

CORRESPONDENCE / HANDOUTS

FROM

COUNCIL MEETING OF

MAY 9, 2005



PLANNING COMMISSION
Pasadena, California

May 6, 2005

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

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CITY CLERK
CITY OF PASADENA

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

Dear Mayor Bogaard and Members of the City Council:

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

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

Among other deficiencies, it was noted that:

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

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Submitted by Liz Trussell

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

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

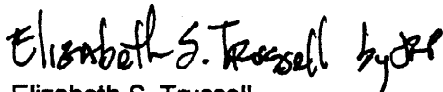
After such discussion, the PC unanimously adopted a motion (8-0; 1 Commissioner absent) authorizing the Chair of the PC to express to the City Council the decision of the PC to make **no statement of recommendation regarding the FEIR** due to:

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

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

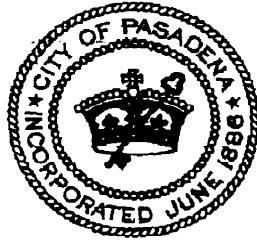
Thank you for your consideration of the issues raised in this letter. I plan on attending the Council's May 9, 2005 meeting and will present these issues and the Commission's deliberations in greater depth at that time.

Very truly yours,



Elizabeth S. Trussell
Chair, Planning Commission

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



TRANSPORTATION ADVISORY COMMISSION

May 9, 2005

William Bogaard, Mayor
Steve Madison, Vice Mayor
Members of the City Council
City of Pasadena
100 N. Garfield Avenue
Pasadena, CA 91109

Subject: Environmental Impact Report for Rose Bowl Stadium Renovation Project, State Clearinghouse No. 2004101073 (EIR)

Dear Mayor Bogaard, Vice Mayor Madison and Members of the City Council:

On March 21, 2005, the Transportation Advisory Commission submitted 19 pages of comments directed at the traffic and transportation section of the Draft Environmental Impact Report for the Rose Bowl Stadium Renovation Project. Commissioners received copies of the Final EIR, including the responses to TAC's comments, on the evening of May 2, 2005, three days before our regularly-scheduled May 5 meeting and seven days before the City Council's May 9 public hearing on the Final EIR.

At our May 5 meeting, Commissioners discussed their concerns regarding the timing and review process for the Final EIR. Commissioners concluded that the compressed schedule for the Final EIR would not allow sufficient time for Commissioners to review the responses to TAC's comments on the EIR. Therefore, TAC was unable to review and comment on the Final EIR.

The proposed Rose Bowl renovation would have significant traffic and transportation impacts. Despite our willingness to review and analyze the responses to comments, however, the compressed time schedule precluded TAC from providing the Council with any further input and advice regarding the EIR.

Respectively submitted by,

Vince Farhat, Chair

Juan Carlos Velasquez, Vice Chair

05/09/2005
7.B.(1)

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Submitted by Alan Clelland

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P A S A D E N A H E R I T A G E

May 9, 2005

Mayor Bill Bogaard and Members of the City Council
City of Pasadena
100 North Garfield Avenue
Pasadena, CA 91109

RE: The NFL Proposal for the Rose Bowl

Dear Mayor Bogaard and Council Members:

As of tonight, you will formally undertake consideration of the NFL Proposal for Rose Bowl. As we understand the procedure, you must:

Consider whether or not the EIR is a complete document,
including whether you have enough information on feasible
alternatives and whether there has been sufficient opportunity
for public review and comment

Consider whether or not a proposed deal with the NFL guarantees
economic benefit to the City

Consider whether the benefits outweigh the negative impacts identified
in the EIR and could justify adopting a "Statement of Overriding
Considerations"

With regard to the EIR, Pasadena Heritage contends that:

- the EIR is not a complete document,
- there is a feasible alternatives that has not been studied, and
- insufficient time was provided to the public to review the "Final" EIR and that no city commissions have had time to review responses to their comments and advise you on this important matter

Pasadena Heritage further concludes, with regard to the NFL deal:

- there is too little information on the NFL deal to evaluate its benefits, and
- the deal has not been approved by the NFL and is highly speculative
- the full economic cost to the city has not been studied and no information has been provided

No Statement of Overriding Considerations can be considered because:

- monetary gain from the NFL does not outweigh the negative impacts identified in terms of traffic, cultural resources, aesthetics, air quality, noise, and land use, and
- there is not sufficient information available to make findings to support a Statement of Overriding Considerations.

The EIR

Pasadena Heritage finds that there are many misstatements and incorrect assertions in the final EIR. Given the short amount of time we have had to review the Final EIR, we have, thus far, been able to draw only partial conclusions. The Final EIR is woefully incomplete in one significant environmental area: Recreation. This deficiency was identified in several responses to the draft, and a minor amount of additional information was included in the Final EIR. On page 9-7, reference is made to a study done as part of the Arroyo Seco Master Plan during a one-hour, weekday period (5:30 to 6:30 pm) which counted 885 users. (An addition study was quoted from June 1992 thirteen years ago.) Consider that an NFL game lasts several hours, could begin at various time during the day (9:00 am, 1:00 pm or 5:00 pm), the counts may differ dramatically. Even multiplying the 885 users by 4 hours would provide a more realistic number for consideration, but this was not done.

No attempt was made to count current casual recreation users of the Arroyo or to conduct a count on Sunday, the day most NFL games would occur. The Arroyo offers free, public recreational opportunities that are not available in any other Pasadena park. The mitigation offered is that trails other facilities and the loop will remain open during displacement events, but if takes substantial time to get into the area due to football traffic, there is no free parking available for recreational users, and the Arroyo is flooded with traffic and fans going to and from the stadium, casual recreational users are, in fact, shut out from regular activities. Some information is provided on various other parks in Pasadena, but no determination of capacity in those parks on Sunday for additional users is given. The statement is made that no additional study is required.

The final EIR concludes that there are significant and unavoidable impacts on Area H, Brookside Golf Course, portions of Brookside Park and the Aquatic Center on page 9-8. It then ignores casual recreation users, as described above. We contend that there are further negative and unavoidable impacts on casual recreation. The study concludes that "no further analysis is required" and that the impacts can be mitigated to a level of insignificance. We strongly disagree with the conclusion and believe that more study is needed, and that the likely result will be that Recreation is added to the list of areas where there are unavoidable negative impacts that cannot be mitigated.

Alternatives

Pasadena Heritage also finds the Final EIR incomplete because it fails to study an alternative that provides for continued sound maintenance and any necessary improvements to the Rose Bowl, designed in keeping with the Secretary of the Interior's Standards (which would assume the identification of revenue sources to strengthen the Rose Bowl's finances). This alternative was not studied in the Draft EIR and, in response to our second request to look at this option in our comments, is dismissed in the Final EIR with the comment that since no funding sources had been identified, the alternative was not considered.

Financial considerations are not the focus of an EIR. This alternative is entirely feasible if funds could be found from sources other than the NFL. Other alternatives that were studied -- including the Alternative Design Alternative, rejected by the NFL, and the restoration alternative, have no proposed financing either. Members of the public have offered suggestions for funding, but none have been studied.

The reason this alternative is particularly important is that the NFL deal is very speculative at this point, and this alternative represents most closely what will need to happen if there is no deal with the NFL. It is unfair to the public and to decision makers to have no "Plan B" to compare to the proposed project. The council is being asked to basically compare no project with the proposed project, which is not the true picture.

It should be noted for the record that none of the alternatives studied meet all the goals of the project.

Several other comments and questions raised by Pasadena Heritage appear not to have been sufficiently answered in the final EIR. We are still reviewing the documents in order to fully understand and evaluate its contents.

Insufficient Time for Public Review

There has been insufficient time for the public to review the Final EIR and the adequacy of responses to comments submitted on the draft document. The Final EIR was supposedly issued on April 29, ten days before this hearing. No copies of the Final EIR were available to the public to review that day. The Final EIR was not posted on the City's website nor available at the public libraries.

Members of the Planning Commission were given copies of the Final EIR on the issue date. The Planning Commission held a special meeting to discuss the EIR on Wednesday, May 4, but it was not considered by staff to be an official public hearing, so was not noticed and no resources were provided to the commission to help them review or evaluate the information. No other advisory commissions were provided information or afforded the time to review and comment on the final document.

Copies of the final EIR on disk were finally available to the public on Monday, May 2. A few printed copies were available if members of the public were persistent in demanding that they be provided with a written copy. Members of the City Council were not provided with printed copies of the Final EIR until Friday, May 6, three days prior to the hearing.

To the best of our knowledge, those who submitted comments on the draft have not received answers to their comments as required under CEQA.

The Final EIR is a complex 2-volume document which is tied directly to the earlier volumes of the Draft EIR. To review the information in the final document, one must refer back to the original draft, cross reference charts and written materials, and sort out

general answers from specific ones. It is a time-consuming process involving a complex set of technical information. The City Council has had four days to do this.

The staff report, NFL deal points, findings and Statement of Overriding Consideration were issued online on Friday, May 6, at approximately 8:00 p.m. No member of the public or even the decision makers had access to these documents before that time. It is an insult to the decision-making process to have so little time to review these documents which are the basis of a monumental decision.

Pasadena Heritage vehemently protests the lack of information provided to the public in a timely manner in order for it to participate in the process. We do not feel the council has had ample time to review and consider all the information it needs to make an informed decision. Input from the city's various commissions, appointed to advise the Council, is critical to good decision making on this important matter, and there has been no time for the commissions to consider the Final EIR or make recommendations.

The NFL Deal is incomplete and benefits, other than rebuilding the Rose Bowl, are not clearly identified or quantified.

The outline of an NFL deal is included in the Council materials for the May 9 meeting. This two-page document is vague and generalized (understandable since negotiations are still underway). The NFL, to our knowledge, has agreed to nothing. Since the basis of the decision is the economic benefit of an NFL deal vs. the serious environmental impacts that would be caused, the Council should not even consider a Statement of Overriding Consideration until it has a written agreement with the NFL that specifies exactly what the benefits will be.

Pasadena Heritage reserves the right to comment more completely once it has had time for further review of the Final EIR and time to review the staff recommendation, findings, deal points, and draft Statement of Overriding Considerations.

Sincerely yours,



Susan N. Mossman
Executive Director

Enclosures:

Executive Summary of conditions survey of the Rose Bowl
Letter from Susan Brandt-Hawley

March 10, 2004

Executive Summary

The Rose Bowl Stadium Facility, originally constructed in 1922, has undergone numerous renovations, expansions, and remodeling efforts during its 80-year history. A rigorous continual maintenance program has been implemented to preserve use of the Stadium over the years. The attention given to the facility has significantly contributed to the overall good condition of the Stadium. The following is a brief synopsis of each of the building systems studied. For more detailed information, one can refer to the remainder of the Condition Survey Report.

Civil Report: The existing paving and sub-grade utility systems are in good condition. Replacement of the asphalt pavement surrounding the Stadium is the only expected significant item requiring attention in the next 20 years. We estimate that the pavement will need to be removed and replaced within five to ten years. All other civil-related components will require the continuance of the standard maintenance now being employed.

Plumbing System Report: The plumbing and fire protection systems are in good condition. The age and condition of the equipment was documented and considered as a part of the overall replacement schedule. Continued maintenance of the plumbing and fire protection components will help assure that the facility will be usable for the desired 20-year time period.

HVAC System Report: The HVAC system is also considered to be in good condition with only a few exceptions. As with the plumbing system, the age and condition of the equipment was documented for maintenance and replacement considerations.

Electrical System Report: The electrical system has been reviewed and evaluated in order to determine the required maintenance and replacement of various electrical components. It is recommended that the electrical system continue to be maintained as has been done in the recent past. We recommend that specific electrical components be replaced at the time period designated to ensure a usable facility. These recommendations have been formulated in conjunction with discussions our office has had with Mr. Steve Mozo. The recommendations included herein provide a description of the suggested maintenance and replacement necessary to facilitate continued use of those electrical systems.

Overall, the Rose Bowl Stadium is in good condition. With persistent maintenance, the Stadium will continue to provide the Rose Bowl Operating Company, the City of Pasadena, and its users with a functional facility. As a result of these efforts, Osborn Engineering contends that the Rose Bowl will maintain its reputation as a prominent and highly regarded facility by others throughout the country.

The recommendations noted herein are accompanied by an associated probable construction cost. The costs are segregated into yearly expenses to facilitate assessment of expected annual expenditures. Please refer to the next two (2) pages for a summary of annual costs.

BRANDT-HAWLEY LAW GROUP

Environment/Preservation

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Glen Ellen, California 95442

May 9, 2005

Susan Brandt-Hawley
Paige J. Swartley

Legal Assistants
Sara Hews
Shannen Jones

Law Clerk
Rachel Howlett

Mayor Bill Bogaard
Members of the City Council
City of Pasadena
100 N. Garfield Avenue, Room 237
Pasadena, CA 91109
fax: 626-744-3921

Re: Rose Bowl Stadium Renovation Project

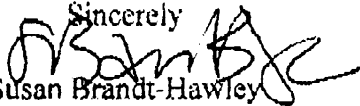
Dear Mayor Bogaard and Councilmembers:

On behalf of Pasadena Heritage, I am writing to respectfully request that the Council deny the Rose Bowl Stadium Renovation Project, and in doing so exempt it from CEQA without certifying the EIR.

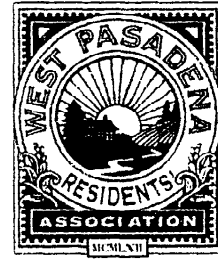
The EIR notes that the Rose Bowl Stadium is "a world-class stadium known as 'America's Stadium.'" Although some key inadequacies remain relative to assessment of project impacts and alternatives, in many ways the EIR process has worked well for this project as it discloses that renovation for use by the NFL would have many, many significant and unavoidable environmental impacts.

Among conceded project impacts is the overarching fact that requested alterations would compromise historic integrity to an extent sufficient to forfeit status as a National Historic Landmark. Pasadena is the envy of cities in California and nationwide that do not have a National Historic Landmark, much less one regarded so fondly and associated with recreation and artistic expression rather than tragedy. Pasadena Heritage points out that choosing to lose the credibility of such a landmark, especially when a more modest rehabilitation project with alternative funding sources has not been explored in the EIR, would be contrary to the mandates of CEQA and the City's long-term legacy.

Thank you very much for your consideration.

Sincerely

Susan Brandt-Hawley

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May 9, 2005

William Bogaard, Mayor
Members of the City Council
City of Pasadena
100 North Garfield Avenue
Pasadena, California 91109

Dear Mayor Bogaard and Members of the City Council:

The West Pasadena Residents' Association (WPRA) urges the City Council to reject as inadequate the Final Environmental Impact Report for the Rose Bowl Renovation Project (EIR).

HERE ARE THE TOP TEN REASONS WHY!

1. The EIR review process is flawed and totally inadequate.

The WPRA submitted extensive written comments on the Draft EIR. However, the Final EIR was not released to the public until April 29, 2005 and **the Final EIR still was not posted on the City's website as of May 8, 2005** (*four days after* the Final EIR went to the Planning Commission and *one day before* it comes before you at City Council!). Moreover, both the Planning and the Transportation Advisory Commissions were unable to review and comment on the Final EIR because of the highly compressed time schedule. How can the citizens of Pasadena possibly review, analyze and make comments on the Final EIR with this timing? The City Council should reject the Final EIR and refuse to certify it because the public has not had adequate time to review and respond to the responses to comments.

2. There were no significant alternatives studied!

For example, there were:

- No alternatives to the NFL.
- No significant alternative designs.
- No alternative parking plans to save the parkland turf and golf course greens.
- No alternative traffic management plans or alternatives to the shuttle bus system.

WEST PASADENA RESIDENTS' ASSOCIATION
POST OFFICE BOX 50252 • PASADENA, CA 91115

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Submitted by Dorothy Lindsey

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There appear to be no alternatives for tenants or uses other than an NFL team in the Rose Bowl, which were considered or studied during the EIR process. The Final EIR does not study or consider an alternative design of any real significance, nor does the Final EIR study alternatives for parking at the Rose Bowl during proposed game times. The City Council should reject the Final EIR and refuse to certify it because it fails to study design, transportation and parking alternatives, or alternatives to the NFL.

3. There was no attempt to address the displacement of park users in the Arroyo Seco!

The Final EIR does not adequately address the NFL's displacement of other recreational uses of the Arroyo Seco. Users of the Arroyo Seco come from all parts of Pasadena. **The Arroyo Seco is our largest park in a city that has a low park acreage per capita ratio. Our park users would be squeezed out on many of the weekend days for six months from August through January.** It is on the weekends that the parkland is used most heavily by citizens across our entire city from kids that play soccer on the turf, to walkers and joggers on the "loop", golfers at Brookside and more. The Final EIR also fails to adequately measure and analyze the impact of NFL's complete range of operational activities, including pre-game activities (as well as their extent and impacts) and post-game traffic and pedestrian movement. The City Council should reject the Final EIR and refuse to certify it because it fails to study displacement of non-NFL recreational uses and fails to study pre-game and post-game NFL activities.

