

**Response to Comment TAC-22**

For purposes of the traffic impact study, the single highest hour of overall arrival and departure traffic volumes were determined for the weekday and weekend analysis conditions. Thus, although other hours (e.g., two hours prior to the commencement of a special event) are expected to experience an increase in traffic volume due to the proposed project, potential impacts are expected to be less than those identified for the peak arrival hour and the peak departure hour. Additionally, no significant event traffic is expected during hours that students will be finishing the school day.

**Response to Comment TAC-23**

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. The comment will be forwarded to the City Council for their consideration prior to approval or denial of the proposed project.

**Response to Comment TAC-24**

The traffic impact study, summarized in Section 3.12, Volume I of the Draft EIR and contained in Appendix G, Volume II of the Draft EIR, was prepared in consultation with the City of Pasadena Police Department. Beyond periodic/on-going consultation with the department, two specific meetings were held with Mr. Eric Mills, Lieutenant, Traffic, in December 2004 to obtain further input from the department. Section 11.0, Project Trip Distribution, beginning on page 58, Appendix G, Volume II of the Draft EIR, contains a detailed discussion of the traffic distribution associated with the project. Specifically, Figures 11A, 11B, and 11C, contained on pages 59, 60, and 61, Appendix G, Volume II of the Draft EIR, illustrate the project trip distribution percentages for vehicles, shuttles and buses, respectively. Overall, approximately 16 percent of patron vehicular trips originate from points northerly.

**Response to Comment TAC-25**

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**Response to Comment TAC-26**

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-27**

Table 2-1, page 2-35, Volume I of the Draft EIR, summarizes the project facility component areas. At the south end of the field/service level of the stadium and within the existing structure, a total of 57,000 square feet is planned for the proposed Hall of Fame, Team Store, and Media, which would replace the existing press and locker

rooms. No further data with respect to the breakdown of these components (in terms of square footage) is available at this time. While the specific breakdown is not provided in the Draft EIR, the retail component is expected to be significantly less than the 57,000 square foot total allocated for the Hall of Fame, Team Store, and Media uses.

The retail component of the project was determined to be ancillary to the special event patronage (i.e., motorists are not anticipated to traverse congested roadways leading into and out of the Rose Bowl vicinity during a Rose Bowl event in order to patronize the team store or Hall of Fame components of the project). Thus, any patronage of these components during the weekday and weekend special event arrival and departure periods was determined to be ancillary to the special event traffic generation. Patrons already destined to the Rose Bowl for events are anticipated to patronize these components (i.e., internal capture trip generation).

As part of the Final EIR, however, a review was undertaken as to the potential trip generation and general traffic impact associated with the proposed team store and Hall of Fame components of the project. It is important to note that the Institute of Transportation Engineers' (ITE) Trip Generation manual does not provide trip generation rates associated with a Hall of Fame (i.e., museum) or a specific team store. However, in order to provide a conservative review of potential trip generation during a non-event condition, the ITE Land Use Code 814 (Specialty Retail) weekday A.M. and P.M. peak hour average trip generation rates were applied to the entire 57,000 square foot component. This is an overly conservative assumption in that this forecast does not account for the reduction in square footage for media uses nor does it recognize that the Hall of Fame component is anticipated to generate vehicular trips at a lower rate than would the team store/retail component of the project. Trip generation during the weekday A.M. peak hour is anticipated to be nominal, as this component will not be open for business prior to 10:00 A.M. and no significant impacts are expected. During the weekday PM peak hour, a conservative forecast of 68 inbound and 86 outbound vehicular trips is calculated. It is important to note that the existing non-event weekday P.M. peak-hour Levels of Service (LOS) in the vicinity of the Rose Bowl are LOS A. Thus, the distribution of these trips to the various Rose Bowl stadium access gateways (e.g., to/from Seco Street, West Drive, Rosemont Avenue, Salvia Canyon Road, etc.) is not anticipated to exceed the City's established significance thresholds.

#### **Response to Comment TAC-28**

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#### **Response to Comment TAC-29**

Refer to Topical Response C 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 Linda Vista Avenue corridor has been analyzed in the Draft EIR traffic analysis. Although many intersections exist along Linda Vista Avenue, the traffic impact study area included representative intersections and street segments for analysis. The following intersection locations along Linda Vista Avenue were analyzed in the Draft EIR:

- Intersection No. 1: San Rafael Avenue and the Route 134 Westbound On/Off Ramps/Linda Vista Avenue

- Intersection No. 20: Linda Vista Avenue and Highland Drive
- Intersection No. 21: Linda Vista Avenue and Oak Grove Drive

The anticipated weekday and weekend traffic impacts due to the proposed project for the above locations are summarized in Tables 8, 9A and 9B, Appendix G, Volume II of the Draft EIR.

In addition, in order to identify potential significant impacts to other locations along the Linda Vista Avenue corridor, both north of and south of the Rose Bowl Stadium access routes (i.e., access routes via Seco Street, Salvia Canyon Drive and Parkview Avenue [which is utilized only as an egress route]), three additional roadway segments were selected for analysis:

- Street Segment No.1: Linda Vista Avenue, south of Mount Vernon Place
- Street Segment No.2: Linda Vista Avenue, south of Charles Street
- Street Segment No.3: Linda Vista Avenue, south of Seco Street

Street segment location No. 1 is the location north of and nearest to the Lida Street intersection, as referenced by the commenter. Please refer to Section 16.1, beginning on page 124, Appendix G, Volume II of the Draft EIR for additional discussion pertaining to the street segment analysis. 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.

It is recognized that the City of Pasadena impact thresholds for street segments are met at the above Linda Vista Avenue analysis locations. These three analysis street segments are forecast to increase in ADT volume by five percent or more with the Rose Bowl Stadium Renovation project during the weekday and weekend conditions, respectively. It is important to note that both the weekday and weekend special event conditions associated with the Rose Bowl stadium are atypical. Also, most of the analysis street segments are key roadways leading into and out of the parking areas around the Rose Bowl stadium. On non-event weekdays and weekends, these roadways operate well within their desired range of daily vehicular trips and significantly below their theoretical capacities. Therefore, specific physical mitigation measures (e.g., roadway widenings, additional travel lanes, etc.) to provide additional capacity are not recommended. The comments with respect to the daytime traffic impacts associated with the Art Center College of Design will be forwarded to the decision-makers.

