



PLANNING COMMISSION
Pasadena, California

May 6, 2005

Mayor Bill Bogaard and
Members of the City Council
Pasadena City Hall
117 East Colorado Boulevard
Pasadena, CA 91109

Re: Planning Commission Review of the Proposed Rose Bowl Stadium Renovation Project

Dear Mayor Bogaard and Members of the City Council:

On Wednesday evening, May 4, 2005, the Planning Commission ("PC") held a special meeting for the purpose of reviewing and commenting on the Final Environmental Impact Report for the Rose Bowl Renovation Project (the "FEIR"). This special meeting was called by the PC Chair because the PC understands that it has a statutory obligation to advise the City Council on projects which affect city development. This understanding was clearly expressed in a letter, dated March 11, 2004, from the previous Commission Chair to the City Council.

As it turned out, (i) no public hearing had been scheduled for this special meeting, (ii) no consultants were present, (iii) the Statement of Overriding Considerations was not available for review because it had not yet been drafted, and (iv) there was no Staff Report analyzing the FEIR. For all these reasons, and the fact that the PC had only received the voluminous FEIR the prior Friday evening, the PC decided not to discuss the substance of the FEIR but instead to discuss the perceived deficiencies in the review process itself.

Among other deficiencies, it was noted that:

1. Chapter 2.105.110 of the Municipal Code provides the PC with statutory authority to review and make recommendations on a number of programs and development projects, prior to those programs and projects being submitted to the City Council. This provision of the Municipal Code was breached as a result of the break-down in the review process.
2. The PC is the sole city commission that acts with a city-wide perspective and purview over all aspects of the planning process. As such, the Council and the credibility of the decision-making process would be best served by having the PC vote on any Staff recommendation approving the FEIR after input from a wide range of the other advisory bodies. This is the process that the PC recognizes as the usual City practice with respect to environmental impact reports of such city-wide significance. This practice was not followed with respect to the Rose Bowl Stadium Renovation Project.
3. When the PC held a public hearing in March, 2005 to comment upon, and receive comments on the draft EIR, the sole comment the PC had, as a commission, for the City on the draft EIR was for the City to explain its rationale for excluding the PC from a decision-making role

in the Rose Bowl Renovation Project, given statutory law, the City's Charter and past practice. The City's response to such comment in the FEIR was nonresponsive and wholly insufficient.

4. Representations were made during the City's deliberation on the Central Arroyo Master Plan that the Rose Bowl Renovation would be subject to a separate environmental analysis that the Commission would have the opportunity to review and comment on. In the PC's opinion, the limited opportunity to review the voluminous comments on the Draft EIR and the responses to those comments is inconsistent with this previous representation.

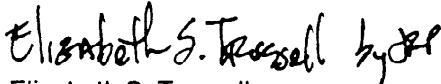
After such discussion, the PC unanimously adopted a motion (8-0; 1 Commissioner absent) authorizing the Chair of the PC to express to the City Council the decision of the PC to make **no statement of recommendation regarding the FEIR** due to:

- A breakdown in the review process, which the PC believes resulted in a violation of Chapter 2.105.110 of the Municipal Code; and
- The insufficiency of the time provided for review of the responses to comments on the Draft Environmental Impact Report.

In addition, the City's inadequate response to the PC's request for clarification of the basis on which to effectively exclude the PC from the review and decision-making process also formed the basis for the PC's action.

Thank you for your consideration of the issues raised in this letter. I plan on attending the Council's May 9, 2005 meeting and will present these issues and the Commission's deliberations in greater depth at that time.

Very truly yours,



Elizabeth S. Trussell
Chair, Planning Commission

cc: Members of the Planning Commission
Cynthia Kurtz, City Manager
Richard Bruckner, Director of Planning and Development
John Poindexter, Planning Division Manager
Darryl Dunn, Rose Bowl General Manager