



May 10, 2005

City of Pasadena
Planning & Building Department
175 North Garfield Avenue
Pasadena, CA 91101

Attention: John Spalding

RE: Rose Bowl Stadium Renovation Project

Dear John:

In response to the comment raised by John Mohler at the City Council meeting on May 9, the following information is provided.

Existing ambient noise levels were monitored at ten locations around the Rose Bowl, as identified on Page 3.9-7, Figure 3.9-1 (Noise Monitoring Locations) of the Draft EIR. Five residential areas were specifically chosen on the east side of the stadium. Richland Place is noted to run parallel to Arroyo Boulevard, between Arroyo and the stadium, across from the north end of the stadium. As noted on Figure 3.9-1, noise monitoring location 3 is at the intersection of Westgate and Richland Place. No backyard monitoring was done, as consultant staff did not have access to private property. Noise levels were measured on a weeknight and weekend non-special event afternoon. In addition, existing noise levels were measured during a UCLA football game on the weekend. These measures are noted in Table 3.9-3 on Page 3.9-5 of the Draft EIR. City of Pasadena Noise Guidelines indicate that for residential use, exposure of up to 70 decibels (dB) are acceptable, with levels up to 75 dB conditionally acceptable (i.e., requiring some mitigation measures).

Page 3.9-18 of the Draft EIR contains a discussion of the impact of construction noise on the single-family dwelling units located along the residential street segments around the Bowl. The nearest residential uses were identified as approximately 200 feet from the edge of the stadium's nearest parking lots and 600 feet from the edge of the stadium itself. Based on US EPA typical outdoor construction noise levels, as noted in Table 3.9-8, noise levels at 200 feet would not exceed 74 dB and would not exceed the City's construction noise standard.



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With regard to operation, as noted on Page 3.9-19 of the Draft EIR, the highest noise level measured during the UCLA football game at the property lines of adjacent residences, including crowd noise and noise from the loudspeaker system, was 60 dBA. Therefore, noise from events would be within the acceptable range (up to 70 dBA). Noise from increased traffic (a periodic increase) was noted to be significant and unavoidable in the discussion of Impacts 3.9-7, 3.9-8, and 3.9-9. Traffic management strategies outlined in MMS 3.12-1 and 3.12-2 in the Transportation section of the EIR would incrementally reduce traffic noise impacts, but not to a less-than-significant level. However, it should be noted that this increased noise level would occur on a periodic level over a discrete period of time.

The commenter also expressed concern over light levels and light spill onto adjacent residents from stadium lighting. As noted in Section 3.1 (Aesthetics) of the Draft EIR, the new lighting standards would emit approximately 300 foot-candles of light, the same as the existing light standards. The new light standards would not emit more light than the existing standards, and would be placed to avoid light spill and direct glare to the maximum extent feasible, as required by MMs 3.1-4 through 3.1-8. In fact, as some of the new stadium lights would be placed along the east and west rooflines of the new suite structures, light escaping the confines may be reduced compared to existing conditions, as the east and west structures would partially obstruct light spill and view of the light banks of the opposite side, at least on direct-angle viewing. The scoreboard on the north side would remain with the recommended design, and the new scoreboards would be placed on the east and west side, rather than on the north side as identified in the EIR. Therefore, similarly, the light from the scoreboards would be at least partially blocked by the east and west suite structures. New light standards would be state-of-the-art, shielded fixtures (to the maximum extent feasible); thus, with implementation of the identified mitigation measures, it is anticipated that the impact of spill light from proposed stadium lighting would be reduced to a less-than-significant level compared to existing conditions.

Sincerely,

A handwritten signature in cursive script that reads "Alison Rondone".

Alison Rondone
Senior Project Manager
EIP Associates

Transportation Advisory Committee
Rose Bowl Questions/Comments
March 10, 2005

TAC

1 ? - After the close of public comment and after the final EIR is prepared the final EIR will respond to all comments, correct? What will be the review process after that? Once the final EIR is prepared does it come back to us, does it go to planning? Where does it go? Why will the Planning Commission not review it? Typically in the past the Planning Commission has reviewed EIR's

Public Comment

2 Joan Hearst (speaking on behalf of WPRA). WPRA did a survey on how people feel
3 about the NFL. We have concerns about the adequacy of the EIR and concerns about
4 some things like the Arroyo Seco Public Lands Ordinance and tree protection. The
citizens have been trying to protect the quality of life in their community for years and we
are particularly concerned about that and traffic is a huge impact. Thank you.

James Bem, I'm speaking for the significant impact people. My concerns relate to all
traffic entering into the Arroyo Seco and the Rose Bowl near themajor streets Linda
Vista, Salvia Canyon, Seco, Washington and Arroyo. My focus shall be on the shuttle
bus impact on Westgate Street, a 36 foot wide residential road that is now used as the
primary avenue for bus traffic. Westgate suffers the impact on any major event day there
are from 600 to 800 bus trips turning back and forth on our street. Currently 12 events
5 are called major and with the NFL presence in the Arroyo this is projected to total 25. If
the NFL is not able to acquire a foothold of the Rose Bowl my understanding is that
events will still move up to 25. Having been a resident since 1969 when only 4 or 5
events were scheduled at the facility intrusion into the quality of life was a non issue. In
the 35 years since we have witnessed an increase in events, some lasting days, and
several for weeks, i.e. the 2 weeks for soccer, the Super Bowl a few years back. The
most recent events, the Billy Graham revival lasted 3 days complete with songs of praise
echoing in the Arroyo. With the UCLA game and the January 1 New Years game the
busses began service at 5:30 in the morning and lasted until late in the evening. Westgate
is used as a private and dedicated way into the Arroyo, no parking, residents are unable to
exit due to bus traffic. Questions we pose and put forth:

6 1) will residents be compensated?

7 2) what mitigation will be offered? Double paned windows, insulation of homes?

8 3) will the city purchase all the homes on the street?

9 In the review of the EIR no reference is made to any other transportation feature,
lightrail, monorail, electric buses, or any devices that moves great numbers of patrons in
and out of the Arroyo. The promoters, consultants, and city staff have declared that the
Goldline system will bring in patrons to Pasadena Memorial Park station but upon
10 arriving must walk 1/2 mile to the shuttle bus downtown. And the EIR states that the
shuttle bus will continue to be the current movement of people in and out of the Rose
Bowl. The shuttle bus all through this report is supposedly the savior of the

10 transportation action here. The premise that shuttle buses will continue to be operated on
cont'd this 36-foot wide street is totally unacceptable to the residents and Westgate Street will
seek federal and state remedies for this intrusion that has existed for over 30 years if not
abated. Thank you. (a letter was submitted)

11 Mic Hansen – I have several items questions to pose. 1) Unless we missed it the EIR does
not study the intersection and street segments south of California. Historically South
Orange Grove has been a major artery for Rose Bowl events and a great deal of incoming
12 traffic comes up the 110. What is the rational of this omission? 2) It is forecast that over
a 24-hour period 37,968 additional net new car trips will be generated as a result of the
project. How will this affect the longevity of the streets? The wear and tear that will
result because of the added traffic, what does this do to traffic? How does this affect
13 Pasadena’s infra structure? 3) The EIR states that Old Pasadena parking lots will be used
for the Rose Bowl NFL events. Weekends are the busiest times in Old Pasadena for the
merchants. What will this mean to them affecting their business? And what will this
14 mean as far as mobility for Old Pasadena customers? 4) And last, EIR states that when it
rains cars will be parked on surrounding neighborhood streets. How can these
neighborhoods absorb perhaps 10-15,000 cars without adverse impact? What will this
mean for emergency vehicles and the neighborhoods daily activities?

15 Denis Crawley – I’m not one of the neighbors but I do come down here a lot. This is my
favorite place to work out. I was part of the Central Arroyo Master Plan Committee
where we had a lot of local residents in prolonged activity trying to figure out what would
be the highest and best use for this immediately surrounding area – and now it seems like
16 that has been totally thrown out. I look at the traffic study and I don’t see any bicycles or
pedestrians in it. Did you count bikes or pedestrians? And I don’t see anything about the
impacts during the construction phase?

