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cont'd ↑ event.¹⁶ This does not seem possible. Was this observation the basis for studying only one hour in each peak period?

THE DEIR DOES NOT ADEQUATELY ADDRESS GENERAL PLAN NEIGHBORHOOD PROTECTION OBJECTIVES (PAGE 3.12-48)

The DEIR discusses whether renovating the Rose Bowl to accommodate an NFL team would be consistent with the objectives and policies contained in the 1994 City of Pasadena General Plan Mobility Element.¹⁷ The DEIR identifies two Mobility Element objectives "related to traffic that are potentially relevant to the proposed project."¹⁸ These are:

1. "Increase the availability and use of transit" (Mobility Element Objective 4.1); and
2. "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 the automobile" (Mobility Element Policy 4.1.5).¹⁹

5 The DEIR concludes that NFL would be consistent with these selected objectives.²⁰ However, the DEIR does not specifically explain how NFL at the Rose Bowl would encourage non-auto transit. The DEIR merely concludes, without any discussion, that NFL would increase the use of public transportation and decrease reliance on the automobile.

The DEIR also fails to study whether NFL would be consistent with other applicable objectives and policies contained in the 1994 General Plan. For example, a guiding principle of the General Plan is that Pasadena will target the type and location of new growth "without increasing traffic or intruding on neighborhood quality of life." The Rose Bowl stadium is located in a single family residential neighborhood. The DEIR concludes that NFL would generate 37,968 net new daily vehicle trips over a 24-hour special event weekday period.²¹ But, the DEIR fails to address how the Rose Bowl can be renovated to accommodate NFL "without increasing traffic or intruding on neighborhood quality of life."

The 1994 Mobility Element also classifies South Orange Grove and portions of California Boulevard as "de-emphasized streets." As discussed above, however, the DEIR does not study any Orange Grove intersections or street segments south of California Boulevard.²²

¹⁶ DEIR, p. 3.12-113

¹⁷ DEIR, p. 3.12-48 & Table 3.12-8.

¹⁸ DEIR, p.3.12-48.

¹⁹ DEIR, p.3.12-48 & Table 3.12-8.

²⁰ Ibid.

²¹ DEIR, p. 3.12-49.

²² DEIR, pp. 3.12-13 and14; Traffic Study, pp. 35-36.

The DEIR also fails to study whether NFL would be consistent with the objectives and policies contained in the City's recently-updated Mobility Element. In April 2003, the City Council conceptually approved the new Mobility Element, more than a year before the DEIR Initial Study was prepared. In November 2004, the City Council approved the final version of the new Mobility Element as part of the Council's certification of the General Plan environmental impact report. The City Council finalized the General Plan before the City conducted scoping sessions on the Rose Bowl DEIR.

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The new Mobility Element continues the 1994 General Plan's commitment to protecting residential neighborhoods from traffic. For example, the new Mobility Element continues to classify South Orange Grove as a "de-emphasized street" and states that "efforts will be made to limit increases in travel" and "[m]easures that would increase traffic in [de-emphasized] streets will not be planned or implemented."²³ The new Mobility Element also retains the concept of the "environmental capacity" of local streets. Indeed, the new Mobility Element contains fourteen (14) specific policies under the general objective entitled "Protect Neighborhoods."²⁴ But, the DEIR fails to address any of the neighborhood protection policies set forth in the new Mobility Element.

The DEIR does not discuss and analyze the following:

1. The General Plan guiding principle to target the type and location of new growth "without increasing traffic or intruding on neighborhood quality of life."
2. The Protection of de-emphasized streets
3. The "Environmental Capacity" analysis of adjacent neighborhood streets.²⁵ There is no environmental capacity analysis included in the DEIR.
4. The effectiveness of current neighborhood protection measures. The DEIR makes no recommendations as to how to improve the protection of the adjacent neighborhoods
5. The DEIR does not appear to analyze or recommend any compliance measures.²⁶

6

THE DEIR DOES NOT ADDRESS THE ARROYO SECO ORDINANCE AND ARROYO SECO MASTER PLAN

During scoping, TAC commented that the DEIR should analyze how an NFL team would comply with the existing Arroyo Seco Ordinance and the Arroyo Seco Master Plan.²⁷

²³ General Plan Mobility Element, Policy No. 3.11, p. 20.

²⁴ General Plan Mobility Element §3.2.3, pp. 18-20.

²⁵ TAC Scoping Comments, p. 3, item 6

²⁶ TAC Scoping Comments, p. 2, item 1

However, the DEIR does not appear to specifically address whether the Rose Bowl renovation project would comply with these City planning documents.

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cont'd Does the DEIR analyze how an NFL team would comply with the Arroyo Seco Ordinance and the Arroyo Seco Master Plan? If not, why? Would adoption of the Project described in the DEIR require the City Council to amend the Arroyo Seco Ordinance? If so, how? Is the DEIR inadequate because it fails to address whether NFL would comply with these City planning documents? Should the City prepare a new traffic study and supplemental DEIR that addresses these planning documents?

THE DEIR DOES NOT ADEQUATELY ADDRESS PARKING AND THE RELATED IMPACTS TO THE ARROYO SECO AND ROSE BOWL-ADJACENT NEIGHBORHOODS (PAGES 3.12-45 & 46, 3.12-95, 3.12-106-108)

The DEIR assumes the current arrangement of infrequent and limited shuttles, limited hard-surface parking, and parking on a public golf course are adequate and acceptable for a major sporting venue. No alternatives, other than what is the existing system of parking for UCLA games, were considered or studied.

7 During DEIR scoping, TAC commented that there might be a financial incentive for the NFL to have maximum parking in the Arroyo Seco, which could conflict with General Plan principles which stress non-auto forms of transportation and neighborhood protection.²⁸ TAC questioned whether the DEIR process would accommodate the public's right to know the financial terms of the NFL transaction, and what forum, if any, would be available where the economic aspects of the proposed NFL agreement could be publicly discussed with respect to parking and transportation issues.²⁹ However, the DEIR does not appear to address the economic incentives for parking in the Arroyo Seco.