4. Placing a NFL stadium in the middle of our largest park and surrounded by residential neighborhoods would be in conflict with our General Plan.

If the Council certifies the Final EIR, and the NFL actually comes to Pasadena, the Rose Bowl stadium will be the only NFL stadium to be sited in a residential neighborhood. **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 City Council should reject the Final EIR and refuse to certify it because the negative impacts of the NFL on our recreational users of the Arroyo Seco and to the surrounding neighborhoods would be substantial, unavoidable and unmitigated.

5. The EIR Traffic Study and traffic mitigation plan is deficient and inadequate.

As discussed in the Traffic Advisory Commission comments on the Draft EIR, the WPRA is concerned that the EIR under-reports the traffic impacts from the NFL. As you know, the EIR concluded that the 110 Freeway was not a regional access point for the Rose Bowl and therefore did not study any intersections between the 110 and California Blvd. Notwithstanding the consultant's response in the EIR, **the failure to include the 110 Freeway is a glaring inadequacy** that renders the Final EIR un-credible as a tool for the City Council to meaningfully consider the NFL proposal. The significant and

unmitigated traffic impacts would be much worse if the EIR had adequately studied the 110/California Blvd. corridor. The City Council should reject the Final EIR and refuse to certify it because the traffic study is flawed and deficient.

6. The NFL has a history of coming into "major" cities with the promise of new jobs and economic benefits that in reality do not come to fruition.

Attached to this letter is a copy of an article by Roger G. Noll and Andrew Zimbalist entitled "Are New Stadiums Worth the Cost?", which outlines some facts that are relevant to the renovation of the Rose Bowl for an NFL team. The article states that "...A new [or renovated] sports facility has an extremely small (perhaps even negative) effect on overall economic activity and employment. No recent facility appears to have earned anything approaching a reasonable return on investment." The City Council should reject the Final EIR and refuse to certify it because the economic benefits cited by the staff reports and RBOC may not be real or significant enough to justify the substantial and unavoidable negative impacts.

7. Who would control the Rose Bowl? The NFL plays to win advantages in their contracts and has become expert in extracting deep concessions from the cities.

The proposed cost of the renovation of the Rose Bowl variously stated as \$400,000,000 or \$500,000,000, which supposedly will all be paid by the NFL, is a large enough sum that it can be rationally assumed that the NFL will want control of the stadium and surrounding commercial area after the renovation. **It can be reasonably assumed that the NFL will want to extract substantial concessions from the city. And subsequently, the NFL team will want more concessions. Pasadena should not hand over control of our registered national landmark stadium to a "for profit enterprise".** The RBOC hands out promotional literature about the Rose Bowl with a folder showing an artistic representation of the Rose Bowl with the words "Rose Bowl, America's Stadium" emblazoned across the front. Maybe it would be more accurate to change the headline to read "Rose Bowl, the NFL's Stadium." The City Council should reject the Final EIR and refuse to certify it because of the inevitable loss of control of our stadium and parklands.

8. The entire EIR process has been driven by the NFL---not by the City of Pasadena.

When the process began, our city leaders assured the citizens that no public monies would be used and that there would be certain deal points that would be adhered to. **The NFL is chipping away at those deal points.** For example, the Final EIR is being rushed through the certification process in order to meet an NFL deadline, not a Pasadena schedule. Moreover, the first design submitted to the NFL, which would have preserved the landmark status of the Rose Bowl, was rejected by the NFL as being too expensive. What other concessions is the NFL asking for? The City Council should

reject the Final EIR and refuse to certify it because it is NFL driven and not in the best interests of our City.

9. The proposed Rose Bowl design is ugly!

The design contained in the Final EIR will radically change the appearance of the Rose Bowl and the surrounding area. **What happens in ten to twenty years when the owners of the NFL team want improvements or a new stadium? Will they walk away and leave us with a bloated, monstrous stadium with no particular appeal and a ruined national landmark contained somewhere within the "bloat"?** The City Council should reject the Final EIR and refuse to certify it because we will lose our landmark in order for the NFL to profit.

10. What happens if the NFL team assigned to the Rose Bowl decides to leave?

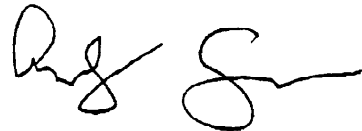
There are several NFL cities (such as San Diego) that are currently grappling with that possibility. **In the past, Los Angeles has experienced the fickleness of NFL team owners when the Rams and the Raiders came and went because of financial incentives from other cities.** The City Council should reject the Final EIR and refuse to certify it because of the likelihood of a future team owner wanting increased financial incentives to stay in Pasadena.

If we can find the money to renovate City Hall, another precious landmark, then we can find a way to support the Rose Bowl without this proposed renovation and the NFL. There too many significant and unavoidable negative impacts to ignore. Please reject this EIR!

Sincerely,



Dorothy Lindsey, President



Cheryl Auger, Vice President

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Pages 35-39

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Are New Stadiums Worth the Cost?

by *Roger G. Noll* (professor of economics at Stanford University) and *Andrew Zimbalist* (professor of economics at Smith College)

AMERICA IS IN THE MIDST of a sports construction boom. New sports facilities costing at least \$200 million each have been completed or are under way in Baltimore, Charlotte, Chicago, Cincinnati, Cleveland, Milwaukee, Nashville, San Francisco, St. Louis, Seattle, Tampa, and Washington, D.C., and are in the planning stages in Boston, Dallas, Minneapolis, New York, and Pittsburgh. Major stadium renovations have been undertaken in Jacksonville and Oakland. Industry experts estimate that more than \$7 billion will be spent on new facilities for professional sports teams before 2006.

Most of this \$7 billion will come from public sources. The subsidy starts with the federal government, which allows state and local governments to issue tax-exempt bonds to help finance sports facilities. Tax exemption lowers interest on debt and so reduces the amount that cities and teams must pay for a stadium. Since 1975, the interest rate reduction has varied between 2.4 and 4.5 percentage points. Assuming a differential of 3 percentage points, the discounted present value loss in federal taxes for a \$225 million stadium is about \$70 million, or more than \$2 million a year over a useful life of 30 years. Ten facilities built in the 1970s and 1980s, including the Superdome in New Orleans, the Silverdome in Pontiac, the now-obsolete Kingdome in Seattle, and Giants Stadium in the New Jersey Meadowlands, each cause an annual federal tax loss exceeding \$1 million.

State and local governments pay even larger subsidies than Washington. Sports facilities now typically cost the host city more than \$10 million a year. Perhaps the most successful new baseball stadium, Oriole Park at Camden Yards, costs Maryland residents \$14 million a year. Renovations aren't cheap either: the net cost to local government for refurbishing the Oakland Coliseum for the Raiders was about \$70 million.

Most large cities are willing to spend big to attract or keep a major league franchise. But a city need not be among the nation's biggest to win a national competition for a team, as shown by the NBA's Utah Jazz's Delta Center in Salt Lake City and the NFL's Houston Oilers' new football stadium in Nashville.

Why Cities Subsidize Sports

The economic rationale for cities' willingness to subsidize sports facilities is revealed in the campaign slogan for a new stadium for the San Francisco 49ers: "Build the Stadium--Create the

Jobs!" Proponents claim that sports facilities improve the local economy in four ways. First, building the facility creates construction jobs. Second, people who attend games or work for the team generate new spending in the community, expanding local employment. Third, a team attracts tourists and companies to the host city, further increasing local spending and jobs. Finally, all this new spending has a "multiplier effect" as increased local income causes still more new spending and job creation. Advocates argue that new stadiums spur so much economic growth that they are self-financing: subsidies are offset by revenues from ticket taxes, sales taxes on concessions and other spending outside the stadium, and property tax increases arising from the stadium's economic impact.

Unfortunately, these arguments contain bad economic reasoning that leads to overstatement of the benefits of stadiums. Economic growth takes place when a community's resources--people, capital investments, and natural resources like land--become more productive. Increased productivity can arise in two ways: from economically beneficial specialization by the community for the purpose of trading with other regions or from local value added that is higher than other uses of local workers, land, and investments. Building a stadium is good for the local economy only if a stadium is the most productive way to make capital investments and use its workers.

In our forthcoming Brookings book, *Sports, Jobs, and Taxes*, we and 15 collaborators examine the local economic development argument from all angles: case studies of the effect of specific facilities, as well as comparisons among cities and even neighborhoods that have and have not sunk hundreds of millions of dollars into sports development. In every case, the conclusions are the same. A new sports facility has an extremely small (perhaps even negative) effect on overall economic activity and employment. No recent facility appears to have earned anything approaching a reasonable return on investment. No recent facility has been self-financing in terms of its impact on net tax revenues. Regardless of whether the unit of analysis is a local neighborhood, a city, or an entire metropolitan area, the economic benefits of sports facilities are de minimus.

As noted, a stadium can spur economic growth if sports is a significant export industry--that is, if it attracts outsiders to buy the local product and if it results in the sale of certain rights (broadcasting, product licensing) to national firms. But, in reality, sports has little effect on regional net exports.

Sports facilities attract neither tourists nor new industry. Probably the most successful export facility is Oriole Park, where about a third of the crowd at every game comes from outside the Baltimore area. (Baltimore's baseball exports are enhanced because it is 40 miles from the nation's capital, which has no major league baseball team.) Even so, the net gain to Baltimore's economy in terms of new jobs and incremental tax revenues is only about \$3 million a year--not much of a return on a \$200 million investment.

Sports teams do collect substantial revenues from national licensing and broadcasting, but these must be balanced against funds leaving the area. Most professional athletes do not live where they play, so their income is not spent locally. Moreover, players make inflated salaries for only a few years, so they have high savings, which they invest in national firms. Finally, though a new stadium increases attendance, ticket revenues are shared in both baseball and football, so that

part of the revenue gain goes to other cities. On balance, these factors are largely offsetting, leaving little or no net local export gain to a community.

One promotional study estimated that the local annual economic impact of the Denver Broncos was nearly \$120 million; another estimated that the combined annual economic benefit of Cincinnati's Bengals and Reds was \$245 million. Such promotional studies overstate the economic impact of a facility because they confuse gross and net economic effects. Most spending inside a stadium is a substitute for other local recreational spending, such as movies and restaurants. Similarly, most tax collections inside a stadium are substitutes: as other entertainment businesses decline, tax collections from them fall.

Promotional studies also fail to take into account differences between sports and other industries in income distribution. Most sports revenue goes to a relatively few players, managers, coaches, and executives who earn extremely high salaries--all well above the earnings of people who work in the industries that are substitutes for sports. Most stadium employees work part time at very low wages and earn a small fraction of team revenues. Thus, substituting spending on sports for other recreational spending concentrates income, reduces the total number of jobs, and replaces full-time jobs with low-wage, part-time jobs.

A second rationale for subsidized stadiums is that stadiums generate more local consumer satisfaction than alternative investments. There is some truth to this argument. Professional sports teams are very small businesses, comparable to large department or grocery stores. They capture public attention far out of proportion to their economic significance. Broadcast and print media give so much attention to sports because so many people are fans, even if they do not actually attend games or buy sports-related products.

A professional sports team, therefore, creates a "public good" or "externality"--a benefit enjoyed by consumers who follow sports regardless of whether they help pay for it. The magnitude of this benefit is unknown, and is not shared by everyone; nevertheless, it exists. As a result, sports fans are likely to accept higher taxes or reduced public services to attract or keep a team, even if they do not attend games themselves. These fans, supplemented and mobilized by teams, local media, and local interests that benefit directly from a stadium, constitute the base of political support for subsidized sports facilities.

The Role of Monopoly Leagues

While sports subsidies might owe from externalities, their primary cause is the monopolistic structure of sports. Leagues maximize their members' profits by keeping the number of franchises below the number of cities that could support a team. To attract teams, cities must compete through a bidding war, whereby each bids its willingness to pay to have a team, not the amount necessary to make a team viable.

Monopoly leagues convert fans' (hence cities') willingness to pay for a team into an opportunity for teams to extract revenues. Teams are not required to take advantage of this opportunity, and in two cases--the Charlotte Panthers and, to a lesser extent, the San Francisco Giants--the financial exposure of the city has been the relatively modest costs of site acquisition and

infrastructural investments. But in most cases, local and state governments have paid over \$100 million in stadium subsidy, and in some cases have financed the entire enterprise.

The tendency of sports teams to seek new homes has been intensified by new stadium technology. The rather ordinary cookie-cutter, multipurpose facility of the 1960s and 1970s has given way to the elaborate, single-sport facility that features numerous new revenue opportunities: luxury suites, club boxes, elaborate concessions, catering, signage, advertising, theme activities, and even bars, restaurants, and apartments with a view of the field. A new facility now can add \$30 million annually to a team's revenues for a few years after the stadium opens.

Because new stadiums produce substantially more revenues, more cities are now economically viable franchise sites--which explains why Charlotte, Jacksonville, and Nashville have become NFL cities. As more localities bid for teams, cities are forced to offer ever larger subsidies.

What Can Be Done?

Abuses from exorbitant stadium packages, sweetheart leases, and footloose franchises have left many citizens and politicians crying foul. What remedy, if any, is available to curb escalating subsidies and to protect the emotional and financial investments of fans and cities?

In principle, cities could bargain as a group with sports leagues, thereby counterbalancing the leagues' monopoly power. In practice, this strategy is unlikely to work. Efforts by cities to form a sports-host association have failed. The temptation to cheat by secretly negotiating with a mobile team is too strong to preserve concerted behavior.

Another strategy is to insert provisions in a facility lease that deter team relocation. Many cities have tried this approach, but most leases have escape clauses that allow the team to move if attendance falls too low or if the facility is not in state-of-the-art condition. Other teams have provisions requiring them to pay tens of millions of dollars if they vacate a facility prior to lease expiration, but these provisions also come with qualifying covenants. Of course, all clubs legally must carry out the terms of their lease, but with or without these safeguard provisions, teams generally have not viewed their lease terms as binding. Rather, teams claim that breach of contract by the city or stadium authority releases them from their obligations. Almost always these provisions do not prevent a team from moving.

Some leases grant the city a right of first refusal to buy the team or to designate who will buy it before the team is relocated. The big problem here is the price. Owners usually want to move a team because it is worth more elsewhere, either because another city is building a new facility with strong revenue potential or because another city is a better sports market. If the team is worth, say, \$30 million more if it moves, what price must the team accept from local buyers? If it is the market price (its value in the best location), an investor in the home city would be foolish to pay \$30 million more for the franchise than it is worth there. If the price is the value of the franchise in its present home, the old owner is deprived of his property rights if he cannot sell to the highest bidder. In practice, these provisions typically specify a right of first refusal at market price, which does not protect against losing a team.

Cities trying to hold on to a franchise can also invoke eminent domain, as did Oakland when the Raiders moved to Los Angeles in 1982 and Baltimore when the Colts moved to Indianapolis in 1984. In the Oakland case, the California Court of Appeals ruled that condemning a football franchise violates the commerce clause of the U.S. Constitution. In the Colts case, the condemnation was upheld by the Maryland Circuit Court, but the U.S. District Court ruled that Maryland lacked jurisdiction because the team had left the state by the time the condemnation was declared. Eminent domain, even if constitutionally feasible, is not a promising vehicle for cities to retain sports teams.

Ending Federal Subsidies

Whatever the costs and benefits to a city of attracting a professional sports team, there is no rationale whatsoever for the federal government to subsidize the financial tug-of-war among the cities to host teams.

In 1986, Congress apparently became convinced of the irrationality of granting tax exemptions for interest on municipal bonds that financed projects primarily benefiting private interests. The 1986 Tax Reform Act denies federal subsidies for sports facilities if more than 10 percent of the debt service is covered by revenues from the stadium. If Congress intended that this would reduce sports subsidies, it was sadly mistaken. If anything, the 1986 law increased local subsidies by cutting rents below 10 percent of debt service.

Last year Senator Daniel Patrick Moynihan (D-NY), concerned about the prospect of a tax exemption for a debt of up to \$1 billion for a new stadium in New York, introduced a bill to eliminate tax-exempt financing for professional sports facilities and thus eliminate federal subsidies of stadiums. The theory behind the bill is that raising a city's cost from a stadium giveaway would reduce the subsidy. Although cities might respond this way, they would still compete among each other for scarce franchises, so to some extent the likely effect of the bill is to pass higher interest charges on to cities, not teams.