17 Christopher Keller – I look at this from a very different angle than most of the other
comments. I kind of speaking for thousands of recreational users who are here 340 days
a year, we make a point of not coming those other 25 days. I’m very concerned that we
are going to make changes for 25 days, and what is that going to do to those other 340
days. And what I don’t see anywhere, and I already made comment in November, what
is going to happen to the basic traffic pattern during those other 340 days? And I’ve been
told it won’t change but I don’t see that in writing anywhere. There are people running,
walking, pushing baby strollers, all of these things. It’s a very useful area but if major
changes are made to that traffic patter it will make it either difficult or impossible to be
used as a recreation area on those 340 days. So even though we don’t have any problem
with the project as it is we don’t see anything also mentioned in the EIR about mitigating
the use during those other times and that’s our major concern.

18 Dale Trader – Vice-chair of the Neighborhood Coalition, as we heard the situation
addressed, we believe that the draft EIR does not address adequately the transportation
impacts coming from the 110 freeway and all the rest of the streets leading from the south
in particular because people will be tempted obviously to exit the 110 freeway maybe
even in Highland Park and try to wind their way up along the Arroyo. I’m sure many of

18 cont'd the residents of the Arroyo and the Arroyo's neighborhoods are not going to be too excited about this tremendous impact. (inaudible) solution something that we can imagine would be imposed on the surrounding neighborhoods. We just would like to know if the traffic consultant has looked at the impacts at the surrounding neighborhoods around the Los Angeles coliseum. Obviously over time we've seen the tremendous impacts that have affected the neighborhoods around the coliseum and even with people selling their front lawns for parking. Really the idea of this kind of use is all connected to transportation as well. We can imagine these take gate parties in front of peoples homes in the area are not a pretty picture

20 Mike Bogler – Save South Orange Grove is deeply concerned about this draft Environmental Impact Report and believes that the report is inadequate and fails to completely study all major regional access points and routes to the stadium. The draft EIR assumes only regional access points are the 210 and the 134; it does not consider whatsoever traffic coming from the south and southwest regions of the LA Basin which will inevitably use the 110 for access to Pasadena and the Rose Bowl. Nor does it study any intersections or segments on South Orange Grove, south of California Blvd. I've asked several colleagues who live in Chevy Hills who regularly attend the UCLA football games what their preferred route is to the Rose Bowl. They all responded that their preferred route is interstate 10 to the 110 to Pasadena, exiting Orange Grove Blvd., yet the draft EIR does not consider this route at all. Interestingly upon the conclusion of a UCLA football game the City of Pasadena purposely converts Arroyo Blvd. into a 2 lane, one-way, southbound street in order to divert traffic to the 110 freeway. The traffic does not suddenly disappear at California Blvd, I know that because I live 5 houses off California Blvd. on California Terrace and am subjected to the traffic from every major event at the Rose Bowl. How is it possible that the draft EIR fails to study the traffic coming from the 110 freeway destined for the Rose Bowl? How is it possible that the draft EIR fails to consider the impacts from increased traffic south of California on South Orange Grove, Arroyo Blvd., and La Loma? Especially given the fact that these streets or portions thereof are classified as deemphasized streets in the City's General Mobility Element? The exclusion of these streets and segments by the study call into question the adequacy of the draft EIR. Should the City prepare for a new traffic study and supplemental EIR that addresses these issues? We believe that it should. One final thought about the EIR – it occurred to me, while the EIR studies regular week night games where traffic begins at 5:00 p.m. it doesn't appear to me that it studies specific events like Monday night football game, which is a much larger event then a standard game. The question then comes: did it study a Monday night football game when arrivals can be as early as 2:00 p.m. along the commuter rush hour route? And access to those surrounding schools, and gridlock that may be associated with schools like Linda Vista, San Rafael, or Westridge and Mayfield Senior School where their primary in and out and mode of access to those schools is South Orange Grove Blvd. south of California.

23 Peter Frausto – I'm a 53 year resident of Pasadena. It gets me all the time when I hear the residents of WPRA or Linda Vista, or anywhere else, consider Brookside Park their private park and their private area. They do not represent the entire city of Pasadena. The entire City of Pasadena goes all the way to Michelinda and the benefit of the NFL

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coming here would really subsidize a whole lot of people. I think the employment opportunities that would come out would be enormous to the youth of Pasadena. There are no CETA programs, no youth employment programs. I spoke to Ralph Tripple one day, the General Manager of the Ritz-Carlton, he said that when the Rose Bowl has 50,000 people come to it 600 people get to work more, 600 people get to work a job. I can't afford to come to an NFL game, I'm not interested in coming to an NFL game. But I'm interested in jobs for our kids and jobs for our community. These jobs represent people who didn't have an opportunity to go to PCC and continue getting an education. The other think I want to say is that any traffic study done without extensive use of the Pasadena Police Department is not a complete traffic study. Can you tell me what is the percentage of traffic that comes from the north? It is 12%, I've done extensive work for the Pasadena Police Department. If anybody knows traffic it is the Pasadena Police Department. Any traffic study done without them is an incomplete study. (Unclear sentences about bicycles or pedestrians) I hope traffic takes a look at that. This is unprecedented that an NFL franchise or any sports franchise would come in and offer a city 450 million dollars to renovate a stadium and not keep it. Unprecedented. We can't afford to do it. We should allow them to come in and do it. It would save the City an enormous amount of money and make a lot of money. I don't think we've taken that chance or that opportunity to look at it. If we try to do it ourselves we're going to lose it. So I think the jobs opportunity is much more important than just the game itself. Somebody was talking about how we only have 340 days, well excuse me, we have 340 free days.

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Audrey O'Kelley – I would like to see the study addressing the 110 freeway access to get to the Rose Bowl. I think it is a very important way for people to get here and I would like to know why it was not addressed. Secondly I am curious as to whether or not there is going to be planned retail operations at the Rose Bowl, and who these retail operators will be, and what their days and hours of operation will be, and is there going to be any traffic impact from that.

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Norman Parker – I'm from the Linda Vista/Annandale Association. Being adjacent associations to the Arroyo-at-large we are doing a complete study of not only the traffic impact issues but the rest of the aesthetics and so forth that are listed in the report and we will have final comments in writing by the deadline.

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Norman Parker – now as a private citizen who lives in the Linda Vista side. I have a couple of things I'd like to at least point out that I am not able to detect in the study. One is that the areas in our locale, the intersection particularly, Linda Vista at Lida; Linda Vista at Seco; and a question mark about whether traffic really flows at Park View and Yocum off of Lida where Washington intersects on the northwest corner. I saw no specific data with regard to the traffic flows at those particular intersections. That section of the area is one lane each way on everyone of those streets. We do have experience of course with the UCLA practices and New Year's Day and so forth. We feel that there is an enormous amount of traffic flow in that area.. I would say that Linda Vista, end to end, in some way perhaps handles 15-20% of the overall traffic that comes to an event and to me that seems significant as to those specific intersections. When we have such

29 things as the Art Center that gets heavy traffic at certain times of the day the residents
cont'd who have that as their only way in and out of the essentially hillside community. A good
deal of through commuters who now go through La Canada, Altadena, or other areas to
avoid the 210 there's considerable traffic. The cumulative impacts in connection with
30 these events would be critical. I don't look at the Arroyo Seco as my private park, and I
don't think anyone else does. It does happen to be the only park on the West side that we
have any kind of immediate access to. So I think we have a right to be concerned about
what happens in that park in the short term and the long term.