The DEIR assumes the Rose Bowl can supply up to 24,310 total parking spaces on paved and turf areas for large events.³⁰ According to the DEIR parking plan, 72% of parking would occur on grass (turf and golf course).³¹ When it rains, the Rose Bowl would implement so-called "Plan C," which calls for parking cars in adjacent residential neighborhoods "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."³²

²⁷ DEIR Vol. II, Appendix B (TAC Scoping Comments, p. 3 at ¶10)

²⁸ TAC Scoping Comments, p. 2 at ¶2.

²⁹ Ibid.

³⁰ DEIR, p. 45.

³¹ Ibid., Table 3.12-18, at p. 3.12-107.

³² Ibid., p. 3.12-108; see also p. 108 ("Neighborhood streets will also be used for the parking of vehicles as determined by the Traffic Lieutenant").

During DEIR scoping, TAC requested that the DEIR include a Project alternative that only allows access via shuttle buses or other non-auto forms of transportation and with extremely limited auto access for Rose Bowl events.³³ But, the DEIR does not appear to analyze a reduced-parking, non-auto Project alternative. Moreover, although the NFL parking plan calls for 18,000 parking spaces, the DEIR states that the Rose Bowl can supply up to 24,310 spaces. Will the City's agreement with the NFL stipulate that NFL can never park more than 18,000 vehicles?

The DEIR discusses displacement of parking from the Rose Bowl to City-owned parking lots and private parking at hotels, office buildings and other commercial development lots. Assuming the average vehicle ridership cited in the DEIR of 3.0 persons per vehicle, this could translate to thousands of people who would be dispersed to parking structures throughout Old Pasadena, South Lake Avenue and other private parking areas. The DEIR does not appear to address whether there is sufficient parking supply to accommodate NFL, and what impact this could have on non-NFL parking requirements for businesses in Old Pasadena.

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The DEIR parking analysis is deficient in the following areas:

1. The DEIR assumes the use of existing parking plans (for UCLA games) which include parking on the golf course and adjacent turf areas. Seventy-two percent (72%) of the proposed parking inventory listed on Page 3.12-107 would use parking on the grassy areas adjacent to the Rose Bowl including the golf course and other turf areas. This will negatively impact the recreational uses of those areas.
2. "Rain day" plans (Plan C) of neighborhood street parking will negatively impact the adjacent residential areas. The DEIR did not recommend or analyze alternative "rain day" parking plans that would not impact adjacent neighborhood streets.
3. The DEIR did not provide an alternative project which removes the need for parking on a public golf course and adjacent turf areas (and so significantly reducing recreational activities) during events?
4. The only off-site parking listed is owned and controlled by Parsons and the DEIR "assumes" that the Parsons parking will continue to be available³⁴ in spite of the fact that it is private property and the owner may withdraw cooperation in the future. The DEIR did not recommend long term contractual requirements regarding Parsons parking. The DEIR did not analyze the impacts without Parsons parking.

³³ TAC Scoping Comments, p. 2 at ¶3.

³⁴ DEIR p. 3.12-95

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5. The DEIR did not provide a "Project Alternative" which would analyze the use of only existing paved areas for parking with all additional parking offsite.³⁵
 6. The DEIR did not analyze or measure the reduced car trips that would be achieved by reducing parking in the Arroyo.
 7. Why is there no alternative project which removes the need for parking on a public golf course and adjacent turf areas (and so significantly reducing recreational activities) during events?
 8. The Project reduces parking in the Rose Bowl by 6,310 spaces (or approximately 25% of capacity). Why? Why not reduce it further? How is this reduction in parking to be achieved?

THE DEIR OMITTED THE STUDY OF TRAFFIC IMPACTS FROM NFL RELATED RETAIL BUSINESSES AND NON-GAME EVENTS

The DEIR should have taken into account not only the impact of the Rose Bowl games themselves, but also the change in use associated with the establishment of the new facilities, such as the Hall of Fame museum and other businesses (e.g. restaurants, retail outlets).

8 The NFL Rose Bowl stadium design calls for a 57,000-square foot retail area, a museum and team store open weekdays and weekends year-round. The NFL's 57,000 square feet of new retail space is roughly equivalent to the square footage of the Crate & Barrel store (45,000 square feet) and Sushi Roku restaurant (6,000 square feet) located in Old Pasadena. The DEIR assumes the NFL's new retail space will be open all seven days of the week.³⁶

During DEIR scoping, TAC commented that the DEIR should study the accumulated environmental impacts of NFL-related events and retail that generate fewer than 20,000 attendees, including the impacts on parking and traffic.³⁷ But, the DEIR assumes that traffic from the NFL's new retail outlets will be "ancillary" to game days and that a renovated Rose Bowl would not be a "popular destination point."³⁸ Similarly, the DEIR's "Traffic Impact Analysis Scenarios" do not address pre-game activity (including traffic), or what other, non-game events NFL would host at the Rose Bowl.³⁹ At this time, there is no maximum number of NFL events defined in DEIR.

³⁵ TAC Scoping Comments, p. 2 item 3

³⁶ DEIR, p. 3.12-2 (traffic analysis assumptions include "Weekend and weekday operation of a 57,000-square-foot Hall of Fame and Team Store").

³⁷ TAC Scoping Comments, p. 3 at ¶7.

³⁸ DEIR, p. 3.12-51.

³⁹ DEIR, pp. 3.12-54 & related tables.

The DEIR also does not appear to study the cumulative traffic impacts of NFL, plus UCLA, Tournament of Roses, flea market, the AAF Rose Bowl Aquatics Center, Kidspace, etc. The Traffic Study only measured traffic from one UCLA game.⁴⁰

The DEIR fails to include the following:

1. The DEIR does not include a specific traffic analysis of the proposed 57,000 square feet of retail that could have all-year long impact, but rather dismissed it as a source of car trips as stated on page 3.12-51 "vehicular trip generation has been assumed to be ancillary to the patron trip forecast." If the store and museum are open on "non-event" days, it would be a source of car trips through-out the year and there was no analysis in the DEIR of the resulting impacts.
2. The DEIR did not study the impacts of Monday night football events which may be more impactful than a UCLA football game. Why doesn't the DEIR differentiate regular NFL games from Monday night football?
3. Should the City prepare a new traffic study and supplemental DEIR that addresses these issues?

