management strategies include the following:*

Offset/Reversible Traffic Flow Along Key Street Segments

Continue to provide offset traffic flow along Salvia Canyon Road, Seco Street (both near Rosemont Avenue and just north of Linda Vista Avenue) and Rosemont Avenue. Traffic cones and barricades will be placed to provide an additional lane for motorists offset from the normal centerline (e.g., two inbound and two outbound lanes become three inbound and one outbound lane).

Use of Police Helicopter to Assist Traffic Control Operations

A City of Pasadena Police helicopter is utilized to assist traffic control operations staff on the ground for events that are anticipated to draw more than 20,000 persons. Police personnel should continue to be positioned at key traffic decision points on the perimeter of the arrival/departure travel routes. Arriving traffic can be diverted to another travel route to obtain a better distribution of parking loading, as the traffic personnel are in direct radio contact with the Police helicopter and the police stationed in the Rose Bowl Traffic Control Center (located in the press box).

Command Center at the Rose Bowl Stadium

The Rose Bowl Stadium renovation will include upgrades to provide a state-of-the-art traffic command center that will be linked to the traffic management center in City Hall. The traffic command center will be equipped with closed circuit television (CCTV) monitors with camera coverage of the entire Arroyo Seco, strategic locations within Pasadena and at shuttle stops.

Temporary Freeway Changeable Message Signs

Continue implementing the freeway changeable message signs for large scale events at the Stadium. These signs, in conjunction/coordination with the police helicopter and the Rose Bowl Stadium Traffic Control Command Center would divert arriving traffic to another travel route to obtain a better distribution of parking loading. Traffic personnel would also be in direct radio contact with the Police helicopter and the police stationed in the Rose Bowl Traffic Control Command Center (located in the press box).

Continue Utilization of Shuttle Buses from the Parsons Complex

Continue the current Rose Bowl Stadium shuttle program for major special events.

Wayfinding Guide Signs

Continue implementing the current wayfinding signage program that exists in the vicinity of the Rose Bowl Stadium.

Deployment of Traffic Control Officers at Key Intersections

Continue stationing traffic control officers at many of the key intersections during the weekday and weekend special events, so as to better direct predominant entering and exiting traffic flows. Based on coordination with the Pasadena Police Department, uniformed officers are typically deployed to approximately 30 posts at all major intersections in the Arroyo Seco and along roadways leading to and from the regional freeway system for UCLA football games to manage and direct the reversible lane operations.

Neighborhood Traffic Management

All residential streets surrounding the Arroyo Seco that are not designated as access to the Stadium shall continue to be closed to event traffic on special event days. This will continue to be implemented through the use of barricades at over 60 locations and will be manned by either Explorer Scouts (consistent with UCLA games), or by uniformed employees of the parking management company. Patrols of the neighborhoods should occur and residents should be given a hotline number to call so as to report any event-related concerns to which patrols can respond.

Designated routes to and from the Arroyo Seco area should be signed approximately 72 hours in advance for temporary special event "No Parking", which will be enforced by towing. Residents of the neighborhoods surrounding the Arroyo Seco will continue to be able to obtain residential passes for their cars that allow free access to roadways otherwise closed via the implementation of barricades.

Design and Implementation of a Pre-Paid/Pre-Assigned Parking Program for Events

Initiate and implement the design of a pre-paid, pre-assigned on-site parking program for all season-ticket holders. This program would be implemented for all suite ticket holders, all club level season ticket holders, and some general admission season ticket holders. With this program, patrons would receive directions to a designated parking area via a designated travel route. Pre-paid parking could be demonstrated through the use of dashboard placards, and preferential parking in close proximity to the Stadium could be provided for suite ticket holders and club level ticket holders.

Design and Implementation of Pre-Assigned Ingress Travel Routes

With implementation of this measure, patrons would receive directions to a designated parking area via a designated travel route in advance of an event.

Marketing/Public Information /Media Outreach Programs

A comprehensive marketing effort should be undertaken so as to provide event patrons with ample public information regarding transportation issues, aimed at reducing impacts associated with the Project to the greatest extent possible. The target audiences would be season ticket holders that purchase pre-paid parking passes, season ticket holders that park at the Parsons complex, single game ticket patrons, regional media, employees, charter bus operators, and area commuters.

Season ticket holders who purchase on-site parking would receive a ticket package that contains detailed information with respect to their designated parking area, the designated ingress travel route, and egress travel route suggestions. A dashboard parking pass/placard to display on event days would also be provided. Detailed maps should be provided on the back side of parking passes/placards which illustrate the pre-assigned route to the designated parking area. In the infrequent event of rain, the information packets should contain special directions for those patrons pre-assigned to an area of turf parking. Use of the Parsons complex parking and use of the shuttle should be encouraged. In addition, season ticket holders that park off site or take transit should be provided with informational brochures containing detailed information on parking access and shuttle bus operations.

Furthermore, key public messages should be provided via the established Rose Bowl Stadium website, public radio and other forms of media. These public announcements should include the following key messages: (1) arrive early, (2) vehicles should use the routes shown on their parking pass/placard, (3) if patrons do not have parking passes/placards, they should head to the Parsons complex, (4) in the event of rain, consider parking at the Parsons complex, (5) the shuttle is a short route and it is an efficient and convenient alternative to driving, and (6) charter buses and other transit (i.e., Gold Line) are encouraged.

Deployment of Additional Traffic Control Officers at Key Intersections

In addition to the current deployment levels, additional traffic control officers should be stationed at the following intersections during the weekday and weekend special events, so as to better direct predominant entering and exiting traffic flows:

Rosemont Ave. & Washington Blvd.

North Arroyo Blvd. & I-210 WB Ramps

North Arroyo Blvd. & I-210 EB Ramps

Lincoln Ave. & I-210 WB Ramps

I-210 EB Ramps & Mountain St.

I-210 WB Ramps & Mountain St.

Linda Vista Dr. & Highland Dr.

Linda Vista Dr. & Oak Grove Dr.

These officers will manually direct motorists at key intersections so as to minimize potential delays during peak inbound and outbound special event time periods (with the number of traffic control officers and the duration of deployment at each location to be determined by the Traffic Lieutenant of the PPD). For those locations involving freeway ramps, coordination with Caltrans and/or the California Highway Patrol (CHP) will continue to be necessary.

Enhanced Wayfinding Guide Sign Program

Implement an enhanced wayfinding program as part of the Project. The wayfinding program should be developed in consultation with the cities of Pasadena and La Canada-Flintridge, as well with the California Department of Transportation. The wayfinding program should include an updated inventory of existing Rose Bowl guide signs and directional freeway guide signs. Furthermore, the wayfinding program should identify opportunities to improve the dissemination of directional information for approaching motorists, including identification and location of specific access roadways. For motorists departing the Stadium area, information regarding access to the regional freeway system should also be enhanced. The enhanced wayfinding plan should be guaranteed prior to the issuance of the building permit for the Project and would be implemented prior to Project completion.

Consideration of Modifications to the Lot 9 Turf Area Access Point

An increase in the driveway/gate width for the Lot 9 turf parking area should be considered to increase efficiency associated with vehicular entry. The increased width may require slight modification to the existing rock walls.

Consideration of Additional Changeable Message Signs

The placement of additional changeable message signs on the arterial system should be considered at other locations in order to continue to provide motorists with real-time information regarding preferred routes.

MM 3.12-2 *Additional traffic control officers should be deployed during large scale special events at intersections within the Parsons complex vicinity and these efforts should be coordinated through the City's Police Department and integrated with Rose Bowl Stadium Traffic Control Command Center.*

MM 3.12-3 *Prior to issuance of grading permits, the project operator shall be required to develop a construction traffic management plan, to be approved by the City, that provides an overview of the project, lists the general contractor contact information, outlines contract responsibilities (e.g., mobilization, any demolition, excavation, grading or shoring work, concrete or steel placement work, etc.), construction hours, material storage and construction trailer locations, truck/haul routes, traffic control, parking, and clean-up.*

MM 3.12-4 *The project operator shall provide plans and specifications, prepared by a civil engineer, regarding any proposed modifications, improvements, or realignments to features in the public right-of-way or on adjacent public land and submit them to the City for approval. The submission shall be made in a timely manner and City approval granted before the issuance of grading permits.*

Finding: **Changes or alterations have been required in, or incorporated into, the project that lessen some of the significant environmental effect related to intersection traffic flow, but this impact would remain significant and unavoidable.**

Impact 3.12-8	**Utilization of off-site parking at the Parsons complex during the weekday P.M. arrival peak period would result in significant adverse impacts on traffic and circulation at the study intersections in the vicinity of the complex.**

In the vicinity of the Parsons complex, the Project is expected to create significant impacts at six of the nine intersections studied under the weekday special event P.M. arrival peak hour. As increased traffic volumes are anticipated to occur only during large special events on an occasional basis, permanent, physical improvement measures are not recommended at the above intersections (e.g., traffic signal modifications, roadway widenings, etc.). While implementation of MM 3.12-2 would require that additional traffic control officers be deployed during large scale special events and that these efforts be coordinated through the City's Police Department and integrated with the Stadium Traffic Control Command Center, it would not reduce the impacts at the six study intersections during the weekday special event P.M. arrival peak hour to a less-than-significant level. As such, this impact would be significant and unavoidable.

MMs 3.12-1 and 3.12-2 would also apply to this impact.

Finding: **Changes or alterations have been required in, or incorporated into, the project that lessen some of the significant environmental effect related to intersection traffic flow in the vicinity of the Parsons complex, but this impact would remain significant and unavoidable.**

Impact 3.12-9	**Implementation of the proposed project would result in significant adverse impacts on average daily traffic on specified street segments.**

Street segments are forecast to increase in average daily traffic (ADT) volume by five percent or more on days of major events at the Project site. On non-event weekdays and weekends, these roadways operate well within their desired range of daily vehicular trips and significantly below their theoretical capacities. Therefore, specific physical mitigation measures (e.g., roadway widenings, additional travel lanes, etc.) to provide additional capacity are not recommended. Nonetheless, since street segments during major special event conditions would remain significantly impacted per the City's significant impact criteria upon implementation of the Project, this impact is considered to be significant and unavoidable. MMs 3.12-1 and 3.12-2 would also apply to this impact but would not reduce the impact to a less-than-significant level.

Finding: **Changes or alterations have been required in, or incorporated into, the Project that lessen some of the significant environmental effects, but this impact would remain significant and unavoidable.**

Impact 3.12-10	Implementation of the proposed project would impair implementation of the highway congestion management plan.