#### Response to Comment TAC-30

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. The comment will be forwarded to the City Council for their consideration prior to approval or denial of the proposed project.

#### Response to Comment TAC-31

Please refer to Topical Response I for a discussion regarding impacts on other parks throughout the City.

**Response to Comment TAC-32**

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.

However, Section 2.1, Appendix G, Volume II of the Draft EIR, provides a summary of the project parking. As stated on page 7, Appendix G, Volume II of the Draft EIR, the project includes a reduction in parking to 18,000 spaces, with 250 spaces being earmarked or reserved for other users of the Central Arroyo Area (e.g., the Rose Bowl Aquatics Center, Brookside Park, etc.). Should parking intrusion become evident on large-scale special event days, the City may consider requiring users to deposit the same parking fee as Rose Bowl event patrons and establish or implement a validation program, whereby users of the Rose Bowl Aquatic Center would be reimbursed for parking charges incurred.

Refer to Response to Comment TAC-15 for a discussion of impacts to equestrian trail and Recreational (Rose Bowl Loop) users. 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-33**

Refer to Response to Comment TAC-4 for a general overview of the Draft EIR traffic analysis. In this case, a great deal of practical experience with events in excess of 75,000 patrons has occurred. Therefore, the impacts of “cut-through” event traffic are known and analyzed in the Draft EIR.

**Response to Comment TAC-34**

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. Refer to Response to Comment TAC-14 for a discussion of the parking management plan in the event of rain.

**Response to Comment TAC-35**

The commenter states that there will be a lot of diesel fumes from trucks. A quantitative analysis of construction and operational emissions associated with the proposed project, including emissions from diesel vehicles, is provided in Section 3.2.6 of the Draft EIR.

**Response to Comment TAC-36**

Noise impacts are discussed in Section 3.9 of the EIR, and are identified as significant and unavoidable during events. The commenter is correct that there is no mitigation available to offset the noise impacts on adjacent

neighborhoods, and this was recognized in the EIR. Noise from construction activities would be mitigated by MM 3.9-1 (as noted on Page 3.9-19 of the EIR) to a less-than-significant level.

**Response to Comment TAC-37**

There will be no private helicopters allowed to land on Rose Bowl property. The helipad that is near the stadium is not for private use.

**Response to Comment TAC-38**

The comment concerning safety issues relative to the narrow access tunnels is acknowledged. 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. The comment will be forwarded to the City Council for their consideration prior to approval or denial of the proposed project.

**Response to Comment TAC-39**

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. The comment will be forwarded to the City Council for their consideration prior to approval or denial of the proposed project.

**Response to Comment TAC-40**

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.

Section 19.0, beginning on page 133, Appendix G, Volume II of the Draft EIR, contains an overview of the Congestion Management Program (CMP) transportation impact assessment. Specifically, CMP Station 120; Pasadena Avenue/St. John Avenue and California Boulevard, which are located at the Route 710 “stub” as referenced by the commenter, have been analyzed in the Draft EIR. Table 12, page 135, Appendix G, Volume II of the Draft EIR summarizes the impact analysis prepared for CMP Stations 120a and 120b, respectively. As shown in Table 12, no significant impacts due to the project at these locations are anticipated. Thus, further analysis of the Route 710 Freeway “stub” was not required.

In addition, Section 19.0, beginning on page 133, Appendix G, Volume II of the Draft EIR, contains an overview of the Congestion Management Program (CMP) transportation impact assessment. Specifically, CMP Station 119, at Arroyo Parkway and California Boulevard, has been analyzed in the Draft EIR. Table 12, page 135, Appendix G, Volume II of the Draft EIR summarizes the impact analysis prepared for CMP Station 119. As shown in Table 12, a significant and unavoidable impact is anticipated at this location.

**Response to Comment TAC-41**

For purposes of the traffic impact study, the single highest hour of overall arrival and departure traffic volumes were determined for the weekday and weekend analysis conditions. Thus, although other hours (e.g., two hours prior to the commencement of a special event) are expected to experience an increase in traffic volume due to the proposed project, potential impacts are expected to be less than those identified for the single greatest peak arrival hour and the peak departure hour. The commenter is incorrect in concluding therefore that the Draft EIR traffic analysis assumes that event traffic during other arrival and departure hours has no impact. No statements with respect to this regard are contained in Appendix G, Volume II of the Draft EIR.

**Response to Comment TAC-42**

Section 7.0, Special Event Traffic Management, beginning on page 28 and continuing through to page 33, Appendix G, Volume II of the Draft EIR, provides a summary of the field observations conducted by LLG Engineers staff. It is important to note that the observations have been conducted at several UCLA football games. The discharge time of 45 minutes (after event conclusion) was measured up to the point whereby the extensive vehicle queuing had subsided/cleared the primary departure routes (e.g., along Seco Street, West Drive, Salvia Canyon Road, and Rosemont Avenue). Additional vehicles were observed to depart the stadium after this 45 minute period, however, the extensive vehicle queuing had dissipated. It is also noted based on field observations that most traffic barricades and cones are removed and traffic control officers and police personnel are dismissed from the primary departure routes approximately 45 minutes after event conclusion. Refer to Response to Comment No. 41 above for a discussion regarding the traffic analysis time period.

**Response to Comment TAC-43**

Refer to Response to Comment TAC-27 for a discussion of the analysis of the retail facility component of the project.

**Response to Comment TAC-44**

Policy 3.2 of the City's General Plan states, "Apply traffic management measures to control vehicular traffic speeds and volumes on local and collector streets within residential neighborhoods to assure safe and orderly traffic flows." Section 7.0, Special Event Traffic Management, beginning on page 28 and continuing through to page 33, Appendix G, Volume II of the Draft EIR, provides a summary of special event traffic management. Specifically, Section 7.4, Neighborhood Traffic Management, page 33, Appendix G, Volume II of the Draft EIR describes the traffic management plan as an important element aimed at protection of neighborhoods from impacts of stadium events. The proposed project would be consistent with the principles embodied in the Mobility Element in that mitigation measures reduce the duration of the impacts that would be experienced from increased traffic through surrounding neighborhoods, reduces parking in the Arroyo, and encourages use of alternative transportation. It should be recognized that the guiding principles in the City's General Plan are formulated to help "guide" decision-makers and planners with regard to new or redevelopment. In this case, the new square footage of development would be ancillary to the existing stadium and would draw little, if any, traffic other than what would be generated by events at the existing stadium. Furthermore, events at the existing stadium would add traffic and

noise impacts on an additional 13 days per year. The decision makers will determine consistency with the referenced Guiding Principle.