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THE DEIR FAILS TO INCLUDE A PEDESTRIAN AND NON-AUTO TRANSPORTATION PLAN (OTHER THAN THE EXISTING UCLA SHUTTLE SERVICE)

The General Plan Mobility Element emphasizes Pasadena's commitment to bicyclists, pedestrians and other non-auto forms of transportation. A guiding principle is that Pasadena "will be a city where people can circulate without cars." Toward this end, Pasadena will "encourage transit-oriented development and stress non-automotive modes of travel."

In Table 3.12-8 on page 3.12-48, the DEIR states that the Project is in conformance with the General Plan Mobility Element Objective 4.1 which is to "Increase the Availability and Use of Transit." But how can this be when the DEIR only recommends the existing shuttle system and is not recommending any increases of transit use?

The DEIR omits a study of the full implementation of transit measures. The DEIR discusses various traffic mitigation measures that are currently being utilized during UCLA football games. However, the DEIR does not describe how the traffic impacts of NFL could be mitigated if all transit systems were fully implemented.

⁴⁰ DEIR, p. 3.12-1 & footnote 1.

Moreover, in Table 3.12-8 on page 3.12-48, the DEIR lists the General Plan Mobility Element Policy 4.1.5 which is "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 the automobile through: providing park and ride lots." But, where is the increase to current conditions?

To mitigate single vehicular traffic access to the arroyo, the DEIR did not consider a regional shuttle system using regional carriers such as the MTA, Foothill and Santa Monica Blue Bus systems for "Park and Ride" locations outside Pasadena similar to the transportation system used by the Hollywood Bowl which has a very successful program. The Hollywood Bowl uses an extensive regional "Park and Ride" system for their venue of 18,000 seats. Certainly with the proposed 75,000 seats in the Project, a regional "Park and Ride" system should have been studied in order to take some of the burden off Pasadena streets and to augment the existing shuttle service between Parson's and the Project.

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The DEIR omits a Pedestrian Plan and Bicycle Plan. The nature of a Project's design, including the character and function of the adjacent street configurations and sidewalks, can either complement our goals to encourage pedestrians and bicyclists, or they can encourage more speeding cars.

The Project described and studied in the DEIR does not appear to address street and sidewalk conditions adjacent to the Rose Bowl. Similarly, the DEIR does not appear to separately analyze how the Project will encourage bicyclists, pedestrians and other non-auto forms of transportation.

The DEIR fails to include the following:

1. Methods to increase the use of public transportation in order to decrease reliance on the automobile through the use of a regional "Park and Ride" system.
2. The DEIR omits a study of the full implementation of transit measures.
3. Many of the transit routes listed in Table 3.12-1 do not appear to readily serve Rose Bowl events. It would be helpful if the table could include a column listing the distance of the closest bus-stop on the route to the Rose Bowl's main gate.
4. The DEIR made no new recommendations or analysis of an improved Pasadena based shuttle service⁴¹ which could include but not be limited to:
 - a. "clean and quiet" shuttle buses

⁴¹ TAC Scoping Comments, p. 2, item 3

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- b. more off-site park-and-ride locations within Pasadena
- c. more shuttle buses so that wait time becomes tolerable
- 5. The DEIR did not provide a Pedestrian Plan or analysis⁴²
 - a. A Pedestrian Plan or analysis is completely absent
 - b. Several streets into the Arroyo have no sidewalks or sidewalks on only one side of the street⁴³
 - c. No analysis of pedestrian linkages between the Project and transit systems.
 - d. No pedestrian safety analysis is provided
- 6. The DEIR did not provide a Bicycle Plan or analysis⁴⁴
 - a. There is no bicycle plan or analysis.
 - b. Amenities for bicyclists such as secure bike parking are not included or recommended.
- 7. The DEIR does not make any recommendations for the mitigation of conflict between recreational users in the Arroyo and the special event vehicular traffic⁴⁵ in the following areas:
 - a. Recreational users of the Arroyo for walking, running and cycling, especially in the Rose Bowl Loop
 - b. Equestrian trail users on the trail and staging area

DISPLACEMENT OF RECREATIONAL USERS OF THE ARROYO

10

The DEIR fails to study the displacement of bikes and pedestrians who go in and out of the Rose Bowl area during recreational use.

The DEIR does not adequately address through measurement and analysis of impact of the complete range of operational situations that are characteristic of (and prevalent in the

⁴² TAC Scoping Comments, p. 3, items 8 & 9
⁴³ DEIR pp. 3.12-4 through 8 (Roadway Descriptions)
⁴⁴ TAC Scoping Comments, p. 3, items 8 & 9
⁴⁵ DEIR p. 3.12-12

vicinity of the Rose Bowl on residents of the area and current users of Rose Bowl facilities, namely:

1. Game Day related:
 - a. Pre-game activities (activities, extent and impacts)
 - b. Post-game traffic and pedestrian movement
2. Day-to-day
 - a. Recreational
 - b. Pedestrian

10

THE PROPOSED ROAD LAYOUT IN THE DEIR IS INADEQUATE

The proposed revised road layout around the Rose Bowl is shown in Figure 2-2. In the area in front of the Rose Bowl, the current circulatory system is replaced by a roundabout arrangement with narrower road ways. This would appear to:

1. Reduce road capacity, and
2. Increase conflicts between recreational traffic/pedestrians and recreational traffic such as cyclists.

11

How does the proposed road layout lead to improved traffic and pedestrian circulation during and outside of game day/event activity? Why are there no physical improvements suggested as mitigation measures? These could improve LOS and safety by addressing pedestrian/vehicle conflicts.