The proposed project is expected to incrementally increase the forecast traffic volumes and corresponding volume/capacity (V/C) rations at the analyzed Congestion Management Plan (CMP) intersections. Based on the CMP significant impact criteria, a project-related impact is anticipated at the intersection of Arroyo Parkway and California Boulevard during the weekday P.M. arrival peak hour. Due to the nature of the proposed project, it is anticipated that up to three special events per year may be held on a weekday evening at the Rose Bowl Stadium. Consequently, physical improvement measures such as roadway widenings, roadway restripings, or traffic signal modifications are not recommended at the intersection of Arroyo Parkway and California Boulevard for traffic conditions that are atypical and are anticipated to occur only a few times a year. However, as the impact at the intersection of Arroyo Parkway and California Boulevard would remain unmitigated per Intersection Capacity Utilization (ICU) criteria during the weekday P.M. arrival peak hour, this is considered to be a significant and unavoidable impact. MMs 3.12-1 and 3.12-2 would also apply to this impact but would not reduce the impact to a less-than-significant level.

Finding: **Changes or alterations have been required in, or incorporated into, the Project that lessen some of the significant environmental effects, but this impact would remain significant and unavoidable.**

M. Utilities and Service Systems

Impact 3.13-1	Implementation of the proposed project would not exceed wastewater treatment requirements of the Regional Water Quality Control Board.

The City requires a wastewater discharge permit for industrial facilities and certain commercial facilities that plan to discharge industrial wastewater to the City's sewage collection and treatment system. The purpose of the wastewater discharge permit program is to ensure the City's compliance with the NPDES program, as administered by the Regional Water Quality Control Board (RWQCB), for all facilities discharging to navigable waters of surface water of the state, including sewage treatment plants. The renovation of the Stadium would comply with all provisions of industrial wastewater permits, if required, which regulate discharges. Therefore, implementation of the proposed project would not exceed applicable wastewater treatment requirements of the RWQCB with respect to discharges to the sewer system or stormwater system. A less-than-significant impact would occur, and no mitigation is required.

Finding: **Due to applicable regulations, no significant impact will result, and no mitigation is required.**

Impact 3.13-2	**Implementation of the proposed project would not increase wastewater generation such that treatment facilities would be inadequate to serve the project's estimated demand in addition to the provider's existing commitments.**

Implementation of the Project would increase the amount of building space and number of events at the Stadium, which could result in the generation and discharge of additional wastewater requiring treatment at either Whittier Narrows or the Los Coyotes WRPs. However, development of the Project would not generate wastewater that would exceed the capacity of either the Whittier Narrows or the Los Coyotes wastewater treatment system in combination with the provider's existing service commitments. It is anticipated that the overall amount of wastewater generated would be increased over existing conditions as a result of the additional displacement events that would occur at the Stadium from implementation of the Project. However, these additional events would not exceed the daily capacity threshold of the wastewater treatment plants. Impacts would be less than significant.

Finding: **No significant impact will result, and no mitigation is required.**

Impact 3.13-3	**Implementation of the proposed project would not require or result in construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.**

Implementation of the Project would increase the amount of building space and the number of major events at the Stadium, which could result in the overall use of additional imported water requiring treatment. However, development of the proposed project would not increase water use that would exceed the capacity of the Weymouth Filtration Plant. The additional 38,300 gallons per day (gpd) (0.038 mgd) water demand that could result from implementation of the proposed project would be adequately treated by the Weymouth Filtration Plant. Assuming a worst-case scenario where all of the additional water demand would require treatment at the facility, coupled with the existing average summer demand at the plant, the proposed project's contribution to the water demand would constitute approximately 0.02 percent of the remaining 180 mgd capacity. Consequently, because the additional water could be treated at the facility and because the increase in water use over existing demand would be negligible, this impact would be less than significant, and no mitigation is required.

Finding: **No significant impact will result, and no mitigation is required.**

Impact 3.13-4	**Implementation of the proposed project would have sufficient water supplies to serve the project from existing entitlements and resources.**

The Project would result in a water demand of approximately 102,300 gpd. Compared to the 2002 water demand for the Stadium, which represents a worst-case scenario based upon available information, the proposed project would result in an increased water demand of approximately 38,300 gpd, or a

60 percent increase. The City's water use is approximately 32 mgd. Thus, the Stadium's 2002 water use represents approximately 0.2 percent of the City's total demand. Consequently, the project's projected demand of 102,300 gpd would represent approximately 0.3 percent of the City's total water use or 0.12 percent increase over the City's existing total water use. While implementation of the proposed project could increase overall water usage at the project site, the increase in water use would not significantly contribute to the overall projected increase in water use in the Pasadena Department of Water and Power service area. In addition, continued implementation of water recycling programs already in effect would reduce the need for increased water supply and, in turn, ease the need for new or expanded water entitlements or facilities. Therefore, impacts are considered less than significant, and no mitigation is required.

Finding: No significant impact will result, and no mitigation is required.

Impact 3.13-5	**Implementation of the proposed project would not require the construction of new or expanded wastewater conveyance systems, the construction of which could cause significant environmental effects.**

Development of the proposed project could increase the amount of wastewater transported by the sewer system by approximately 230,000 gpd (0.23 mgd or 44 percent). The projected increase in wastewater flows would represent approximately 11 percent of the remaining 2.1 mgd in the LACSD trunk sewer that serves the project site. Therefore, the existing sewer lines have adequate capacity to serve the projected increase in wastewater flows. In addition, as previously indicated, the City considers the local sewer system that serves the project site in good repair, and does not foresee the need to plan for any additional rehabilitation to the sanitary sewers in the next twenty years.

Further, as stated above for comparison reasons, it should also be noted that the existing Stadium can hold approximately 92,500 persons. Because the Stadium has held sold-out events in the past without any significant wastewater conveyance problems, it is anticipated that implementation of the proposed project, with sold-out capacity at approximately 75,000 seats, would also be adequately served by the existing infrastructure. Based on peak activity at the Stadium, which would dictate the maximum capacity needed in the system, wastewater generation would actually be reduced by approximately 175,000 gpd. Additional events at the Stadium would not affect the outcome of this analysis because the sewer lines operate on a daily capacity threshold. Renovation of the existing Stadium would not directly require extensions of the sewer lines on the project site to the existing conveyance systems, and would not require expanded conveyance systems. Consequently, although wastewater flow generated by the Project would be greater than the existing flow generated by the Stadium, peak flow should be reduced and no construction-related impacts would occur. Thus, impacts would be less than significant, and no mitigation is required.

Finding: **No significant impact will result, and no mitigation is required.**

Impact 3.13-6	The proposed project would be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs.

The projected increase of approximately 150 tons per year from the Project would represent a 1.3 percent increase in total commercial solid waste collected by the City's Street Maintenance & Integrated Waste Management Division (SMIWM) and transferred to the Scholl Canyon Landfill. As discussed previously, the servicing landfill has a remaining permitted capacity of 15.84 million cubic yards (approximately 7.62 million tons). The Project would represent a contribution of about one one-thousandth of one percent of the capacity of the landfill. In addition, according the SMIWM, implementation of the Project would not result in a significant impact on SMIWM collection or disposal capabilities. Although implementation of the Project could increase solid waste generation at the Project site, the existing permitted capacity of the Scholl Canyon Landfill would be able to accommodate the waste that would be generated by the Project. Consequently, the Project would not result in the need for additional landfill capacity, and this impact would be less than significant. No mitigation is required.

Finding: **No significant impact will result, and no mitigation is required.**

Impact 3.13-7	Implementation of the proposed project would comply with federal, state, and local statutes and regulations related to solid waste.

Structural demolition associated with implementation of the Project could generate substantial sources of refuse. In order to ensure continued compliance with requirements of AB 939, the additional solid waste generated during construction and operation of the proposed project would need to include provisions for recycling. Without recycling of some of the construction materials and refuse generated during operations, the project may compromise the City's efforts in reducing the amount of waste transported to the landfills.

However, the City enforces construction and demolition waste reduction by adhering to City Municipal Code Section 8.62 (Waste Management Plan for Certain Construction and Demolition Projects within the City of Pasadena), which also requires a 50 percent waste diversion rate on "covered projects." Covered projects include new structures, residential additions, and demolition of 1,000 square feet or more, and any tenant improvement of 3,000 square feet or more. A waste management plan and monthly progress reports must be submitted and approved by the City. Consequently, continued compliance with existing regulations and City policies would ensure a less than significant impact. No mitigation is required.

Finding: **No significant impact will result, and no mitigation is required.**

Impact 3.13-8	**Implementation of the proposed project could require an increase in electricity and natural gas, but would not require the construction of new energy production or transmission facilities, the construction of which could cause significant environmental effects.**

Implementation of the proposed project would increase the intensity of development at the existing Stadium and correspondingly increase the demand for electricity and natural gas in the project area. The proposed project would increase demand by an additional 0.8415 MW/year of electricity and 1,189,320 Therms/year of natural gas. Connections to gas and electric utilities are currently provided on the Project site to serve the existing facility. Although the proposed project, given the magnitude of additional development, could result in increases in energy demand, electrical and natural gas supplies and infrastructure to support demand are generally provided as needed by the providers. Therefore, the proposed project would not substantially increase demands beyond available supply. In addition, if incremental extensions of existing transmission lines would be required to serve the new development, these improvements would be primarily within the urbanized portions of the project site or other built locations, construction would not be expected to cause additional significant environmental impacts. Thus, development of the Project would have a less-than-significant impact on overall energy and gas consumption. Implementation of MM 3.13-1 would further ensure that this impact remains less than significant.

Mitigation Measure: The following mitigation measure will be required to ensure that potential impacts related to energy supply are less than significant.

MM 3.13-1 *Project design and construction shall be coordinated with SCG and the City's Department of Water & Power, and improvements provided if necessary in order to ensure that connections are adequate and capacity is available to accommodate estimated demand for gas and electric utilities.*

Finding: **No significant impact will result, and required mitigation would ensure that impacts would not be significant.**

Impact 3.13-9	**Development of the Rose Bowl Stadium Renovation Project could incrementally increase impervious surfaces in the project area, which could require expansion or construction of existing storm drainage facilities.**

The two main storm drains in the vicinity of the Stadium have recently been modernized. However, the remainder of the Stadium drainage system does not meet current needs. Many of the corrugated metal pipes around the Stadium have collapsed and City engineers cannot confirm the location of many older lines. Although flooding is not experienced on the field during the occasional rainstorms in the area, these surrounding deficiencies in the storm drain system could pose flooding problems in the Project area. Consequently, the increase in impervious surfaces in the project area and subsequent increase in

storm water runoff as a result of the project, although not anticipated to be considerable, is considered potentially significant in view of the current condition and capacity of the storm drain system.

Implementation of MM 3.13-2 would address storm drain deficiencies for the proposed Project, and would require the developer to either pay in-lieu fees or provide on-site improvements in order to ensure that storm drain lines and connections are adequate and capacity is available to accommodate the anticipated increase in stormwater flows. As these improvements would be primarily within the urbanized portions of the Project site or other built locations (i.e., streets) construction would not be expected to cause additional significant environmental impacts. Thus, impacts would be reduced to a less-than-significant level.