When determining a project's consistency with the General Plan, the General Plan must be looked at as a whole document. A project may be inconsistent with some facets of a General Plan, but at the same time it could be consistent with a preponderance of its objective and polices. It is not atypical for a General Plan to be internally inconsistent, and it is the responsibility of the City Council to determine a project's compliance with the General Plan when it acts upon the project. The Rose Bowl Renovation project is consistent with the City of Pasadena's General Plan in that it furthers its policies and objectives by encouraging and promoting the adaptive reuse of a historic resource (Policy 6.3), it supports the continuation and expansion of an existing use (Policy 10.3), it increases employment opportunities to a diverse population (Policy 11.1 and 11.7), it promotes and encourage fiscal health by encouraging a sales tax producing business to promote retail areas (Policy 12.1), it recognizes and supports the expansion of an existing regionally significant cultural and entertainment institution (Policy 23.1), it provides opportunities to retain a regionally significant cultural and entertainment use (Policy 23.2), and it encourages diversity within Pasadena's cultural and entertainment institutions (Policy 23.5). Additionally, the project furthers the principles of the Mobility Element by reducing the number of trips into the Arroyo by reducing the stadium's capacity, it reduces the number of parking spaces within the Arroyo by physically limiting the number of cars that will park in the Arroyo and utilizing the off-site parking at Parsons. Lastly, it encourages the use of transit (i.e. light rail, shuttle, bus).

**Response to Comment TAC-45**

As a point of clarification, it is assumed that the commenter meant “de-emphasized” streets rather than “emphasized” streets. Refer to Response to Comment WPRA4-36 for further discussion pertaining to these corridors.

**Response to Comment TAC-46**

Refer to Response to Comment WPRA4-54 for further discussion on environmental capacity.

**Response to Comment TAC-47**

The current practices used for neighborhood protection will be employed for the increased number of events proposed by the project. Increases in police and traffic control personnel deployed for events, and the reduction in seating capacity of the stadium from over 90,000 to 65,000 (via permanent seating) and 75,000 (via temporary seating) should decrease impacts in adjacent neighborhoods on any given major special event day when compared with existing events with an attendance of greater than 75,000 patrons. The terms of the lease between the NFL will define any penalties related to compliance matters.

**Response to Comment TAC-48**

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. Refer to Response to Comment TAC-14 for a discussion of the

parking management plan in the event of rain. Refer to Responses to Comment TAC-13 and BAR-2-12 regarding the Parsons complex and lease agreement.

**Response to Comment TAC-49**

Please refer to Topical Response E concerning alternatives considered. In addition, refer to Response to Comment KNA1-8.

**Response to Comment TAC-50**

Please refer to Response to Comment TAC-14 for a discussion of parking in the event of rain.

**Response to Comment TAC-51**

Please refer to Topical Response E concerning alternatives considered. In addition, refer to Response to Comment KNA1-8.

**Response to Comment TAC-52**

The commenter is referred to Appendix F, contained within Appendix G.1, Volume III of the Draft EIR for a summary of the analysis of secondary impacts due to off-site parking at the Parsons Complex.

**Response to Comment TAC-53**

Table 3, page 51, Appendix G, Volume II of the Draft EIR summarizes the special event attendance mode split assumptions utilized in the Draft EIR. As shown in Table 3, all modes of transportation have been considered in the analysis. Patrons are anticipated to arrive via automobiles (i.e., club and luxury suite tickets holders, season ticket holder and general admission patrons), shuttle service from the Parsons complex (including Gold Line patrons), charter bus (i.e., a total of 165 charter buses), transit, walking, bicycling as well as the Pasadena Area Rapid Transit Service (ARTS). Section 5.0, page 21, Appendix G, Volume II of the Draft EIR, indicates that the project study area is served by bus lines operated by the ARTS, the Los Angeles County Metropolitan Transportation Authority (MTA), the City of Los Angeles Department of Transportation (LADOT) and the Foothill Transit. Figure 3, page 22, and Table 2, pages 23 and 24, Appendix G, Volume II of the Draft EIR, illustrate and summarize these routes. While it is recognized that very few of these routes traverse the streets within the Arroyo Seco, the identified lines do serve the vicinity (via transfers or walking). Based on discussions with the RBOC, the shuttle fleet is equipped with clean air vehicles.

As noted in footnote 3 of Tables 4 and 5A and footnote 4 of Table 5B, a total of up to 150 shuttle departures from the Parsons complex during the event arrival period would be necessary while a total of up to 200 shuttle departures from the Rose Bowl during the event departure period would be necessary. As each round trip takes approximately 20 minutes, it is assumed that each shuttle can complete between two and three round trips per hour. Therefore, a shuttle bus fleet size of approximately 65 buses would be required to accommodate the entire shuttle ridership/demand associated with a sold out event at the Rose Bowl within a one-hour period. This should not result in lengthy wait times. If more than 65 shuttle buses are provided, wait times will likely be reduced.



Page 25, Appendix G, Volume II of the Draft EIR states that a fleet of 80 buses was utilized for the Year 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). Refer to Response to Comment TAC-5 for a discussion of a review of alternate shuttle routes.

**Response to Comment TAC-54**

Section 21954, subsection (a) of the California Vehicle Code, Pedestrian Outside Crosswalks, requires that every pedestrian upon a roadway at any point other than within a marked crosswalk or within an unmarked crosswalk at an intersection shall yield the right of way to all vehicles upon the roadway so near as to constitute an immediate hazard. Subsection (b) of the same section states that the provisions of this section shall not relieve the driver of a vehicle from the duty to exercise due care for the safety of any pedestrian upon a roadway.

Pedestrians are currently channelized during major events through the deployment of barricades, special event staff, and the Pasadena Police Department. It is expected that continuation of these efforts will minimize the potential for pedestrian-vehicle conflicts, to the extent possible. Therefore, significant pedestrian-vehicle conflicts would not be anticipated.