THE DEIR'S EVENT MANAGEMENT SECTION IS INADEQUATE

- 12 DEIR Section 2.4.5 asserts that "The traffic control measurescurrently employed during displacement events ...are effective in the movement of vehicles into and out of the stadium parking areas".⁴⁶ How has this been established? What evidence is there to support this?

⁴⁶ DEIR p. 2-37 (Parking, Access and Circulation)

The DEIR proposes the establishment of a traffic control center at the Rose Bowl.⁴⁷ This is a valid and welcome idea. However, Section 2.4.5 continues by proposing continuation and expansion of the current measures, emphasizing a manually oriented approach to future events. This includes expansion of police control.

However, the DEIR points to evidence that the use of cones and barriers alone are not effective in encouraging drivers to use added inbound travel lanes created under a reversible lanes scheme.⁴⁸ This would point to the need to use measures other than the ones currently being utilized.

Advantage, instead, should be taken of the application of advanced traffic control technologies to support event traffic management options such as lane control signals for tidal/reversible flow. It is recognized that the use of CCTV is mentioned, but no indication of the number, location and use of these cameras has been suggested.

The expanded use of police officers for traffic control is also suggested⁴⁹ without consideration for the operational costs that would be involved. This proved to be a significant factor in event operational expenses at the Santa Anita Race Course which has adopted technology-based improvements to reduce these costs.

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A significant factor in effective event access management is the reduction in circulating traffic looking for parking spaces. If a scheme using the pre-allocation of parking spaces is not adopted, then there needs to be implemented an extensive dynamic parking guidance system⁵⁰ which would indicate to incoming traffic where available space are located. To be the most effective this would include the location of parking guidance signs on the Freeway.

The DEIR proposes the use of "temporary" (*sic*) freeway changeable message signs. To be correct, these signs are not temporary, but permanent. These are under the operational control of Caltrans, and are used according to Caltrans policies and procedures. These currently preclude the use of the signs in association with private events.

What assurances have been received from Caltrans that the Department is willing to operate the signs:

1. In support of the NFL events at the Rose Bowl, and
2. According to the procedures which would be developed by the City of Pasadena for traffic management?

⁴⁷ DEIR pp. 3.12-124 (Mitigation Measures and Residual Impact, MM 3.12-1)

⁴⁸ DEIR p. 3.12-12 (Offset Traffic Operations Summary)

⁴⁹ DEIR pp. 3.12-127 (Mitigation Measures and Residual Impact, MM 3.12-1)

⁵⁰ TAC Scoping Comments, p. 2 item 3

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Indeed, Caltrans does not appear in the list of organizations and persons consulted.⁵¹

There is the implication that the use of the freeway signs would enable traffic to be diverted to allow balancing of the flows of traffic to the Rose Bowl. However, DEIR Table 3.12-13 would appear to indicate that the majority of access routes have intersections at LOS E or F,⁵² so the opportunity for benefits in this area would seem to be limited.

CONSTRUCTION IMPACTS (PAGE 3.12-105, 109 & 110)

13

With respect to Impact 3.12-1, construction activities may obstruct traffic. The DEIR only appears to address emergency access. Does the DEIR consider access for recreational uses, golf course, Kidspace, the AAF Rose Bowl Aquatics Center, Brookside Park, etc. during construction? If not, why?

14

With respect to Impact 3.12-6, the DEIR's discussion of a Construction Staging and Traffic Management Plan does not appear to address enforcement and protection of neighborhoods.

THE DEIR MITIGATION MEASURES ARE INADEQUATE (SECTION 3.12.8)

The DEIR focuses on what we already know, rather than what else we can do.

15

It is regrettable that a more holistic approach has not been taken to identifying potential mitigation measures which use a variety of solutions for addressing the movement of traffic and people in and out of the Rose Bowl vicinity, especially during game days and major events.

The DEIR describes certain mitigation measures that would be required to address NFL traffic impacts.⁵³ Many of these mitigation measures currently are implemented in connection with UCLA football games and the DEIR states that the Rose Bowl should "continue" them.⁵⁴

The DEIR states that NFL would continue to provide offset traffic / reversible traffic flow along key street segments.⁵⁵ But, the DEIR also states that motorists are reluctant to use the reversible lane.⁵⁶

⁵¹ DEIR Table 6-1, p. 6-1

⁵² DEIR, pp. 3.12-75 & 76

⁵³ DEIR, pp. 3.12-124 through 130.

⁵⁴ *Ibid.*, p. 3.12-124 (Offset/Reversible Traffic Flow Along Key Street Segments, and Use of Police Helicopter to Assist Traffic Control Operations); p. 127 (Temporary Freeway Changeable Message Signs, Shuttle Buses from Parsons Complex, Wayfinding Guide Signs, Deployment of Traffic Control Officers).

⁵⁵ DEIR, p. 3.12-124

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The NFL also would continue the current Rose Bowl shuttle program from the Parsons complex.⁵⁷ The DEIR studied six intersections in the vicinity of the Parsons complex, and the traffic analysis was supposed to have been included as Appendix F to the Traffic Study.⁵⁸ Although the Traffic Study itself is included as Appendix G to DEIR, the Traffic Study does not include Appendix F, Figure F-1. See Traffic Study, pp. 128-129 (under separate cover).

The DEIR also calls for a traffic control command center at the Rose Bowl that would be linked to Pasadena's downtown center.⁵⁹ But, the DEIR does not discuss how this new command center will communicate with explorer scouts, staff and police that would be posted directing traffic at key intersections and streets.