Mitigation Measure: The following mitigation measure will be required to ensure that potential impacts related to storm drainage are less than significant.

MM 3.13-2 *The developer shall provide a storm drainage analysis to ensure that storm drain lines and connections are adequate and that capacity is available to accommodate the anticipated increase in stormwater flows. If the report provides recommendations for on-site storm drainage improvements, the recommendations must be followed and implemented. If found that off-site improvements would be necessary, the developer shall pay in-lieu fees to the City for the future construction of those facilities.*

Finding: **Mitigation has been required that substantially lessens or avoids the significant impact.**

Section IV. Project Alternatives

The alternatives identified in the EIR either would not sufficiently achieve the basic objectives of the Project or would do so only with unacceptable adverse environmental or social impacts. Accordingly, and for any one of the reasons set forth herein or in the record of these proceedings, the City Council finds that specific economic, social, or other considerations make infeasible each of the Project alternatives identified in the EIR and each is hereby rejected. The City Council finds that the Project, with mitigation (including the design mitigation), represents the combination of features that best achieves the Project's objectives while minimizing environmental impacts and maximizing public benefits. The City Council further finds that a good faith effort was made to incorporate alternatives into the preparation of the EIR, and that a reasonable range of alternatives were considered in the review process of the EIR and the ultimate decision on the Project.

The EIR analyzed a total of four (4) alternatives to the proposed Project. The alternatives considered were: "Alternative 1 – the No Project Alternative," "Alternative 2 –the Increased Displacement Events Alternative," "Alternative 3 – the Alternate Design Alternative," and "Alternative 4 – the Historic Restoration Alternative." Other alternatives were considered, but not analyzed because they did not meet the basic project objectives or were determined to be infeasible for the reasons described in the EIR.

5.1. *Alternative 1 – The No Project Alternative*

1. Summary of Alternative

Under Alternative 1, the Stadium would not be improved except for improvements required by the current lease agreement with UCLA. These improvements include the following: (1) an upgrade and expansion of the locker rooms and provision of adjacent storage, (2) an upgrade and expansion of the media room, and (3) an upgrade of the Stadium structure to meet the requirements of the University of California Seismic Safety Policy for purchased and leased buildings. Under Alternative 1, there would be no increase to the number of major (displacement) events at the Stadium. That number would remain at twelve.

2. Reasons For Rejecting Alternative

Although Alternative 1 would avoid many, if not all, of the significant environmental impacts associated with the Project, Alternative 1 would fail to meet important Project objectives and is infeasible for social reasons. Alternative 1 would not involve a long-term tenant of the Stadium that could facilitate long-term economic viability. Thus, the City will continue to be required to devote significant revenues to subsidize Stadium improvements, maintenance and operations, including $12 million for improvements required by the current lease with UCLA and approximately $550,000 annually for capital improvements. If these funds were not devoted to the Stadium, these funds would otherwise be available to the general fund in order to meet public health, safety and welfare needs. Additionally, Alternative 1 would not include the modernization of the Stadium to provide state-of-the-art amenities that would enhance the experience of those patronizing the Stadium. For each of these reasons, the City Council finds that Alternative 1 is infeasible for social policy reasons.

The City Council hereby finds that each of the reasons set forth above would be an independent ground for rejecting Alternative 1 as infeasible and by itself, independent of any other reason, would justify rejection of Alternative 1 as infeasible.

Alternative 2 – The Increased Displacement Events Alternative

1. Summary of Alternative

Under Alternative 2, the Stadium would not be improved, except for improvements required by the current lease agreement with UCLA. These improvements include the following: (1) an upgrade and expansion of the locker rooms and provision of adjacent storage, (2) an upgrade and expansion of the media room, and (3) an upgrade of the Stadium structure to meet the requirements of the University of California Seismic Safety Policy for purchased and leased buildings. Also under Alternative 2, there would be an increase in the number of major (displacement) events at the Stadium to twenty-five. This would potentially accommodate more events to increase revenue generated by the Stadium.

2. Reasons For Rejecting Alternative

Alternative 2 would avoid impacts to cultural resources, but would have similar event day impacts on traffic, air quality, noise, and recreation. While increasing the number of displacement events at the

Stadium would potentially generate more revenue, there does not appear to be a demand by users for twenty-five major events at the Stadium that would generate sufficient revenue to meet the operating, maintenance and capital needs of the Stadium. As described in the EIR, the Rose Bowl Operating Company has been attempting for several years to identify a long term tenant or special event that would generate sufficient revenue to make the Stadium self sustaining. The Rose Bowl Operating Company has been unable to do so. Therefore, simply increasing the number of permitted major events at the Stadium, without renovation or a long-term tenant, will not meet the basic project objective of long-term economic viability. Thus, the City will continue to be required to devote significant revenues to subsidize Stadium improvements, maintenance and operations, including $12 million for improvements required by the current lease with UCLA and approximately $550,000 annually for capital improvements. If these funds were not devoted to the Stadium, these funds would otherwise be available to the general fund in order to meet public health, safety and welfare needs. Additionally, Alternative 2 would not include the modernization of the Stadium to provide state-of–the-art amenities that would enhance the experience of those patronizing the Stadium. For each of these reasons, the City Council finds that Alternative 2 is infeasible for social policy reasons.

Additionally, the Stadium would not be renovated to reduce the number of seats in the Stadium. Therefore, traffic, noise and air quality impacts associated with the most popular events at the Stadium, such as the Tournament of Roses football game and the UCLA vs. USC football game, would be greater under this Alternative than the proposed Project due to the greater number of patrons attending the event and the resulting increase in the number of vehicles being driven to the event.

The City Council hereby finds that each of the reasons set forth above would be an independent ground for rejecting Alternative 2 as infeasible and by itself, independent of any other reason, would justify rejection of Alternative 2 as infeasible.

Alternative 3 – The Alternate Design Alternative

1. Summary of Alternative

Under Alternative 3, the Stadium would be leased to the NFL and the Stadium would be modernized to include many of the comforts and amenities associated with contemporary stadiums. This alternative would eliminate the mid-level concourse on the east and north sides of the bowl. In order to meet the first two basic project objectives without the mid level concourse, this Alternative would instead include construction of a concourse below grade that would contain patron amenities such as restrooms, restaurants, lounges, souvenir shops and other services. In order to develop this below grade concourse, the exterior structure of the Stadium would be reinforced and its earth filled interior hollowed out to traverse the existing lengthy entrance tunnels. 120 to 140 luxury suites would be constructed above the east and west rims of the Stadium, but would be no higher than the existing press box and luxury suite structure on the west side of the Stadium. This alternative involves an increase to the number of major (displacement) events at the Stadium to twenty-five and this alternative involves a lease with the NFL as a long term tenant to facilitate economic viability of the Stadium.

2. Reasons For Rejecting Alternative

Alternative 3 would appear to meet several basic Project objectives. However, representatives of the NFL have presented testimony that this alternative fails to include several features of state-of-the-art stadiums.

Additionally, the Alternate Design Alternative would involve increased air quality impacts during construction from additional excavation. Furthermore, as described by Hammes Company in a memorandum to the Director of Planning, this alternative would involve risk to worker safety and the historic fabric of the Stadium due to a complicated shoring process to convert the seating bowl structure from one that is supported by earthen berms to one that is supported by structures.

The Hammes Company memorandum also explains that this Alternative would reduce seating capacity for existing tenants during phased construction, which would reduce capacity for UCLA football games to 58,000 for one season and as low as 43,000 for a second season.

Finally, the primary benefits to this alternative are reduced impacts in the areas of aesthetics and cultural resources. However, implementation of the proposed design mitigation will achieve the same benefits on the north side of the Stadium and some of the aesthetic benefits on the east side of the stadium without the impacts to air quality, risk to workers and the historic structure, and impacts to the UCLA football season. The design mitigation will also not require substantial additional construction costs or loss of revenue from the reduction in the number of luxury suites.

The City Council hereby finds that each of the reasons set forth above would be an independent ground for rejecting Alternative 3 as infeasible and by itself, independent of any other reason, would justify rejection of Alternative 3 as infeasible for environmental or social policy reasons.

Alternative 4 – The Historic Restoration Alternative

1. Summary of Alternative

Under Alternative 4, the Stadium would not be initially improved except for improvements required by the current lease agreement with UCLA. These improvements include the following: (1) an upgrade and expansion of the locker rooms and provision of adjacent storage, (2) an upgrade and expansion of the media room, and (3) an upgrade of the Stadium structure to meet the requirements of the University of California Seismic Safety Policy for purchased and leased buildings. Additionally, under Alternative 4, restoration of the character defining features of the Stadium would be undertaken periodically as funding would become available. There would be no increase to the number of major (displacement) events at the Stadium. That number would remain at twelve.

2. Reasons For Rejecting Alternative

Alternative 4 would meet the objective of preserving the setting and integrity of the Stadium, but would not meet the basic Project objectives of facilitating the long-term economic viability of the Stadium and modernizing the Stadium to provide state-of-the-art amenities that would enhance the experience of those patronizing the Stadium. Thus, the City will continue to be required to devote significant revenues to subsidize Stadium improvements, maintenance and operations, including $12 million for improvements required by the current lease with UCLA and approximately $550,000 annually for capital improvements. If these funds were not devoted to the Stadium, these funds would otherwise be

available to the general fund in order to meet public health, safety and welfare needs. Additionally, Alternative 4 would not include the modernization of the Stadium to provide state-of–the-art amenities that would enhance the experience of those patronizing the Stadium. For each of these reasons, the City Council finds that Alternative 4 is infeasible for social policy reasons.

The City Council hereby finds that each of the reasons set forth above would be an independent ground for rejecting Alternative 4 as infeasible and by itself, independent of any other reason, would justify rejection of Alternative 4 as infeasible.

EXHIBIT B

Statement of Overriding Considerations

The following Statement of Overriding Considerations is made in connection with the approval of the Project.

CEQA requires the decision-making agency to balance the economic, legal, social, technological or other benefits of a project against its unavoidable environmental risks when determining whether to approve the project. If the benefits of the project outweigh the unavoidable adverse effects, those effects may be considered acceptable. CEQA requires the agency to provide written findings supporting the specific reasons for considering a project acceptable when significant impacts are unavoidable. Such reasons must be based on substantial evidence in the EIR or elsewhere in the administrative record. Those reasons are provided in this Statement of Overriding Considerations.

The City Council finds that the economic, social and other benefits of the Project outweigh the significant and unavoidable impacts identified in the EIR and in the record. In making this finding, the City Council has balanced the benefits of the Project against its unavoidable impacts and has indicated its willingness to accept those adverse impacts. The City Council finds that each one of the following benefits of the Project, independent of the other benefits, warrant approval of the Project notwithstanding the unavoidable environmental impacts of the Project.