**Response to Comment TAC-55**

Today attendees at stadium events overwhelmingly use motorized vehicles to access the Arroyo and this profile of use is expected to continue in the future. If demand for bicycle access by event spectators increases, a bicycle plan, including bike parking, will be prepared by RBOC, if and when the City determines it is required.

**Response to Comment TAC-56**

Refer to Topical Response B and Response to Comment TAC-15 for discussion of impacts to recreational users in the vicinity of the Rose Bowl stadium. 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.

**Response to Comment TAC-57**

Please refer to Topical Response A for a discussion pertaining to the request for recirculation of the Draft EIR.

**Response to Comment TAC-58**

Refer to Response to Comment TAC-53 for an analysis of modes of travel contemplated to be used by event patrons. Mitigation Measure 3.12-1 contains a measure to engage in public outreach regarding alternative modes of transportation available to event patrons. Section 15.0, Transportation Mitigation Measures, beginning on page 110 and continuing through page 112, Appendix G, Volume II of the Draft EIR, summarizes the proposed project

mitigation measures. The statement contained in the Draft EIR that indicates that the current management of ingress and egress is effective on event days, is made in the context that without the measures, additional congestion would occur and thus, the measures are effective. For example, arriving traffic can be diverted to another travel route to obtain a better distribution of parking loading since the traffic personnel are in direct radio contact with the Police helicopter and the police stationed in the Rose Bowl Traffic Control Command Center (located in the press box). As stated on page 28, Appendix G, Volume II of the Draft EIR, the renovated Rose Bowl building will include upgrades to provide a state-of-the-art traffic command center that will be linked to the traffic management center in City Hall. The traffic command center will be equipped with closed circuit television (CCTV) monitors with camera coverage of the entire Arroyo Seco, strategic locations within Pasadena and at shuttle stops. As drivers near the Rose Bowl, the level of traffic control and Police personnel increases. For larger events, temporary changeable message signs (CMS) on the SR-134 and I-210 Freeways are deployed in coordination with the California Department of Transportation (Caltrans), and are used to create a more even traffic distribution. These CMS will also be coordinated with Police and Caltrans personnel from the command center. The renovated Rose Bowl Traffic Control Center will also contain a studio for live Highway Advisory Radio (HAR). These and other Intelligent Transportation System (ITS) project elements are part of the traffic management plan.

Section 15.2, beginning on page 113, Appendix G, Volume II of the Draft EIR, summarizes the additional mitigation measures (i.e., in addition to the existing traffic management strategies currently employed for large scale Rose Bowl events) recommended for implementation as part of the proposed project:

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

The Draft EIR recommended that the design of a pre-paid, pre-assigned on-site parking program be initiated and implemented for all season-ticket holders. This program would be implemented for all suite ticket holders, all club level season ticket holders and some general admission season ticket holders. With this program, patrons would receive directions to a designated parking area via a designated travel route. This is expected to significantly improve operations during the pre-event arrival period, in that parking fees would not need to be collected either on adjacent roadways leading into the Rose Bowl Stadium vicinity or at the entrances of the individual parking areas. Pre-paid parking could be demonstrated through the use of dashboard placards. Preferential parking in close proximity to the stadium could be provided for suiteholders and club level ticket holders.

#### **Design and Implementation of Pre-Assigned Ingress Travel Routes**

With implementation of the above mitigation measure, patrons would receive directions to a designated parking area via a designated travel route in advance of an event. This is expected to significantly improve operations during the pre-event arrival period, in that traffic volumes along certain routes could be influenced through the early notification of an assigned travel route to event patrons.

### Marketing/Public Information/Media Outreach Programs

As summarized on page 113, Appendix G, Volume II of the Draft EIR, it is recommended that a comprehensive marketing effort be undertaken so as to provide event patrons with ample public information regarding transportation issues, aimed at reducing impacts associated with the proposed project to the greatest extent possible. The target audiences would be season ticket holders that purchase pre-paid parking, passes, season ticket holders that park at the Parsons complex, single game ticket patrons, regional media, employees, charter bus operators, and area commuters.

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

In addition, the Draft EIR recommended that key public messages be provided via the established Rose Bowl Stadium website, public radio and other forms of media. Those public announcements should include the following key messages; 1) arrive early, 2) vehicles should use the routes shown on their parking pass/placard, 3) if patrons do not have parking passes/placards, they should head to the Parsons complex, 4) in the event of rain, consider parking at the Parsons complex, 5) the shuttle is a short route and it is an efficient and convenient alternative to driving, and 6) charter buses and other transit (i.e., Gold Line) are encouraged. A comprehensive public outreach campaign is anticipated to be effective in reducing potential impacts of the proposed project, to the extent feasible.

### Deployment of Additional Traffic Control Officers at Key Intersections

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

- Int. No. 5            Rosemont Ave. & Washington Blvd.
- Int. No. 9            North Arroyo Blvd. & I-210 WB Ramps
- Int. No. 10          North Arroyo Blvd. & I-210 EB Ramps
- Int. No. 12          Lincoln Ave. & I-210 WB Ramps
- Int. No. 13          I-210 EB Ramps & Mountain St.
- Int. No. 14          I-210 WB Ramps & Mountain St.
- Int. No. 20          Linda Vista Ave. & Highland Dr.
- Int. No. 21          Linda Vista Ave. & Oak Grove Dr.

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

It should be noted that Intersection No. 9: North Arroyo Boulevard / I-210 Westbound Ramps, Intersection No. 10: North Arroyo Boulevard / I-210 Eastbound Ramps, and Intersection No. 12: Lincoln Avenue / I-210 Westbound Ramps are currently controlled by traffic signals. The remaining five intersections identified above are currently controlled by stop signs. As shown in Tables 8 and 9, Appendix G, Volume II of the Draft EIR, the presence of these traffic control officers, in conjunction with the other special event traffic management strategies, is anticipated to reduce the project-related impacts to less than significant levels at these locations.

#### **Enhanced Wayfinding Guide Sign Program**

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

#### **Consideration of Modifications to the Lot 9 Turf Area Access Point**

Another consideration for increased efficiency associated with vehicular entry into the Lot 9 turf parking area is an increase in the driveway/gate width. The increased width may require slight modification to the existing rock walls.