Antitrust and Regulation

Congress has considered several proposals to regulate team movement and league expansion. The first came in the early 1970s, when the Washington Senators left for Texas. Unhappy baseball fans on Capitol Hill commissioned an inquiry into professional sports. The ensuing report recommended removing baseball's antitrust immunity, but no legislative action followed. Another round of ineffectual inquiry came in 1984-85, following the relocations of the Oakland Raiders and Baltimore Colts. Major league baseball's efforts in 1992 to thwart the San Francisco Giants' move to St. Petersburg again drew proposals to withdraw baseball's cherished antitrust exemption. As before, nothing came of the congressional interest. In 1995-96, inspired by the departure of the Cleveland Browns to Baltimore, Representative Louis Stokes from Cleveland and Senator John Glenn of Ohio introduced a bill to grant the NFL an antitrust exemption for franchise relocation. This bill, too, never came to a vote.

The relevance of antitrust to the problem of stadium subsidies is indirect but important. Private antitrust actions have significantly limited the ability of leagues to prevent teams from relocating. Teams relocate to improve their financial performance, which in turn improves their ability to

compete with other teams for players and coaches. Hence, a team has an incentive to prevent competitors from relocating. Consequently, courts have ruled that leagues must have "reasonable" relocation rules that preclude anticompetitive denial of relocation. Baseball, because it enjoys an antitrust exemption, is freer to limit team movements than the other sports.

Relocation rules can affect competition for teams because, by making relocation more difficult, they can limit the number of teams (usually to one) that a city is allowed to bid for. In addition, competition among cities for teams is further intensified because leagues create scarcity in the number of teams. Legal and legislative actions that change relocation rules affect which cities get existing teams and how much they pay for them, but do not directly affect the disparity between the number of cities that are viable locations for a team and the number of teams. Thus, expansion policy raises a different but important antitrust issue.

As witnessed by the nearly simultaneous consideration of creating an antitrust exemption for football but denying one for baseball on precisely the same issue of franchise relocation, congressional initiatives have been plagued by geographical chauvinism and myopia. Except for representatives of the region affected, members of Congress have proven reluctant to risk the ire of sports leagues. Even legislation that is not hampered by blatant regional self-interest, such as the 1986 Tax Reform Act, typically is sufficiently riddled with loopholes to make effective implementation improbable. While arguably net global welfare is higher when a team relocates to a better market, public policy should focus on balancing the supply and demand for sports franchises so that all economically viable cities can have a team. Congress could mandate league expansion, but that is probably impossible politically. Even if such legislation were passed, deciding which city deserves a team is an administrative nightmare.

A better approach would be to use antitrust to break up existing leagues into competing business entities. The entities could collaborate on playing rules and interleague and postseason play, but they would not be able to divvy up metropolitan areas, establish common drafts or player market restrictions, or collude on broadcasting and licensing policy. Under these circumstances no league would be likely to vacate an economically viable city, and, if one did, a competing league would probably jump in. Other consumer-friendly consequences would flow from such an arrangement. Competition would force ineffective owners to sell or go belly up in their struggle with better managed teams. Taxpayers would pay lower local, state, and federal subsidies. Teams would have lower revenues, but because most of the costs of a team are driven by revenues, most teams would remain solvent. Player salaries and team profits would fall, but the number of teams and player jobs would rise.

Like Congress, the Justice Department's Antitrust Division is subject to political pressures not to upset sports. So sports leagues remain unregulated monopolies with de facto immunity from federal antitrust prosecution. Others launch and win antitrust complaints against sports leagues, but usually their aim is membership in the cartel, not divestiture, so the problem of too few teams remains unsolved.

Citizen Action

The final potential source of reform is grassroots disgruntlement that leads to a political reaction against sports subsidies. Stadium politics has proven to be quite controversial in some cities.

Some citizens apparently know that teams do little for the local economy and are concerned about using regressive sales taxes and lottery revenues to subsidize wealthy players, owners, and executives. Voters rejected public support for stadiums on ballot initiatives in Milwaukee, San Francisco, San Jose, and Seattle, although no team has failed to obtain a new stadium. Still, more guarded, conditional support from constituents can cause political leaders to be more careful in negotiating a stadium deal. Initiatives that place more of the financial burden on facility users--via revenues from luxury or club boxes, personal seat licenses (PSLs), naming rights, and ticket taxes--are likely to be more popular.

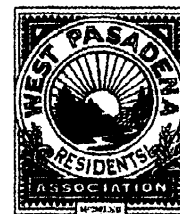
Unfortunately, citizen resistance notwithstanding, most stadiums probably cannot be financed primarily from private sources. In the first place, the use of money from PSLs, naming rights, pouring rights, and other private sources is a matter to be negotiated among teams, cities, and leagues. The charges imposed by the NFL on the Raiders and Rams when they moved to Oakland and St. Louis, respectively, were an attempt by the league to capture some of this (unshared) revenue, rather than have it pay for the stadium.

Second, revenue from private sources is not likely to be enough to avoid large public subsidies. In the best circumstance, like the NFL's Charlotte Panthers, local governments still pay for investments in supporting infrastructure, and Washington still pays an interest subsidy for the local government share. And the Charlotte case is unique. No other stadium project has raised as much private revenue. At the other extreme is the disaster in Oakland, where a supposedly break-even financial plan left the community \$70 million in the hole because of cost overruns and disappointing PSL sales.

Third, despite greater citizen awareness, voters still must cope with a scarcity of teams. Fans may realize that subsidized stadiums regressively redistribute income and do not promote growth, but they want local teams. Alas, it is usually better to pay a monopoly an exorbitant price than to give up its product.

Prospects for cutting sports subsidies are not good. While citizen opposition has had some success, without more effective intercity organizing or more active federal antitrust policy, cities will continue to compete against each other to attract or keep artificially scarce sports franchises. Given the profound penetration and popularity of sports in American culture, it is hard to see an end to rising public subsidies of sports facilities.

To find out more, see Roger Noll and Andrew Zimbalist's edited book, *Sports, Jobs, and Taxes: The Economic Impact of Sports Teams and Stadiums*



May 9, 2005

William Bogaard, Mayor
Members of the City Council
City of Pasadena
100 North Garfield Avenue
Pasadena, California 91109

Subject: Survey Results

Dear Mayor Bogaard and Members of the City Council:

It was important to see that the Survey conducted by the Rose Bowl, provided the same conclusions as an earlier survey conducted by West Pasadena Residents Association. In the Star News article, summarized below, 12% of the survey responses came from district 6.

"A total of 808 people responded to the poll. The survey was divided between the council districts with roughly 100 people contacted in each except for District 6, where 200 people were surveyed. In districts 6 and 7...a plurality of those surveyed 48 percent and 49 percent, respectively supported the NFL bid."

As you may recall, WPRA mailed a two-page NFL survey to approximately 8,200 households in the 91105 and 91103 zip codes. As of October 20, the WPRA received 1,198 surveys. 1,006 respondents identified their zip codes; of those, about 60% live in 91105 and 40% in 91103. A greater percentage of Pasadena Residents were polled by WPRA. WPRA surveyed 14.6% of residents in these two areas versus the RBOC survey polled less than 1% of Pasadena residents. (800 residents out of 136,237 were surveyed).

Fifty-nine percent (59%) of respondents said they oppose NFL at the Rose Bowl, and ten percent (10%) said they are in favor. Twenty-nine percent (29%) would support NFL only if there is a demonstrated net financial benefit to the City and if use of the Arroyo Seco for other activities is not adversely affected. The result is an approximate ten percent gap, but either way residents in Steve Madisons' district oppose the NFL as a feasible alternative to solve the stadiums financial problems. The break out for Joyce Streater's district is unknown, but they may be similar. Some additional points regarding the survey are attached.

Last week, at the annual WPRA meeting, Steve Madison said he was still deciding which way to vote on this issue. According to both surveys, his constituents have overwhelmingly determined that he should vote "no" when called upon to make a decision regarding the NFL.

When a vote is taken on whether or not to certify the EIR, the answer should also be no. The public has not been provided adequate time to review the responses to the comments. With no

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Submitted by Cheryl Auger


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time provided to review the responses provided to comments made on the EIR earlier this year, the public review process guaranteed by CEQA has been derailed.

Sincerely,



Dorothy Lindsey, President



Cheryl Auger, Vice President

Survey Points

The RBOC background and questions were heavily weighted to the alleged economic benefits of having an NFL presence. At the same time, references to the many serious adverse environmental impacts were much less numerous, often very vague and sometimes phrased in the most benign possible way. It is not surprising that many people might respond that an NFL deal sounds good.

The specific examples below demonstrate how some of the key questions in the survey misrepresent the environmental impact of an NFL deal (13-d), minimize the consequences of adverse impacts (13-c and 13-n), or leave out information that that gives very important context (12 and 13-l).

- Question 13-d (Page 6): This question asserts that traffic and parking on event days would be reduced because stadium seating would be reduced by 25,000. That is inaccurate. The amount of traffic and parking for UCLA games will be essentially the same as it is now, about 12,000 to 14,000 cars parked per game.¹ Furthermore, the average traffic and parking for the ten or more new NFL games will be greater than for the UCLA games.
- Average attendance at UCLA football games over the years is well below 60,000 per game. On average, there are more than 32,000 empty seats at UCLA games. If the stadium capacity is reduced by 25,000 seats, it merely means that the average number of empty seats will be down in the range of between 5,000 to 10,000 for most UCLA games. Consequently, since attendance at future UCLA games would rarely be constrained by the reduction in seating capacity there will rarely be a reduction in attendance, traffic or parking volume compared to what it is now. Further, the EIR itself assumes that the NFL games will have average attendance that is significantly higher than UCLA game attendance. If the UCLA traffic and parking will be essentially unchanged and the ten or more new NFL games will have higher attendance, it is absurd to suggest that traffic and parking needs on game days will be reduced just because 25,000 seats that are usually empty at UCLA games have been eliminated.

¹ Per Larry Madden (RBOC's CFO) and Dave Sam's (RBOC's manager of the Golf Course contract).

- Question 13-c (Page 6): This question states that Brookside Park, Brookside Golf Course and the Aquatics Center will be "unavailable to the public for 13 additional days per year". Those are not just any random 13 days scattered throughout the year. What the survey fails to disclose is that those "13 days per year" happen to be more than 50% of all the Sundays from mid-August through at least early January! Brookside Park, Brookside Golf Course, the Aquatics Center and virtually all other facilities in the central Arroyo would be "unavailable for the public" on more than 50% of all the Sundays from mid-August through at least early January. Do those who conducted this survey believe that "support for the NFL" in their survey would be the same if those who were polled were given that important information?
- Question 13-n (Page 8): This question states that "modernizing the Rose Bowl will reduce the glare and annoyance of stadium lighting to less than significant levels". What the EIR probably actually says is that the modernized lighting will "produce less annoyance than there is now" for each nighttime event. Those are two very different things. Consequently, there will probably still be some annoyance from the stadium lighting no matter how modern the installation.

Furthermore, when you add the NFL schedule, the number of football games played at the Rose Bowl will increase by 140% or more. Given that, why did the question imply that with an NFL team at the Rose Bowl, the total amount of annoyance from stadium lighting would be less than significant especially when the NFL is much more likely to play during evening hours than UCLA.

- Question 12 (Page 6): This question states that "the City of Pasadena has hired independent scientists and engineers to conduct a detailed study of the environmental effects" of renovation of the Rose Bowl for the NFL. The survey then asks whether the City Council should "certify" the EIR so that it would be possible to proceed further with considering the NFL plan. Before asking this question, the survey question fails to mention that more than 900 objections or requests for clarifications were submitted after the draft EIR was made available for review and that numerous members of City advisory commissions (such as the Planning Commission and Transportation Advisory Commission) consider the EIR to be inadequate. Without providing that additional and extremely pertinent background, it was meaningless for the survey to ask whether the City Council should certify the EIR.
- Question 13-l (Page 7). This question states that Pasadena will receive certain economic benefits from an NFL deal. What is not mentioned is that the UCLA economic impact study found that the vast majority of the fiscal and economic benefits will not be enjoyed by Pasadena. To the extent the NFL in Pasadena becomes a regional "economic engine", more than 90% of the benefits will go to others while Pasadena bears virtually all of the burdens. Furthermore, the amount of economic benefits captured by Pasadena would be so small that it would be only an extremely small fraction of a percentage of the total economic activity in Pasadena. It would hardly even be noticeable. That is the full context of the issue.



May 9, 2005

William Bogaard, Mayor
Members of the City Council
City of Pasadena
100 North Garfield Avenue
Pasadena, California 91109

Dear Mayor Bogaard and Members of the City Council:

The City Council should reject the Final Environmental Impact Report for the Rose Bowl Renovation Project (EIR) because there are too many serious negative impacts, including traffic, an inadequate parking analysis and the displacement of parkland.

By far the issue most muddled by the Rose Bowl Operating Committee (RBOC) in its discussion of the EIR is the impact of "parking and traffic" in the Arroyo. Improving traffic and parking in the Arroyo is one of the five specific "Project Objectives" stated in the EIR – and yet, the impact of Rose Bowl bound traffic has a severe, adverse, cascading effect on other areas, such as recreation in the Arroyo.

In one of the questions in a recently conducted survey, the RBOC asserts that "The environmental study shows that renovating the Rose Bowl would eliminate about 25,000 seats, which in turn would reduce Rose Bowl traffic and parking needs on event days". The assertion that parking impacts would be reduced is both wrong and misleading.

Someone should explain how the RBOC can justify that the proposed Rose Bowl renovation project would "reduce parking needs on event days." The following is incontrovertible and yet the EIR makes no mention of:

1. NFL would like 21,000 parking spaces in the Arroyo because they will be able to sell that many parking spaces and not share any of that money with other NFL teams. In a *Los Angeles Times* article on the Carson NFL negotiations, it says: "...among the league's concerns was sufficient parking at the site and within a half-mile radius. The league wants about 21,000 parking spots, roughly 9,000 more than the current site plan has."
2. Larry Madden (RBOC's CFO) and Dave Sams (RBOC's manager of the Golf Course contract) have said that 21,000 cars is thousands and thousands more cars than currently park in the Arroyo for any "average" UCLA game. (If UCLA is playing USC or perhaps "a top 5 team that travels well" the thousands of cars parked may approach the upper teens). Madden and Sams have stated that the average for a UCLA game is close to 12,000 to 14,000 cars parked.

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Submitted by Dorothy Lindsey

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3. With an NFL team playing at the Rose Bowl, the number of football games will increase by a minimum of 140% (at least 17 with the NFL from only 7 currently) and at those additional games both the average number of attendees and the number of cars parked in the Arroyo will be substantially higher than the average for the seven UCLA games now being played.

If the NFL can park more cars in the Arroyo than the 18,000 cars analyzed in the EIR, by how many cars and how many times can they exceed the maximum number analyzed in the EIR? If not, does that mean the NFL can never park more than 18,000 cars in the Arroyo? With cars parking on the golf course and greens around the Rose Bowl, what effects and costs will be associated with the damage caused to the turf and the displacement of our recreational users of the Arroyo?

An argument that the Rose Bowl is currently "losing" \$2 million per year is, at best, misleading. The loss is NOT a real loss. Rather, we have the golf course in the Arroyo subsidizing the Rose Bowl in the Arroyo so the public can use the Arroyo. What's wrong with that? In fact, if someone offered that kind of arrangement to the any other city with a guarantee that they would have the Tournament of Roses conduct the Rose Parade every year; most cities would pay millions of dollars for the privilege.

Ultimately the City Council has to determine whether the City of Pasadena is just a revenue producing enterprise, or a municipality. The Council must look after its FIRST PRIORITY: meeting the needs of its residents. The residents' interests must be protected by safeguarding our fragile infrastructure which is already reeling under the pressure of traffic, and securing our existing park space which is irreplaceable.

If the NFL comes to Pasadena it will assure:

1. Loss of control of the Rose Bowl. The NFL is not going to pay \$400 to \$500 million without having a full time year-around facility in the Arroyo that, at a minimum, will include a museum, a sports store and a restaurant.
2. Loss of use of the Arroyo park and recreation space for residents of Pasadena in exchange for a money making enterprise which will enrich the NFL. Our Arroyo provides 90% of our park space. It is irreplaceable.

For all of these reasons, and more, the EIR is totally inadequate and deficient. It must be rejected and not certified.

Sincerely,



Dorothy Lindsey, President

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BRANDT-HAWLEY LAW GROUP

Environment/Preservation

Chauvet House PO Box 1659

Glen Ellen, California 95442

May 9, 2005

Susan Brandt-Hawley
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Mayor Bill Bogaard
Members of the City Council
City of Pasadena
100 N. Garfield Avenue, Room 237
Pasadena, CA 91109
fax: 626-744-3921

Re: Rose Bowl Stadium Renovation Project

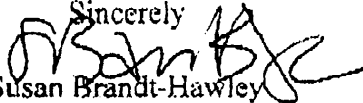
Dear Mayor Bogaard and Councilmembers:

On behalf of Pasadena Heritage, I am writing to respectfully request that the Council deny the Rose Bowl Stadium Renovation Project, and in doing so exempt it from CEQA without certifying the EIR.