NFL WOULD CREATE "SIGNIFICANT AND UNAVOIDABLE" TRAFFIC IMPACTS

16

The DEIR determines that NFL at the Rose Bowl would result in significant and unavoidable effects on transportation/traffic.⁶⁰ Utilization of off-site parking at the Parsons complex during weekdays would result in significant adverse impacts on traffic and circulation at the study intersections in the vicinity of the complex.⁶¹ The DEIR also found the Project to adversely impact average daily traffic on specified street segments, as well as impair implementation of the Highway Congestion Management Plan. NFL at the Rose Bowl "would result in significant adverse impacts on average daily traffic on specified street segments."⁶²

Even if all traffic mitigation measures described in the DEIR were utilized, at least twelve (12) of the study intersections would remain unmitigated during weekdays, per the City's significant impact criteria.⁶³ Moreover, six (6) of these intersections would operate at a Level of Service of "Failure."⁶⁴ These "LOS F" intersections include Orange Grove and California, San Rafael and the 134 Freeway, and Rosemont Avenue and Seco Street.⁶⁵ At least ten (10) of the study intersections would remain unmitigated during weekends, and five (5) of these intersections would operate at LOS E or F.⁶⁶ The DEIR concludes that

⁵⁶ Ibid., p. 3.12-12 (offset traffic operations summary).

⁵⁷ Ibid., p. 3.12-127; see also p. 95 (assuming continued use of 3,125 Parsons parking spaces)

⁵⁸ DEIR, p. 3.12-113 (Impact 3.12-8)

⁵⁹ DEIR, p. 3.12-124

⁶⁰ DEIR, p. 3.12-111 (NFL "would result in significant adverse impacts on traffic and circulation at the study intersections during both weekday and weekend special events at the Rose Bowl stadium").

⁶¹ Ibid., p. 3.12-113 (Impact 3.12-8)

⁶² Ibid., p. 3.12-114 (Impact 3.12-9)

⁶³ DEIR, p.3.12-129

⁶⁴ Ibid.

⁶⁵ Ibid.

⁶⁶ Ibid., p. 3.12-130

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↑ traffic impacts at these intersections during weekdays and weekends "would remain significant and unavoidable."⁶⁷

How much worse would the "significant and unavoidable" traffic impacts be if the DEIR had studied the omitted intersections, street segments and freeway segments discussed above? How much worse would the traffic impacts be if the DEIR had studied more than just one-hour "peak" traffic? How much worse would the traffic impacts be if the DEIR had addressed General Plan neighborhood protection principles? How much worse would the traffic impacts be if the DEIR had studied the impacts from NFL-related retail and non-game events? How much worse would the traffic impacts be if the DEIR had studied the displacement of recreational users of the Arroyo?

Is the DEIR inadequate because it fails to address these issues? Should the City prepare and circulate a supplemental EIR that addresses these issues? If not, why?

ECONOMIC IMPACTS OF NFL AT THE ROSE BOWL

17

Under CEQA, the City Council will be required to adopt a "statement of overriding consideration" if the environmental impacts of the Project cannot be fully mitigated. In effect, the City will have to find that the economic benefits of NFL would outweigh the environmental impacts. However, the DEIR does not discuss the economic impacts of NFL, including jobs and other economic benefits. Nor does the DEIR describe an economic alternative to NFL. When will the community be informed of the economic impacts of NFL, which would form the basis of a statement of overriding consideration? Will the community have an opportunity to review the potential economic benefits before the City Council votes to certify the EIR?

18

Thank you for this opportunity to review and comment on the DEIR. TAC looks forward to the City's responses to these Commissioner comments before the City Council takes action on the proposed renovation of the Rose Bowl.

Respectively submitted by:



Richard Quirk, Chair
Transportation Advisory Commission

⁶⁷ Ibid.

■ **Transportation Advisory Commission (March 21, 2005)**

Response to Comment TAC-L1

The commenter correctly states the significant and unavoidable impacts to traffic as presented in the Draft EIR. The remainder of the 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-L2

The commenter provides background material on the TAC review process. The remainder of the 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-L3

Refer to Response to Comment TAC-40 for discussions of traffic analysis study area, additional mainline freeway segment analysis performed for the Route 110 Pasadena Freeway, and the CMP transportation impact assessment of the Route 710 Freeway at California Boulevard and Arroyo Parkway at California Boulevard. Refer to Response to Comment TAC-87 for a discussion of the Lake Avenue/Route 210 ramps and the Sunday morning conditions associated with the Lake Avenue Church. Refer to Response to Comment TAC-29 for a discussion regarding Linda Vista impacts.

Regarding the comment on the CMP intersections, the commenter is referred to Section 19.0, Appendix G, Volume II of the Draft EIR for a full discussion of the CMP transportation impact assessment, including the traffic impact analysis of Pasadena Avenue/California Boulevard and St. John Avenue/California Boulevard intersections.

Response to Comment TAC-L4

Please refer to Responses to Comments TAC-41 and TAC-42 for discussions of the traffic analysis time periods.

Response to Comment TAC-L5

Refer to Response to Comment TAC-44 for a discussion regarding consistency with the Mobility Element and the associated neighborhood protection policies contained within. In addition, refer to Topical Response C for a discussion regarding the traffic analysis study area.

Response to Comment TAC-L6

Refer to Topical Response J for a discussion regarding the Arroyo Seco Public Lands Ordinance and Central Arroyo Master Plan.

Response to Comment TAC-L7

Please refer to Topical Responses E and F. The proposed economic terms of an NFL agreement will be publicly available prior to City Council consideration of the project. Refer to Responses to Comment TAC-13, 14, and 53 for a discussion regarding the use of shuttles and the Parsons complex, as well as impacts of Plan "C." In addition, refer to Section 4.8.2 of the EIR and Response to Comment KNA1-8 for a discussion regarding further reduction of parking in the Arroyo.

As a point of clarification, as shown on Table 1, page 8, Appendix G, Volume II of the Draft EIR, a total of 12,366 golf course parking spaces and 3,925 turf parking spaces are currently provided at the Rose Bowl via 2-stack parking. This constitutes approximately 76 percent of the parking supply located with the Arroyo Seco.