A. The Project will allow the City to avoid significant costs in connection with the maintenance and operation of the Stadium, thus freeing City funds for other important public purposes.

1. Approval of the Project will mean that the City will no longer be obligated to expend approximately $12 million for Stadium improvements required under the current lease agreement with UCLA and will save an estimated $18 million in debt service costs over a sixteen year period.

2. Approval of the Project will mean that the City will avoid spending approximately $550,000 per year for ongoing capital maintenance improvements to the Stadium.

3. Approval of the Project will ultimately result in a management agreement with the NFL for the Rose Bowl Stadium. The management agreement will allow the City to avoid approximately $3,000,000 in Stadium operational costs per year. Although these operational costs are offset in part by revenues that currently flow to the City and would now flow to the NFL as Stadium manager, it is estimated that the City will save approximately $1.8 million over a 16 year period as a result of this management agreement.

B. The Project will modernize the Stadium to improve the experience of those patronizing Stadium events.

1. The Project will improve accessibility to the Stadium for disabled patrons.

2. The Project will improve egress from the Stadium in the event of an emergency by reducing the maximum number of patrons within the Stadium and increasing the number of egress routes from the seating areas.

3. The Project will increase the distance between rows of seats, thus providing for a more comfortable experience for patrons.

C. The update and modernization of the Stadium will be financed with private funds. The Project provides that the NFL will pay for the improvements described in paragraph B above as well as other improvements to modernize the Stadium and to provide increased amenities for Stadium patrons. Improvements planned by the NFL are expected to result in an investment of between $500 million and $600 million in this public facility.

D. Based on a report from the Anderson School of Management at UCLA, the Project is excepted to generate substantial revenue to the City of Pasadena and Pasadena businesses due to the economic stimulus provided by NFL games at the Stadium.

CHAPTER 10 Environmental Mitigation Monitoring and Reporting Program for the Rose Bowl Renovation Project

10.1 AUTHORITY

This Environmental Mitigation Monitoring and Reporting Program has been prepared pursuant to Section 21081.6 of the California Environmental Quality Act, known as CEQA (Public Resources Code Section 21000 *et seq.*), to provide for the monitoring of mitigation measures required of the Rose Bowl Renovation Project, as set forth in the Final Environmental Impact Report (Final EIR) prepared for the project. This report will be kept on file in the offices of the City of Pasadena Planning and Development Department, 175 North Garfield Avenue, Pasadena, CA 91101.

10.2 MONITORING SCHEDULE

Prior to the issuance of building permits, while detailed development plans are being prepared for approval by City staff, City staff will be responsible for ensuring compliance with mitigation monitoring applicable to the project design phase. City staff will prepare or cause to be prepared reports identifying compliance with mitigation measures. Once construction has begun and is underway, monitoring of the mitigation measures associated with construction will be included in the responsibilities of designated City staff, who shall prepare or cause to be prepared reports of such monitoring no less than once a month until construction has been completed. Once construction has been completed, the City will monitor the project as appropriate and provided in the monitoring plan.

10.3 FORMAT OF MITIGATION MONITORING MATRIX

The mitigation monitoring matrix on the following pages is formatted to parallel the format of the Executive Summary table contained in the Final EIR. The matrix identifies the environmental issue areas for which monitoring is required, the required mitigation measures, the time frame for monitoring, and the responsible monitoring agencies.

If any mitigation measures are not being implemented, the City may pursue corrective action. Penalties that may be applied include, but are not limited to, the following: (1) a written notification and request for compliance; (2) withholding of permits; (3) administrative fines; (4) a stop-work order; (5) criminal prosecution and/or administrative fines; (6) forfeiture of security bonds or other guarantees; (7) revocation of permits or other entitlements.

Table 10-1 Mitigation Monitoring and Reporting Program Matrix

Impact	*Mitigation Measures*	*Time Frame/ Monitoring Milestone*	*Responsible Monitoring Party*
Aesthetics			
Impact 3.1-1 The proposed project could result in a substantial adverse effect on a scenic vista.	**MM 3.1-3** Consistent with the implementation methods MM3.3-2a (see Section 3.3 Biology) and the provisions of the Tree Protection Ordinance, the City of Pasadena shall also require that any Replacement Tree Canopy Coverage (for removed or damaged trees) be concentrated on the east side of the stadium. Also replacement plantings (24 in. box minimum) of one tree for every one lost or removed shall be installed along the edges of existing hardscape parking lots within the Arroyo. In addition vines shall be planted to grow to be permanently secured to vertical building wall surfaces on the east side of the stadium. At retaining walls, vines and shrubs shall be installed and spaced so as to completely cover walls when mature. All plantings shall be implemented in accordance with a City approved landscape plan. Planting off site within the Arroyo shall be done under the direction of the City. **MM 3.1-3 (a)** The project operator shall prepare a landscape plan for improvements to the perimeter areas of Parking Lots B, D, F, I, K, J-East, J-West, and M for City approval prior to the issuance of grading permits. The landscape improvements shall include the planting of trees (minimum of 24 in. box, planted 30 feet on center or equivalent as determined by the City) with complementary ground cover and supporting irrigation system. The improvements shall be completed prior to issuance of occupancy permits to the tenant. **MM 3.1-3 (b)** The project operator shall prepare a hardscape plan for improvements to Parking Lots J-East and J-West for City approval prior to the issuance of grading permits. The improvements shall include the installation of a hard drivable surface that remains permeable (such as turf block) and developed to industry standards. The improvements shall be completed prior to issuance of occupancy permits. MM 3.4-4 also applies to this impact.	Prior to issuance of Occupancy Permit	Planning and Development Department Public Works Department
Impact 3.1-2 The proposed project could substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a scenic highway.	**MM 3.1-1** The City of Pasadena shall require construction contractors to strictly control the staging of construction equipment and the cleanliness of construction equipment stored or driven beyond the limits of the construction work area as a means of minimizing temporal degradation of the visual character of surrounding areas and the associated impact to aesthetics. Prior to completion of final plans and specifications, the City of Pasadena shall review the plans and specifications to ensure that all construction vehicles and equipment shall be parked in designated staging areas when not in use. Vehicles shall be kept clean and free of mud and dust before leaving the project site. Completion of this measure shall be monitored and enforced by the City of Pasadena. **MM 3.1-2** The City of Pasadena shall require construction contractors to provide	At plan review; weekly during construction	Planning and Development Department

Table 10-1 Mitigation Monitoring and Reporting Program Matrix

Impact	Mitigation Measures	Time Frame/ Monitoring Milestone	Responsible Monitoring Party
	temporary screening from the present public view site, around construction work areas, for all improvements that require grading during construction and enhancement, as a means of minimizing the temporal effects to the visual character of the surrounding area and the associated impacts to aesthetics. MM 3.1-3, MM 3.3-1, and MM 3.3-2 would also apply.		
Impact 3.1-3 The proposed project could result in new sources of increased light and glare from new lighting systems.	**MM 3.1-4** Security lighting for the project shall be designed to minimize light migration in accordance with this measure. The City of Pasadena shall specify the lighting type and placement on the project site to ensure that the effects of security lighting are limited as a means of minimizing night lighting and the associated impacts to aesthetics. Prior to completion of final plans and specifications, the City of Pasadena shall review the plans and specifications to ensure that all light fixtures will use glare-control visors, arc tube suppression caps, and will use a photometric design that maintains 70 percent of the light intensity in the lower half of the light beam. Completion of this measure shall be monitored and enforced by the City of Pasadena. **MM 3.1-5** Prior to opening the stadium, the Applicant shall test the installed field-lighting system to ensure that lighting meets operating requirements in the stadium and minimizes obtrusive spill lighting in the stadium facility. Testing would include light-meter measurements at selected locations in the vicinity to measure spill lighting from field-lighting fixtures, permit adjustment of lighting fixtures, and confirm that spill-lighting effects would not exceed 3 foot-candles 1,000 feet from the project perimeter and no more than 1 foot-candle 3,000 feet from the project perimeter. **MM 3.1-6** Stadium lighting and advertising (including signage) shall be oriented in such a manner to reduce that amount of light shed onto sensitive receptors and incorporate "cut-off" shields as appropriate to minimize any increase in lighting at adjacent properties. **MM 3.1-7** All interior floodlights, exterior parking lot, and other security lighting shall be directed away from sensitive receptors and towards the specific location intended for illumination. State-of-the-art fixtures shall be used, and all lighting shall be shielded to minimize the production of glare and light spill onto both existing and proposed residential units on the adjacent hillsides. A lighting design plan shall be submitted to the City for approval at plan check. **MM 3.1-8** Landscape illumination and exterior sign lighting shall follow the City's Municipal Code guidelines and be accomplished with low-level unobtrusive fixtures. **MM 3.1-9** All facilities shall emphasize the natural setting and use of natural materials. Building color shall be warm and earth-toned. Non-reflective materials shall be used on the exterior surfaces. Where appropriate, arroyo stone shall be	At design review and plan check (MM 3.1-4, 3.1-6, 3.1-7, 3.1-8, 3.1-9); prior to issuance of occupancy permit (MM 3.1-5)	Planning and Development Department

Table 10-1 Mitigation Monitoring and Reporting Program Matrix

Impact	Mitigation Measures	Time Frame/ Monitoring Milestone	Responsible Monitoring Party
	incorporated into the design.		
Impact 3.1-4 The proposed project could result in new sources of increased light and glare from the new scoreboard and advertising systems.	MM 3.1-6 would apply.	At design review and plan check	Planning and Development Department
Impact 3.1-5 Implementation of the proposed project would substantially adversely impact the visual character or quality of the existing architectural features of the Rose Bowl stadium.	MM 3.1-9 would apply. MM 3.4-4 also applies to this impact. No other feasible mitigation is available to reduce this impact to less than significant.	At design review and plan check	Planning and Development Department
Air Quality			
Impact 3.2-5 Site preparation and construction activities would contribute to an existing air quality violation (NOx and PM_{10} only).	**MM 3.2-1** The project builder(s) shall develop and implement a construction management plan, as approved by the City of Pasadena, which includes the following measures recommended by the SCAQMD, or equivalently effective measures approved by the City of Pasadena: ■ Configure construction parking to minimize traffic interference ■ Provide temporary traffic controls during all phases of construction activities to maintain traffic flow (e.g., flag person) ■ Schedule construction activities that affect traffic flow on the arterial system to off-peak hours to the degree practicable ■ Consolidate truck deliveries when possible ■ Maintain equipment and vehicle engines in good condition and in proper tune as per manufacturers' specifications and per SCAQMD rules, to minimize exhaust emissions ■ Use methanol- or natural gas-powered mobile equipment and pile drivers instead of diesel to the extent commercially practical ■ Use propane- or butane-powered on-site mobile equipment instead of gasoline to the extent commercially practical **MM 3.2-2** The project builder(s) shall implement all rules and regulations by the Governing Board of the SCAQMD that are applicable to the development of the Project (such as Rule 402—Nuisance and Rule 403—Fugitive Dust) and that are in effect at the time of development. The following measures are currently recommended to implement Rule 403—Fugitive Dust. These measures have been quantified by the SCAQMD as being able to reduce dust generation between 30 and 85 percent	Prior to issuance of grading permits; weekly during construction	Planning and Development Department Public Works Department City Transportation Department