Bob Kniesel – Chair of Neighborhood Coalition. For neighborhoods that aren't
immediately around the Rose Bowl bringing the NFL to the Rose Bowl is going to
provide some impacts to them. A lot of people are jogging, even as we speak, around the
Rose Bowl, bicycling, rollerblading, whatever, they are thick as flies, it's kind of
dangerous at night so you slow down. But those people don't come just from right
around the Rose Bowl, they come from all over Pasadena, probably other cities too.
31 What's going to happen when the opportunity is denied for them to do that because the
NFL is here or they are setting up for the NFL? They are going to go somewhere else,
probably to their own neighborhood park, which is going to cause more problems in
neighborhood parks. Maybe they will sit at home like a couch potato instead of getting
out there and exercising, I doubt that – they are going to go somewhere else and use other
parks in other neighborhoods and maybe provide some problems there. Suppose
somebody from East Pasadena comes to Kidspace regularly, or to the Aquatic Center,
NFL is here – sorry, it's all parked up you can't get in. I've heard that there is going to
be a procedure when people want to go to the aquatic center can follow when they are
coming over here during an NFL game. They just go to the aquatics center and whisper
"aquatics" and they let them in the park for free. How long is it going to take for people
32 to find out about this on the internet and everyone going to the NFL game will just say
"aquatics center" and they'll park at the aquatic center for free and then go to the NFL
game. So there are going to be some impacts on people living in neighborhoods all over
Pasadena who want to come here and use the facilities, not just of the Rose Bowl, but ball
diamond, soccer fields, etc. And third, traffic congestion isn't just going to be confined
to the Rose Bowl, it's going to spill over into other neighborhoods in Pasadena near and
far. Traffic is like water, it seeks its own level. If you can't get through one intersection
33 you cut through a residential neighborhood and try to get around, got to get there before
the game starts for heaven sake. We're going to have a lot more traffic than people think
because drivers are very canny about trying to get around congestion and get to where
they want to go when they want to get there. I don't think any models can capture this
but it is real. There are some impacts of course on the neighborhoods directly affected
and immediately adjoining the Rose Bowl. I think we saw something when it rained for
34 the UCLA game and people couldn't park on the golf course so they had to park
somewhere else. They didn't all park in the Parson's lot and shuttle to the Rose, they
didn't all take the Goldline. They parked where? In the neighborhoods. There's going to
35 be a lot of diesel fumes from the trucks, there's going to be a lot of noise. Any I don't
36 think any amount of sound proofing or Glade Plug Ins is going to offset that. It's an
impact that can not be mitigated in the neighborhoods around the Rose Bowl.

37 James Fallbren – Question about the high-end audience. Many wealthy people fly into airports. At other venues a lot of them take helicopters. Any plans for handling that? Will there be heliports, will they use an existing one? Where will these be if they were to build one?

38 Knowingly the White House has said that we are under a terrorist threat we are a target. If you saw any of the games last year you saw FBI at the offices, we have bomb dogs. I think one of the safety issues about rebuilding the stadium is that if there is a terrorist strike or any kind of major civil impact here getting these people out of the present stadium, the small holes, would be like toothpaste – you’re going to get extremely hurt.

39 The other thing is when they talk about the displacement of people, my own survey showed that either 92% of people either walking, jogging, or use the area are not from even from Pasadena. I don’t care if I displace nonresidents. And if I replace them with 65,000 other people who want to use recreation inside the stadium, I’ll do that

Commission Comments

40 Carolyn – I did review the Transportation and Traffic section of the EIR and I found a lot of, what I consider, inadequate and deficient aspects to it, which I’ve listed here. I’d be happy to provide it to you after I have finished. If you want to follow along I have some page number references as well. The first item has to do with the study area Intersections and Street Segments, those are listed on page 3.12-13 and 14. I believe it is deficient because people in the audience have noticed by reading the EIR that the 110 freeway was not included in the traffic study. I would also add that the 710 freeway stub was not included in the traffic study. I know from living in that area that a lot of people come to the Rose Bowl via the 710 stub at Del Mar and California. Also missing street segments include as people have indicated tonight:

- South Orange Grove off of California, which is a deemphasized street;
- Avenue 64 is a major traffic ingress and egress from the Rose Bowl and that street segment from the Rose Bowl is missing;
- Lida from the Glendale city limits to Linda Vista, that is a cut through street;
- Washington Blvd. from West Drive to Linda Vista that is another ingress and egress street;
- Linda Vista from Mt. Vernon to Oak Grove Drive, the study did take the east part of it but it didn’t take the west part of that section of town;
- Arroyo Parkway from the 110 freeway all the way up to Holly Street;
- Fair Oaks Blvd from the 110 to freeway to the 210 freeway.

These street segments are particularly important to study because the EIR has mention that the Goldline will be used, and other shuttle services from Parsons and the people will be using those street segments to get to those locations. Intersections that are particularly important that missing from the EIR were:

- South Orange Grove at Columbia.
- The 110 freeway at Orange Grove
- The 110 freeway at Avenue 64
- The 710 freeway at Del Mar
- The 710 freeway at California

The other intersections that are missing are Goldline at grade intersections, they are:

- Raymond at Del Mar
- Arroyo Parkway at Del Mar
- Raymond at California
- Arroyo Parkway at California

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I consider it a real deficiency of the EIR not to have included those in the study area. As a side note TAC had a presentation from Darryl Dunn several months ago about traffic patterns of UCLA games and he had mentioned that most people do come from the west and the south so I was appalled that the south was not included in this EIR. The EIR only studies traffic patterns for a one-hour peak time period at the beginning of the event and at the end of the event; the EIR should have analyzed the entire traffic load of a special event. The Consultant did make the note that this is unique, it is not for a particular project that is open twelve months out of the year everyday of the week. But at the same time this DEIR shouldn't have studied it the same way, and really take a look at the whole impact of all of the traffic from the time the vehicles begin entering the stadium all the way to when they end. The project is going to generate 37,968 net new vehicle trips but as a result of only studying that one hour period it only studies 45% of the incoming traffic and only 55% of the outgoing traffic. Therefore the DEIR assumes that there is no impact from the remaining traffic that is outside of that one hour period. Another part of the DEIR, on page 3.12-113, talks about how there was a visual observation at a well attended UCLA game and the DEIR states that the majority of patrons exit the site within 45 minutes from the conclusion of the event. That doesn't sound logical to me, intuitively living in the area I know the streets are clogged significantly a lot longer than 45 minutes so therefore I'm just wondering how scientific of an observation that was. Was this observation the basis for studying only one hour each peak period? The DEIR did not include a specific traffic analysis of the proposed 57,000 sq. ft. museum/retail space which could have all year long impact but rather it dismissed it as a source of car trips – "vehicular trip generation has been assumed to be ancillary to the patron trip forecast". I just feel that this is a sizeable entity that will be an addition to the Arroyo area and if it would have been an entity all on its own it probably would have required an EIR or at least a traffic study and that was not really done in the EIR.

Point #3, the EIR in my view does not adequately address the General Plan Neighborhood Protection Principles. Missing in the analysis is how does this plan jive with the General Plan Guiding Principle to target the type and location of new growth without increasing traffic or intruding on neighborhood quality of life. It also did not adequately address, analyze or stipulate how it was going to continue to protect the emphasized streets. There were no recommendations for mitigation in that regard or analysis. There was no environmental capacity analysis of the adjacent neighborhood streets; and I would call your attention to the text scoping comments, page 3 item 6, suggesting that that should have been in the EIR. There was no environmental capacity analysis in this DEIR. Also, the current effectiveness of current neighborhood protection measures was not measured or analyzed in any sort of way. Nor were there any recommendations as to how to improve those adjacent neighborhoods. No compliance measures were analyzed or recommended. In other words it is one thing to say we're going to have these type of rules and another thing is are we going to ensure that whatever traffic mitigation protection rules will be implemented will in fact be

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47 implemented. What penalties will there be, what type of compliance measures will we
cont'd have? I felt that was a deficient area of the EIR as well.

48 **Point #4** – The EIR does not adequately address parking and the related impacts. The
DEIR assumes the use of existing parking plans for the UCLA games, which include
parking on the golf course and adjacent turf areas as well as rainy day plans, plan C. So
the DEIR uses that as a basis for its study. When you look at that based on the proposed
parking inventory for the Rose Bowl renovation project 72% of all the parking inventory
as listed on page 3.2-107 would use parking grassy areas, such as the golf course, the
adjacent turf areas that are used for soccer games and that type of activity for the public.
So a great deal of the parking is on grassy areas. The only off-site parking is owned and
controlled by Parsons and the DEIR assumes that Parsons parking will continue to be
available, that's on page 3.12-95. In spite of the fact this is private property and the
owner may withdraw cooperation in the future, they may have other plans for that
property. The DEIR did not recommend any long term contractual requirements
regarding Parsons parking and the DEIR did not analyze the without Parsons parking.
49 The DEIR did not provide a project alternative which would analyze the use of only
paved areas for parking with all additional parking off-site. You see our TAC scoping
comments page 2, item 3. The DEIR did not recommend or analyze alternative rainy day
50 Plan C parking plans that would not impact adjacent neighborhoods. The DEIR did not
analyze or measure the reduced car trips that would be achieved by reducing parking in
51 the Arroyo. When you studied the intersections adjacent to the parking lot there were
several listed, Walnut at Pas Avenue, etc., it listed Appendix F as where the study was. I
52 could not find Appendix F anywhere, I've searched high and low, if someone could let
me know where it is then I can find and study it and respond with comments.