#### **Consideration of Additional Changeable Message Signs**

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

Lastly, a comprehensive review of potential equipment/advanced technologies was undertaken. It was recommended that installation of permanent infrastructure/ improvements (e.g., illuminated signs/indicators that illustrate the number of available parking spaces by area, permanent overhead signage, etc.) not be included as part of the mitigation package in that this infrastructure would only be utilized up to a total of 25 days per year and would detract from the natural setting and therefore is socially infeasible. In addition, the City of Pasadena Department of Transportation currently implements an event arrival and departure traffic signal timing plan for

signalized locations along major corridors leading to and from the Rose Bowl vicinity. These timing programs are coordinated through the City's operation center and will continue to be implemented with the proposed project.

**Response to Comment TAC-59**

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. The comment will be forwarded to the City Council for their consideration prior to approval or denial of the proposed project.

**Response to Comment TAC-60**

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. The comment will be forwarded to the City Council for their consideration prior to approval or denial of the proposed project.

**Response to Comment TAC-61**

Refer to Response to Comment TAC-58, for a discussion of the mitigation measures proposed as part of the project.

**Response to Comment TAC-62**

The staff report that will be presented to the City Council for their review prior to the EIR certification hearing will contain an analysis of economic benefits and impacts of the proposed project. In addition, please refer to Topical Response F.

**Response to Comment TAC-63**

Several alternatives are examined in the EIR. If the project is not approved, the most likely scenario for development at the Rose Bowl is the "No Project" alternative, which provides for improvements in accordance with the current UCLA contract.

**Response to Comment TAC-64**

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. Pursuant to CEQA, a general response is sufficient when a comment is general in nature. The comment will be forwarded to the City Council for their consideration prior to approval or denial of the proposed project.

**Response to Comment TAC-65**

Please refer to Topical Response C: Traffic Analysis Study Area, 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-66**

Please refer to Response to Comment No. TAC-22 for a discussion of the Draft EIR analysis time periods.

**Response to Comment TAC-67**

Please refer to Responses to Comment TAC-12 and TAC-44 for a discussion of the City's General Plan and 2004 Mobility Element and the project's consistency with the 2004 Mobility Element.

**Response to Comment TAC-68**

Please refer to Response to Comment TAC-14 for a discussion of project parking and the parking strategy in the event of rain.

**Response to Comment TAC-69**

Please refer to Response to Comment 62, above.

The project is proposing to reduce the number of automobiles that currently park on site from over approximately 21,000 (via double-stack parking) and approximately 24,000 (via five-stack parking) to approximately 18,000. The financial terms of the deal between the City, the RBOC, and the NFL is not currently available to the public because it is still being negotiated.

**Response to Comment TAC-70**

Please refer to Response to Comment TAC-27 for a discussion of the retail component of the proposed project and the traffic impact analysis.

**Response to Comment TAC-71**

Please refer to Response to Comment TAC-22 for a discussion of the Draft EIR analysis time periods.

**Response to Comment TAC-72**

Please refer to Response to Comment TAC-53 for a discussion of non-auto modes incorporated into the Draft EIR traffic analysis.

**Response to Comment TAC-73**

Please refer to Topical Response C: Traffic Analysis Study Area, 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. Please also refer to Topical Response A.

**Response to Comment TAC-74**

Please refer to Topical Response C 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-75**

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. The comment will be forwarded to the City Council for their consideration prior to approval or denial of the proposed project.

**Response to Comment TAC- 76**

The economic impact of parking in the Arroyo will be a reduction in the revenue generated from parking fees. The terms of the deal between the City, RBOC, and the NFL have not been finalized to adequately determine where the parking revenues will be directed. Therefore, any other comprehensive economic impact cannot be determined at this time.

Table 1, page 8, Appendix G, Volume II of the Draft EIR provides a summary of the Rose Bowl parking inventory for the existing and proposed project conditions. As illustrated, a supply total is provided for each paved parking lot, turf parking area and golf course parking area. The 18,000 space supply is achieved by the prohibition of parking on golf course Areas 9 and 10 and a reduction of parking on Areas 4 and 8.

Refer to Response to Comment TAC-13 for a discussion of off-site parking proposed as part of the project. Based on the parking analysis set forth in the EIR, 18,000 spaces in the Arroyo plus off-site parking at the Parsons complex should be sufficient to meet demand in the downsized stadium. The comment is noted and will be forwarded to the decision-makers for their required review and consideration prior to any action being taken on the project.

**Response to Comment TAC-77**

As stated in the Draft EIR traffic analysis, detailed observations were conducted of major events at the Rose Bowl Stadium and the current measures employed by the RBOC and the City of Pasadena. The statement contained in the Draft EIR that indicates that the current management of ingress and egress is effective on event days, is made in the context that without the measures, additional congestion would occur and thus, the measures are effective. For example, arriving traffic can be diverted to another travel route to obtain a better distribution of parking loading since the traffic personnel are in direct radio contact with the Police helicopter and the police stationed in the Rose Bowl Traffic Control Command Center (located in the stadium). As stated on page 28, Appendix G, Volume II of the Draft EIR, the renovated Rose Bowl building will include upgrades to provide a state-of-the-art traffic command center that will be linked to the traffic management center in City Hall. The traffic command center will be equipped with closed circuit television (CCTV) monitors with camera coverage of the entire Arroyo Seco, strategic locations within Pasadena and at shuttle stops. As drivers near the Rose Bowl, the level of traffic control and Police personnel increases. For larger events, temporary changeable message signs (CMS) on the SR-134 and I-210 Freeways are deployed in coordination with the California Department of Transportation (Caltrans), and are used to create a more even traffic distribution. These CMS will also be controlled from the command center. The renovated Rose Bowl Traffic Control Center will also contain a studio for live Highway Advisory Radio (HAR). These and other Intelligent Transportation System (ITS) project elements are part of the traffic management plan. Thus, without these components of the special event traffic management plan, additional congestion would be expected than what currently occurs on event days.

**Response to Comment TAC-78**

Economics are not a CEQA-related issue and are not normally discussed in an EIR. This comment will be forwarded to the decision-makers for their review of the economic aspects of the proposed arrangement with the NFL prior to taking action on the proposed project.

**Response to Comment TAC-79**

Refer to Response to Comment TAC-58 for a discussion of the proposed project mitigation measures. A comprehensive review of potential equipment/advanced technologies was undertaken. In addition, the City of Pasadena Department of Transportation currently implements an event arrival and departure traffic signal timing plan for signalized locations along major corridors leading to and from the Rose Bowl vicinity. These timing programs are coordinated through the City's operation center.