The EIR notes that the Rose Bowl Stadium is "a world-class stadium known as 'America's Stadium.'" Although some key inadequacies remain relative to assessment of project impacts and alternatives, in many ways the EIR process has worked well for this project as it discloses that renovation for use by the NFL would have many, many significant and unavoidable environmental impacts.

Among conceded project impacts is the overarching fact that requested alterations would compromise historic integrity to an extent sufficient to forfeit status as a National Historic Landmark. Pasadena is the envy of cities in California and nationwide that do not have a National Historic Landmark, much less one regarded so fondly and associated with recreation and artistic expression rather than tragedy. Pasadena Heritage points out that choosing to lose the credibility of such a landmark, especially when a more modest rehabilitation project with alternative funding sources has not been explored in the EIR, would be contrary to the mandates of CEQA and the City's long-term legacy.

Thank you very much for your consideration.

Sincerely

Susan Brandt-Hawley

707.938.3908 ♦ 707.576.0198 ♦ fax 707.576.0175 ♦ susanbh@econet.org

05/09/2005

7.B.(1)

Submitted by Joyce Huyett Turner

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May 9, 2005

Honorable Mayor and City Councilpersons
City of Pasadena – City Hall
117 East Colorado Boulevard
Pasadena, CA 91105

Comment by:
Wayne Lusvardi

Re: **Urge Certification of NFL Rose Bowl Stadium Re-Design EIR**

I urge you to certify the EIR for NFL Rose Bowl Stadium Re-Design.

The City of Pasadena should not reject the EIR for a possible one-half billion dollar infusion of funds from the NFL to save the economically obsolescent Rose Bowl merely because:

- The bowl would lose its paper status as historic;
- The Flea Market would be displaced some Sundays;
- The Brookside Golf Course and outdoor walking and biking paths would be off-limits for 24 days a year;
- 200 replaceable trees would be lost;
- The Kid Space and Aquatic Center will erroneously be inaccessible on game days;
- NFL games would generate something like 1/10th the traffic on game days as the Rose Bowl Parade and Bowl Game.

As I understand it, the \$2 million per year currently diverted from the Golf Course would go back into City coffers, the schools would get \$1.5 million per year, and NFL games would create about 2,000 part time jobs. This doesn't sound like a deal the City should reject on its face because of some modest and mitigatable environmental impacts.

The EIR should be put into proper perspective. Would you reject an offer upfront to rent your house and yard for film shooting for 24 days a year in return for taking over your annual mortgage payments, providing educational scholarships and part time jobs for your children, and providing the neighborhood with a new park in return for the nuisance? Would you reject such a deal just because?

- You could not have a yard sale on those 24 days a year;
- You could not use your backyard putting golf green for 24 days;
- A few trees in your yard would have to be moved and replanted;
- Parts of your home may no longer be considered historic; and,
- There would be some mitigatable nuisance to the neighbors.

You would not personally reject such a potentially advantageous deal on its face for your own family; and neither should you do so as an elected decision maker.

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Submitted by Wayne Lusvardi

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Bowl Historic Status. The designation of the Rose Bowl as historic has no relevance if it is economically obsolescent. The Bowl may be structurally sound. But if it is economically obsolescent gradually the current tenants may leave or look for legal ways to abrogate their contracts. An analogy can be made to the Raymond Theater which even has a conservation easement on it. Because there is no continued economic viability for a movie theater or entertainment facility due to new multi-plex theaters and home movies the building is being developed for housing anyway, which is its economic highest and best use. The same could be said for the Rose Bowl. What may result in the long-run is the loss of the Rose Bowl Parade and Bowl Game to other competitive venues.

Sporadic Loss of Park Space. The periodic loss of the Arroyo bowl area as a park and recreation area for 24 additional days per year may be largely offset by the:

- Recent restoration of the Lower Arroyo;
- The pending acquisition of 30-acres of open space-recreation land adjacent to Hahamonga Park from the MWD; and,
- The rumored acquisition of the rights of way underneath Edison's transmission line in East Pasadena for a greenbelt with walking and bike paths (est. 60-acres +).

Technically the addition of the MWD property and possible acquisition of easement rights within Edison's transmission line right of way are not contained in the NFL EIR. But just because they are not being extracted from the NFL as mitigation should not mean that they should not be factored into the decision as to whether the EIR is adequate.

Loss of Trees. The loss of 200 trees would be fully offset by the acquisition of the MWD property as it has a large mature grove of oak trees in a much more ecologically sensitive area than the Bowl.

Traffic Impacts. The 38,000 added vehicle trips through Pasadena on NFL game days is a real impact, but would be something like only 1/10th that experienced on New Years Day. However, the City should consider the use of one-way ingress and egress streets during NFL game days similar to what the City of L.A. successfully did with the Olympics in 1984.

Kidspace and Aquatic Center Access. The contention that visiting Kidspace and the Aquatic Center near the Rose Bowl will be impossible on game days is hyperbole. Couldn't special access passes and parking be reserved for such users?

NFL Rose Bowl EIR
Wayne Lusvardi – Comments
May 9, 2005, Page 3.

Fiscal Impacts. The potential fiscal impacts on home values and property taxes surrounding any larger scaled Rose Bowl do not appear to have been adequately addressed in the EIR. However the recent boom in the real estate market seems to have overwhelmed any discount for such visual nuisances at least during an up-market cycle.

At minimum, I urge you to certify the NFL Rose Bowl Stadium Re-design EIR based on principle. If a reasonably adequate EIR can be shot down for the NFL proposal, then the EIR for any proposed development in the City can be rejected for highly politicized reasons rather than its merits or demerits under the law. This will set a bad legal and political precedent that the City should be wary of.

Respectfully submitted,



Wayne Lusvardi
180 South Euclid Avenue
Pasadena, CA 91101

Save South Orange Grove

May 9, 2005

Via E-Mail & Hand Delivery
City of Pasadena City Council
100 North Garfield Avenue
Pasadena, California 91109-7215

Re: NFL in the Rose Bowl EIR

Dear Council members:

Save South Orange Grove ("SSOG") a 501 c (4) non-profit corporation that represents residents on South Orange Grove Boulevard and much of west Pasadena is deeply concerned about the significant impacts reflected in the final Environmental Impact Report for NFL at the Rose Bowl before you tonight, and believes that it is inadequate.

On March 10th, Save South Orange Grove pointed out that the draft EIR does not consider, whatsoever, any traffic coming from the south and southwest regions of the LA Basin, which will inevitably use the 110 freeway for access to Pasadena and the Rose Bowl, nor does it study any intersections or street segments on South Orange Grove south of California Boulevard.

The response in the Final EIR to that question claims that the City considered the 110 Freeway and determined that there was enough capacity to handle the increased traffic.

Yet neither the Draft EIR, nor the Study ever mentioned that staff first considered, then disregarded, the 110/South Orange Grove Corridor as a regional access point, despite the three signs on the 110 freeway which direct traffic through the residential neighborhoods of South Orange Grove to the Rose Bowl.

Despite the claim that the 110 has sufficient capacity to handle the traffic generated by the NFL and therefore no study is required, then way, if the Final EIR is to be believed, has the City concluded that South Orange Grove will suffer significant, unmitigated traffic impacts, but then not recommend any mitigation measures for neighborhoods south of California?

The effects of these conflicting outcomes are that the Final EIR may significantly under-represent the traffic impacts generated by NFL.

This Council should not certify the Final EIR until a more thorough supplemental traffic study is undertaken.

1

P.O. Box 50342
Pasadena, CA 91115

05/09/2005
7.B.(1)
Submitted by Michael Vogler

286

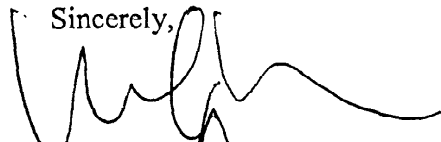
Save South Orange Grove

Finally, there is a Design issue, which must be considered. The EIR recognizes that by significantly modifying the Rose Bowl, as this project proposes, it is likely that we will lose the National Register of Historic Places designation, as occurred with the redesign of the Soldier Field in Chicago. There is a marquee value in that historic designation, one that undoubtedly results in enormous revenue to the city, be it through television contracts for the Tournament of Roses or tourism by which people from around the world journey here to see the Rose Bowl. That marquee value belongs to every member of this community, not the NFL. To lose that for the sake of a few billionaire NFL owners would be unconscionable.

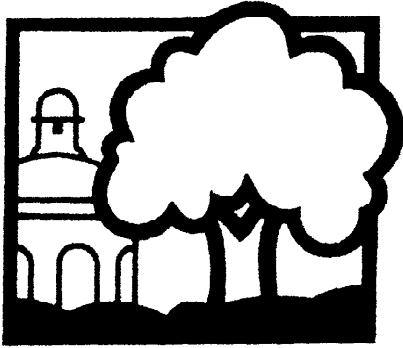
This is a threshold issue.

As there is no alternative in the Plan, one which protects the historic designation of the stadium, the City Council must reject the EIR.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael Vogler', written in a cursive style.

Michael Vogler
Save South Orange Grove



pasadena beautiful foundation

140 south lake avenue, suite 268
pasadena, california 91101
Telephone/Fax: 626-795-9704
Email: pasadenabeautiful@earthlink.net

RECEIVED
05 MAY -9 P 2:44
CITY CLERK
CITY OF PASADENA

PBF Officers:

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Vice Pres—Emina Darakjy
Vice Pres—Bette Cooper
Treasurer—Tina Fuller
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Gloria Lowry
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Betsy Tyler
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Robert Cheesewright
Richard Nevins ♡
Mary Frances Russell

Dear Mayor, Council Members, and City Manager,

The mission of the Pasadena Beautiful Foundation is to protect and enhance Pasadena's urban forest and streetscape by encouraging beautification and sustainable landscapes, both public and private. We believe these elements make Pasadena a truly beautiful city in which to live and work.

Pasadena Beautiful is concerned with retaining and preserving open space. Pasadena Beautiful provided comments on the EIR (dated March 7, 2005) but due to the limited review period, Pasadena Beautiful has not had a chance to determine if issues such as open space or tree removal were mitigated or resolved.

Regardless, it is understood that the NFL project will result in impacts on the use of the open space in the Central Arroyo and on the existing mature trees within the project boundary. Pasadena Beautiful strongly encourages the city to maintain open space at all costs and to preserve the inventory of trees within the Central Arroyo area. This is paramount to maintaining the character of this great city.

Sincerely,

Randy Finch
President

BRANDT-HAWLEY LAW GROUP

Environment/Preservation

Chauvet House PO Box 1659

Glen Ellen, California 95442

May 9, 2005

Legal Assistants

Sara Hews

Shannen Jones

Law Clerk

Rachel Howlett

Susan Brandt-Hawley
Paige J. Swartley

Mayor Bill Bogaard
Members of the City Council
City of Pasadena
100 N. Garfield Avenue, Room 237
Pasadena, CA 91109
fax: 626-744-3921

Re: Rose Bowl Stadium Renovation Project

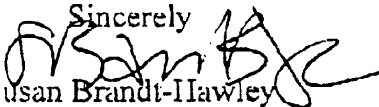
Dear Mayor Bogaard and Councilmembers:

On behalf of Pasadena Heritage, I am writing to respectfully request that the Council deny the Rose Bowl Stadium Renovation Project, and in doing so exempt it from CEQA without certifying the EIR.

The EIR notes that the Rose Bowl Stadium is "a world-class stadium known as 'America's Stadium.'" Although some key inadequacies remain relative to assessment of project impacts and alternatives, in many ways the EIR process has worked well for this project as it discloses that renovation for use by the NFL would have many, many significant and unavoidable environmental impacts.

Among conceded project impacts is the overarching fact that requested alterations would compromise historic integrity to an extent sufficient to forfeit status as a National Historic Landmark. Pasadena is the envy of cities in California and nationwide that do not have a National Historic Landmark, much less one regarded so fondly and associated with recreation and artistic expression rather than tragedy. Pasadena Heritage points out that choosing to lose the credibility of such a landmark, especially when a more modest rehabilitation project with alternative funding sources has not been explored in the EIR, would be contrary to the mandates of CEQA and the City's long-term legacy.

Thank you very much for your consideration.

Sincerely

Susan Brandt-Hawley

707.938.3908 • 707.576.0198 • fax 707.576.0175 • susanbh@econet.org

290

May 9, 2005

Mayor Bill Bogaard and City Council, City of Pasadena
117 E. Colorado Blvd.
Pasadena, CA 91105

Via e-mail:

Dear Mayor and City Council:

While I do not live in Pasadena, I have worked in this City for many years. I grew up in adjacent San Marino and have lived in nearby Sierra Madre for nearly 20 years. So I feel I am qualified to comment on the proposed NFL project to ruin the Rose Bowl and the EIR that accompanies it.

The authors of the EIR have used very clever wording concerning recreation areas surrounding the Rose Bowl, but if one reads closely one will see that there are many contradictions and omissions. For example, the EIR states that there will be many more passive recreational (also identified as "recreation-viewing") opportunities, which the EIR then concludes satisfies the goals of the City of Pasadena for expanding the uses of existing facilities. What is omitted is the fact that many more "active" recreational opportunities will be sacrificed for these "passive" purposes, thereby netting NO gain in recreational uses, and in fact probably decreasing the total amount.

The EIR admits that during the additional 13 NFL events the Aquatic Center, Lot H and Brookside Park and Golf Course will be "unavailable to the public" (3.11.2 Significant and Unavoidable Impacts). It suggests, however, that those who currently utilize the golf course could go elsewhere, due to the advance notice of events, thereby reducing this impact to less-than-significant; a ridiculous statement in itself. The EIR confesses that the increase in unavailability of Brookside Park, Brookside Golf Course, Aquatic Center and Lot H would result in a "significant and unavoidable impact to recreational access." Is this acceptable to the City of Pasadena? It seems an incredible oversight that no Mitigation Measures are offered to offset this loss.

The EIR also admits that the Arroyo Seco Trail, utilized by hikers, joggers, equestrians and bicyclers, will be "significantly affected...due to heavy vehicle and pedestrian traffic crossing those paths." In one of its more stunningly absurd statements, the EIR states that Mitigation Measure 3.11-1, which states "the trail shall remain open," reduces this impact to less-than-significant. Just how is the trail supposed to be accessed? Are horses to be brought onto the shuttles from Old Pasadena? Do bicyclers parachute down onto the trail? Mitigation Measure 3-11.2 is equally ridiculous – "notification of events shall be posted." How does that ensure use of the trail is impacted in a "less-than-significant" way? In another potentially frightening assessment, the EIR points out that those accessing the trail must "pick their way through the parking lots adjacent to the Rose Bowl." There is no mention of additional liability, safety concerns or risk for potential injury due to the additional events attracting more cars and "passive recreation" attendees.

On a related matter, the EIR mentions that UCLA has priority over all other lessees and that "between August 25 and November 30, RBOC cannot schedule events that would affect the quality of the turf in the stadium." Are we really to believe that NFL games will not affect the quality of the turf? Has no one watched NFL games played outdoors and seen the deterioration of the field conditions as the season wears on?

Page 2

May 9, 2005
From Lynn Kolberg

My final point has to do with the impact on historic resources in the Arroyo. Although the EIR identifies the Lower Arroyo Seco as a Pasadena landmark, the impacts to the area are dismissed almost casually as "significant," perhaps because it is now nominated to the National Register as part of Arroyo Seco Cultural Landscape. Even so, the "project would be inconsistent with the objectives of the General Plan Historic and Cultural Resources Element" according to the consistency analysis, page 3-4-19.

The EIR (on page 3-4-34) correctly states that "elected and appointed officials often face difficult and controversial decisions that affect the character of their communities." I urge the City Council to remove the rose-colored glasses provided by the NFL's proposed project. Protect the resources and neighborhoods that make Pasadena special.

Sincerely,

Lynn Kolberg
481 E. Sierra Madre Blvd.
Sierra Madre, CA 91024

Cc: Pasadena Heritage

MEMORANDUM

To: Richard Bruckner, City of Pasadena
From: Kirk Funkhouser
Date: May 3, 2005
Re: Rose Bowl Alternative Design

Hammes Company has reviewed the Alternate Design Alternative as presented in the Rose Bowl EIR and evaluated it in terms of how the design is currently planned as well as its constructability. Hammes Company staff members individually have previous experience in the design and construction of major sports facilities and as an organization Hammes has built on this experience by providing project management services on two existing NFL stadiums, both of which included major renovation work. In addition, our organization is providing similar consulting services for two more NFL teams that are evaluating new or renovated stadiums.