Table 10-1 Mitigation Monitoring and Reporting Program Matrix

Impact	Mitigation Measures	Time Frame/ Monitoring Milestone	Responsible Monitoring Party
	depending on the source of the dust generation: ■ Water trucks will be utilized on the site and shall be available to be used throughout the day during site grading and excavation to keep the soil damp enough to prevent dust from being raised by the operations ■ Wet down the areas that are to be graded or that are being graded and/or excavated, in the late morning and after work is completed for the day ■ All unpaved parking or staging areas, or unpaved road surfaces shall be watered three times daily or have chemical soil stabilizers applied according to manufacturers' specifications ■ Enclose, cover, water twice daily, or apply approved soil binders to exposed piles (i.e., gravel, sand, and dirt) according to manufacturers' specifications ■ The construction disturbance area shall be kept as small as possible ■ All trucks hauling dirt, sand, soil, or other loose materials shall be covered or have water applied to the exposed surface prior to leaving the site to prevent dust from impacting the surrounding areas ■ Wheel washers shall be installed where vehicles enter and exit unpaved roads onto paved roads and used to wash off trucks and any equipment leaving the site each trip ■ Streets adjacent to the project site shall be swept at the end of the day if visible soil material is carried over to adjacent roads ■ Wind barriers shall be installed along the perimeter of the site ■ All excavating and grading operations shall be suspended when wind speeds (as instantaneous gusts) exceed 25 miles per hour over a 30-minute period ■ A traffic speed limit of 15 miles per hour shall be posted and enforced for the unpaved construction roads (if any) on the project site Remediation operations, if required, shall be performed in stages concentrating in single areas at a time to minimize the impact of fugitive dust on the surrounding area		
Impact 3.2-6 Project implementation would exceed daily operational emissions thresholds.	MMs 3.12-1 and 3.12-2 would also apply to this impact.	Prior to issuance of grading permits; weekly during construction	Planning and Development Department

Table 10-1 Mitigation Monitoring and Reporting Program Matrix

Impact	Mitigation Measures	Time Frame/ Monitoring Milestone	Responsible Monitoring Party
Biological Resources			
Impact 3.3-6 Implementation of the project could, through habitat modifications, result in a potential reduction in nesting opportunities for resident and migratory avian species of special concern, including raptors or the loss of a active avian nest.	**MM 3.3-1** To ensure that avian species of concern, protected migratory species (e.g., MBTA), or raptors species are not injured or disturbed by construction in the vicinity of nesting habitat, the project applicant shall implement the following measures: ■ When feasible, all tree removal shall occur between August 30 and February 15 to avoid the breeding season of any raptor species that could be using the area, and to discourage hawks or bats from nesting/roosting in the vicinity of an upcoming construction area. This period may be modified with the authorization of the DFG; or if it is not feasible to remove trees outside this window then, prior to the beginning of mass grading, including grading for major infrastructure improvements, during the period between February 15 and August 30, all trees and potential burrowing owl habitat within 350 feet of any grading or earthmoving activity shall be surveyed for active raptor nests or burrows by a qualified biologist no more than 30 days prior to disturbance. If active raptor nests are found, and the site is within 350 feet of potential construction activity, a fence shall be erected around the tree at a distance of up to 350 feet, depending on the species, from the edge of the canopy to prevent construction disturbance and intrusions on the nest area. The appropriate buffer shall be determined by the City in consultation with CDFG. ■ No construction vehicles shall be permitted within restricted areas (i.e., raptor protection zones), unless directly related to the management or protection of the legally protected species. ■ In the event that a nest is abandoned, despite efforts to minimize disturbance, and if the nestlings are still alive, the developer shall contact CDFG and, subject to CDFG approval, fund the recovery and hacking (controlled release of captive reared young) of the nestling(s). If a legally protected species nest is located in a tree designated for removal, the removal shall be deferred until after August 30th, or until the adults and young of the year are no longer dependent on the nest site as determined by a qualified biologist.	Prior to issuance of grading permit	Planning and Development Department Public Works Department
Impact 3.3-7 Implementation of the proposed project could be inconsistent with Pasadena's Tree Ordinance in that the proposed project would cause the loss of native and/or specimen trees and would conflict with local policies protecting biological resources.	**MM 3.3-2(a)** The Applicant, prior to being issued a grading permit, shall submit a tree report prepared by a certified arborist that meets the requirements of the Pasadena City Tree Ordinance identifying trees to be removed and trees to be saved. It shall specifically identify, by number according to the tree inventories prepared in March 2004 and March 2005, all trees that are candidates for relocation as well as the best and most feasible locations where the trees shall be replanted. It shall also include the preparation and submission of a tree protection and replacement plan. The tree replacement plan shall include replanting for increased canopy and include a minimum replacement ratio for removed or damaged trees of 1:1. Native plant species shall be used to the maximum extent feasible. The	Prior to issuance of grading permit; weekly during construction	Planning and Development Department Public Works

Table 10-1 Mitigation Monitoring and Reporting Program Matrix

Impact	Mitigation Measures	Time Frame/ Monitoring Milestone	Responsible Monitoring Party
	plan shall be prepared and approved by the City prior to grading or construction and shall include the following: ■ Identification of specific best management practices for those trees to be relocated, including specific removal and replanting procedures to maximize successful relocation. ■ The details and procedures required to prepare the restoration site for planting (i.e. grading, soil preparations, soil stocking, etc.). ■ The methods and procedures for the installation of the plant materials. ■ Guidelines for the maintenance of the mitigation site during the establishment phase of the plantings. The maintenance program shall contain guidelines for the control of nonnative plant species and the replacement of plant species that have failed to recolonize. ■ The revegetation plan shall provide for monitoring to evaluate the growth of the trees. Annual monitoring of the replacement trees shall occur for the first five years after which it shall be performed on the seventh and tenth year. Specific success criteria for replaced trees shall include the following: o For a replacement ratio greater than 1:1: 90 percent or more of the transplanted/ replacement trees surviving 10 years after transplantation with overall no net loss of trees o For replacement ration of 1:1: 100 percent survival ■ Contingency plans and appropriate remedial measures shall also be outlined in the replacement plan should the plantings fail to meet designated success criteria and planting goals. When construction activities occur near protected tree species that are proposed to be saved, Best Management Practices (BMPs) to avoid damage to the trees shall be implemented, and verified by the developer. The BMPs will include, but are not limited to (1) installing protective fencing prior to and during construction, using wire mesh or plastic barrier fencing placed at 2.25 times the canopy of the tree; (2) avoiding disturbance and trenching within the tree drip line; (3) maintaining the surface grade around the tree; and (4) prohibiting the placement of paving or landscaping requiring summer irrigation in the vicinity of trees. **MM 3.3-2(b)** A drainage plan shall be designed in such a way as to avoid changes to hydrology in the vicinity of the protected trees. **MM 3.3-2(c)** Construction staging areas shall be designated on the construction plans and parking, loading, and grading during all construction activities prohibited within the root zone of the protected trees. MM 3.1-3 also applies to this impact.		

Table 10-1 Mitigation Monitoring and Reporting Program Matrix

Impact	Mitigation Measures	Time Frame/ Monitoring Milestone	Responsible Monitoring Party
Impact 3.3-8 Increases in nighttime illumination could disturb nighttime activities of local wildlife species, and alter local species composition.	**MM 3.3-3** All lighting along the perimeter of natural areas such as the channel shall be downcast luminaries with light patterns directed away from natural areas, as coordinated with a certified lighting engineer and project biologist.	At design review and plan check	Planning and Development Department
Cultural Resources			
Impact 3.4-1 Construction activities associated with implementation of the proposed project could cause a substantial adverse change in the significance of an archaeological resource.	**MM 3.4-1(a)** Prior to site preparation or grading activities, the Applicant shall retain a qualified (ROPA-listed) archaeologist to inform construction personnel of the potential for encountering unique archaeological resources and the regulatory framework of cultural resources protection. All construction personnel shall be instructed to stop work within 50 feet of a potential discovery until a qualified (ROPA-listed) archaeologist assesses the significance of the find and implements appropriate measures to protect or scientifically remove the find. Construction personnel shall also be informed that unauthorized collection of archaeological resources is prohibited. **MM 3.4-1(b)** The Applicant shall retain a qualified archaeologist to provide spot-checks—on a schedule approved by the City—during grading and excavation activity and to be available on-call in the event of a discovery. In the event of a discovery, the archaeologist shall first determine whether an archaeological resource uncovered during construction is a "unique archaeological resource" under Public Resources Code Section 21083.2(g). If the archaeological resource is determined to be a "unique archaeological resource," the archaeologist shall formulate a mitigation plan in consultation with the City that satisfies the requirements of Section 21083.2. If the archaeologist determines that the archaeological resource is not a unique archaeological resource, the archaeologist shall record the site and submit the recordation form to the California Historic Resources Information System South Central Coastal Information Center, and no further investigation of the particular find would be required. The archaeologist shall prepare a report of the results of any study prepared as part of a mitigation plan, following accepted professional practice. Copies of the report shall be submitted to the City and to the California Historic Resources Information System South Central Coastal Information Center.	Prior to issuance of grading permit; monthly during construction period	Planning and Development Department