**Response to Comment TAC-80**

The California Department of Transportation (Caltrans-District 7) has been consulted throughout the Notice of Preparation (NOP) process as evidenced by receipt of the Caltrans response letter (dated October 28, 2004). In addition, Caltrans received a copy of the Draft EIR. Other than the Rose Parade and Rose Bowl game conditions (for which encroachment permits are obtained from Caltrans related to the roadway and freeway ramp closures), the temporary changeable message signs that are placed on the freeways are owned and operated by Caltrans. Thus, a formal encroachment permit is not required. Based on discussions with City of Pasadena Department of Public



Works and Transportation staff, the PPD Event Planning group informs the Caltrans Traffic Operations group of events that are generally anticipated to draw 70,000 or more patrons, and a request is made for the deployment of the portable freeway changeable message signs. Although there is no written agreement between the City and Caltrans regarding the use of signs, these coordination efforts have been in effect for many years and would continue with implementation of the proposed project.

**Response to Comment TAC-81**

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

**Response to Comment TAC-82**

Refer to Response to Comment TAC-9.

**Response to Comment TAC-83**

Please refer to Response to Comment TAC-4 for a discussion of the Draft EIR traffic analysis. Refer also to Topical Response C. Refer also to Response to Comment No. TAC-53 for a discussion of the modes of transportation assumed to be utilized in the analysis of potential project-related impacts. The intersections and street segments analyzed are representative of overall impacts in the Rose Bowl vicinity.

**Response to Comment TAC-84**

Please refer to Response to Comment TAC-27 for further discussion related to the retail component of the proposed project. As the retail component of the project will only operate on event days (except for the Team Store) no material alteration to the circulation plan is anticipated. Figure 2-2 shows project boundaries; however, it is not intended to show revisions to the circulation system immediately adjacent to the stadium.

Although the roadway circulation plan as identified in the Draft EIR is conceptual in nature, it has been generally reviewed by the City Department of Transportation. Should the project be reviewed and approved by the City of Pasadena, the preparation of detailed street improvement plans will be required and will require the review and approval by the City's Department of Public Works. The street improvement design plans will be reviewed with respect to capacity, turning radii, sight distance, and potential pedestrian/vehicular conflict issues. Please refer to MM 3.12-3, which requires preparation of a construction traffic management plan approved by the City prior to issuance of grading permits, and MM 3.12-4, which requires that the project operator shall provide plans regarding any proposed modifications to features in the public right-of-way

**Response to Comment TAC-85**

Please refer to Response to Comment TAC-15 for a discussion of impacts to recreational users during large-scale special events at the Rose Bowl.

**Response to Comment TAC-86**

Please 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-4 for further discussion of the project's traffic impacts. Also please refer to Topical Response E concerning alternatives considered.

**Response to Comment TAC-87**

Please refer to Topical Response C for a discussion of the formulation of the traffic analysis study area. The Lake Avenue on and off ramps to/from the Route 210 Foothill Freeway were not analyzed as they are not utilized as a major route to and from the Rose Bowl. The analysis of Sunday morning conditions in the vicinity of Lake Congregational Church was also not included as it is considered to be outside the time period of overall greatest impact associated with the Rose Bowl.

**Response to Comment TAC-88**

Please refer to Topical Response C 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. Refer to Response to Comment No. TAC-53 for a discussion of the modes of transportation assumed to be utilized in the analysis of potential project-related impacts. In addition, refer to Response to Comment KNA1-8 and the discussion in Section 4.8.2 of the EIR. Due to the accessibility of the Rose Bowl area by freeways and the available parking supply, patrons are expected to continue to utilize personal vehicles. Therefore, a regional shuttle system, similar to that employed by the Hollywood Bowl, would likely be less effective (when compared to events at the Hollywood Bowl) in reducing traffic and parking impacts. The City and project operator will continue to examine local and regional shuttle operations similar to those conducted at the Hollywood Bowl that would meet the needs of Rose Bowl attendees, reduce traffic in the Arroyo, and be economically feasible. After approval of the project, a program of analysis will be initiated to examine shuttle alternatives that could be effective without creating secondary environmental impacts that would be counter-productive.

**Response to Comment TAC-89**

Please refer to Response to Comment TAC-16 for further discussion regarding the construction analysis associated with the proposed project. Refer to page 132, Appendix G, Volume II of the Draft EIR for a summary of the additional measures/recommendations made with respect to construction activities associated with the proposed project. As stated on page 130, Appendix G, Volume II of the Draft EIR, based on coordination 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 at this time. Also, as stated on page 131, Appendix G, Volume II of the Draft EIR, the project will be conditioned to provide a comprehensive Construction Staging and Traffic Management Plan associated with the project prior to issuance of a building permit. Access to the land uses mentioned by the commenter (e.g., the golf course, Kidspace, and the Aquatic Center) is expected to be maintained during construction.

**Response to Comment TAC-90**

Construction staging and management will be subject to a City approved Construction Traffic Management Plan that will ensure all mitigation measures and required construction practices are followed. Enforcement of this plan is the responsibility of the City's Building Division. In addition, please refer to Responses to Comment TAC-47 and TAC-89.

**Response to Comment TAC-91**

Please refer to Response to Comment TAC-14 for a discussion of the parking management plan/strategy in the event of rain. Also refer to Response to Comment TAC-4 for a general overview of the transportation impact analysis.

**Response to Comment TAC-92**

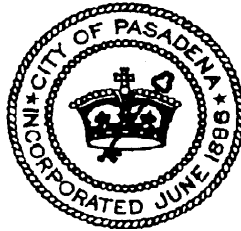
Please refer to Response to Comment TAC-15 and TAC-55 for a discussion of potential impacts to recreational users of the Central Arroyo Seco area and bicycle access, respectively.

**Response to Comment TAC-93**

Please refer to Response to Comment TAC-53 for a discussion of the modes of transportation assumed to be utilized in the analysis of potential project-related impacts.

**Response to Comment TAC-94**

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. The comment will be forwarded to the City Council for their consideration prior to approval or denial of the proposed project.