53 **Point #5** – The DEIR does not include a pedestrian or non-auto transportation plan other
than the existing UCLA shuttle service. The DEIR made no new recommendations or
analysis of an improved shuttle service, see our TAC scoping comments page 2 item 3,
which could include but not be limited to clean and quiet shuttles, more off-site park and
ride locations, more shuttle busses so that the wait time becomes tolerable. The DEIR
did not provide a pedestrian plan or analysis, see our TAC scoping comments page 3,
item 8 & 9. A pedestrian plan or analysis is completely absent, in fact several streets in
54 the Arroyo have no sidewalks, or sidewalks on only one side of the street, their
descriptions are in the roadway descriptions, page 3.12-4-8. No pedestrian safety
analysis is provided in the DEIR. The DEIR did not provide a bicycle plan or analysis,
55 see TAC scoping comment page 3 item 8&9. A bicycle plan or analysis is completely
absent. Amenities for bicyclists such as secure bike parking are not included or
recommended. The DEIR does not make any recommendations for mitigations for
conflict for recreational users in the Arroyo and the special event vehicular traffic, see
page 3.12-12, in the following 2 areas:

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- 1) Recreational users of the Arroyo for walking/running/cycling, especially
on the Rose Bowl loop
 - 2) and the equestrian trail users on the trail and staging area

57 That completes my comments. I do feel that the transportation and traffic analysis of this
DEIR are incomplete and should be recirculated.

58 Ralph – To the transportation consultant: I didn't hear anything in your report that suggests that of all the things you provided that any consideration was given to what sort of traffic mitigation impact would be provided if all the existing transportation systems were used. I'd like to know if a study could be provided wherein theoretically all the existing transportations that we have available are used to the fullest capacity how much of a mitigation of the traffic problem would we have as a consequence of that. My reason for saying that is quite simple, we spend a lot of time here talking about important things, but we don't spend enough time talking about how to get people on board these vehicles. I think that if did something sensible in marketing these alternative methods of transportation that some of the problems we're discussing here might be very easily mitigated. I happen to fully agree with the gentleman that spoke about the number of jobs that would be provided for by the implementation of the NFL here. I think Pasadena is a very progressive city. We've had a number of projects here in the city where a very large element of the population has been totally ignored and not involved. My suggestion is that: 1) we do consider this because we need the jobs in Pasadena, 2) in terms of the Rose Bowl itself taking away from the recreational activities of people coming to town the games at the Rose Bowl and other sorts of activities at the Rose Bowl are in fact recreation so it should be considered as a part of the entire recreation as a whole. I also agree with the young man who that we really shouldn't be interested in the very large percentage of people who come here from other areas, unless they are willing to pay for the upkeep of the Rose Bowl and all the things associated with it then that should not be our major concern. Our major concern ought to be trying to figure out ways to mitigate this traffic situation to accommodate the needs of a Rose Bowl who has the NFL as an occupant. I would like to emphasize the need for some study that indicates the full impact of total of available systems. I think that's where a lot of our energy ought to be directed, instead of directing our energy towards solve problems with what we have available.

62 Vince – I know that the EIR isn't supposed to consider economic impacts so maybe a way of framing a comment on the EIR that would at least allow a discussion of this is: because there is going to have to be a statement of overriding consideration because the EIR has concluded that there is going to be significant and unavoidable traffic impacts. When we learn of the economic benefits and the economic impacts of NFL at the Rose Bowl, at what point in the process will that occur? Because there has to be a statement of overriding consideration when the burdens are weighed against the benefits, when will the community learn what the benefits are? And will there be a Plan B on the table, an economic alternative to this? We know there are project alternatives in CEQA, project alternatives in EIR, will there be a Plan B? So I'm asking this in the context of a question and a comment on the statement of overriding consideration, I would hope that you would be able to respond in writing as to when in the process the economic benefits would disclosed to the public since a statement of overriding consideration under CEQA has to be based on a balance of burdens and benefits. And secondly will there be a Plan B? That's my effort to try to bring Ralph's comment into the CEQA context, and hopefully staff and the consultant will be able to give us an answer to that.

64 (misc. thanks given to public and Mr. Dunn) I also agree with Darryl when he said that there are major impacts of this project, it's undisputed. The EIR concludes that the NFL

64 at the Rose Bowl would generate almost 38,000 net new daily residential trips over a 24-
cont'd hour period and as many speakers have pointed out residential neighborhoods around the
Rose Bowl as well as city-wide are going to be impacted by the added traffic generated
by NFL games. I've reviewed the EIR in detail but I do have a few comments and
questions, which have been raised by members of the public and my colleagues.

65 First, the EIR does not study intersections or street segments south of California
Boulevard and fails to include the 110 freeway. Why? The EIR assumes the 110
66 freeway is not a regional access point to the Rose Bowl. Why? The EIR only studies
traffic impacts for a one-hour time period in and out. Why? The EIR does not address
certain General Plan neighborhood plan objectives. It only focus on 2 Mobility concepts
form the 1994 Mobility Element. It doesn't discuss the other neighborhood protection
principles, including the principle that new development should be focused in a way as
not to increase traffic in residential neighborhoods. It also fails to address whether this
67 project would comply with the newly updated mobility element, which the community
spent so much time and the staff spent so much time working on. Why does the EIR not
address the new mobility element? The EIR does not address the Arroyo Seco ordinance,
and in fact concludes that the Arroyo Seco ordinance would have to be amended. Why
and how would it be amended? The EIR fails to address the Arroyo Seco Master Plan, as
Mr. Crawley pointed out a lot of people labored over that plan. A lot of citizen in-put
went into that plan. Why does this EIR not address those provisions? The EIR does not
adequately address parking in the Arroyo Seco and Rose Bowl adjacent residential
68 neighborhoods. Plan C for traffic, when you park during rain in residential
neighborhoods has not been adequately studied, as Carolyn Neighbor pointed out in her
comments. Also, we know, and this was address in our scoping comments, which was
not address in the EIR, it is well known that parking revenue is something that is held
onto, or not shared with other teams. In other words, certain revenue streams are shared
among all teams, parking revenue presumably belongs to the team that would have
69 ownership of the team here in the Rose Bowl. So there would be potentially an economic
incentive to do maximum parking in the Arroyo because it would be in their interest to do
so. Again, to the extent that this requires a statement of overriding consideration when
will the economic details of the parking finances be disclosed to the public so the Council
can make a reasonable decision on the benefits and the burdens? Will there be an
economic incentive to park cars in the Arroyo? The EIR does not study the traffic
impacts from the more than 57,000 square feet of retail that's being proposed to be built
70 here at the Rose Bowl, a museum, a hall of fame store, the EIR does address the
transportation impacts, the traffic impacts of retail. It also does not discuss any of the
71 pregame activities and set up activities. Why? And finally, a point that TAC raised in
it's scoping comments, specifically requested was not address in the EIR. The EIR does
72 not include a pedestrian and nonauto transportation plan. Why? Even with these
omissions the EIR finds significant and unavoidable impacts in the areas of traffic and
transportation traffic. A question that I would like to have answered is how much worse
73 would the significant and unavoidable traffic impacts be if the EIR had studied traffic
between California Blvd. and the 110 freeway? That needs to be answered even if it
requires a new traffic study that is recirculated for public comment. Thank you.

74 Mike – My comments have been pretty much addressed by everybody. They primarily
centered on: there should have been a broader study the 110 should have been included. I
75 do think there are going to be some impacts that cannot be mitigated and I think we need
to look at overriding issues as not the purview of this commission.