Table 10-1 Mitigation Monitoring and Reporting Program Matrix

Impact	Mitigation Measures	Time Frame/ Monitoring Milestone	Responsible Monitoring Party
Impact 3.4-2 Construction activities associated with implementation of the proposed project could directly or indirectly result in damage to, or the destruction of, unique paleontological resources on the site.	**MM 3.4-2(a)** Prior to site preparation or grading activities, the Applicant shall retain a qualified paleontologist to inform construction personnel of the potential for encountering paleontological resources and the regulatory framework of cultural resources protection. All construction personnel shall be instructed to stop work within 50 feet of a potential discovery until a qualified paleontologist assesses the significance of the find and implements appropriate measures to protect or scientifically remove the find. Construction personnel shall also be informed that unauthorized collection of paleontological resources is prohibited. **MM 3.4-2(b)** The Applicant shall retain a qualified paleontologist to provide spot-checks—on a schedule approved by the City—during grading and excavation activities and, in the event of a discovery, shall first determine whether a paleontological resource uncovered during construction meets the definition of a "unique archaeological resource" under Public Resources Code Section 21083.2(g). If the paleontological resource is determined to be a "unique archaeological resource," the paleontologist shall formulate a mitigation plan in consultation with the campus that satisfies the requirements of Section 21083.2. If the paleontologist determines that the paleontological resource is not a unique resource, the paleontologist shall record the site and submit the recordation form to the Natural History Museum of Los Angeles County, and no further investigation of the particular find would be required. The paleontologist shall prepare a report of the results of any study prepared as part of a mitigation plan, following accepted professional practice. Copies of the report shall be submitted to the City and to the Natural History Museum of Los Angeles County.	Prior to issuance of grading permit; monthly during construction	Planning and Development Department
Impact 3.4-4 Implementation of the proposed project could result in the demolition or adverse modification of contributing elements to the Rose Bowl, a National Register property, and could result in a substantial loss of historic status of the bowl.	**MM 3.4-3(a) Compliance with the *Secretary of the Interior's Standards for Treatment of Historic Properties*.** MM 3.4-3(a) only applies to the existing character defining features of the Rose Bowl that are proposed for retention and does not apply to the new construction. The scope of work is currently conceptual and will be defined further as the project progresses. All work on elements of the Rose Bowl to be retained shall be designed for maximum possible compliance with the *Secretary of the Interior's Standards for Treatment of Historic Properties*. This shall be accomplished through the oversight of an independent historic preservation consultant and City staff, as described below. ■ **Historic Preservation Consultant.** The City shall retain the services of a qualified historic preservation consultant with experience in architectural preservation. The role of the historic preservation consultant shall be review of structural designs and construction activities that could potentially affect character-defining features as identified in this EIR	At design review and plan check; weekly during construction	Planning and Development Department

Table 10-1 Mitigation Monitoring and Reporting Program Matrix

Impact	Mitigation Measures	Time Frame/ Monitoring Milestone	Responsible Monitoring Party
	and the Historic Structure Report. All reviews by the historic preservation consultant shall be carried out by a person or persons meeting the Secretary of the Interior's Professional Qualification Standards. Knowledge of historic architecture, materials, surface finishes, and historic restoration techniques is required. This consultant shall have a structural engineer and conservator available for consultation. The consultant's main responsibility shall be to monitor and advise the City regarding compliance with the Secretary of Interior's Standards with respect to elements of the Rose Bowl that would be retained, as well as approved design criteria. Through a series of development, design, and specification review meetings, as well as construction monitoring, the historic preservation consultant shall work in conjunction with City and with the Applicant's project and construction management teams. In addition, the consultant shall review the historic record and photo documentation, protection of historic fabric, mock-ups, and test panels of treatments to historic fabric. In consultation with other experts, the consultant shall approve the materials and replica designs used in the restoration, rehabilitation and new construction related to the historic resources. ■ *Construction Monitoring.* On-site construction monitoring by a historic preservation consultant shall be undertaken throughout the construction phase to ensure protection of historic fabric and compliance with the Standards and approved design and construction documents. Monitoring will be scheduled based on potential construction impacts and specific scope of work and will vary between daily and weekly visits upon approval by the City. In addition, all submittals, mock-ups, and change orders that affect historic fabric shall be reviewed by the consultant. On-site changes that might affect historic fabric shall be undertaken in consultation with the historic consultant. If the historic preservation consultant determines that construction does not substantially conform to the approved criteria, the historic preservation consultant will immediately notify the City. The City will require any contractors, vendors etc. to take all reasonable measures to avoid or minimize harm to the property until the issue is resolved. The historic preservation consultant, design team, and construction management will work cooperatively and diligently to resolve issues in a timely manner. **MM 3.4-3(b)** *Documentation.* A Historical Resource Documentation Report shall be prepared for the Rose Bowl. The resources shall be described photographed in a manner that conforms to Historic American Buildings Survey/Historic American Engineering Record (HABS/HAER) Level I documentation standards, as well as the HABS/HAER Guidelines for HABS Historical Reports. The documentation shall amend the photographic content of the existing HABS report for the Rose Bowl in the Library of Congress collection, focusing on those areas that would be directly affected by the proposed project. The documentation shall be donated to suitable repositories selected by the City, one of which shall include the main branch of the Pasadena Library.		

Table 10-1 Mitigation Monitoring and Reporting Program Matrix

Impact	Mitigation Measures	Time Frame/ Monitoring Milestone	Responsible Monitoring Party
	MM 3.4-3(c) The arroyo stone berms and landscaping on the south side shall be photographed and recorded before removal and replaced in kind, replicating the original intent, look, and function. **MM 3.4-4** The design of the project shall be modified as shown on Attachment C of the staff report presented to the City Council on May 9, 2005 and as described in the Errata to the Final EIR dated May 9, 2005.		
Impact 3.4-5 Implementation of the proposed project could result in direct and indirect effects to the significance of historical resources in the project vicinity.	MMs 3.4-3(a) through (c) would also apply to this impact.	At design review and plan check; weekly during construction	Planning and Development Department
Geology and Soils			
Impact 3.5-1 Buildings and infrastructure associated with the implementation of the proposed project would be subject to potentially damaging seismically induced ground shaking during the life of the project.	**MM 3.5-1** The Applicant shall incorporate site-specific ground motion criteria, as described in the current Pasadena Building Code Chapters 16, 18, and A33, and reviewed by the City's California-registered geotechnical and/or structural engineer, in the design of trenches, slopes, foundations, and structures for the project. Implementation of this measure is required by the Building Code and includes the following provisions: ■ The minimum seismic-resistant design standards for all proposed facilities shall conform to the California Building Code Seismic Zone 4 Standards ■ Additional seismic-resistant earthwork and construction design criteria shall be incorporated in the project as necessary, based on the site-specific recommendations of a California Certified Engineering Geologist in cooperation with California-registered geotechnical and structural engineering professionals ■ During site preparation, the registered geotechnical professional shall be on the site to supervise implementation of the recommended criteria ■ The California Certified Engineering Geologist consultant shall prepare an "as built" map/report, to be filed with the City, showing details of the site geology, the location and type of seismic-restraint facilities, and documenting the following requirements, as appropriate ■ Engineering analyses shall demonstrate satisfactory performance of compacted fill or natural unconsolidated sediments where either forms part or all of the support for any structures, especially where the possible occurrence of liquefiable soils exists Access roads, foundations, and underground utilities in fill or alluvium shall be designed to accommodate settlement or compaction estimated by the site-specific geotechnical investigations of the geotechnical consultant	At design review and plan check; Prior to issuance of grading permits	Planning and Development Department

Table 10-1 Mitigation Monitoring and Reporting Program Matrix

Impact	Mitigation Measures	Time Frame/ Monitoring Milestone	Responsible Monitoring Party
Impact 3.5-2 The use of expansive, weak or slide-prone soils for foundation or roadway support without prior treatment could create unstable soil conditions at the construction site, thus threatening the integrity of completed construction.	**MM 3.5-2** Site-specific soil suitability analysis and stabilization procedures, and design criteria for foundations and road bases (described in the current Pasadena Building Code Chapters 16, 18, and A33) shall be required, as recommended by a California-registered soil engineer, during the design phase for each site where the existence of unsuitable soil conditions is known or suspected. During the design phase, where the existence of unsuitable soil conditions is known or suspected, the Developer's registered soil engineering consultant shall provide documentation to the City that: ■ Site-specific soil suitability and stability analyses have been conducted in the area of the proposed foundations and road bases to establish the design criteria for appropriate foundation or road base type and support ■ The recommended criteria have been incorporated in the design of foundation During grading, the registered soils professional shall be on the site to do the following: ■ Observe areas of potential soil unsuitability or instability ■ Supervise the implementation of soil remediation or reconstruction programs ■ Verify final soil conditions prior to setting the foundations The registered soils engineering consultant shall prepare an "as built" map/report, to be filed with the City, showing details of the site soils, the location of foundations, retaining walls, sub-drains, clean-outs, etc., and the results of suitability/stability analyses and compaction tests.	At design review and plan check; Prior to issuance of grading permits	Planning and Development Department
Impact 3.5-3 Construction activities on the project site would not result in increased potential for short- or long-term increases in erosion.	**MM 3.5-3** The following actions shall be taken: To the extent practicable, project site grading shall be scheduled for the dry season (April through September). In addition, NPDES permit requirements shall be fulfilled prior to issuance of building permits. The Applicant shall submit a soil erosion and sedimentation control plan for the project to the City of Pasadena prior to grading, subject to the following recommendations: ■ The Erosion and Sediment Transport Control Plan (as part of the overall SWPPP) shall be submitted, reviewed, implemented, and inspected as part of the approval process for the grading plans ■ The Plan shall be designed by the Applicant's erosion control consultant, using concepts similar to those formulated by the California, as appropriate, based on the specific erosion and sediment transport control needs of the site where grading, excavation, and construction is to occur. Those concepts include some that apply generally to the entire project area and some that would be appropriate only for specific sites. The possible methods are not necessarily limited to the following items: ■ Confine grading and activities related to grading (demolition, excavation, construction,	At design review and plan check; Prior to issuance of grading permits	Planning and Development Department Public Works Department

Table 10-1 Mitigation Monitoring and Reporting Program Matrix

Impact	Mitigation Measures	Time Frame/ Monitoring Milestone	Responsible Monitoring Party
	preparation and use of equipment and material storage areas and staging areas) to the dry season, whenever possible ■ Locate staging areas outside streams and drainage ways ■ Keep the lengths and gradients of constructed slopes (cut or fill) as low as possible ■ Discharge grading and construction runoff into small drainages at frequent intervals to avoid buildup of large potentially erosive flows ■ Prevent runoff from flowing over unprotected slopes ■ Keep disturbed areas (areas of grading and related activities) to the minimum necessary for demolition or construction of the project ■ Keep runoff away from disturbed areas during grading and related activities ■ Stabilize disturbed areas as quickly as possible, either by vegetative or mechanical methods ■ Direct runoff over vegetated areas prior to discharge into public storm drainage systems, whenever possible ■ Trap sediment before it leaves the site with such techniques as check dams, sediment ponds, or siltation fences ■ Use interceptor ditches, drainage swales, or detention basins to prevent storm runoff from transporting sediment into drainage ways and to prevent sediment-laden runoff from leaving any disturbed areas ■ Install silt fences to prevent sedimentation in areas adjacent to grading and down gradients into drainage ways. Design fences using the Universal Soil Loss Equation to calculate their proper storage capacity. The contractor shall implement installation by prior to mass grading and other soil disturbing construction activities on site ■ The contractor shall be responsible for the removal and disposal of all project-related sedimentation in off-site retention ponds ■ Use landscaping and grading methods that lower the potential for down-stream sedimentation. Modified drainage patterns, longer flow paths, encouraging infiltration into the ground, and slower stormwater conveyance velocities are examples of effective methods ■ Control landscaping activities carefully with regard to the application of fertilizers, herbicides, pesticides, or other hazardous substances. Provide proper instruction to all landscaping personnel on the construction team During the installation of the erosion and sediment transport control structures, the erosion control professional shall be on the site to supervise the implementation of the designs, and the maintenance of the facilities throughout the demolition, grading, and construction period		

