

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.
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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.
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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 Mw 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.
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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.
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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.
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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.
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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.
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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 well 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.
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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.
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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.
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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
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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.
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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.
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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.
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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.
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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.
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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.
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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.
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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.
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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