76 Allen – There have been a tremendous amount of comments so far and I think that I
largely agree with what's been said. That leaves me to comment on a couple of
operational type issues. One point I keep going back to is parking. There is a statement
that parking is actually going to be reduced in the Arroyo and I share Commissioner
Farhat's concern over the economic impact of that, which we will not address now. But I
can't correlate the reduction in parking by 18,000 spaces; it doesn't say where that going
to happen, how that's going to happen, and how the additional parking spaces is going to
be compensated for. That doesn't come through, maybe it's in the report but I just don't
see it. To me it's a critical element of game day operations because the whole of the
impact during game day is centered: around where is the parking? If parking is in the
Arroyo the problem is getting vehicles into the Arroyo and getting them out again. If the
parking is not in the Arroyo the problem is: where is it in Pasadena? Because we don't
have any, we're already saturated. Anyone trying to park in Pasadena during a weekend
knows that we have a significant parking deficiency. So if it's not in the Arroyo and it is
somewhere in Pasadena, where is it going to be? And I hope it's not going to be on the
residential streets cause that is an obviously unacceptable alternative. So if we look at the
2 aspects of this facility, and one of them being the event aspect which the draft EIR
purports to address, we've heard all the comments about deficiencies to the area of
77 coverage, there's a gross assumption here that's made. There's a statement here that
current management of access and egress is effective on game days, I'd like to see some
justification for that. What does that mean? It's certainly just a visual observation and
it's certainly not adequate. To make the statement that the current management measures
are affective, therefore the mitigations measures more the same. You have to prove (end
of tape- sentence cut off) But a major affect of operations at Santa Anita was the
staggering cost of police overtime for sporting events. We've already got 30 police we're
deploying it looks as if we're going to double that at least. And we're going to increase
the number of events that they are going to have to be present for. I'm all for job creation
in the community but where does that cost fall? I think it is a traffic/transportation
78 impact because if that does not work, if scaling up police presence which is a gross
assumption that there is not a scalability issue here, that scaling up traffic operations by
simply adding more manual effort is going to cope with increase demand then we have a
significant Achilles heal with this whole approach. So I think it's justifiable to look at
the economic impact of staffing what is essentially are manually driven mitigation
measures for game days. I'm disappointed that with the history that the City has of using
advanced technologies for traffic mitigation measures I see very little of it in the DEIR.
79 There's talk of having staff out there and having changeable message signs that will
indicate how to get access, these will be dynamic message signs that will indicate where
the parking will be I see no indication of how your going to know that and how you are
going to be sure that you have a system that is consistently giving the right information to
motorists trying to access this venue. And to give the right information you have to have
the right information on available parking spaces to be able to convey that to the

79 cont'd ↑ motorists. And I see no way you can do that with this manually driven effort that is here. There are a couple of detail points here, you continually refer temporary message signs on the freeway – that’s misleading. You’re talking of temporary use of Cal-trans permanent message signs. There’s no mention of getting any kind of commitment from Cal-trans to support operations. Historically it is Cal-trans policy not to support private sporting events. And there was no discussion with Cal-trans, it was not listed as one of the agencies in the Appendix that was contacted and I think that is a deficiency and they are a critical part of this whole management effort. It is accepted that access from the freeway is critical and yet the department that has full control of those message signs that are critical part of access have not been contacted. That needs to be looked at. I don’t think anybody would say that current arrangements on game day for access are adequate. 80 To me parking cars on a public golf course is not adequate. Shuttle service from a significant distance in a hilly area is not adequate, especially when you hear the impact that it already has on residential areas. The transit services are not adequate. There is a table which lists what it calls relevant transit services, I found 2 out of 30 services that you could actually consider would be usable to get access here. The Goldline is not a transit service that is applicable to the Rose Bowl. It’s like saying that the Greenline is a transit facility to get to LAX; it’s ridiculous. If the Goldline could come down the Arroyo and maybe the NFL could pay 600 million, then 200 million would go to providing actual transit access to the facility then maybe this would solve a lot of the problems. I can only echo what Commissioner McKnight said, let’s have a look at the full transportation system instead of focusing on 26 intersections, that’s not the issue. 81 The issue is getting people and getting people out and reducing the environmental impact. That’s the event aspect, the other aspect which has been completely ignored is the day-to-day operations of an almost million square feet facility here. That’s approaching the Santa Anita Fashion Mall before it was extended. So we have a large facility here that’s a retail facility, that’s the best way of describing it, and yet is in an Arroyo recreational area. There’s no consideration at all of the impact and the conflict between the 2 of them and there is no indication of what the road layout is going to be. The only one I could find is this (holding up illustration) where the new road layout is in gray. It actually shows a reduction in roadway capacity within the area around the stadium. If we’re going to really mitigate against extra activity because we have this retail facility together with – (inaudible) this is a full scale museum (**figure 2-2**). We have to look at the roadway design to understand how you propose to mitigate against a conflict of the expected attendance of this retail facility with recreational use. I came here tonight to drive in to the Arroyo, everything ground to a halt because this heard of bicyclists came thundering through this area that’s going to be redesigned with less capacity and more conflicts. You’ve got to do something about that, that has to be addressed. I’m not criticizing the bikes; we have to accommodate the bikes. That the established use, and it’s a great use for this facility, let’s accommodate it. I’m convinced we can have both the extended use of the stadium, that we can mitigate against traffic impacts, and we can accommodate both the events, this retail facility and maintain a recreational nature. But we’re not going to be able to do it with the mitigation measures that proposed in the report at the moment. 82 83 84 85

86 ? – I just want to follow up on what Allen said, he had good direction and I'm going to follow that a little bit. Usually when we have projects they are theoretical projects, we don't know what the traffic impacts are, we study all these intersections to try to put it in a model and come up with what the impacts are. We know what they are here. He's right about the 26 intersections. It's probably 40 or 80, or whatever, but we know that they are there. We've spend a lot focus and energy on what we already know instead of what we could do that's different. I was very disappointed in the alternative section; it's very small. There is one alternative that mentions no parking, it's a paragraph and just says well this is dismissed. I would have like to have seen more alternatives of actually reduced parking, there is a stadium in San Francisco that has less than 5,000 parking spaces and somehow it sells out, this is where the Giants play. On New Year's Day we had the rain and only very limited parking, no parking in the Golf Course, and somehow 90,000 people showed up at the stadium. And I disagree with Allen- the Goldline can be used. We heard that a lot of people walked a mile and a half that day because they got tired of waiting for the shuttles. There can be alternatives that look at pedestrian linkages, ways for bicyclists to get there from the Goldline. There could have been a lot of alternatives explored that weren't, for me that's the biggest area that fell short. That's it.

87 ? – I have a couple of comments. There was a big deficient area that was left out, that's Lake and the 210, especially on Sundays. That street is backed up from the freeway north to Orange Grove and south to Green Street because of Lake Avenue Church. The whole on and off ramp situation that is mingling with the 210/134 interchange, the Fair Oaks off ramp, you can't even get onto the freeway westbound on a Sunday. It is a horrible intersection, it's horrible on a daily basis, try at noon getting on the freeway, you can't do it. It is very difficult, people get stuck in the intersections and we get gridlocked intersections because the on ramp is backed up all the way to Lake. That intersection is a big one that was left out. In section 3.12.3 there are a couple of policies from the Mobility Element. It says "when new programs, projects, and developments are selected preference should be given to those which increase the use of public transportation in order to decrease reliance on automobile through providing park and ride lots" we are using existing park and ride lots, I don't see anywhere where we are increasing the effort to park and ride here. We're relying on the Parson's lot and that's it. I don't see any efforts in here to go beyond what we're already doing for this increased traffic congestion and to mitigate. The people who live around here aren't going to like this, but to mitigate a lot of the cars that are coming in here did the people doing the study think about doing like something like what the Hollywood Bowl does? It only has 18,000 seats but has a tremendously successful shuttle system from the whole region. You get busses from Santa Monica, Torrance, West Covina, Pasadena, everywhere. The Hollywood Bowl has a lot less land to work with and a lot less seats but they seam to make it work. We haven't though regionally on this and the big missing one 110 and south of California are missing pieces. Section 3.12.7, the last sentence significant impacts, impact 3.12-1 talks about construction activities obstructing traffic. During the 2 years that construction 89 activities are going to occur here they only address emergency access they didn't specify anything about people getting here for recreational uses – golf course, kid space, aquatic center, Brookside, and everything else that's down here during construction. Also on 90

90 cont'd impact 3.12-6, construction staging and management plan, I didn't see anything in the report regarding enforcement and protection of neighborhoods. All these projects that we have going on in the City have these plans but they're not enforced. I don't know what the answer to that is but I think this thing needs to look at that otherwise the neighborhoods around here are going to get trampled by the construction industry that is going to be working on this site because they take advantage of the residential neighborhoods whenever they can get the shortest distance from point A to point B. I 91 also agree that Plan C is very sketchy. I really think that another missing piece is pedestrian bicycle access to the Bowl. I'm not talking about the thundering herd everyone is talking about because it's not the bikes or the bicyclists, its just with cars, you 92 have courteous drivers and rude drivers, there's a lot of courteous bikers out there and rude bikers out there. I really think the pedestrian and bike access needs to be looked at and not just the guys riding around the Bowl but the guys coming to an event or the community coming to the Bowl to use this area. Where is the bike plan for that?