## TRANSPORTATION ADVISORY COMMISSION

March 21, 2005

Mr. John Spalding  
Consulting Planning Manager  
City of Pasadena  
Planning & Development Department  
175 N. Garfield Avenue  
Pasadena, CA 91109

Via email to: [asocarras@cityofpasadena.net](mailto:asocarras@cityofpasadena.net)

Subject: Transportation Advisory Commission Comments on Draft Environmental Impact Report for Rose Bowl Stadium Renovation Project, State Clearinghouse No. 2004101073

Dear Mr. Spalding:

The Transportation Advisory Commission ("TAC") is pleased to have this opportunity to review and comment on the Draft Environmental Impact Report for the Rose Bowl Stadium Renovation Project ("DEIR"). The DEIR examines how rebuilding the 83-year-old Rose Bowl Stadium to accommodate a National Football League ("NFL") team would impact the surrounding environment. NFL at the Rose Bowl would generate 37,968 net new daily vehicle trips over a 24-hour special event weekday period. The DEIR finds "significant unavoidable impacts" in the areas of transportation and traffic.

Pursuant to the California Environmental Quality Act of 1970 ("CEQA") and applicable City of Pasadena CEQA guidelines, TAC Commissioners and other members of the public are invited to comment in writing on the information contained in the DEIR. The City of Pasadena Planning & Development Department must respond to all written public comments before the City Council can rule on the adequacy of the DEIR and prior to taking action on the proposed renovation of the Rose Bowl.

### Background on TAC Review

On October 8, 2004, Darryl Dunn, General Manager of the Rose Bowl Operating Company, made a presentation to TAC regarding the existing transportation and traffic plans for large events at the Rose Bowl. TAC received public comment and Commissioners made comments to be included in DEIR scoping. TAC formed an ad-hoc sub-committee to review and comment on the Initial Study for the Rose Bowl Stadium Renovation Project. At TAC's meeting on November 4, 2004, additional comments were added by various Commissioners. On November 10, 2004, TAC submitted written scoping comments on the Initial Study. TAC's scoping comments (hereinafter "TAC Scoping Comments") are included in an appendix to the DEIR.

On February 3, 2005, the City of Pasadena released the DEIR analyzing the proposed Rose Bowl stadium renovation project. The 130-page transportation section of the DEIR is based on a Traffic Impact Study prepared by Linscott, Law & Greenspan.<sup>1</sup> The DEIR studies potential NFL traffic impacts at 29 study intersections, 13 study street segments and two freeway segments (134 and 210 Freeways) in the vicinity of the Rose Bowl.<sup>2</sup> The study intersections were determined by Pasadena Department of Transportation staff "as those most likely to experience traffic impacts."<sup>3</sup>

On March 10, 2005, TAC held a meeting to comment on the DEIR. The meeting started with presentations by City staff on the Project and DEIR. Following the presentations, TAC received comments from the public. Twelve members of the public made comments on the DEIR, including representatives from the following organizations: Pasadena Neighborhood Coalition; Pasadena Heritage; Save South Orange Grove; Linda Vista Annandale Association; and West Pasadena Residents' Association. Written comments submitted to TAC at the March 10 meeting are included in the record.

After the close of public comment, TAC Chair Richard Quirk invited Commissioners to comment on the DEIR. Commissioners Carolyn Naber, Ralph McKnight, Vince Farhat, Michael Brady, Alan Clelland, Juan Carlos Velasquez and Richard Quirk commented on the DEIR.

At the conclusion of Commissioner comments, Chair Quirk suggested that TAC appoint an ad hoc subcommittee to summarize Commissioners' comments on the DEIR. Commissioners concurred with this recommendation, and appointed Chair Quirk and Commissioners Farhat and Naber to the subcommittee. TAC directed the subcommittee

<sup>1</sup> DEIR Vol. I, §3.12.1 & Vol. II, Appendix G (traffic study)

<sup>2</sup> DEIR Vol. I, §3.12.1.

<sup>3</sup> Ibid.

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to prepare a summary of Commissioner comments for submission to the City as part of the DEIR record. This document is a summary of Commissioners' comments.

### COMMISSIONER COMMENTS ON DEIR

The Transportation and Traffic Environmental Analysis (DEIR Section 3.12) of the Rose Bowl Stadium Renovation Project Draft Environmental Impact Report (DEIR) is deficient and inadequate in the following areas:

#### THE DEIR STUDY AREA OMITTS KEY INTERSECTIONS, STREET SEGMENTS AND FREEWAY SEGMENTS (PAGES 3.12-13 & 14)

The DEIR studies potential NFL traffic impacts at 29 study intersections, 13 study street segments and two freeway segments (134 and 210 Freeways) in the vicinity of the Rose Bowl.<sup>4</sup> The DEIR states that regional access to the Rose Bowl is provided by the 210 and 134 Freeways.<sup>5</sup>

3 However, the DEIR excludes the 110 Freeway and the 710 Freeway stump and the surrounding intersections and street segments, as well as other key intersections and street segments. The DEIR Study Area should have been broader.

#### 1. The DEIR omits Intersections and Street Segments from the 110 Freeway.

The DEIR assumes NFL fans will not use the 110 Freeway because it is not a "regional access point" to the Rose Bowl. This assumption belies the fact that South Orange Grove Boulevard south of California Blvd. and Arroyo Parkway between the 110 Freeway and Holly Street experience greatly increased traffic congestion during UCLA football games. In omitting the 110 Freeway, the DEIR also fails to address the fact that South Orange Grove and portions of California Boulevard are classified as "de-emphasized streets" in the General Plan Mobility Element.

During DEIR scoping, residents commented that the Initial Study ignored that regional access to the Rose Bowl is provided by the 110 Freeway and South Orange Grove Boulevard between the 110 and Colorado Boulevard.<sup>6</sup> "It is

<sup>4</sup> DEIR Vol. I, §3.12, pp. 3.12-13 and 14; Vol. II, Appendix G (Traffic Study, pp. 35-36).

<sup>5</sup> DEIR, pp. 13-14; see also Traffic Study, pp. 35-36 (identifying regional access points).