Table 10-1 Mitigation Monitoring and Reporting Program Matrix

Impact	Mitigation Measures	Time Frame/ Monitoring Milestone	Responsible Monitoring Party
Hydrology and Water Quality			
Impact 3.7-3 The proposed project is not expected to substantially alter the existing drainage pattern of the site or area in a manner that would result in substantial erosion or siltation on or off site.	**MM 3.7-1** Prior to the issuance of a grading permit, the project Applicants shall file a Notice of Intent (NOI) with the state and comply with the requirements of the NPDES General Construction Permit, including the preparation of a SWPPP and a SUSMP incorporating BMPs for construction and post-construction control of runoff. A Civil Engineer shall prepare the SWPPP and SUSMP for City review and approval. The plans shall reduce the discharge of pollutants, including sediment, to the maximum extent practical using management practices, control techniques and systems, design and engineering methods, and such other provisions that are appropriate. The plans shall include applicable post-construction measures such as the following: ■ Control of impervious area runoff, including installation of detention basins, retention areas, filtering devices, energy dissipaters, pervious drainage systems, porous pavement alternatives ■ Implement regular sweeping of impervious surfaces such as streets and driveways ■ Use of efficient irrigation practices ■ Provision of infiltration trenches and basins ■ Linings for urban runoff conveyance channels ■ Vegetated swales and strips ■ Protection of slopes and channels ■ Landscape design such as xeriscape or other design minimizing use of fertilizers **MM 3.7-2** Prior to the issuance of a grading permit, the Applicant shall submit and obtain approval of construction drainage and erosion control plans for in connection with site grading activities. The control measures contained in the plan shall be approved by the City of Pasadena prior to starting construction. The plans shall serve as the basis for the construction portion of the SWPPP and shall include the applicable measures such as the following: ■ Diversion of off-site runoff away from the construction site ■ Prompt revegetation of proposed landscaped areas ■ Perimeter sandbagging and silt fences and/or temporary basins to trap sediment ■ Regular sprinkling of exposed soils to control dust during construction ■ Installation of a minor retention basin(s) to alleviate discharge of increase flows ■ Specifications for construction waste handling and disposal, including wheel washing activities ■ Erosion control measures maintained throughout the construction period	Prior to issuance of grading permits	Planning and Development Department Public Works Department

Table 10-1 Mitigation Monitoring and Reporting Program Matrix

Impact	Mitigation Measures	Time Frame/ Monitoring Milestone	Responsible Monitoring Party
	■ Construction stabilized construction entrances to avoid trucks from imprinting debris on City roadways ■ Construction timing to minimize soil exposure to storm events ■ Training of subcontractors on general site housekeeping The SWPPP is a "live" document and shall be kept current by the person responsible for its implementation.		
Impact 3.7-7 Development of the Rose Bowl Stadium Renovation Project would increase impervious surfaces in the project area, which could exceed the capacity of existing stormwater drainage systems and require expansion or construction of existing storm drainage facilities.	MMs 3.13-2, 3.7-1 and 3.7-2 would also apply to this impact.	Prior to issuance of grading permit	Planning and Development Department
Land Use			
Impact 3.8-3 The proposed project could interfere with existing other uses of the immediate area.	**MM 3.8-1** 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** During project operation, if the event schedule conflicts with the monthly Flea Market held on the second 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 rescheduled Flea Market operation. **MM 3.8-3** The City and the NFL shall ensure, through provisions in the lease agreement, that the Tournament of Roses and Rose Bowl game activities will be accommodated in a manner consistent with traditional operating circumstances, needs, and locations. (This is the same as MM 3.11-3)	During construction MM 3.8-3 prior to issuance of grading permits	Planning and Development Department
Impact 3.8-4 The proposed project would adversely affect adjacent neighborhoods.	MM 3.7-1, MM 3.7-2, MM 3.10-1, MM 3.10-2, MM 3.12-1, and MM 3.12-2 also apply to this impact.	During construction; semi-annually upon implementation	City Transportation Department

Table 10-1 Mitigation Monitoring and Reporting Program Matrix

Impact	Mitigation Measures	Time Frame/ Monitoring Milestone	Responsible Monitoring Party
Noise			
Impact 3.9-5 Construction activities associated with the proposed project could generate noise levels that exceed the standards established in the City of Pasadena Noise Regulations.	**MM 3.9-1** To mitigate potential pile driving or other extreme noise-generating impacts, a set of site-specific noise attenuation measures shall be completed under the supervision of a qualified acoustical consultant. This plan shall be submitted for review and approval by the City to ensure that feasible noise attenuation is achieved to satisfy standards contained in the City of Pasadena Noise Ordinance. These attenuation measures shall include as many of the following control strategies as feasible and shall be implemented prior to any required pile driving activities: ■ Implement "quiet" pile driving technology (e.g., cast-in-drilled hole piles, soil-mix wall technology, shielded pile drivers, vibratory pile driving or pre-drilled pile holes), where feasible, in consideration of geotechnical and structural requirements and conditions ■ Erect temporary plywood noise barriers around the entire construction site ■ Adjust the scheduling and duration of pile driving ■ Monitor the effectiveness of noise attenuation measures by taking noise measurements during pile driving activities **MM 3.9-2** Prior to the issuance of each building permit, along with the submission of construction documents, the Project Applicant shall submit to the City a list of measures to respond to and track complaints pertaining to construction noise. These measures shall include the following: ■ A procedure for notifying City staff ■ A plan for posting signs on the project site pertaining to permitted construction days and hours, complaint procedures, and who to notify in the event of a problem ■ A listing of telephone numbers (during regular construction hours and off hours) ■ The designation of an on-site construction complaint manager for the proposed project Notification of residents within 800 feet of the proposed project construction area at least 30 days in advance of pile-driving along with the estimated duration of the activity	Prior to issuance of grading permits	Planning and Development Department

Table 10-1 Mitigation Monitoring and Reporting Program Matrix

Impact	Mitigation Measures	Time Frame/ Monitoring Milestone	Responsible Monitoring Party
Impact 3.9-6 Operation of the proposed project could generate noise levels that exceed the standards established in the City of Pasadena Noise Regulations.	**MM 3.9-3** (a) Prior to installation of the new sound system, the project operator shall present a noise analysis to the City that demonstrates that the new sound system will meet the City's Noise Regulations. (b) Stadium noise level in the residential areas surrounding the project site shall be monitored periodically during the first year of operation by the operator in cooperation with the City. (c) Based on the monitoring results, the operator shall modify operation of the loudspeaker system to reduce noise levels observed at the residential areas to meet City Noise Regulations. Modifications may include adjustments to volumes or relocation of individual loudspeakers and shall ensure any necessary modifications provide the maximum feasible reduction of noise to the surrounding community. (d) Prior to the first special event associated with a NFL football game at the Rose Bowl, the operator shall retain a qualified acoustical consultant to develop noise performance standards for the stadium loudspeaker system to minimize noise effects at the residential areas surrounding the Rose Bowl. The performance standards shall specify a noise limit and may include suggestions for sound equipment orientation or other measures. The performance standards shall be subject to review and approval by the Director of Community Development.	Prior to issuance of occupancy permits; quarterly during implementation	Planning and Development Department City Health Department
Impact 3.9-7 Operation of the proposed project could expose nearby noise-sensitive land uses to substantial temporary or periodic increases in ambient noise levels.	MMs 3.12-1 and 3.12-2 would also apply to this impact.	Prior to issuance of occupancy permits	Planning and Development Department
Impact 3.9-8 The increase in local traffic volumes during weekdays resulting from implementation of the proposed project would cause a substantial periodic increase in off-site roadway noise levels.	MMs 3.12-1 and 3.12-2 would also apply to this impact.	Annually upon implementation	Planning and Development Department City Transportation Department

Table 10-1 Mitigation Monitoring and Reporting Program Matrix

Impact	Mitigation Measures	Time Frame/ Monitoring Milestone	Responsible Monitoring Party
Impact 3.9-9 The increase in local traffic volumes during weekends resulting from implementation of the proposed project would cause a substantial periodic increase in off-site roadway noise levels.	MMs 3.12-1 and 3.12-2 would also apply to this impact.	Annually upon implementation	Planning and Development Department
Public Services			
Impact 3.10-2 When fully operational, the estimated increase in visitor population as a result of project implementation could impact police service levels within the project area, but would not require the construction of new or physically altered police facilities to accommodate the increased demand.	**MM 3.10-1** Prior to issuance of a building permit, the City and the Developer shall consult with the Pasadena Police Department to develop a security plan indicating detailed Crime Prevention Design and event security measures, including specific duties with regard to control and monitoring of tailgating activities in surrounding neighborhoods and on the recreational trails, and shall incorporate the Department's recommendations into the Plan. **MM 3.10-2** The operator of the proposed project shall provide sufficient private-sector security (licensed, uniformed, and insured) and video surveillance camera systems to meet the project's needs and include coverage for all of the project area in order to prevent crime and offset potential impacts to police services.	Prior to issuance of building permit	Pasadena Police Department Planning and Development Department
Recreation			
Impact 3.11-2 The proposed project would significantly interfere with or prohibit use of existing recreational facilities in the Central Arroyo.	**MM 3.11-1** The RBOC shall ensure that the Arroyo Seco Trail (also known as the Rim of the Valley Trail) and the Recreation Loop shall remain open during construction and operation of the proposed project. **MM 3.11-2** Notification of major stadium events shall be posted by the RBOC along the Arroyo Seco Trail and Recreation Loop at least thirty (30) days prior to the events; notice for playoff games may be less than 30 days and shall be posted as soon as possible **MM 3.11-3** The City and the NFL shall ensure, through provisions in the lease agreement, that the Tournament of Roses and Rose Bowl game activities will be accommodated in a manner consistent with traditional operating circumstances, needs, and locations. (This is the same as MM 3.8-3) **MM 3.11-4** The project operator or their designees shall be responsible for timely repair of damaged turf areas as a result of parking during displacement events.	Annually upon implementation	Planning and Development Department Recreation & Parks Department