There are two fundamental concerns with the Alternate Design Alternative. These concerns are the excavation process beneath the seating bowl and the construction phasing plan that is proposed to deliver the Alternative. The concerns are detailed as follows:

Excavation Process

The existing Rose Bowl seating bowl can be generally referred to as a "slab-on-grade" structure as opposed to a "structural slab." More specifically, the slabs are in the form of horizontal treads and vertical risers placed on a sloping earth berm, creating the tiers of seating that make up the seating bowl. The key difference between a slab-on-grade and a structural slab is the ability of the structural slab to span from one point to another without continuous support underneath, much like the way a beam spans from one column to another. The slab-on-grade is neither designed nor constructed to span and it must be continuously supported beneath---in the case of the Rose Bowl by the earth berm.

The Alternate Design Alternative calls for the excavation of the supporting earth berms beneath the seating bowl in order to create a location for new concourse, amenities, and club lounges. At the same time, historic requirements necessitate the retention of the seating bowl treads and risers. Therefore, in order to excavate the berms, the seating bowl treads and risers must be temporarily supported as the berm is removed. If the contractor attempted to simply excavate the berm without such temporary support, the seating bowl would likely collapse since it is not designed to span. In effect, this excavation procedure is much like mining in that support must be added as more earth is removed out of the mine tunnel.

The temporary support would require steel or timber shoring members at multiple, closely aligned areas. The long term design solution will require either erecting new structure beneath the existing to support the treads and risers or by modifying the treads and risers into

structural members themselves that can span from one support point to another. The latter would be accomplished by adding reinforcing steel to the underside of the treads and risers and encapsulating it with sprayed-on concrete, thus resulting in essentially a series of beams capable of spanning from one new or modified girder all the way around the seating bowl. To further complicate the process, new foundations and vertical structure, most likely columns, must be constructed amongst the temporary shoring. The close proximity of the shoring seriously limits the ability to utilize large excavation and boring equipment.

The risks associated with such an excavation process include: 1.) the possibility of shifting or settling with resulting damage to the historic fabric, 2.) the possibility of the treads and risers collapsing during excavation before temporary support can be placed; 3.) the possibility of temporary shoring collapsing due to contact with heavy equipment, faulty installation, and/or structural failure of one or more of its members; 4.) construction cost and schedule overruns due to unforeseen conditions during excavation. All of these risks would ultimately be measured in terms of worker safety, lost historic fabric and/or the impacts to the project budget and schedule.

The Project as described in the EIR does not require an excavation process like that of the Alternate and as such does not carry the same aforementioned risks.

Construction Phasing

Given the complicated excavation process described above, the Alternate Design Alternative may be delivered using two possible schedules. The first schedule requires the stadium to be vacated for two complete UCLA football seasons and at least one Rose Bowl Game. The UCLA program would be forced to play all its games "AWAY" or find an alternative stadium in the LA area. The Rose Bowl Game would also have to be played elsewhere for at least one season. The second schedule would be a phased delivery that addresses the tenants' desires to keep the Rose Bowl open for UCLA football and for the Rose Bowl Game. Such phases allow portions of the stadium to be used for football games while other portions are being excavated, addressed structurally, and constructed.

Since the relocation of UCLA and the Rose Bowl is highly unlikely to be accepted by the City, UCLA and the Tournament of Roses, the phased construction will be considered the only means of completing the Alternative design. Unfortunately, the projected capacity for UCLA during phased construction is reduced to 58,000 in the first season and 43,000 in the second. Rose Bowl Game capacities are limited to 82,500 and 70,000 during its two affected seasons.

The Project design, however, allows UCLA and the Tournament of Roses to utilize the existing 92,000 capacity during construction. The seating bowl reconstruction that would result in the new capacity of approximately 65,000 would be completed in the final off-season of construction, preserving thousands of ticketed seats during the construction process.

- c: Neil Glat, National Football League
- Chris Hardart, National Football League
- Bob Dunn – Hammes Company
- George Mihlsten – Latham & Watkins
- William Delvac – Latham & Watkins

Pasadena

CHAMBER OF COMMERCE
& CIVIC ASSOCIATION

865 E. Del Mar Boulevard
Pasadena, CA 91101-2904

(626) 795-3355

FAX (626) 795-5603



May 4, 2005

The Honorable Bill Bogaard, Mayor
The City of Pasadena
117 East Colorado Boulevard
Pasadena, CA 91105

Dear Mayor Bogaard:

On Monday, May 9, the City Council will be asked to certify the Environment Impact Report (EIR) for the Rose Bowl's renovation project. On behalf of the Pasadena Chamber of Commerce and its board of directors, I am writing to urge you and the rest of the City Council to certify the EIR in order to keep the Rose Bowl in contention for a National Football League (NFL) franchise in the LA area.

The Chamber has long held a position that the Rose Bowl, one of Pasadena's major assets, is in serious financial trouble. Rather than contributing to the city coffers, it has become a drain on other revenue streams that could be put to use elsewhere. We have supported the Rose Bowl Operating Company (RBOC) in their efforts to find a long-term tenant that could help ensure the future economic vitality of that asset. Right now, there is an opportunity for that tenant to be the NFL.

The NFL is going to come to the Los Angeles region and will probably invest \$400-500 million to build or renovate a stadium here. Pasadena is one of three or four potential sites. Obviously, there is no guarantee that the RBOC will be successful, and we recognize that there are bound to be issues and problems even if Pasadena is selected as the site. However, we also believe that there will be many opportunities to address those issues if the project should move forward. On the other hand, if the Rose Bowl renovation project's EIR is not certified, Pasadena would immediately be out of the competition and there would be no opportunity for further negotiations.

In supporting the RBOC's efforts, the Chamber expects those doing the negotiating to secure a good deal for Pasadena. No one is willing to accept a bad project or a bad deal to get the NFL, but if Pasadena can win this competition and negotiate a fair deal, then we submit that it would be financially irresponsible not to do so.

Respectfully submitted:

Lynne C. Hess
President and CEO

CC: Cynthia Kurtz, City Manager
Jane Rodriquez, City Clerk
Darryl Dunn, Rose Bowl General Manager



296

March 16, 2005

RECEIVED

05 MAR 17 P3:54

Ariel Socarras, Planner
City of Pasadena
175 North Garfield Avenue
Pasadena, CA 91101

CITY CLERK
CITY OF PASADENA



Dear Ms. Socarras:

After reviewing the Draft Environmental Impact Report (DEIR) for the Rose Bowl renovation, the Chamber has reaffirmed its position in support of the project. The DEIR has adequately studied the environmental impacts and alternatives and proposed sound mitigation measures as required by CEQA Guidelines. Since CEQA does not require a study of the economic impacts of a proposed project, one of the most important issues at stake in this project is not included in an EIR, and that is the substantial negative economic impact to the community if the Rose Bowl renovation does not go forward.

The stadium is 81-years old and has become increasingly uncompetitive with newer stadiums. It has uncomfortable seats, claustrophobic tunnels and growing maintenance problems. The Rose Bowl already loses \$2 million a year, and the losses will continue to grow, even if it manages to hold onto all current tenants. If the growing deficit is subsidized from city coffers, it would surely have to reduce the funding available for police, fire protection, parks, and libraries.

If a new stadium is built elsewhere, the situation goes from bad to worse. A stadium in Carson or Anaheim would take much of the Rose Bowl's current business, including some concerts and big soccer events that they can't handle. Then, the annual deficit would quickly balloon to \$4-5 million a year.

Even though CEQA does not require an economic impact study, we believe that in the case of the Rose Bowl, the negative impact of not doing a project should be given equal, if not greater, consideration.

The Chamber believes that the NFL would bring tremendous financial benefits, such as:

- Half-a-billion dollars invested in our most famous municipal.
- Instead of costing the city millions a year, the Rose Bowl can help support improved city services.
- The golf course can be properly maintained and improved, without having to mortgage its future to cover Rose Bowl deficits.
- Local businesses, restaurants and hotels will gain additional income and contribute additional sales taxes to the city.

The proposed Rose Bowl renovation project would bring the following benefits as well:

- A preserved and improved stadium and an enhanced Arroyo Seco with more green space and better facilities for public recreation.
- New jobs for local residents, both during construction and regular operations.
- More national exposure and year-round promotion of Pasadena, helping to attract conventions and tourists to the city.



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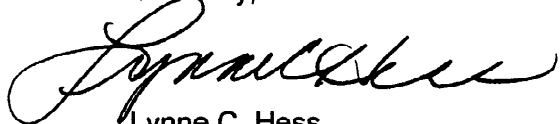
The Rose Bowl was built in 1922 as a football stadium. The public wants it used primarily for football, not for a more disruptive mixture of other events. Those impacts cited in the DEIR as significant and unavoidable such as the traffic that would be generated on game days can be mitigated by more sophisticated traffic plans to a level that is much less of a burden to the neighborhoods than what is currently experienced.

The possible loss of historic status is, of course, a serious concern, but it is one that elected officials face when balancing historic preservation and economic sustainability. We would hope that the mitigation measures recommended would keep our City Council from having to make that decision.

And finally, while we recognize that the recreational areas in the Arroyo Seco are used by many people each week, we must also emphasize that the Rose Bowl belongs to all of the residents of Pasadena. The city cannot afford to sit back and do nothing to ensure that this community asset has a viable future. If we let that happen, it will eventually cost each and every one of us a substantial amount to maintain what should be one of the city's most profitable assets.

Recognizing that the economic impact is not a requirement by CEQA, we still ask that our comments be included with other comments on the Draft EIR for the Rose Bowl Renovation Project because we believe that to be the primary issue to be considered as this project moves forward.

Sincerely,



Lynne C. Hess
President and CEO

CC: William Bogaard, Mayor
Sid Tyler, Vice Mayor
Chris Holden, Council Member
Joyce Streater, Council Member
Paul Little, Council Member
Steve Haderlein, Council Member
Steve Madison, Council Member
Victor Gordo, Council Member
Cynthia Kurtz, City Manager
Darryl Dunn, Rose Bowl General Manager
Jane Rodriguez, City Clerk ✓

Rodriguez, Jane

From: Rodriguez, Jane
Sent: Monday, May 09, 2005 10:51 AM
To: 'Sean Franklin Howell'
Subject: RE:

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

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

From: Sean Franklin Howell [mailto:showell@stanford.edu]
Sent: Sunday, May 08, 2005 4:46 PM
To: Rodriguez, Jane
Cc: johnrhowell@earthlink.net
Subject:

I am writing to express my opposition to an NFL team playing in the Rose Bowl. It would degrade the community's quality of life and ruin the stadium, and would provide no economic benefit to the city that I can see.

Thank you for your consideration.

I would be happy to provide my address: 625 S. Hudson Ave.

Sean Howell

Rodriguez, Jane

From: KAHIOM@prodigy.net
Sent: Monday, May 09, 2005 3:42 PM
To: Rodriguez, Jane
Subject: Rose Bowl - Replay Irwindale

Mayor Bogaard and the City Council
Pasadena has always been a special place to my family
since my mother arrived as a young teenager from
Nebraska. That was 60 years ago.

We don't need The NFL (check with the City of
Irwindale) and we don't need to destroy the Arroyo -
its beauty and uniqueness - much less deface an area
that only Pasadena can offer its citizens and
visitors.

PLEASE put this issue aside once and for all
Thank you for your consideration.
Karen Hall

Rodriguez, Jane

From: Ken Van Wagenen [kvw639@yahoo.com]
Sent: Monday, May 09, 2005 3:42 PM
To: Streator, Joyce
Cc: Bogaard, Bill; Madison, Steve; Holden, Chris; Little, Paul; Tyler, Sid; Haderlein, Steve; Gordo, Victor; Rodriguez, Jane; emina@earthlink.net
Subject: Say no to NFL

Dear Joyce Streator:

I know you are our representative in city government. Please make sure our negative feelings about developing and commercializing the beautiful arroyo for NFL football are represented.

I own a home on Rosemont Avenue, one of the most often used residential streets for access to the arroyo. It would be totally objectionable to me to encourage in any way the development of the Rose Bowl for other than local college games. This sort of NFL development should be allowed only in a strictly non-residential area. The traffic would be horrible on many weekends. The security necessary to police my home and our neighbors from the inner city ticket scalpers and vendors and their customers would be disgusting. The cleanup necessary from the beer cans, discarded food wrappers, and the like would be very unfair to the local homeowners in the neighborhood. The historic RoseBowl would have to undertake a complete remodel making it unrecognizable to those who hold it historically dear.

I trust you will represent me and say no to this proposal.

Ken Van Wagenen
639 Rosemont Avenue
Pasadena 91103
626-676-0880

email: vanwagke@wellsfargo.com

Yahoo! Mail Mobile

Take Yahoo! Mail with you! Check email on your mobile phone.
<http://mobile.yahoo.com/learn/mail>

Rodriguez, Jane

From: Susan Ghirardelli [s.ghirardelli@verizon.net]
Sent: Monday, May 09, 2005 5:10 PM
To: Rodriguez, Jane
Subject: Rose Bowl

Dear Mayor Bogaard and City Council Members,

I would like to register my disapproval of possible plans to convert the Rose Bowl into a venue for the NFL. You in Pasadena have an historic treasure in the Rose Bowl which should be preserved for future generations. Let the NFL find some other place less valuable to convert for their use where it would cause less damage and congestion to the local community.

Sincerely,
Susan Ghirardelli
San Fernando, CA

Rodriguez, Jane

From: Pope, Janet Amelia
Sent: Monday, May 09, 2005 1:35 PM
To: Rodriguez, Jane
Subject: FW: NO NFL for the Rose Bowl!!!!

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

From: andrevaugh@aol.com [mailto:andrevaugh@aol.com]
Sent: Monday, May 09, 2005 12:47 PM
To: Bogaard, Bill; Madison, Steve; Holden, Chris; Streater, Joyce; Little, Paul; Tyler, Sid; Haderlein, Steve; Gordo, Victor
Subject: NO NFL for the Rose Bowl!!!!

I Reside on Kenilworth Ave between Arroyo & Lincoln Ave, off Howard.

I am appalled that you as city members (and Mayor!) would consider this preposterous proposal that would not only harm the Rose Bowl's landmark status, but make my life, my neighbor's life, HELL with the additional traffic, smog, noise and congestion in a predominately residential area!

Not to mention the disruption to the community who uses Brookside Golf Course & Park.

Are you people smoking crack?

Or as usual, in your view, the bottom line is MONEY?

Or is it your OWN EGOS so you can declare down the road how you "helped make Pasadena better?"

Or you just don't give a RAT's ASS about your constituent's??

I swear to you, if this catastrophe comes to pass, I will do everything in my power as a citizen & taxpayer of this city to give every-last one of you the boot off the council in the next elections. I will even be willing to help with a campaign to IMPEACH THE MAYOR.

I will get all my neighbors to send an email to your offices and to rise up in protest!

All of you need to reflect on why you chose to run for Pasadena City Government. You should be ashamed of yourselves for letting it get this far.

Andre Vaughn
1692 Kenilworth Ave
Pasadena, CA 91103

Rodriguez, Jane

From: Muse, Trisha [tmuse@semprautilities.com]
Sent: Monday, May 09, 2005 1:22 PM
To: Rodriguez, Jane
Cc: preservation@pasadenaheritage.org
Subject: NO to NFL Proposal

Dear Ms. Rodriguez,

Would you kindly pass along this email to Mayor Bogaard and the City Council for tonight's City Council meeting. Unfortunately, I am unable to attending the meeting, but I wanted to express my thoughts regarding the proposed NFL plan.

As a resident of Pasadena, I care deeply about our city. I am very concerned about bringing the NFL to our city, as I feel it would be detrimental to Pasadena...from an environmental impact, traffic and noise standpoint. But more importantly, I'm concerned about the impact this plan would have on this national historic landmark, our treasured historic neighborhoods, and our largest public park.

Please vote no on the NFL plan.

Thank you.

Trisha Muse
1649 Whitefield Rd.

Pasadena, CA

626-794-7186

Rodriguez, Jane

From: Kristen Farley [knfarley@yahoo.com]
Sent: Monday, May 09, 2005 12:34 PM
To: Rodriguez, Jane
Subject: NO to NFL

Mayor Bogaard and the City Council,

As you undertake the important job of evaluating the EIR for the NFL project and making decisions that will impact the future of Pasadena, please consider the opinions of the many Pasadena residents who are adamantly opposed to such an inappropriate use of our largest block of parkland.