Response to Comment TAC-L8

Please refer to Response to Comment TAC-27 for a discussion of the project retail facility components including the Hall of Fame, Team Store and Media uses. Refer to Response to Comment TAC-41 for a discussion of the Draft EIR analysis time periods. Refer to Response to Comment WPRA4-23 for a discussion of pre-game activities and other potential non-game NFL related events. Refer to Response to Comment TAC-21 for a discussion of the weeknight sold-out event analysis at the Rose Bowl. Therefore, a supplemental traffic analysis is not required.

Response to Comment TAC-L9

Please refer to Response to Comment TAC-15 for a discussion of bicycle routes in the vicinity of the project. Refer to Responses to Comment TAC-53 for discussions of transit services in the project vicinity, modes of transportation assumed, clean air vehicles/shuttles, and shuttle fleets. Refer to Response to Comment TAC-58 for a discussion of the proposed transportation mitigation measures, including measures to increase mass transit ridership. Refer to Response to Comment TAC-54 for a discussion of the project's anticipated impact on pedestrian circulation. Refer to Response to Comment TAC-15 for discussions of bicycle routes in the project area and impacts to recreational users during special event time periods. Refer to Response to Comment TAC-82 for a discussion of additional mitigation measures considered as part of the Draft EIR traffic analysis. Figure 3, page 22, Appendix G, Volume II of the Draft EIR shows the transit lines in the vicinity of the proposed project. It is important to note that during the time the Draft EIR was being circulated for public review, Pasadena ARTS (Route 50) was revised to Route 51/52 and continues to provide service through the Arroyo Seco, along Seco Street between Rosemont Avenue and West Drive. An eastbound Route 51/52 stop is provided on the south side of Seco Street, west of Rosemont Avenue, while a westbound Route 51/52 stop is provided on the north side of Seco Street, west of Rosemont Avenue. In addition, MTA Route 267 provides service along Lincoln Avenue and stops are provided near Seco Street.

Table 3.12-8 on Page 3.12-48, regarding policy 4.1-5 of the Mobility Element, does not state that there will be an *increase* in the use of public transportation as stated in the policy. It is true that shuttle service will be increased proportionately to the increased number of events. However, because parking will be *decreased* in the Arroyo through implementation of the proposed project, those displaced vehicle riders will of necessity use the shuttle service or other means to enter the Arroyo, as they will be unable to park directly near the stadium. Parking will be

decreased from current conditions by 3,000 spaces, which may shift those patrons to other modes of transportation, thus providing consistency with this policy of the Mobility Element.

Response to Comment TAC-L10

Please refer to Response to Comment TAC-15 for discussions of bicycle routes in the project area and impacts to recreational users during special event time periods. Refer to Topical Response B for a discussion regarding casual recreation users. Refer to Responses to Comment TAC-41 and 42 regarding time period analysis on game day, and refer to Topical Response M regarding set-up and take-down schedules for events.

Response to Comment TAC-L11

Please refer to Response to Comment TAC-84 for a discussion of the roadway circulation plan

Response to Comment TAC-L12

Please refer to Response to Comment TAC-77 for discussions of the effectiveness of current traffic control measures and the provision of an upgraded state-of-the-art traffic command center. The exact number and locations/placements of the closed circuit television (CCTV) will be determined in conjunction between the City's Police, Public Works, and Transportation departments. Traffic control measures such as lane control signals were considered socially infeasible and not recommended due to their inconsistency with the residential character of surrounding streets and the natural character of the Arroyo.

Refer to Response to Comment TAC-78 for a discussion regarding the costs associated with the deployment of additional traffic control officers.

Please refer to Response to Comment TAC-58 for a description of the measures recommended to improve inbound and outbound traffic flow during events. Please refer to Response to Comment TAC-80 for discussions on the continued utilization of Caltrans changeable message signs and consultation with Caltrans throughout the NOP process. Also refer to Responses to Comments DOT-1 through DOT-4 for responses to comments provided by Caltrans on the Draft EIR.

As a point of clarification, as shown on Table 3.12-13, Volume I of the Draft EIR as referenced in the comment, of the 26 study intersections, a total of 16 intersections are projected to operate at LOS D or better during the future year 2008 with project weekend special event conditions (without mitigations). Therefore, the comment with respect to most access routes with intersections operating at LOS E or F conditions is not substantiated.

Response to Comment TAC-L13

Please refer to Response to Comment TAC-16 for a discussion of the construction analysis associated with the proposed project. Refer to Response to Comment TAC-89 for a discussion of recreational uses during construction.

Response to Comment TAC-L14

Please refer to Response to Comment TAC-16 for a discussion of the preparation of the Construction Staging and Traffic Management Plans. The enforcement of the approved Construction Management Plan will be the responsibility of the City's Planning and Development Building Division.

Response to Comment TAC-L15

Please refer to Response to Comment TAC-58 and TAC-79 for descriptions of the proposed transportation mitigation measures. With presence of additional traffic control officers at key locations, motorists will be directed to utilize the reversible lane in a more effective manner during the special event departure time periods.

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.

Traffic personnel (police, staff, and explorer scouts) will be in direct communication via radio contact with the Police helicopter and the police stationed in the Traffic Control Center (refer to page 111, Appendix G, Volume II of the Draft EIR).

Response to Comment TAC-L16

Please refer to Topical Response C for a discussion of the formulation of the traffic analysis study area. Refer to Response to Comment TAC-41 for a discussion of the traffic analysis time periods.

Traffic impacts have already been identified as significant and unavoidable with respect to identified intersections and street segments. An impact cannot be greater than significant and unavoidable; i.e., there are no further levels of significance within levels defined in CEQA. A statement of overriding considerations will be required for all significant and unavoidable impacts, and the EIR has identified all significant and unavoidable impacts. Please also see Topical Response A. If the General Plan neighborhood protection principles had been specifically addressed, impacts would not increase in level of significance, nor is the project necessarily in conflict with those principles. Please refer to Response to Comment TAC-44. The project will generate traffic on relatively few occasions during the year. Regardless, the decision-makers have been adequately informed by the analysis in the Traffic section to be able to determine the level of significance of traffic impacts.