93 ? – I just want to say how strongly at the top of all this ought to be consideration for a study of what the resulting impact would be if the current systems that we have available are fully utilized and then make all calculations on an incremental basis based on that.

94 The Chair requested that the Scoping Subcommittee summarize the Commission's comments into a single document for submittal to the Consultant.

■ Transportation Advisory Commission (March 10, 2005)

Response to Comment TAC-1

This comment contains introductory, opinion, anecdotal, closing, or general information, and is not a direct comment on environmental issues or the content or adequacy of the Draft EIR.

Response to Comment TAC-2

The comment is noted and will be forwarded to the decision-makers for their required review and consideration prior to any approval action on the project.

Response to Comment TAC-3

Please refer to Topical Response A for a discussion regarding the adequacy of the EIR. In addition, please see Topical Responses J and D for a discussion regarding the Arroyo Seco Public Lands Ordinance and the tree inventory, respectively. As the commenter does not disclose specific concerns regarding tree protection, no further comment can be made.

Response to Comment TAC-4

The transportation impacts of the proposed project have been analyzed for the weekday and weekend periods, respectively, and are summarized in Section 3.12, Volume I of the Draft EIR and in Appendix G, Volume II of the Draft EIR. Specifically, Tables 8, 9A, 9B, 11, 12, 13 of Appendix G, Volume II of the Draft EIR, and Table F-1, Appendix F of Appendix G.1, Volume III of the Draft EIR, summarize the traffic impacts for the traffic analysis locations, including 38 intersections, 13 street segments and two freeway segments. The comment is noted and will be forwarded to the decision-makers for their required review and consideration prior to any approval action on the project.

Response to Comment TAC-5

Refer to Topical Response No. C: Traffic Analysis Study Area, for a discussion of the formulation of the traffic analysis study area. As shown on Figure 1, Appendix G, Volume II of the Draft EIR, the above referenced roadways have been analyzed for potential project impacts due to the proposed project. Specifically, the anticipated weekday and weekend traffic impacts due to the proposed project for the above locations are summarized in Table 11, pages 125 and 126, Appendix G, Volume II of the Draft EIR. Linda Vista Avenue has been analyzed at three locations (i.e., referenced as Location Nos. 1, 2, and 3). Salvia Canyon Road (i.e., Location No. 4), Seco Street (Location No. 8), Washington Boulevard (Location No. 6), N. Arroyo and Arroyo Boulevards (Location Nos. 7 and 12) have all been analyzed for project impacts.

Section 6.0 and 7.0, Appendix G, Volume II of the Draft EIR, summarizes the existing special event shuttle bus routes and current special event traffic management strategies. The shuttle bus activities to and from the Parsons

complex have been analyzed in the Draft EIR traffic analysis. Figure 4, page 26, Appendix G, Volume II of the Draft EIR illustrates the existing shuttle routes associated with large special events at the Rose Bowl. As stated on page 25, Appendix G, Volume II of the Draft EIR, shuttle buses currently typically accommodate a range of 3,000 to 7,000 persons during special events, which results in an overall lessening of surface street congestion in the vicinity of the Rose Bowl project area by about 1,100 to 2,600 vehicles on event days. Eighty shuttle buses were used for the 86,800 attendance at 2003 Bowl Championship Series (BCS) football game, which transported 8,900 people into the Arroyo Seco and 14,500 out (5,600 persons walked down the hill to the Rose Bowl game following the Rose Parade and rode the shuttle back). The existing shuttle route is an 8.2-mile round trip and takes less than 30 minutes (arrival and departure routes). This round trip time includes boarding, alighting as well as dwell time.

The specific evaluation of the existing shuttle operation and a review of potential route alternatives was conducted by Crain & Associates in response to concerns raised by community members regarding the use of certain residential streets for shuttles. This document is incorporated by reference and is available at the RBOC main offices for review upon request. As shown in Figure 4, page 26, Appendix G, Volume II of the Draft EIR, the shuttle bus route does include access via some residential streets, including Westgate Avenue and Arroyo Boulevard. As summarized in the above referenced report, many alternative routes were reviewed by the RBOC as well as the PPD in accordance to the set of developed goals and objectives. Some of the alternative routes reviewed included utilization of the following roadways: (1) Seco Street, east of Rosemont Avenue, (2) Rosemont Avenue, south of Seco Street, (3) North Arroyo Boulevard, (4) Zanja Street, (5) Washington Boulevard, (6) Arroyo Boulevard, (7) Rosemont Avenue via the Windsor Avenue/Arroyo Boulevard freeway ramps, and 8) West Washington Drive/West Drive.

After careful review of the shuttle route alternatives, it was previously determined by the City (with input from RBOC and PPD staff) that none of the shuttle route alternatives was superior to the existing route in that additional significant impacts to the surrounding street system were expected and many of the roadways were not suitable for shuttle buses due to either width, design, or grade issues. As a result, a change to the shuttle route was not included as part of the Rose Bowl Stadium Renovation project description, and thus the analysis of project impacts reflects continued utilization of the existing shuttle route. The comment is noted and will be forwarded to the decision-makers for their required review and consideration prior to any approval action on the project.

Response to Comment TAC-6

It is not City policy to compensate residents for perceived quality of life impacts.

Response to Comment TAC-7

It is not City policy to upgrade residents' homes with double-paned windows or insulation, as the commenter suggests. In any event, double-paned windows would not likely reduce project noise impacts to a less-than-significant level.

Response to Comment TAC-8

The City will not purchase any homes on Westgate Street at this time.

Response to Comment TAC-9

Refer to Response to Comment TAC-53 for a discussion of transit service in the vicinity of the proposed project and the various modes assumed in the analysis of potential project impacts. The extension of the MTA Gold Line into the Arroyo Seco Area was determined not to be feasible given the time frame of proposed project (buildout by the end of Year 2008). In addition, as stated on page 110, Appendix G, Volume II of the Draft EIR, large-scale special events at the Rose Bowl stadium are not anticipated to occur on a daily or weekly basis. Consequently, permanent physical improvement measures such as roadway widening, with its attendant financial and social costs due the taking of private property, are not recommended for traffic conditions which are considered to be atypical. Furthermore, the introduction of the MTA Gold Line into the Arroyo Seco, as referenced by the commenter, would have significant environmental impacts and financial costs, which would not be justified given the anticipated ridership for days other than the 25 major event days. It is also anticipated that the community would have significant objections to the extension of the Gold Line into the Arroyo Seco, as it would be the introduction of a permanent physical infrastructure. Refer to Topical Response C for a discussion of the formulation of the traffic analysis study area. Refer also to Response to Comment TAC-58 for a discussion of the recommended traffic mitigation measures.

Response to Comment TAC-10

Please refer to Response to Comment TAC-5, above, for further discussion of the special event shuttle route and Response to Comment TAC-53 for discussion of the modes of transportation assumed to be utilized in the Draft EIR traffic analysis, contained in Appendix G, Volume II of the Draft EIR (Volume III of the FEIR).

Response to Comment TAC-11

Please refer to Topical Response C for a discussion of the traffic analysis study area. Further, although page 13, Appendix G, Volume II of the Draft EIR states that regional access to and from the Rose Bowl project area is provided by the I-210 Foothill Freeway and the Route 134 Ventura Freeway via several interchanges, it was not intended to imply that other freeways, including the Route 110 Pasadena Freeway, are not utilized by patrons of special events at the Rose Bowl. As part of the Final EIR, a review was undertaken of potential project impacts along the Route 110 Freeway, just south of Orange Grove Boulevard (i.e., near post mile 30.59). Refer to Table A in the Final EIR for a summary of the supplemental analysis. Based on a review of the existing and future demand/capacity ratios along this mainline freeway segment, it was concluded that the Route 110 Freeway would not be significantly impacted.