Table 10-1 Mitigation Monitoring and Reporting Program Matrix

Impact	*Mitigation Measures*	*Time Frame/ Monitoring Milestone*	*Responsible Monitoring Party*
Transportation/Traffic			
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 events at the Rose Bowl stadium.	**MM 3.12-1** The traffic control measures and traffic management strategies currently employed during large-scale events at the Rose Bowl (i.e., UCLA football games) should continue to be implemented along with new strategies during the weekday and weekend special events associated with the proposed project to effectively move vehicles into and out of the Rose Bowl stadium parking areas. These traffic management strategies include the following: Offset/Reversible Traffic Flow Along Key Street Segments Continue to provide offset traffic flow along Salvia Canyon Road, Seco Street (both near Rosemont Avenue and just north of Linda Vista Avenue) and Rosemont Avenue. Traffic cones and barricades will be placed to provide an additional lane for motorists offset from the normal centerline (e.g., two inbound and two outbound lanes become three inbound and one outbound lane). Use of Police Helicopter to Assist Traffic Control Operations A City of Pasadena Police helicopter is utilized to assist traffic control operations staff on the ground for events that are anticipated to draw more than 20,000 persons. Police personnel should continue to be positioned at key traffic decision points on the perimeter of the arrival/departure travel routes. Arriving traffic can be diverted to another travel route to obtain a better distribution of parking loading, as the traffic personnel are in direct radio contact with the Police helicopter and the police stationed in the Rose Bowl Traffic Control Center (located in the press box). Command Center at the Rose Bowl Stadium The Rose Bowl stadium renovation will include upgrades to provide a state-of-the-art traffic command center that will be linked to the traffic management center in City Hall. The traffic command center will be equipped with closed circuit television (CCTV) monitors with camera coverage of the entire Arroyo Seco, strategic locations within Pasadena and at shuttle stops. Temporary Freeway Changeable Message Signs Continue implementing the freeway changeable message signs for large-scale events at the Rose Bowl. These signs, in conjunction/coordination with the police helicopter and the Rose Bowl Stadium Traffic Control Command Center would divert arriving traffic to another travel route to obtain a better distribution of parking loading. Traffic personnel would also be in direct radio contact with the Police helicopter and the police stationed in the Rose Bowl Traffic Control Command Center (located in the	Annually	City Transportation Department Pasadena Police Department

Table 10-1 Mitigation Monitoring and Reporting Program Matrix

Impact	Mitigation Measures	Time Frame/ Monitoring Milestone	Responsible Monitoring Party
	press box). Continue Utilization of Shuttle Buses from the Parsons Complex Continue the current Rose Bowl stadium shuttle program for major special events. Wayfinding Guide Signs Continue implementing the current wayfinding signage program that exists in the vicinity of the Rose Bowl stadium. Deployment of Traffic Control Officers at Key Intersections Continue stationing traffic control officers at many of the key intersections during the weekday and weekend special events, so as to better direct predominant entering and exiting traffic flows. Based on coordination with the PDD, uniformed officers are typically deployed to approximately 30 posts at all major intersections in the Arroyo Seco and along roadways leading to and from the regional freeway system for UCLA football games to manage and direct the reversible lane operations. Neighborhood Traffic Management All residential streets surrounding the Arroyo Seco that are not designated as access to the Rose Bowl should continue to be closed to event traffic on special event days. This will continue to be implemented through the use of barricades at over 60 locations and will be manned by either Explorer Scouts (consistent with UCLA games), or by uniformed employees of the parking management company. Patrols of the neighborhoods should occur and residents should be given a hotline number to call so as to report any event-related concerns to which patrols can respond. Designated routes to and from the Arroyo Seco area should be signed approximately 72 hours in advance for temporary special event "No Parking", which will be enforced by towing. Residents of the neighborhoods surrounding the Arroyo Seco will continue to be able to obtain residential passes for their cars that allow free access to roadways otherwise closed via the implementation of barricades. Design and Implementation of a Pre-Paid/Pre-Assigned Parking Program for Events Initiate and implement the design of a pre-paid, pre-assigned on-site parking program for all season-ticket holders. This program would be implemented for all suite ticket holders, all club level season ticket holders, and some general admission season ticket holders. With this program, patrons would receive directions to a designated parking area via a designated travel route. Pre-paid parking could be demonstrated through the use of dashboard placards, and preferential parking in close proximity to the stadium could be provided for suite holders and club level ticket holders.		

Table 10-1 Mitigation Monitoring and Reporting Program Matrix

Impact	Mitigation Measures	Time Frame/ Monitoring Milestone	Responsible Monitoring Party
	Design and Implementation of Pre-Assigned Ingress Travel Routes With implementation of this measure, patrons would receive directions to a designated parking area via a designated travel route in advance of an event. Marketing/Public Information /Media Outreach Programs A comprehensive marketing effort should be undertaken so as to provide event patrons with ample public information regarding transportation issues, aimed at reducing impacts associated with the proposed project to the greatest extent possible. The target audiences would be season ticket holders that purchase pre-paid parking passes, season ticket holders that park at the Parsons complex, single game ticket patrons, regional media, employees, charter bus operators, and area commuters. Season ticket holders who purchase on-site parking would receive a ticket package that contains detailed information with respect to their designated parking area, the designated ingress travel route, and egress travel route suggestions. A dashboard parking pass/placard to display on event days would also be provided. Detailed maps should be provided on the back side of parking passes/placards that illustrate the pre-assigned route to the designated parking area. In the infrequent event of rain, the information packets should contain special directions for those patrons pre-assigned to an area of turf parking. Use of the Parsons complex parking and use of the shuttle should be encouraged. In addition, season ticket holders that park off site or take transit should be provided with informational brochures containing detailed information on parking access and shuttle bus operations. Furthermore, key public messages should be provided via the established Rose Bowl stadium website, public radio and other forms of media. These public announcements should include the following key messages: (1) arrive early, (2) vehicles should use the routes shown on their parking pass/placard, (3) if patrons do not have parking passes/placards, they should head to the Parsons complex, (4) in the event of rain, consider parking at the Parsons complex, (5) the shuttle is a short route and it is an efficient and convenient alternative to driving, and (6) charter buses and other transit (i.e., Gold Line) are encouraged. Deployment of Additional Traffic Control Officers at Key Intersections In addition to the current deployment levels, additional traffic control officers should be stationed at the following intersections during the weekday and weekend special events, so as to better direct predominant entering and exiting traffic flows: ■ Rosemont Ave. & Washington Blvd. ■ North Arroyo Blvd. & I-210 WB Ramps ■ North Arroyo Blvd. & I-210 EB Ramps		

Table 10-1 Mitigation Monitoring and Reporting Program Matrix

Impact	Mitigation Measures	Time Frame/ Monitoring Milestone	Responsible Monitoring Party
	■ Lincoln Ave. & I-210 WB Ramps ■ I-210 EB Ramps & Mountain St. ■ I-210 WB Ramps & Mountain St. ■ Linda Vista Dr. & Highland Dr. ■ Linda Vista Dr. & Oak Grove Dr. These officers will manually direct motorists at key intersections so as to minimize potential delays during peak inbound and outbound special event time periods (with the number of traffic control officers and the duration of deployment at each location to be determined by the Traffic Lieutenant of the PPD). For those locations involving freeway ramps, coordination with Caltrans and/or the California Highway Patrol (CHP) will continue to be necessary. <u>Enhanced Wayfinding Guide Sign Program</u> Implement an enhanced wayfinding program as part of the proposed Rose Bowl Stadium Renovation project. The wayfinding program should be developed in consultation with the cities of Pasadena and La Canada-Flintridge, as well with the California Department of Transportation. The wayfinding program should include an updated inventory of existing Rose Bowl guide signs and directional freeway guide signs. Furthermore, the wayfinding program should identify opportunities to improve the dissemination of directional information for approaching motorists, including identification and location of specific access roadways. For motorists departing the Rose Bowl area, information regarding access to the regional freeway system should also be enhanced. The enhanced wayfinding plan should be guaranteed prior to the issuance of the building permit for the Rose Bowl Stadium Renovation project and would be implemented prior to project completion. <u>Consideration of Modifications to the Lot 9 Turf Area Access Point</u> An increase in the driveway/gate width for the Lot 9 turf parking area should be considered to increase efficiency associated with vehicular entry. The increased width may require slight modification to the existing rock walls. <u>Consideration of Additional Changeable Message Signs</u> The placement of additional changeable message signs on the arterial system should be considered at other locations in order to continue to provide motorists with real-time information regarding preferred routes. **MM 3.12-2** Additional traffic control officers should be deployed during large scale special events at intersections within the Parsons complex vicinity and these efforts should be coordinated through the City's Police Department and integrated with Rose		

Table 10-1 Mitigation Monitoring and Reporting Program Matrix

Impact	Mitigation Measures	Time Frame/ Monitoring Milestone	Responsible Monitoring Party
	Bowl Stadium Traffic Control Command Center. **MM 3.12-3** Prior to issuance of grading permits, the project operator shall be required to develop a construction traffic management plan, to be approved by the City, that provides an overview of the project, lists the general contractor contact information, outlines contract responsibilities (e.g., mobilization, any demolition, excavation, grading or shoring work, concrete or steel placement work, etc.), construction hours, material storage and construction trailer locations, truck/haul routes, traffic control, parking, and clean-up. **MM 3.12-4** The project operator shall provide plans and specifications, prepared by a civil engineer, regarding any proposed modifications, improvements, or realignments to features in the public right-of-way or on adjacent public land and submit them to the City for approval. T he submission shall be made in a timely manner and City approval granted before the issuance of grading permits.		
Impact 3.12-8 Utilization of off-site parking at the Parsons complex during the weekday P.M. arrival peak period would result in significant adverse impacts on traffic and circulation at the study intersections in the vicinity of the complex.	MMs 3.12-1 and 3.12-2 would also apply to this impact.	Quarterly monitoring	City Transportation Department
Impact 3.12-9 Implementation of the proposed project would result in significant adverse impacts on average daily traffic on specified street segments.	MMs 3.12-1 and 3.12-2 would also apply to this impact.	Quarterly monitoring	City Transportation Department
Impact 3.12-10 Implementation of the proposed project would impair implementation of the highway congestion management plan.	MMs 3.12-1 and 3.12-2 would also apply to this impact.	Quarterly monitoring	City Transportation Department

Table 10-1 Mitigation Monitoring and Reporting Program Matrix

Impact	Mitigation Measures	Time Frame/ Monitoring Milestone	Responsible Monitoring Party
Utilities and Service Systems			
Impact 3.13-8 Implementation of the proposed project could require an increase in electricity and natural gas, but would not require the construction of new energy production or transmission facilities, the construction of which could cause significant environmental effects.	**MM 3.13-1** Project design and construction shall be coordinated with SCG and the City's Public Works Department, and improvements provided if necessary in order to ensure that connections are adequate and capacity is available to accommodate estimated demand for gas and electric utilities.	At design review and plan check	Public Works Department
Impact 3.13-8 Development of the Rose Bowl Stadium Renovation Project could incrementally increase impervious surfaces in the project area, which could require expansion or construction of existing storm drainage facilities.	**MM 3.13-2** The project Applicant shall provide a storm drainage analysis to ensure that storm drain lines and connections are adequate and that capacity is available to accommodate the anticipated increase in stormwater flows. If the report provides recommendations for on-site storm drainage improvements, the recommendations must be followed and implemented. If found that off-site improvements would be necessary, the project Applicant shall pay in-lieu fees to the City for the future construction of those facilities.	At design review and plan check	Public Works Department