Please refer to Response to Comment TAC-27 for a discussion of the analysis of the retail facility component of the project. Refer to Response to Comment TAC-15 and Topical Response B for a discussion of impacts to recreational users during special event time periods.

Response to Comment TAC-L17

Refer to Topical Responses E and F for a discussion of economic considerations of the project.

Response to Comment TAC-L18

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.

NEW
CORRESPONDENCE / MATERIALS
FOR
COUNCIL MEETING OF
MAY 16, 2005

Rodriguez, Jane

From: Rodriguez, Jane
Sent: Thursday, May 12, 2005 9:00 AM
To: 'DONLRAE@cs.com'
Subject: RE: (no subject)

Would you be willing to provide your name and address for the record?

--Jane Rodriguez, City Clerk

-----Original Message-----

From: DONLRAE@cs.com [mailto:DONLRAE@cs.com]
Sent: Wednesday, May 11, 2005 11:14 PM
To: Rodriguez, Jane
Subject: (no subject)

Mayor Bogaard:

Please vote no on the NFL in our city.

We have lost so many great things already, great buildings and the great ambience that Pasadena once was. It is getting too big. Already too much traffic and too much smog - one of the smoggiest cities around, as you know.

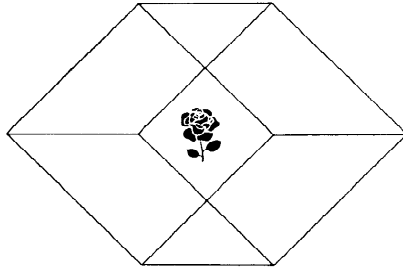
Can't get across town in less than 40 minutes.

Please do not introduce more smog and more traffic into our city.

There are other cities. Let them go to one of them.

SPACE ENHANCING

OFFERING DIRECTION TOWARD PERSONAL AND ENVIRONMENTAL STRESS-RELIEF THROUGH INNOVATIVE SYSTEMS • PRODUCTS • SERVICE



To: Pasadena City Council

May 9, 2005

RE: N.F.L. Question - (Sat. MAY 7, 200)

Pasadena Star News - Guest View - NFL Team too costly for Pasadena - by President, Pasadena Heritage - Sue Mossman.

My opinion, as reader of the Pasadena Star News - and as a 50 year resident of Pasadena, La Cañada Flintridge, and Altadena, California, is as follows:

1. We are NOT mind readers, and no one knows what the future holds; not even the R.B.O.C.
2. There is ample passion on both sides to suggest VERY STRONGLY that we hold open, decision directives until a mutually balanced vision of Competence is allowed to emerge:

- A. A passionate energy to improve, claim, expand and succeed, regarding the total expansion of the Brookside Area; and in the process pay for past errors.
- B. A passionate energy to maintain the Parkland which is rapidly disappearing; Deal with the negative impact which would cost Pasadena dearly - and also Southern California - and cause giving up its National Historic Landmark Status; Deal with the shared space of the pedestrian zone and the shared auto/bicycle lane around the Rose Bowl as currently configured; Drastic changes in public services monitoring that area (Police, Fire, transportation vehicles) including Freeway Exits and
(OVER, PLEASE)

05/09/2005

7.B.(1)

(not distributed at meeting)

471 West Loma Alta Drive

HELEN TARR COATES
(818) 798-5605

Altadena, California 91001

all city streets - (adding smog to the already smoggy season).

3. If it is found best for Pasadena and Southern California to change the entire historical value, use, beauty and personality - along with the environment of our cities to accommodate the R. B. C. C. - after a less passionate review, with a mutually balanced whole - so be it.

But this is the time to remember: the Cart does not go before the horse.

Respectfully submitted,

Helen T. Coates
Altadena

Dear Ms. Rodriguez,

I have created a petition online for people to sign opposing the NFL Proposal. The petition is available through a link at www.SavePasadena.info.

The petition text states:

"I am opposed to the NFL Proposal for the Rose Bowl because of the negative consequences it would cause for Pasadena and all its residents.

The Pasadena City Council should vote NO and reject the NFL Proposal."

Following are the signatures that we downloaded as of early this afternoon. Please enter this into the record.

Thank you,



Elizabeth M. Phelps

PETITION SIGNATURES:

ID "FIRST NAME" "LAST NAME" ADDRESS CITY STATE "ZIP CODE" EMAIL
COMMENTS

- 1 Elizabeth Phelps "646 S Madison Ave" Pasadena CA 91106
- 2 Lewis Phelps "646 S. Madison Ave." Pasadena CA 91106 "Don't ruin the Arroyo and Rose Bowl by turning the Rose Bowl into another Soldier Field!!"
- 3 Catherine Phelps "646 S Madison Ave" Pasadena CA 91106 "This proposal will be a disaster for our quality of life. Save Pasadena today."
- 4 Laura Olinski 91106
- 5 John Olinski 91106
- 6 Joyce "Huyett Turner" "1281 N. Catalina Ave." Pasadena CA 91104
joycehturner@sbcglobal.net "Save our historic Rose Bowl and the beautiful Arroyo!
Just say no to the NFL."
- 7 "William W." "Ellinger III" "516 South Oakland Avenue" Pasadena CA 91101
ellinger.wm@sbcglobal.net
- 8 James Edwards "4855 Walnut Grove" Rosemead CA 91770 ibm686@earthlink.net
- 9 Sharon Yonashiro Pasadena CA 91105 sharon.y@mac.com "I believe there are other ways to improve the stadium without this drastic alteration to the Rose Bowl and the negative effects this intensity of events will have on the park, the neighborhood, and the City."
- 10 Janet Gordon "313 Arlington Drive" Pasadena CA 91105-3372
- 11 Philip McGrath "355 South Los Robles #242" Pasadena CA 91101
Ppasadenaphil@aol.com "To allow an NFL team into Pasadena to play in the Rose Bowl would be a disaster which could not be reversed once it has been done. This

05/09/2005

7.B.(1)

Submitted by Elizabeth Phelps
(not distributed at meeting)

action would forever change the character of our beautiful city. There can be other means to finance the upkeep and upgrading of the Rose Bowl. Please say no!!!! this this terrible proposal."