Response to Comment TAC-12

The City of Pasadena has recently prepared an update to the City's General Plan (i.e., City of Pasadena General Plan, 2004 Mobility Element, adopted November 8, 2004), which includes an analysis of traffic conditions to the Year 2015. The City, as part of that update, incorporated the Southern California Association of Governments (SCAG) future socioeconomic forecasts/data (i.e., population, housing, and employment forecasts). The City's regional travel demand model and traffic volume forecasts account for growth throughout the City on major corridors. Consistent with current City practice, the Department of Public Works will be the responsible agency

for the maintenance and repair of public rights of way (i.e., streets located within the City). To the extent that additional traffic volumes will occur on various roadways the department will be establishing an ongoing budget and schedule for necessary roadway improvement/maintenance projects. However, all the roadways within the Rose Bowl area are "Park Roads" and are not a part of the City's maintained street system. The project would be conditioned by the City to repair any potential damages caused by construction activities, as well as upgrade the pavement conditions on selected park roads as determined by the City to meet the additional traffic demand generated by the project. In addition, it is important to note that approximately 38,000 passenger vehicle trips on an additional 13 days per year are not anticipated to materially affect or shorten the projected life of a typical street. Streets are designed to accommodate this level of traffic on a regular basis.

Response to Comment TAC-13

Section 17, beginning on page 128 of Appendix G, Volume II of the Draft EIR, contains detailed discussion of off-site parking associated with large special events at the Rose Bowl stadium. As described in Section 10.0, Project Trip Generation, beginning on page 50 of Appendix G, Volume II of the Draft EIR, the trip generation forecast accounts for off-site parking at the Parsons complex located at 100 West Walnut Street in Pasadena. A total of 3,125 parking spaces are located at the facility. Tables 4, 5A and 5B, Appendix G, Volume II of the Draft EIR, summarize the project trip generation forecast for the weekday and weekend special event conditions. The forecasts account for parking at the Parsons complex, shuttle ridership from the Parsons complex and MTA Gold Line station at Memorial Park, charter buses, and club, luxury suite, season ticket and general admission ticket holders.

In order to address potential secondary impacts due to the expected utilization of off-site parking at the Parsons complex during the weekday PM arrival peak period, a supplemental traffic analysis was prepared. The following nine intersections in the vicinity of the Parsons complex were selected in consultation with City staff for analysis of potential impacts related to the proposed project (assumes a sold-out attendance of 75,000 persons):

1. St. John Avenue and Colorado Boulevard
2. Pasadena Avenue and Union Street
3. Pasadena Avenue and Colorado Boulevard
4. Pasadena Avenue and Green Street
5. Fair Oaks Avenue and Walnut Street
6. Fair Oaks Avenue and Union Street
7. Fair Oaks Avenue and Colorado Boulevard
8. Fair Oaks Avenue and Green Street
9. Arroyo Parkway and Colorado Boulevard

The Parsons Complex parking facilities have been used for Rose Bowl Stadium satellite parking for over ten years, and is expected to continue in that function into the future. If for any reason this arrangement should change, an assessment of the environmental impacts of the changing circumstances will be made and the appropriate action taken at that time. Parking supply in the Arroyo Seco and at the Parsons Complex would provide adequate parking to accommodate event patrons. Therefore, patrons would not need to utilize alternative parking facilities in Old

Pasadena. Patrons who wish to patronize Old Pasadena restaurants before or after an event may park in Old Pasadena and walk, drive, or take a shuttle bus to the Arroyo.

Response to Comment TAC-14

Section 2.1, Appendix G, Volume II of the Draft EIR, provides an overview of parking associated with the project. As described on page 9, Appendix G, Volume II of the Draft EIR, in the event of rain, a consultation will take place between the PPD, stadium manager, American Golf Corporation and event management staff and a determination will be made regarding the availability of turf parking and implementation of an alternative parking strategy (referred to as Plan "C"). Based on discussions with RBOC staff, it is noted that implementation of the alternative parking strategy, due to inclement weather and/or saturated soil conditions, has not occurred for any large scale event over the past ten years, prior to the Year 2005 Tournament of Roses Rose Bowl game. It is expected to continue to be an unusual condition.

Plan "C" typically utilizes the parking of all available paved lots and various streets surrounding the Rose Bowl to park vehicles in a systematic manner so as to maximize the number of vehicles that can be parked as quickly, efficiently and as close to the stadium as possible. The following streets have been identified as roadways that will be utilized for stacked parking:

- Rose Bowl Drive from Rosemont Avenue to Arroyo Boulevard
- Rosemont Avenue from Washington Boulevard to Arroyo Boulevard
- Rosemont Avenue from Washington Boulevard to the Brookside Clubhouse
- Salvia Canyon from West Drive to Linda Vista Avenue
- Seco Street from Rosemont Avenue to Lincoln Avenue
- Washington Boulevard from West Drive to Rosemont Avenue
- Washington Boulevard from Rosemont Avenue to Arroyo Boulevard
- West Drive from Washington Boulevard to Lot 5

It should be noted that a traffic lane will be kept clear on all of the above listed streets for use by emergency vehicles and vehicles with parking lot or handicap passes and residents to bypass the barricades to continue to their respective destinations. Depending on the width of these roadways, vehicles may be stacked up to eight abreast. In addition, one parking lane will be utilized in the following areas as needed:

- Lining Area "H" along Rosemont Avenue and Seco Street
- Arroyo Boulevard southbound from Seco Street to the end of Lot "I"

Neighborhood streets will also be used for the parking of vehicles as determined by the Traffic Lieutenant. Personnel working at the outer perimeter traffic posts will encourage legal parking within the residential neighborhoods above the Rose Bowl on the east and west sides.

The decision to utilize a Plan "C" parking plan is generally made 24 to 48 hours prior to a scheduled event. RBOC staff will make notification to the surrounding neighborhood associations and the event promoter. Page 10,

Appendix G, Volume II of the Draft EIR, states that additional significant impacts to the surrounding street system are anticipated to occur should turf parking not be made available in the event of rain. However, this occurrence is not considered to be a typical condition for analysis purposes. In addition, as required by the California Vehicle Code (Section 21806, Authorized Emergency Vehicles), motorists must yield the right-of-way to emergency vehicles. Specifically, motorists are required to pull to the right side of the highway and stop to allow an emergency vehicle to pass. If required, drivers of emergency vehicles are trained to utilize center turn lanes, or travel in the opposing through lanes to pass through crowded intersections. Thus, the respect entitled to emergency vehicles and driver training allow emergency vehicles to negotiate typical street conditions in urban areas and areas near special event venues. In the vicinity of the Rose Bowl Stadium, the only roadway segment that does not have one lane reserved for opposing traffic flows is Rosemont Avenue, between Seco Street and Orange Grove Boulevard. An alternate route via Seco Street, Arroyo Terrace, and Prospect Boulevard would be utilized for alternate emergency access. In the event that emergency access must be obtained for any homes that directly front Rosemont Avenue, traffic control officers will immediately close both ends of Rosemont Avenue (i.e., at Orange Grove Boulevard and Seco Street) to preclude additional vehicular traffic and that through immediate communications, each of the manned local streets (e.g., the local street of Prospect Terrace, Prospect Square, Fremont Drive, Bellmore Way, Scott Place, etc., all of which are barricaded) will be opened so these roadways can be utilized to clear Rosemont Avenue in order to ensure that emergency access can be obtained. Because emergency access will be maintained and Plan "C" conditions are expected to occur only sporadically, this impact is not considered significant.

Response to Comment TAC-15

Section 8.0, page 34, Appendix G, Volume II of the Draft EIR contains a discussion of the equestrian trail and recreational (Rose Bowl loop) users. As commonly referred to, the "Rose Bowl loop" consists of an approximately five kilometer loop and is currently utilized for recreational use for walking, running and cycling. The loop consists of Seco Street (between Rosemont Avenue and West Drive), West Drive (between Seco Street and Washington Boulevard), Washington Boulevard (between West Drive and Rosemont Avenue), and Rosemont Avenue (between Washington Boulevard and Seco Street). Research has been conducted with respect to the existing and future planned bicycle route system. Bicycle routes and facilities in the vicinity of the proposed project area are provided. The City of Pasadena's Bicycle Master Plan (adopted in November, 2000 and amended in January, 2004) designates the striped area around the Rose Bowl as a Class III bicycle facility. In addition, some portions of Arroyo Boulevard and Grand Avenue have been designated as Class II and Class III bicycle facilities. Linda Vista Avenue is designated as an Enhanced Bicycle Route in the vicinity of the Project.