<sup>6</sup> DEIR Vol. II, Appendix B (citing Initial Study at pp. 32 & 41).

imperative that the impact of this project on the access to the Rose Bowl from the 110 and Orange Grove be evaluated in the DEIR."<sup>7</sup>

However, the DEIR does not study any intersections or street segments south of California Boulevard and does not include the 110 Freeway.<sup>8</sup>

The City's failure to analyze traffic from the 110 Freeway is a recurring theme throughout the DEIR. The "Project Trip Distribution" analysis fails to include the 110 Freeway.<sup>9</sup> Similarly, the "Traffic Impact Analysis Scenarios" included in the DEIR does not include traffic between the 110 Freeway and California Boulevard.<sup>10</sup> The "Year 2008 Pre-Project Conditions" and "Year 2008 With Project Conditions" analyses also do not study traffic between the 110 Freeway and California Boulevard.<sup>11</sup>

The DEIR does not study traffic that could be caused by motorists exiting the 110 Freeway at Ave 64 and taking surface streets north to the Rose Bowl, or exiting the 110 Freeway at Fair Oaks or Arroyo Parkway and taking surface streets north to the Rose Bowl.

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The DEIR's street segments do not include the following:

- a. South Orange Grove south of California (which is a street listed in the General Plan Mobility Element as "de-emphasized") to the 110 Freeway
- b. Fair Oaks Blvd. from 110 Freeway to 210 Freeway
- c. Arroyo Parkway between the 110 Freeway and Holly Street
- d. Avenue 64 from the 110 Freeway to Colorado Blvd.
- e. Glenarm from Pasadena Avenue to Arroyo Parkway

The DEIR's study intersections do not include the following:

- f. South Orange Grove at Columbia
- g. South Orange Grove at 110 Freeway
- h. Avenue 64 at 110 Freeway
- i. Colorado Blvd. at South San Rafael Avenue
- j. Linda Vista at Colorado Blvd. junction
- k. Glenarm at Fair Oaks
- l. Glenarm at Arroyo Parkway

<sup>7</sup> Ibid.

<sup>8</sup> DEIR, pp. 3.12-13-14; Traffic Study, pp. 35-36.

<sup>9</sup> DEIR, pp. 3.12-53 and 54.

<sup>10</sup> Ibid., pp. 3.12-54 & Tables 3.12-12 through 14.

<sup>11</sup> Ibid., pp. 3.12-80 through 93 (pre-project); pp. 3.12-93 through 95 (with project).

2. The DEIR omits Intersections and Street Segments from the 710 Freeway.

- a. 710 Freeway at Del Mar
- b. 710 Freeway at California

3. The DEIR omits Intersections and Street Segments in the Lake Avenue and 210 Freeway Area.

- a. Lake Avenue, 210 Freeway, Maple and Corson area including the freeway ramps and intersections were omitted from the study area.
- b. The impacts on Sundays from the Lake Avenue Church were omitted from the study. Lake Avenue can back up to Orange Grove to the north and Green Street to the south with normal Sunday activity and yet the DEIR did not study the impacts of NFL related traffic to these intersections and street segments should there be a Sunday game.

4. The DEIR omits the 210 Freeway, 134 Freeway, 710 Freeway and Fair Oaks Avenue Interchange

This is particularly problematic due to the "feathering" of cars that move westbound between the 210 Freeway, the 134 Freeway, the Fair Oaks Avenue off-ramp and the 710 Freeway stub to Del Mar and California Blvd.

5. The DEIR omits Intersections at the Gold Line:

- a. raymond at Del Mar
- b. Arroyo Parkway at Del Mar
- c. Raymond at California
- d. Arroyo Parkway at California

6. The DEIR omits Other Residential Intersections and Street Segments:

- a. Lida from the Glendale city limits to Linda Vista
- b. Washington Blvd. from West Drive to Linda Vista
- c. Linda Vista from Mount Vernon to Oak Grove Drive

7. CMP Intersections

The DEIR also contains references to the Los Angeles County Congestion Management Plan ("CMP").<sup>12</sup> According to the DEIR, CMP intersections include Arroyo Parkway and Pasadena Avenue/St. John and California Boulevard. But,

<sup>12</sup> DEIR, p. 3.12-47 (Regulatory Framework), p. 3.12-123 (CMP Freeway Locations); p. 3.12-125 & Tables 3.12-20 and 3.12-21 (Mitigation Measures and Residual Impacts).

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it is unclear whether the DEIR actually studied these intersections. Does the DEIR model CMP intersections based on L.A. County data? Or, did the DEIR traffic study take traffic counts in the same way the other 26 intersections were studied?

The DEIR's study intersections do not include the following:

- a. Pasadena Avenue at California
- b. St. John Avenue at California

The exclusion of the 110 Freeway, 710 Freeway stub, the streets south of California Boulevard and other key street segments and intersections calls into question the adequacy of the DEIR. Should the City prepare a supplemental traffic study and EIR that addresses these issues? If not, why?

**THE DEIR ONLY STUDIES TRAFFIC IMPACTS FOR ONE-HOUR "PEAK" TIME PERIODS (SECTION 3.12.4)**

4 NFL would generate 37,968 net new daily vehicle trips over a 24-hour special event weekday period.<sup>13</sup> However, the DEIR only studies impacts from 17,318 so-called "peak" one-hour passenger vehicle trips.<sup>14</sup> The DEIR studies "peak" inbound and outbound traffic by assuming that 45% of vehicles will go into the Arroyo during peak hours and 55% will go out of the Arroyo during peak hours.<sup>15</sup> Therefore, the DEIR's traffic analysis appears to exclude the other 55% of vehicles driving into the Arroyo and 45% of the outgoing traffic, thereby assuming residential neighborhoods are only impacted by traffic during the one-hour "peak" time period.

1. The Project will generate 37,968 net new vehicle trips but the DEIR only studies 45% of the incoming traffic and only 55% of the outgoing traffic.
2. The DEIR assumes that there is no impact from the remaining traffic that is outside the "one-hour" periods. Does the DEIR under-represent potential traffic impacts? Is the DEIR inadequate because it only studies peak traffic impacts?
3. During visual observations of a well attended UCLA game, the DEIR states that "the majority of patrons exit the site within 45 minutes from the conclusion of the

<sup>13</sup> DEIR, p. 3.12-49.

<sup>14</sup> Ibid., Table 3.12-9, at p. 3.12-50.

<sup>15</sup> See footnotes in Tables 3.12-9; 3.12-10; 3.12-11; 3.12; see also p. 3.12-113 (vehicle queuing anticipated during peak hours; "the majority of patrons exit the site within 45 minutes from the conclusion of an event...").