As a family full of frequent Arroyo users, the addition of an NFL team to our city would have an enormous negative impact on our lifestyle. Three of us are swimmers who train daily at the Aquatic Center.

Periodic closings of the Center for Rose Bowl events are understandable; weekly closings are not (please note that I say this as a parent, swimmer, and resident -- not as an RBAC board member). Two of us are serious endurance runners. The only pleasant way to get from the trails of the Lower Arroyo to the trails of the Upper Arroyo is through Brookside Park and the Rose Bowl area. The construction, crowds, and traffic that an NFL team would bring would make our solace-seeking runs nearly impossible in that area.

One of us is a triathlete and enjoys using the roads in the arroyo for training. Drivers are notoriously inconsiderate of cyclists, thus the increases in traffic that an NFL team would bring to the Arroyo are not compatible with the bicycling training that goes on in that area. Furthermore, like many Pasadena families, we enjoy spending our weekends walking, biking, and rollerblading in the Arroyo.

Please, do not make decisions that will further denigrate the miniscule amount of parkland currently available to Pasadena residents. The Rose Bowl area has a regional reputation as an excellent area for athletic training and recreation.

Make the best decision for the residents of Pasadena and do not bring an NFL team to our city.

The Farley Family
1035 South Madison Ave
Pasadena, CA 91106

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<http://discover.yahoo.com/online.html>

Rodriguez, Jane

From: Sue Parilla [sparilla@earthlink.net]
Sent: Monday, May 09, 2005 10:21 AM
To: Rodriguez, Jane
Subject: Fw: Against NFL Team
Importance: High

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

From: Sue Parilla
To: bbogaard@cityofpasadena.net ; styler@cityofpasadena.net
Cc: rodriguez@cityofpasadena.net ; Sue Parilla
Sent: Monday, May 09, 2005 7:27 AM
Subject: Against NFL Team

Dear Bill and Sid,

We are against having an NFL team in Pasadena, both for the traffic that will be engendered and the kind of Rose Bowl reconfiguration that will be required.

Ted Krontiris and Sue Parilla
770 S. El Molino Avenue
626-796-7255

307
5/9/2005

Rodriguez, Jane

From: BillScreen@aol.com
Sent: Monday, May 09, 2005 10:37 AM
To: Rodriguez, Jane
Subject: NFL no

Just a note to cast my NO vote for the invasion of the NFL. Don't want 'em, don't need 'em.

Bill Provence
626-683-9364
S. El Molino resident

5/9/2005

308

Rodriguez, Jane

From: Amy Richards [arichards@altrionet.com]
Sent: Sunday, May 08, 2005 1:06 PM
To: Rodriguez, Jane
Subject: Rose Bowl NFL plan

Dear Mayor Bogaard and Pasadena City Council,

I am writing to register my opposition to the plan to turn the Rose Bowl into an NFL venue. I believe that the NFL plan would negatively impact many of the things that make Pasadena such a great place to live - plenty of open space, tolerable traffic, the historic character of its neighborhoods and public institutions.

I urge you to vote "No" on the NFL plan.

Sincerely,

Amy Richards
1545 North Catalina Avenue
Pasadena, CA 91104

626-797-7720
626-376-0922 - cell
arichards@altrionet.com

Rodriguez, Jane

From: John R. Howell [johnrhowell@earthlink.net]
Sent: Sunday, May 08, 2005 3:57 PM
To: Rodriguez, Jane
Cc: 'Sally Howell'
Subject: Rose Bowl

Dear Mayor and City Council members,

I have already expressed my opposition to the NFL proposal to Mayor Bogaard and my Council member Tyler, but take this opportunity to do the same to the balance of the Council. It would degrade our community's quality of life rather than enhance it. It would ruin an historical gem. I would arrive at my conclusion whether or not there were any economic benefit to the City, but I fail to even see one. In fact, if the choice were between a bastardized Rose Bowl and its removal and further restoration of the Arroyo, I would heartily endorse the latter as a truly progressive contribution to our community.

Thank you for your consideration.

John Howell

John R. Howell, Esq.
301 East Colorado Boulevard, Suite 320
Pasadena, California 91101
telephone 626-796-3004 | facsimile 626-796-0118
JohnRHowell@earthlink.net

Rodriguez, Jane

From: Nancy McClaskey [nmccclaskey@msn.com]
Sent: Sunday, May 08, 2005 10:25 PM
To: Rodriguez, Jane
Subject: Rose Bowl - NFL

To Mayor Bogaard and Members of the City Council:

As a long time home owner-resident of Pasadena, I am vehemently opposed to the City of Pasadena moving forward with efforts to encourage the NFL to consider the Rose Bowl as a venue.

This is a moment in time for you elected officials to demonstrate moral leadership. The Arroyo Seco (Park) is a sociological phenomenon which can never be replicated. It is a place where people of all ethnicities, socio-economic levels and ages come together to recreate. You would give this venue of the people to the NFL? The NFL does not give a fig about the people of Pasadena. Their agenda is all about money and greed. Is that your agenda?

The neighborhoods surrounding the Arroyo Seco Park and Rose Bowl will be greatly compromised by NFL games. I remember all too well the Super Bowl of some years ago. The professional football fans were very disrespectful of our residential neighborhoods. Fans were urinating in our shrubbery and trashing the streets. Such behavior is not the norm for other groups who use the Rose Bowl.

If you support the NFL coming to Pasadena, you will have become active participants in the destruction of the Arroyo Seco as a park and of the Rose Bowl. Two facets of the charm of Pasadena will be irrevocably damaged. It is morally irresponsible for you, the elected officials, to not preserve the Arroyo Seco and the Rose Bowl for the current and future citizens of Pasadena.

Nancy McClaskey
273 Rosemont Avenue
Pasadena, Ca 91103

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<http://search.msn.click-url.com/go/onm00200636ave/direct/01/>

Rodriguez, Jane

From: Tim Aldana [nlfifan88@sbcglobal.net]

Sent: Sunday, May 08, 2005 9:27 PM

To: Rodriguez, Jane

Subject: resident

I want a team at the rose bowl it would be a splendid idea let them do it

Rodriguez, Jane

From: Velina Petrovic [petrodna@earthlink.net]
Sent: Saturday, May 07, 2005 8:05 AM
To: Rodriguez, Jane
Subject: Not in favor of NFL takeover of Rose Bowl

Good day,

I do not want the NFL to take over the Rose Bowl. Pasadena is growing and there are so few things that define our city. The Rose Bowl is the last thing that Pasadena can hold onto that defines our city. Once we destroy the historical Rose Bowl there will be no turning back..it will forever be gone.

Thank you for your time,

Velina Petrovic
3820 Mayfair Dr.
Pasadena CA

Rodriguez, Jane

From: cityweb-server@cityofpasadena.net
Sent: Saturday, May 07, 2005 11:42 AM
To: Bogaard, Bill
Subject: WWW PUBLIC COMMENT

Subject: The NFL, Rose Bowl and the draft EIR
Name: George R. Rossman
Address: 297 Sycamore Glen
City: Pasadena
State: CA
Zip: 91105-1350
Email: grr@gps.caltech.edu
Date: 5/7/2005
Time: 11:41:39 AM

Comment:

Mr. Mayor,

I wish to express my opposition to the current proposal for the NFL in the Rose Bowl. I find the draft EIR to seriously downplay major negative impacts on the community and to fail to consider broader negative impacts on the city and the significant displacement of recreational opportunities for the community that are currently enjoyed in the Central Arroyo.

My most serious concern is the fact the NFL's operation of the Rose Bowl would curtail the numerous recreational and open-space activities that are currently enjoyed by myself and thousands of others in the city. Open space and the opportunities that it offers are in short supply in Pasadena. I view protection of this asset in the Arroyo to be fundamental and contrary to the NFL's proposal. The expansion of displacive commercial activity in Arroyo is a particular negative.

Even though I am more than a mile and a half removed from the Rose Bowl, I am still impacted by the current traffic congestion and can only envision more frequent and more intense impacts if the proposed changes happen.

The EIR inadequately considers these issues and the broader impact on the city as a whole. Nor do I believe that if the proposed plan were to be approved that we would see the end of disruptive and displacive commercial demands on the Arroyo.

The direction of many of the discussions is that the physical structure of the Bowl is more important than the Central Arroyo park and benefits the park provides to the citizens of our city. Although I would prefer to maintain the Rose Bowl for its current limited uses, I would even go to so far as to suggest that we must face the option that if it is impossible to maintain the financial viability of the structure without serious degradation of the open space of the central arroyo and the displacement of the recreational opportunities the area offers, then it may be preferable to see the Rose Bowl abandoned and the park returned to the community, with, perhaps, the entrance way preserved as a historical monument to the former Bowl. The city would maintain a positive cash flow from the golf course and the recreational activates enjoyed daily by thousands of our citizens would only grow.

In short, I see major negatives and little positive in this proposal for me and the city beyond the dream of a cash cow that would graze heavily and destructively upon our fields.

Rodriguez, Jane

From: Cheryl Carasik [ccarasik@earthlink.net]
Sent: Saturday, May 07, 2005 5:10 AM
To: Bogaard, Bill
Subject: NO NFL at the Rose Bowl!!!!!!!!!!!!

Please don't let this happen!!!!!! I'm going on 12 years in my home which is close enough to the Bowl to easily hear the score of any game or activity going on. We already have enough traffic on game days and holiday activities. We love the Rose Bowl just the way it is and need I say, I'm totally against the N.F.L. coming to our college bowl and recreation area..... please, if they come, I will have to move out of my home, and I don't want to do that!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!
NO NFL AT THE ROSE BOWL.....Cheryl, a very concerned friend of the Bowl.

Rodriguez, Jane

From: robbi dominguez [robimd@sbcglobal.net]
Sent: Friday, May 06, 2005 5:59 PM
To: Madison, Steve; Bogaard, Bill
Subject: NFL @ Rose Bowl

Dear Gentlemen,

Please consider the total impact of putting an NFL team at the Rose Bowl. I live on Linda Vista Ave., and we have lived with games and concerts, but the NFL is a different story. Just the noise alone is tough, but our lives are completely impacted by the events- we either can't leave our home or we can't get in, and now you want to add the NFL to the existing events. No one around the Rose Bowl area wants the noise, trash and inconsiderate fans. We are also concerned about an increase in crime, not to mention the value of our property going down. The Rose Bowl is a historic landmark. The NFL combined with television network control will harm our city's prize, and we will be their subjects. Also, can you really fight the golfers that will be up in arms about the parking?

Please don't do this to our city- do we really want an "Econo Lube and Tune Bowl"? That will be next!

Thank you,
Robbi Dominguez
1490 Linda Vista Ave.
91103

5/9/2005

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Rodriguez, Jane

From: Shirley Curren [scurren19@earthlink.net]
Sent: Friday, May 06, 2005 10:44 AM
To: Bogaard, Bill
Subject: NFL

Dear Mayor,

I have read the E.I.R. for the N.F.L. and I am very opposed to them coming to Pasadena and taking over our Irreplaceable Arroyo.

It is very clear that any benefits are negated by the excessive negative impacts they will have on the city.

Sincerely,
Shirley Curren

317
5/9/2005

Rodriguez, Jane

From: Robert Lopuck [rlopuck@sbcglobal.net]

Sent: Friday, May 06, 2005 8:39 AM

To: Bogaard, Bill

Subject: No to NFL

Please don't destroy our heritage in this valuable Pasadena resource

Rodriguez, Jane

From: Snodgrass, S R [srsnodgrass@labiomed.org]
Sent: Friday, May 06, 2005 8:15 AM
To: Bogaard, Bill
Cc: preservation@pasadenaheritage.org
Subject: What's this baloney about a majority of residents wanting the NFL to come in?

Hey, this NFL steamroller is running on hot air. We were alarmed to wake up today and see the Star-News saying that the majority of Pasadenans support a deal with the NFL. Nobody gave us any chance to vote on this. We don't buy this poll done by the RBOC. We live on the peon side of the Bowl, very close to the Arroyo, and that's the reason we bought the property. We don't want more bars and sleaze cafes in NorthWest Pasadena, there are way too many already.

We are very dubious of this NFL idea. Yes, listen to any specific proposal, but remember:

1. Pasadena has a soul and should not aim to become like Anaheim
2. The Arroyo is a jewel and walking/running/hiking in the Arroyo should be increased, not decreased
3. The City can increase fees charged at the Golf Course
4. The City can and should have more concerts and similar events at the Rose Bowl- yes, some people from Linda Vista (the haute couture people) don't want anything in the Bowl, but they are only 5% of the population.
5. Pasadena is already stuck with a very expensive retrofitting of City Hall and with schools that need a lot more help from all of us. We must not put **any tax money** into an NFL project, which is likely to be a fancy stadium surrounded by litter and parking lots. **NO WAY.**
6. We work during the day and we're cheap, so we've not joined the West Pasadena residents Association- can't get to most meetings. We use the arroyo every weekend; it's a treasure for us. We're going to join WPRA & Pasadena Heritage and we're going to work against any politician or city councilor who wants to sell out our quality arroyo seco...
7. From the NFL's point of view, the Carson site gives them much more freedom of action, more customers, no parking problems and tax support. Let them have it.
8. Yes, listen to any NFL proposal, but remember that Pasadena is a quality city, not a city of beer joints. Many of us will fight hard on this issue. If we lose the arroyo, we'll move out and we don't want to do that.

Thank you

Bob and Kay Snodgrass
 731 West Washington Blvd., Pasadena 91103

Rodriguez, Jane

From: PPasadenaphil@aol.com
Sent: Friday, May 06, 2005 12:11 PM
To: Rodriguez, Jane
Cc: PPasadenaphil@aol.com
Subject: The NFL and the Rose Bowl

I am totally opposed to the idea of the the NFL becoming involved in any way with the Rose Bowl. The idea of this organization having anything to do with the future of the Rose Bowl and the adjacent land in the Arroyo makes me ill. This is a bad idea which if entered into by the City will come back to haunt our city for many years to come. This is a mistake which will be irreversible. I know the Rose Bowl needs to increase it's revenue and all other means should be investigated to assure that; but this action will change forever the character and future for the worse. Please don't let this happen !

Philip McGrath
355 South Los Robles #242
Pasadena, Ca. 91101
626-449-6070

Rodriguez, Jane

From: Pepi and Joe Feinblatt [jfphoto@pacbell.net]
Sent: Friday, May 06, 2005 12:08 PM
To: Gordo, Victor; Rodriguez, Jane
Subject: NFL Proposal

Victor –

We urge you to reject the current proposal for the NFL at the Rose Bowl, because the scale of development is totally out of character with Pasadena's most important public park.

The proposed development may be appropriate for the center of an industrial city like Anaheim, or perhaps the industrial fringes of a large urban downtown, but this development is not appropriate for Brookside Park. It will seriously impact the availability of the park for other appropriate park activities in our park starved community. It will also destroy the historic character of the park and Pasadena's famous Rose Bowl.

The narrow section of Mountain Street that passes by Washington Square is already carrying more traffic than it can handle. This increase of very intense use of the Rose Bowl will bring more traffic to our neighborhood.

Thank you for considering these important implications of the NFL proposal.

Your constituents,

Joe and Pepi

Rodriguez, Jane

From: Tania Rizzo [ctmrizzo@oco.net]
Sent: Friday, May 06, 2005 11:10 AM
To: Rodriguez, Jane
Subject: RE: NFL at Rose Bowl

Sure, I live at 2227 Lambert Drive, Pasadena 91107. As a former employee at the Pasadena Museum of History, I can also personally attest to the tremendous impact that big football games have on visitors, residents, and commuters. Thank you.

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

From: Rodriguez, Jane [mailto:jrodriguez@cityofpasadena.net]
Sent: Friday, May 06, 2005 9:08 AM
To: 'Tania Rizzo'
Subject: RE: NFL at Rose Bowl

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

--Jane Rodriguez, City Clerk

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

From: Tania Rizzo [mailto:ctmrizzo@oco.net]
Sent: Thursday, May 05, 2005 5:26 PM
To: Rodriguez, Jane
Subject: NFL at Rose Bowl

I would like to add my name to fellow Pasadenans opposed to bringing the NFL to the Rose Bowl. We are already experiencing major assaults on our quality of life and having large numbers of football fans invading our city and crowding into the Arroyo can only cause more congestion, disruption, inconvenience, and--inevitably--destruction. I live here because Pasadena offers an attractive respite from the traffic, noise, and other aggravations of Los Angeles. Our beautiful neighborhoods and elegant architecture are the envy of the region. The Rose Bowl is a cherished icon. Please don't ruin our town and our way of life for the sake of a spurious temptation to make a buck.