During large-scale special events at the Rose Bowl, page 34, Appendix G, Volume II of the Draft EIR notes that the potential for conflicts between trail/loop users and special event vehicular traffic/pedestrians is higher than on non-event days. As summarized on page 34, the Draft EIR recommended that posting of special event notices be provided at least 72 hours in advance of an event to inform users of event dates and times, and mitigation provides that special event notices will be posted 30 days prior to an event, except in the case of playoff games, where shorter notice will likely be necessary. The Draft EIR also recommended that a hotline be established so that any concerns may be reported. Although some parking will be allocated within the Central Arroyo Seco on event days

for recreational users as part of the proposed project (approximately 250 parking spaces), parking and increased pedestrian traffic will make the usage of the trails more inconvenient than on non-event days. Other activities, such as soccer on turf parking Lot H, will not be able to be held on event days. The Draft EIR concluded that significant and unavoidable impacts are anticipated to occur to recreational users during special event time periods. Additional analysis associated with the displacement of recreational users was determined to be purely speculative and indeterminate, as these recreational users would have an almost infinite number of alternative locations and times to walk, bicycle and/or run. Further, the origin of these users is not known.

As part of the Central Arroyo Master Plan effort, a review was conducted of prior loop user data collection efforts undertaken for the City of Pasadena. Prior counts conducted in the month of June indicated that approximately 85 percent of loop users travel in a clockwise direction. Based on the weekday PM peak hour counts (i.e., between 5:30–6:30 P.M.), approximately 700 bicyclists, 100 walkers, 75 runners/joggers, and 10 skaters (i.e., rollerbladers) were observed. These volumes are anticipated to increase with the continuing popularity of the Rose Bowl as a recreational area.

Response to Comment TAC-16

Section 18.0, beginning on page 130, Appendix G, Volume II of the Draft EIR, includes a discussion of project construction activities. Renovation of the Rose Bowl 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. Both the number of construction workers and trucks would vary throughout the construction process in order to maintain a reasonable schedule of completion.

As stated on page 130, Appendix G, Volume II of the Draft EIR, the renovation construction activities are estimated to occur over eight quarters (i.e., each quarter defined as a three-month period) beginning in the fourth quarter of 2006 and concluding in the third quarter of 2008. Construction activities will vary with each quarter including, but not limited to, the following activities: 1) demolition and excavation, 2) foundation work, 3) structural work, 4) exterior enclosure work, 5) seating bowl renovation work, 6) tunnel excavation, construction and renovation work, 7) mechanical, electrical and plumbing work, 8) interior finishes work, and 9) landscaping work. Based on information provided by the project applicant, it is assumed that construction would occur during hours that are consistent with the City's existing noise ordinance (i.e., 7:00 A.M. - 9:00 P.M.). In addition, based on consultation with the City of Pasadena Department of Transportation, the construction haul route will include use of Seco Street, Mountain Street, and the I-210 (Foothill) Freeway. No other roadways are anticipated to be utilized by construction vehicles at this time.

Several construction activities will include large work forces (as discussed below), however, the general contractor is estimated to require a crew of approximately five personnel. During peak excavation activities, a total of approximately 3,000 cubic yards of material per day may need to be removed. Based on utilization of semi-dump trailers with a capacity of 20 cubic yards, approximately 54 trucks would be necessary (assumes roughly three round trips for each semi-dump truck). This activity would require up to approximately five months, however, this duration may be split into two distinct phases dependent upon the contractor's overall project construction

schedule. During non-excavation phases, an average of between 25 and 35 trucks per day, six days a week, can be anticipated.

During periods of major concrete pours, a maximum of between 800 and 1,000 daily workers may be required. During this peak activity, two shifts of construction workers would be necessary (i.e., the first shift would work from between 7:00 A.M. and 3:00 P.M. and the second shift would work from approximately 1:00 P.M. to 9:00 P.M.). In general, it is anticipated that construction workers would arrive and depart the site during off-peak hours and that construction-related traffic would be largely freeway oriented. Construction workers would arrive and depart via nearby on- and off-ramps serving the I-210 Freeway to/from Mountain Street. The construction work force would likely be from all parts of the Los Angeles region and are, thereby, assumed to arrive from all directions. As stated above, the majority of construction workers are expected to arrive and depart the project site during off-peak hours (i.e., arrive prior to 7:00 A.M. and depart between 3:00 and 4:00 P.M.), thereby avoiding generating trips during the 7:00 to 9:00 A.M. and 4:00 to 6:00 P.M. peak periods. Consequently, their impact on peak hour traffic operations in the vicinity of the site would be small. With regard to other construction traffic-related issues, construction equipment would be stored within the perimeter fence of the construction site/sites. Construction worker parking would be provided in paved parking areas surrounding the Rose Bowl Stadium.

Depending upon the specific nature of the construction activity (e.g., demolition, excavation, or concrete pouring), it is assumed that the majority of truck traffic would be distributed evenly across the work day. As stated on page 131, Appendix G, Volume II of the Draft EIR, some short-term significant impacts can be anticipated associated with truck trips during the excavation phase and during the periods of major concrete pours. The City of Pasadena will require the preparation of a Construction Traffic Management Plan for the required review and approval by the City of Pasadena Departments of Transportation and Public Works. Construction Staging and Traffic Management Plans provide an overview of the project, list the general contractor contact information, outline 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. The project will be required to provide a comprehensive Construction Traffic Management Plan associated with the project prior to issuance of a building permit (see new MM 3.12-3). As outlined on page 132, Appendix G, Volume II of the Draft EIR, the Construction Traffic Management Plan would contain measures/features including, but not limited to the following:

1. Maintain existing access for land uses in proximity of the project site;
2. Limit any potential lane closures to off-peak travel periods;
3. Schedule receipt of construction materials to non-peak travel periods, to the extent possible;
4. Coordinate deliveries to reduce the potential of trucks waiting to unload for protracted periods of time; and
5. Prohibit parking by construction workers on adjacent streets and direct construction workers to utilize available parking within the vicinity of the Rose Bowl.

With the required approvals, as well as the construction management practices described above, impacts due to construction activity can be minimized to the extent feasible.

Response to Comment TAC-17

No change is proposed to field space, trails, or traffic patterns on non-event days. Please refer to Response to Comment TAC-15, above, for further discussion of impacts during construction. Further, the transportation impacts of the proposed project have been analyzed for the weekday and weekend periods, respectively, and are summarized in Section 3.12, Volume I of the Draft EIR and in Appendix G, Volume II of the Draft EIR. Specifically, Tables 8, 9A, 9B, 11, 12, 13 of Appendix G, Volume II of the Draft EIR, and Table F-1, Appendix F of Appendix G.1, Volume III of the Draft EIR, summarize the traffic impacts for the traffic analysis locations, including 38 intersections, 13 street segments and two freeway segments. In addition, these tables also summarize the existing conditions/operations for typical non-event conditions. The comment is noted and will be forwarded to the decision-makers for their review and consideration prior to any approval action on the project.

Response to Comment TAC-18

Refer to Topical Response C: Traffic Analysis Study Area, for a discussion of the formulation of the traffic analysis study area. Please also refer to Response to Comment TAC-11 above, for a discussion of the additional mainline freeway segment analysis performed for the Route 110 Pasadena Freeway.

Response to Comment TAC-19

The parameters of the traffic impact study were determined in conjunction with the City of Pasadena Department of Transportation. Analysis of special event conditions and operations in the vicinity of the Los Angeles Memorial Coliseum was not deemed applicable or necessary as part of the Rose Bowl Stadium project. However, as summarized in Section 7.0, beginning on page 28, Appendix G, Volume II of the Draft EIR, detailed observations of special event traffic and traffic management strategies were required as part of the preparation of the traffic analysis.

Response to Comment TAC-20

Refer to Topical Response C: Traffic Analysis Study Area, for a discussion of the formulation of the traffic analysis study area. Refer to Response to Comment TAC-11 above, for a discussion of the additional mainline freeway segment analysis performed for the Route 110 Pasadena Freeway. Also refer to Comment TAC-4 and TAC-29 for a general overview of the Draft EIR traffic analyses.

Response to Comment TAC-21

As stated on page 4, Appendix G, Volume II of the Draft EIR, as part of the stadium renovation, the maximum seating capacity would be reduced to 65,000 patrons via permanent seating for all events and to a capacity of 75,000 patrons (with temporary seating) for the UCLA versus USC football game, the Super Bowl and the collegiate Rose Bowl game, which would continue to be held at the Rose Bowl. In addition, it is anticipated that approximately two events per year (e.g., NFL) would be held on a weeknight. For purposes of analyzing potential impacts due to the project, a conservative, worst-case scenario of 75,000 patrons was used for weeknight events (i.e., not a smaller event as implied by the commenter's statement).