12 Philip Barnes-Roberts "323 Marathon Road" Altadena CA 91001-4426
pbarnrob@acm.org "Many of us walk the three-mile circuit around the Rose Bowl and golf course several times a week, for healthful exercise and a cheerful start to the day. I must meet easily a hundred walkers/runners/cyclists on every circuit (too many going the wrong way. ""Walk Facing Traffic"" signage needed - but that's another topic.) All this will be lost if the historic Arroyo site becomes just another mall around a new stadium. The Rose Bowl and Brookside is just fine as it is."

13 Carolyn Wilson 91103 "The NFL will destroy the great city of Pasadena!"

14 Andy Wilson "803 S Oakland Ave" Pasadena CA 91106
andrew_r_wilson@yahoo.com "They will destroy a great landmark and negatively impact too many critical elements that are important to our quality of life."

15 Herbert Meiselman "627 East Mendocino St" Altadena CA 91001
meiselma@usc.edu

16 Jenna Olsen 91214

17 Diana Britt "280 Sequoia Drive" Pasadena CA 91105 dkbritt@earthlink.net "The NFL is just playing with us, as they have from the beginning. Quit spending City money even considering their proposal."

18 Candice Miller "745 N. Pasadena Ave. #4" Pasadena CA 91103

19 Lawanda Allee "285 Malcolm Drive" Pasadena CA 91105 "How much more is the city going to sell out the quality of life in Pasadena? Overbuilding is rampant and traffic is already heavy, frustrating and unhealthy."

20 Lindsay Walter "800 Hilgard Ave" "Los Angeles" CA 93101 lindsayw@ucla.edu
"Keep it for UCLA!"

21 Douglas Madsen 91103

22 Nancy Kristofferson CA 91105

23 Gregory Miller "745 N. Pasadena Ave. #4" Pasadena CA 91103
gandcm@charter.net "The Rose Bowl is for the whole of the Pasadena community to share in a variety of activities. In that way it serves the needs of all of us that live in Pasadena. This NFL Proposal eliminates consideration of the community for the sake of a few that will be monetarily reimbursed for their efforts to compromise Pasadena's quality of life. To approve this proposal will only achieve lining the pockets of a few at the cost of destroying Pasadena for all of us that have invested our lives here."

24 Michael Schneickert "1330 Hillcrest Av." Pasadena CA 91106

25 donald hall "475 la loma rd" pasadena CA 91105 "The qualitative beauty of our wonderful little city is being threatened by more and more traffic. I have seen traffic studies that show a small increase in volume at a certain point increases the travel time exponentially."

26 James Ipekjian 91106

27 Jennifer DeVoll 91106 devoll@sbcglobal.net "I am concerned about the traffic and impact on the Arroyo parkland that we all enjoy on weekends."

28 Kathleen Ipekjian CA 91106

29 Carolyn Barela 91001 "I am strongly against the NFL Proposal for the Rose Bowl. There is enough congestion in the area and I see no benefit to the public at large."

30 Barbara Christopher "574 Bellefontaine St." Pasadena CA 91105
BOCWWC@aol.com

31 William Christopher "574 Bellefontaine St." Pasadena CA 91105
BOCWWC@aol.com

32 Sally Howell "625 S. Hudson Avenue" Pasadena CA 91106 "WE DON'T WANT THE NFL IN PASADENA....THIS IS NOT WHAT THIS CITY IS ABOUT. RECALL STEVE MADISON!!!!!"

33 Lisa Montano 91105

34 Jennifer Phelps "646 South Madison Avenue" Pasadena CA 91106-3830
jenniphelps@mac.com "Because of a similar remodeling project Soldier's Field in Chicago now looks like it has a UFO sitting on top of it. Please don't do the same to the Rose Bowl."

35 Rebecca Smith 91105

36 Andrea Rawlings "375 Anita Dr." Pasadena CA 91105 "I am also oppose to the effects the NFL's requirements would have on the Rose Bowl as a venue."

37 Lazzaretto Christine 91001

38 John Ipekjian "636 S. Mentor Ave." Pasadena CA 91106

39 Marsha rood "216 S. Madison Ave. #302" Pasadena CA 91101
marsharood@earthlink.net "Saving the Rose Bowl and attracting the NFL to Pasadena are mutually exclusive activities and should be considered as such. It is clear that the impacts to the Linda Vista neighborhood are substantially, particularly for traffic congestion, and the ability of the community as a whole to enjoy what open space we have in the city would be constrained in the face of a growing population. If the NFL is desirable to have in Pasadena, where should it be? If saving the Rose Bowl is desirable, what are the alternative that further that goal? The public discussion is much too linked -- one action should be considered separately from the other."

40 Jesse Dillon "516 S. Oak Knoll Ave. #6" Pasadena CA 91101 jdillon6@earthlink.net

41 Rosalyn Rich "4942 Hellman Avenue" "Los Angeles" CA 90042-5006
rosalynr@juno.com "I walk the around the Rose Bowl 3-5 nights or more a week with 2-4 other walkers. This is the most central and level place for us to walk. There must be at least 100 other walkers, runners and bikers out there doing the same circuit ever time I have been there. We have walked as late as 11PM and there are always plenty of other people out there using the Rose Bowl for exercise. With obesity running rampant in our country we need places such as this to get the exercise we desperately need. I am always trying to get more of my friends to walk with us every night. Please think of us, the continuous users, when you make a decision about the use of the Rose Bowl area."

42 Chris Peck "1211 Romney Way" Pasadena CA 91105

43 steven ralph "1050 seco st 104" pasadena CA 91103 yere2@hotmail.com

44 Mary Barrie "5159 Crown Ave" "La Canada" CA 91011 meb787@aol.com "This is a crucial decision which will effect Pasadena negatively for years to come. The process