Tania Rizzo

Rodriguez, Jane

From: Judy Fisher [judyleefisher@hotmail.com]
Sent: Friday, May 06, 2005 9:32 AM
To: Rodriguez, Jane
Subject: Re: STOP THE NFL FROM COMING

2234 Cooley Place, Pasadena 91104

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

From: Rodriguez, Jane
To: 'Judy Fisher'
Sent: Friday, May 06, 2005 9:11 AM
Subject: RE: STOP THE NFL FROM COMING

This is to acknowledge receipt of your e-mail, which will be distributed to the Mayor and City Council.

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

--Jane Rodriguez, City Clerk

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

From: Judy Fisher [mailto:judyleefisher@hotmail.com]
Sent: Thursday, May 05, 2005 8:00 PM
To: Rodriguez, Jane
Subject: STOP THE NFL FROM COMING

Dear Mayor Bogaard,

I've only lived in Pasadena the past seven years, but I have come to realize that it is one of the best communities in the greater Los Angeles area. What makes us special is the wonderful preservation of old architecture. As a member of Pasadena Heritage, I am concerned about the NFL coming into the city, but especially what will happen to the beautiful Rose Bowl designed by Myron Hunt. I've fortunate to work at Occidental College, which was also designed by the renown architect. I'm a member of the Huntington Library as well - another great structure still remaining from Myron Hunt.

Please don't let the NFL take away this landmark!!!

In addition, all the construction of new buildings for apartments and townhouses concerns me. Our lovely city will soon be very crowded. Every time I drive on Colorado, I can't believe what I'm seeing. The council should be award of what it could be creating for the future - more people, more cars and traffic. Our wonderful community will change and not necessarily for the better.

Sincerely,

Judy Fisher

Rodriguez, Jane

From: Robert Lopuck [rlopuck@sbcglobal.net]

Sent: Friday, May 06, 2005 8:37 AM

To: Rodriguez, Jane

Subject: NO on nfl rose bowl

Don't distroy our beautiful landmark -keep Pasadena special -we don't need to sell out our treasures

Rodriguez, Jane

From: dld829@aol.com
Sent: Friday, May 06, 2005 8:22 AM
To: Rodriguez, Jane
Subject: My vote.....

Dear Mayor Bogaard and the City Council,

May 7, 2005

We are strongly opposed to the restructuring of the Rose Bowl !! It is a wrong decision for Pasadena; it would deprive the local residents of the use of their largest park; it would destroy the legendary National Historic Landmark; and finally, it would heavily impact the historic neighborhoods.

VOTE NO on the NFL plan.

Sincerely,

Dianna Lee Davidson
Rhea Walco
Marion Diamond

Rodriguez, Jane

From: Todd Ellis [tellis@earthlink.net]
Sent: Friday, May 06, 2005 6:35 AM
To: Rodriguez, Jane
Subject: No NFL at the Rose Bowl

Dear Mayor Bogaard,

I am writing to express my opposition to the installment of an NFL team at the Rose Bowl. I don't believe an event that will adversely effect Pasadena has taken place since the construction of the 210 freeway and the discussion about tearing down the Colorado Street Bridge. Please consider the critical losses to the city if this takes place. The Arroyo is just one of the many incredible things that helps Pasadena stand out from our neighbors and especially the city of Los Angeles and the modifications that will have to take place to achieve this football goal will destroy this incredible area that people have been writing about, painting and photographing for over a century.

Please vote NO on the NFL plan.

Thank you.

Todd Ellis
999 North Madison Avenue
Pasadena, CA 91104
626-797-6664

Rodriguez, Jane

From: David H. Hundley [dhhundley@earthlink.net]
Sent: Friday, May 06, 2005 5:14 PM
To: Rodriguez, Jane
Subject: FW: Rose Bowl

From: "David H. Hundley" <dhhundley@earthlink.net>
To: jrodriguez@cityofpasadena.net
Subject: FW: Rose Bowl
Date: Fri, May 6, 2005, 5:06 PM

Please pass this along to the Mayor and other Commission members. Thank you.

From: "David H. Hundley" <dhhundley@earthlink.net>
To: jstreatpr@cityofpasadena.net
Subject: Rose Bowl
Date: Fri, May 6, 2005, 1:34 PM

Dear Council Woman Streator:

As a long time resident of Pasadena I felt compelled to respond to your letter.

You must think that I am [we] a stupid resident of Pasadena and not able to read between the lines and comments of your letter. I am an educated white male with an MFA in design and was the youngest faculty member ever hired at the Art Center College of Design when I moved here in 1977.

1. In re. to the content of your letter I cannot recall the date of the last retrofitting and updating of the Rose Bowl, but I don't think it was that long ago. The intent then was to increase a profitability for the City and to maintain neighborhoods and traffic to a minimum. I believe that was one of the "Commissions" great plans. 2. In re. to the \$600 million for the NFL to retro the Bowl it is nothing when I know for a fact professionally, that they get more than that from ads for one Super Bowl +. 3. Also, 'additional revenue' for maintenance and parks does not compensate [since we do not know] for wildlife and park services. Additional parking alone for the NFL would decimate the area- let alone the traffic increase. 4. 2000 part-time and seasonal jobs does not classify as "work experience" if you are selling hot dogs and directing cars. To use that as an unemployment ploy is beyond --- 5. AND \$1.5 million doesn't even pay for an NFL 60 second spot ad once a year, and that is suppose to help our schools? 6. I am not aware of benefiting 'financially' from the Rose Bowl. Please enlighten me. 7. Could you also share with me the last 'cultural event' held at the Bowl. The Rev. Billy Graham does not constitute a cultural event and that's the closet thing I can think of. Which was free and as a resident I picked up the tab in more ways than one. 8. Lastly I have seen "your" Commission ignore and jeopardize what Pasadena is and now was! i.e. ignoring, transgressing, and taking advantage of pacts and agreements set forth by the individual who gave the beautiful land to ACCD when it was first built. You ignored neighborhoods and schools re. traffic and the population of ACCD.

I taught at Art Center College of Design for 10 years. Education yes, but not to the detriment of neighborhoods due to traffic congestion that still races to and fro on Linda Vista and now to "La Raymond ACCD". All in the commemoration of the City of Pasadena's Commission and Richard Koshalek.

And in closing might I ask, where do you live?

Sincerely,

David H. Hundley
8 Oak Knoll Terrace
PASADENA

PS And now what a price to pay to have today's Star News with a poll of people with an income of \$50,000. or less in favor of Your proposal. That's brilliant! Have you hired an agency yet??

Rodriguez, Jane

From: pmontalbano@charter.net
Sent: Thursday, May 05, 2005 10:49 AM
To: Bogaard, Bill; Madison, Steve
Subject: NFL Proposal

Dear Mayor Bogaard and Councilman Madison,

My husband, Eric Frank and I as residents of the Linda Vista area urge you to vote NO to the NFL Proposal. We are strongly against having a football team in the Rose Bowl.
Thank you.

Sincerely,
Penni Montalbano

Rodriguez, Jane

From: theganters [theganters@earthlink.net]
Sent: Thursday, May 05, 2005 5:44 PM
To: Bogaard, Bill
Subject: NFL Proposal

Mayor Bogaard,

I am corresponding with you as a resident of the City of Pasadena and a concerned property owner in the Rose Bowl neighborhood. I have reviewed the facts and proposals regarding the possibility of an NFL team coming to town and my conclusion is a very negative one. Specifically, it troubles me that the city leadership is actually considering an NFL proposal at the detriment of my family, neighborhood and property. I am urging you to support the residents of the potentially impacted area and end this matter. As a property owner I do feel it is fair to ask my neighbors and me to absorb more traffic, noise pollution and property depreciation. My street (North Arroyo Boulevard) as it is now has become a thoroughfare for street vendors, ticket scalpers, parking and litter for Rose Bowl events. It is insulting that you and the political leadership are actually considering imposing on us even more. Are you aware that on the day of Rose Bowl events my neighbors and I have to rearrange our lives and how we go about our affairs? Friends and relatives cannot visit without waiting in lines; a short trip to the market becomes a frustrating task.

At what point do we say enough is enough. I have traveled across this country and visited many sports venues in many forms. In every case, I have never seen a professional sports arena or stadium that was in a residential neighborhood that property values did not drop, crime did not increase and the residents did not flee. The Los Angeles Coliseum is a prime example of a once glorious neighborhood transformed to demise to housing value decline, crime and a poor quality of life.

In conclusion I am looking to you protect my family's quality of life and not force us to leave a neighborhood that we have resided in for generations. Do the right thing and say no to the NFL proposal. In the spirit of being objective, I would like to know what your position is on this matter why you feel the way you feel. At your convenience please respond by e-mail, by mail 1890 North Arroyo Boulevard in Pasadena, CA 91103 or by telephone at 626 296-9304.

Respectfully Submitted,

Derek Ganter

Rodriguez, Jane

From: cityweb-server@cityofpasadena.net
Sent: Thursday, May 05, 2005 11:34 PM
To: Bogaard, Bill
Subject: WWW PUBLIC COMMENT

Subject: Rose Bowl
Name: Paul Felix
Address: 757 South Euclid Avenue
City: Pasadena
State: CA
Zip: 91106-3734
Email: pfelix@earthlink.net
Date: 5/5/2005
Time: 11:33:35 PM

Comment:

Dear Mayor Bogaard,

Please add my name to the list of those opposed to the destruction of the Rose Bowl as we know it. I find it difficult to believe that we would be willing to so casually and drastically alter a beloved city landmark to satisfy the greed and whim of the NFL. I resent the methods used by the league to play cities against each other and I am incredulous that Pasadena is willing to play along. Please keep in mind we are stewards of our historic resources. Once gone, they're gone for good. The Rose Bowl is an emblem, a national symbol of Pasadena. To lose its character and landmark status would not only be disastrous for it but also for the fabric of the surrounding city. What possible gain is worth this? In the fourteen years I've lived in Pasadena I've seen many changes come to the city--some short-sighted, some necessary to accomodate the increased density of the Southland--but always I've thought the council and mayor would do their utmost to preserve that which is best, that which defines us as a city and symbolizes our respect for our history. Please don't shirk your duty. This is important. This matters. Let the NFL work its manipulative schemes elsewhere.

Sincerely,

Paul Felix
757 South Euclid Avenue

Rodriguez, Jane

From: Cara_Crosetti@capgroup.com
Sent: Thursday, May 05, 2005 12:49 PM
To: Rodriguez, Jane
Subject: Arroyo resident's concern about Rose Bowl development

Hello.

I recently sent this note to Ariel Socarras and wanted to send a copy to you as well....

Thank you for the letter you sent last week regarding the Rose Bowl Renovation Plan and the EIR. I have reviewed the information on the website and wanted to once again share my strong concern for this project moving forward.

As an Arroyo resident, I am deeply concerned and feel strongly against any redevelopment of the Rose Bowl or Arroyo area. The issues listed in the meeting minutes regarding noise level, increased traffic flow, lack of use of the Arroyo by residents, parking issues, trash pickup/issues, access/street barriers issues, etc. all concern me as well.

With the current Rose Bowl use, the barriers are not picked up in a timely manner, the young people who man the barriers are not respectful that they are working in someone else's front or backyard during the weekend when residents are trying to enjoy their home and neighborhood, and the increase of traffic, and potential NFL fans, will reduce the value of our property. The areas surrounding the Arroyo today create a respectable, clean, and safe neighborhood....let's keep it that way.

It is my sincere belief that changing the Rose Bowl and Arroyo in any way will reduce the quality of our neighborhood, our lives, and our property value.

I do not support this effort and hope that you do not either. Pasadena has plenty of revenue...we don't need more money coming into the city. We need to maintain and control what we have in place today.

Please focus on the poor quality of our public school system...that's where the city's efforts should be focused.

Thank you for your time. Please don't hesitate to contact me with any questions.

Sincerely,

Cara Crosetti
1150 Wotkyns Drive (corner of Arroyo and Wotkyns)
Pasadena, CA 91103
626-793-1713

Rodriguez, Jane

From: gty52jade@netscape.net
Sent: Thursday, May 05, 2005 2:01 PM
To: Rodriguez, Jane
Subject: RE: NO NFL in the Rose Bowl!!!!!!!!!!!!!!!!!!!!!!

"Rodriguez, Jane" <jrodriguez@cityofpasadena.net> wrote:

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

>
>
>

>--Jane Rodriguez, City Clerk

>
>
>

>-----Original Message-----

>From: gyama [mailto:gty52jade@netscape.net]

>Sent: Wednesday, May 04, 2005 9:01 PM

>To: Rodriguez, Jane

>Subject: NO NFL in the Rose Bowl!!!!!!!!!!!!!!!!!!!!!!

>
>
>

> hello,

>
>
>

> i just want to be clear and as brief as possible, i wonder if you
>could tell me how many professional sports teams have their
>stadium/arena in the middle of a residential area? i would bet none
>especially in the cities main green zone. yes the rose bowl is historic
>but remember it is built on one of the cities first dumps.

> i live near the rose bowl and my feeling is that the city has
>dumped more undesirerable things on this part of town i'll list a few,
>the 210 fwy, all the school buses and their repair yards, the unified
>repair yard, police heliport, chp station, city repair yard, overuse of
>the rose bowl to list a few. now the school buses don't sound like much
>but they use our small streets as their private freeway and the do ALL
>their driver training in our neighborhoods. i grew up in this house so
>i've remember how it used to be compared to now. i have also lived in
>other parts in the city so i have some idea about how things are
>handled in the other parts of this city. i don't think most of the
>people that make the decisions about the rose bowl really consider how
>their decisions affect us, oh yeah i've heard the lip service answers,
>but why don't some of you all that have pets come spend the forth of
>july over hear and watch the effect on you pets. also we get suprised
>sometimes like the premire of that disney movie remember the titans
>someone thought it would be cute to have a f-15 fighter jet fly over
>the bowl a few times. i did not think it was cute. i also have a feeling that if the nfl
gets in we will see a hotel and retail complex go in.

> NO NFL FOOTBALL IN THE ROSE BOWL

>

>sure no problem i live at 1636 kenilworth avenue.

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Rodriguez, Jane

From: Dennis Hill [dennis@dennishill.com]
Sent: Thursday, May 05, 2005 10:18 PM
To: Rodriguez, Jane
Subject: NFL @ Rosebowl

Dear Mayor Bogaard and the City Council Members;

At the behest of Pasadena Heritage I am writing to express my opinion concerning having an NFL team in Pasadena and play at the Rose Bowl. I am a business and property owner and a member of Pasadena Heritage but I do not share the opinions of the Board of Directors of this organization. They have not made the case to me that this would be a bad move for Pasadena. As long as the City does not "give away the store" in order to bring in a team at any cost, I am very much in favor. I say this not as a sports fan but as a practical matter of finances. I really don't care if Southern California has a team or not, but raising the profile of our community, increased revenue, increasing public services is very important to all of us.

Many people raised similar concerns when UCLA wanted to play at the stadium but I feel that it has been nothing but a positive for our city. They are using many of the same arguments when my alma mater, Art Center, College of Design wanted to build or expand its current campus. Do not let the few dictate the wishes of the majority.

I urge you to vote in FAVOR of the NFL and to use your best judgment to negotiate the best deal for all of the citizens of Pasadena and its surrounding communities.

DENNIS HILL
2012 N EL MOLINO AVE
ALTADENA CA 91001 USA
626 345 0670
photos@dennishill.com
www.dennishill.com

Rodriguez, Jane

From: ecic@earthlink.net
Sent: Thursday, May 05, 2005 5:57 PM
To: Rodriguez, Jane
Subject: NFL

Dear Jane,

Please let Mayor Baagard know my opinion regarding the Rose Bowl.

I would like to voice my opinion against the NFL coming to the Pasadena Rose Bowl. I do not believe this would a benefit for Pasadena. I believe in preserving the Rose Bowl as a part of the history of Pasadena. I was born in Pasadena and support the beauty and history of Pasadena.

Thanks you.

Judith Packard

Rodriguez, Jane

From: Paul Anthony Felix [pfelix@earthlink.net]
Sent: Thursday, May 05, 2005 11:34 PM
To: Rodriguez, Jane
Subject: Rose Bowl meeting

Dear Ms. Rodriguez,

I've already emailed the following to my councilman and the mayor, but I've noticed Pasadena Heritage urges messages regarding the upcoming meeting on the NFL Rose Bowl proposal be sent to you for distribution. Thanks for your help.

Please add my name to the list of those opposed to the destruction of the Rose Bowl as we know it. I find it difficult to believe that we would be willing to so casually and drastically alter a beloved city landmark to satisfy the greed and whim of the NFL. I resent the methods used by the league to play cities against each other and I am incredulous that Pasadena is willing to play along. Please keep in mind we are stewards of our historic resources. Once gone, they're gone for good. The Rose Bowl is an emblem, a national symbol of Pasadena. To lose its character and landmark status would not only be disastrous for it but also for the fabric of the surrounding city. What possible gain is worth this?

In the fourteen years I've lived in Pasadena I've seen many changes come to the city--some short-sighted, some necessary to accomodate the increased density of the Southland--but always I've thought the council and mayor would do their utmost to preserve that which is best, that which defines us as a city and symbolizes our respect for our history. Please don't shirk your duty. This is important. This matters. Let the NFL work its manipulative schemes elsewhere.

Sincerely,

Paul Felix
757 South Euclid Avenue

Rodriguez, Jane

From: Davidson, Christopher [Christopher.Davidson@tvc.cbs.com]
Sent: Wednesday, May 04, 2005 12:12 PM
To: Rodriguez, Jane
Cc: Bogaard, Bill; Tyler, Sid
Subject: ROSE BOWL

Pasadena is not Las Vegas. That is why this is such a desirable, uplifting, stimulating and thoughtful place to live. The glitz, hype, crowds, crime and waste that will inevitably accompany an "NFL-ized" Rose Bowl are not in the best interest of our city in the broadest sense. Any short term cash influx cannot be allowed to undue the classic simplicity of the Rose Bowl. People care about this facility. There are other routes to "long-term financial viability." The Rose Bowl's inherent peacefulness will be ruined by "state-of-the-art" upgrades. Please do not allow this precious resource, which embodies the classic values and historical aspirations of Pasadena, to be dismantled by the crass, the shoddy and the greedy

Pasadena is better than that.

337
5/9/2005

Rodriguez, Jane

From: Mary Ellen Schubel [meschubel@earthlink.net]
Sent: Wednesday, May 04, 2005 8:25 PM
To: Rodriguez, Jane
Subject: Rose Bowl Proposed Changes

May 4, 2005

Dear Mayor Bogaard and Councilmembers:

I am writing to oppose the changes proposed by the NFL for the Rose Bowl. The Rose Bowl is a beautiful and historic treasure of the area. Pasadena is recognized and valued for the historic character it nourishes. It does not make good sense, monetarily or otherwise, to jeopardize the character of the arroyo or the City in general.

I recognize the City's desire for additional revenue in these hard economic times for cities, but I believe the long term costs of added traffic, parking demand, and added security are not worth it. While football can be very entertaining, professional football doesn't fit with the image I believe Pasadena wants to project.

Thank you for consideration.

Sincerely,

Mary Ellen Schubel
1427 Monte Vista St.
Pasadena, CA 91106

Rodriguez, Jane

From: Karinmfcc@aol.com
Sent: Wednesday, May 04, 2005 4:19 PM
To: Rodriguez, Jane
Subject: Rose Bowl

(Please pass on my comments to the Mayor, etc.) I am very disappointed by the plans to expand the Rose Bowl into an NFL stadium. Within the last year, more and more buildings are being constructed in the city to the point that there are no empty spaces anywhere. I feel the proposed Rose Bowl plans would destroy one of the few open spaces left in Pasadena, not to mention the variety of recreational areas available there. I'm sure this project would bring in alot of money to the city, but would at the same time take away the average Pasadena residents quality of life, and ability to enjoy the nicest and biggest recreational area in Pasadena. Please consider the residents and not the money.

Thank You,
Karin Romp

431 S. oakland 91101

339
5/4/2005

Rodriguez, Jane

From: Michael Pisarik [mdpisarik@hotmail.com]
Sent: Wednesday, May 04, 2005 2:42 PM
To: Rodriguez, Jane
Subject: Opposed to the NFL in the Rose Bowl

In order to appease the powers of the NFL the City of Pasadena would be tragically altering a treasure, not just of the City, but of Southern California. The Rose Bowl needs to be preserved at or near its present form. The suites, sight lines and parking that the NFL mandates would destroy it beyond belief and be in violation of its historic status and role.

Beyond that, other taxpayer-funded facilities would be altered and damaged. Brookside, the Aquatic Center, and the entire Arroyo would be damaged and diverted from their mission. The costs clearly outweigh the benefits and the NFL is not wanted as a result.

Rodriguez, Jane

From: Terry Paule [hkpaules@yahoo.com]
Sent: Wednesday, May 04, 2005 1:03 PM
To: Rodriguez, Jane
Subject: Opposition to the NFL

Dear Elected Officials,

We live at 510 Rosemont Ave., a direct artery to the Rose Bowl. We love our neighborhood and graciously "put up" with the current traffic to the Rose Bowl.

We are absolutly appauled and shocked that you would support the development of the Rose Bowl by the NFL.....

The adverse impact on our neighborhood would be horrific. It is inconceivable that you would deprive us of even more of our peace and tranquility...and acces to our property.

The adverse impact on traffic, congestion, smog and crime are beyond obvious...

Would you like to live on our street on a NLF game day????

As elected rerepresentatives, you have an obligation to look beyond dollars and protect the quality of life in our city. Your vote for the NFL would be a direct contradiction of this responsibilty. People come before corporations and giantic sports franchises.

VOTE NO ON THE NFL!!!!!!!!!!!!!!

Terry Paule
510 Rosemont Ave
Pasadena, CA. 91103

Rodriguez, Jane

From: Davidson, Christopher [Christopher.Davidson@tvc.cbs.com]
Sent: Wednesday, May 04, 2005 12:12 PM
To: Rodriguez, Jane
Cc: Bogaard, Bill; Tyler, Sid
Subject: ROSE BOWL

Pasadena is not Las Vegas. That is why this is such a desirable, uplifting, stimulating and thoughtful place to live. The glitz, hype, crowds, crime and waste that will inevitably accompany an "NFL-ized" Rose Bowl are not in the best interest of our city in the broadest sense. Any short term cash influx cannot be allowed to undue the classic simplicity of the Rose Bowl. People care about this facility. There are other routes to "long-term financial viability." The Rose Bowl's inherent peacefulness will be ruined by "state-of-the-art" upgrades. Please do not allow this precious resource, which embodies the classic values and historical aspirations of Pasadena, to be dismantled by the crass, the shoddy and the greedy

Pasadena is better than that.

Rodriguez, Jane

From: karensugars@earthlink.net
Sent: Wednesday, May 04, 2005 11:38 AM
To: Little, Paul
Cc: Rodriguez, Jane
Subject: No to the NFL!

Dear Paul,

I feel compelled to send a note letting you know how concerned I am about the possibility of a NFL team coming to the Rose Bowl.

I understand the facilities in the stadium are long due for some upgrading and that currently there are no funds for these types of repairs. I find it impossible to believe that the only way of obtaining money for these upgrades is by selling Pasadena's soul (the beautiful and world-recognized Rose Bowl) to the NFL. There has to be a better option.

The proposed plans change the facade of the Bowl considerably. The Rose Bowl is a National Historic Landmark and needs to be protected. If the city allows its most celebrated landmark to be substantially altered, what protection can it offer smaller buildings and residences with historic significance?

In addition, I hate the idea of Pasadena being over-run with traffic and football fans. Pasadena already is struggling with street traffic and congestion. I make it a practice never to go to Old Town on the weekend. There isn't any parking and the streets and shops are full of out-of-town guests. I can deal with that now because I think it's important to bring revenues to our city, but, if a NFL team comes to town, Pasadena residents will have to share area services and businesses with a huge influx of fans. That will be the end of my visits to Pasadena merchants, I'll just head on over to the Santa Anita mall to shop and dine.

I'm also deeply concerned about the environmental impact a NFL team would have on the Arroyo and the surrounding area. If a team comes to Pasadena, there will be no turning back. Our precious Arroyo will be bombarded with cars, buses, noise, exhaust and litter.

Paul, it breaks my heart to think of the Rose Bowl, the Arroyo, and the city of Pasadena being forever impacted by bringing a NFL team to our beautiful community. I'd appreciate you considering my concerns as you make the decision on May 9th to move forward with this proposal.

Thanks for listening!

Karen Sugars
1056 N. Holliston Ave.
Pasadena, CA 91104
626-398-4547

Rodriguez, Jane

From: Sally Fee [sally.fee@fme-arch.com]
Sent: Wednesday, May 04, 2005 11:51 AM
To: Rodriguez, Jane
Subject: Rose Bowl Renovation

My family is completely opposed to the proposed renovation of the Rose Bowl. The negative impacts on the area are too severe.
Please pass my opinion on to the mayor and the Council.

Thank you!
Sally Fee

SALLY PIPER FEE
sally.fee@fme-arch.com

F | M | E

FEE HUNSON EBERT ARCHITECTURE + DESIGN
500 MONTGOMERY STREET SAN FRANCISCO CA 94111-3874
+1 415 434 0320 FAX +1 415 434 2407 WWW.FME-ARCH.COM

Rodriguez, Jane

From: Angela Solie [asolie@pacbell.net]
Sent: Wednesday, May 04, 2005 11:12 AM
To: Rodriguez, Jane
Subject: vote no on stadium.

Please do not go forward with building plans at the Rose Bowl. Pasadena is already too congested and I strongly oppose a new stadium for a pro football team.

Sincerely,

Angela M. Solie

345

5/4/2005

Rodriguez, Jane

From: Leo Bonamy [leo@bonamyassociates.com]
Sent: Tuesday, May 03, 2005 9:43 AM
To: Bogaard, Bill
Subject: NFL at the Rose Bowl

I am writing to express my concern about the NFL at the Rose Bowl. The City Council should not trade away our quality of life, our largest public park (the Arroyo), and our National Historic Landmark stadium to the NFL for any price. Once the NFL has control the city loses. This deal should not happen and we must find alternate ways to maintain the Rose Bowl that may not be as financially profitable.

--

Leo Bonamy
1056 North Holliston Avenue
Pasadena, California 91104-3014

Rodriguez, Jane

From: cityweb-server@cityofpasadena.net
Sent: Monday, May 02, 2005 10:12 AM
To: Bogaard, Bill
Subject: WWW PUBLIC COMMENT

Subject: NFL in the Rose Bowl
Name: Pat St. John
Address: 495 Bellmore Way
City: Pasadena
State: CA
Zip: 91103
Email:
Date: 5/2/2005
Time: 10:11:36 AM

Comment:

Mayor Bogaard:

I respectfully ask that you vote NO on the NFL plan for the Rose Bowl.

Pat St. John

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Rodriguez, Jane

From: Kurt Hauser [khauser@getty.edu]
Sent: Monday, May 02, 2005 12:27 PM
To: Bogaard, Bill
Subject: NFL at RB

Dear Mr. Bogaard,

I am a resident of the Linda Vista neighborhood, and I would like to voice my disapproval of a NFL team at the Rose Bowl. I feel that it would greatly compromise both our quality of life and the value of our property. The traffic and crowds created by the current events are enough, and the presence of the NFL would destroy the pleasant character of the Arroyo and of the Linda Vista area.

Sincerely,
Kurt Hauser
1382 Chamberlain Road
Pasadena, CA 91103

Rodriguez, Jane

From: A.Lou.Whitley@SCE.com
Sent: Monday, May 02, 2005 11:15 AM
To: Rodriguez, Jane
Subject: Fw: Rose Bowl--NFL Proposal

For the city records.

Mayor Bogaard,
I'm writing to express my dismay and disappointment over the prospect of the NFL moving a team into the Rose Bowl. In hopes that you listen to your constituency, I'm urging you and the council members to reconsider supporting a move of this magnitude that will irreversibly affect a National Historic Landmark, the largest public park we have in Pasadena, thousands of children involved in soccer and baseball, walkers, joggers, bikers, golfers and countless others who enjoy the uniqueness of the Arroyo and support its preservation for future Pasadenians.

Where and when does this stop? A 20 year agreement with UCLA to play their home games in the Rose Bowl already means Saturdays, from August to December, are booked to 2025. Now, you're going to take Sundays in the Arroyo, during the same time period, away also? What are our elected officials thinking?

Our 'town' has rapidly become incapable of handling the traffic, pollution, disruption, and construction of the townhouse alleys popping up on every conceivable piece of property imaginable to development speculators---almost without restraint. Already, our 'town' has become a concrete planter of parking meters---and we want to bring another 60,000 people into Pasadena, on Sundays, following UCLA Saturdays, to park where? On the golf course that the city is spending \$8-10 million dollars to renovate over the next few years? Have you ever experienced an afternoon stroll into Old Town on UCLA football day with dozens of buses spewing diesel smoke into the air while awaiting their run up and down residential streets to scurry fans back to the parking structures? If you did, you'd have a first hand view of what you're about to add to our Sundays in the Fall.

I urge you to take pause, to reflect on what makes Pasadena so special and attractive to residents and visitors. Quite simply, it does not include an artist's rendering of a bucolic, tree-lined, open park setting with 'NFL' on a deconstructed Rose Bowl. In this case perception is not reality---outside consultants and promoters are here to do one thing---promote their views, with hopes to fill their pockets and empty our lifestyle. I've yet to meet a consultant or promoter who has had to live with their advice---but we certainly will.

Thank you for listening and for considering my views.

Lou Whitley
235 Rosemont Ave.
Pasadena, CA. 91103

Rodriguez, Jane

From: Ljbaisley@aol.com
Sent: Friday, April 29, 2005 12:09 PM
To: Bogaard, Bill
Cc: preservation@pasadenaheritage.org
Subject: Rose Bowl

Dear Mr. Boggard.

I own a home in the historic section of Prospect Park. Our home is a 1923 Wallace Neff and has historic as well as architectural value. I am **totally against** having the NFL intrude on our wonderful community and neighborhood. As a longtime resident of Pasadena and native of Los Angeles, I urge you to please **VOTE NO on the NFL**. The Rose Bowl is one of the last remaining historic sites in our community as well as southern California and it should be respected as such.

Thank you.
Sincerely,
Linda J. Baisley
470 Prospect Terrace
Pasadena, CA 91103

5/9/2005

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Rodriguez, Jane

From: Adrian Griffin [griffinadrian@hotmail.com]
Sent: Friday, April 29, 2005 5:41 PM
To: Bogaard, Bill
Subject: NO! to NFL at the Rosebowl

Dear Mayor Bogaard,

I live at 624 W. Howard Street. I have lived in Pasadena all my life and have witnessed great growth in our city. Growth is good but there are limits and priorities.

Let the Rosebowl area serve OUR community. It's a place for good clean fun: running, soccer games, cycling and walking. We don't need the NFL with the noise, the cars and added pollution.

NO to the NFL at the Rosebowl!

Adrian Griffin

Rodriguez, Jane

From: Niceboy97@aol.com
Sent: Friday, April 29, 2005 1:16 AM
To: Rodriguez, Jane
Subject: Rose Bowl and NFL

Dear Mayor Bogaard and Pasadena City Councilmen,
I wish to state for the record that I am completely opposed to any and all plans to allow the NFL or any other sports team to use the Rose Bowl for their games.

What is at issue here is the proper action to take to insure the well-being and comfort of the majority of Pasadena residents, rather than what would be best for the tiny minority of wealthy investors and businesses. Clearly, if the NFL or any other such entities were allowed frequent and ongoing use of the Rose Bowl, only those with a vested business interest would benefit, while the rest of Pasadena would suffer intolerable levels of additional traffic and congestion!

It is bad enough that the Gold Line was put through one of the busiest areas in Pasadena, crippling the normal flow of traffic from east to west and visa-versa, and benefitting only the narrow corridor or surrounding shops and businesses. I call upon all of you not to continue in this vein and reverse course before our city becomes the epitome of urban sprawl.

Sincerely, Philip A. Lefcourt
330 Cordova Str., # 134
Pasadena, Calif.

5/2/2005

352

I AM OPPOSED TO THE NFL COMING TO PASADENA AND URGE THE CITY COUNCIL TO VOTE NO!

I am particularly opposed to:

- Shutting residents and recreational users out of the Arroyo one weekend day, every weekend, from August to January - more than half the weekends every year.
- Allowing more than 800,000 square feet of new construction in the Arroyo, around and on top of the Rose Bowl, and ruining the original National Historic Landmark stadium.
- Flooding our streets with football traffic every weekend for half the year, impacting neighborhoods and degrading our quality of life.
- Displacing the Rose Bowl Flea Market and disrupting its schedule.

Name Karen Sugars
 Address 1056 N. Holliston Ave.
 City Pasadena CA Zip 91104

Email (optional) _____

I'm convinced there is a better way to renovate the Rose Bowl. Please don't sell out to the NFL!

ALL THIS!

I AM OPPOSED TO THE NFL COMING TO PASADENA AND URGE THE CITY COUNCIL TO VOTE NO!

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- Displacing the Rose Bowl Flea Market and disrupting its schedule.

Name Megan Perez
 Address 221 N. Myers St. #D
 City Burbank Zip 91506

Email (optional) _____

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- Displacing the Rose Bowl Flea Market and disrupting its schedule.

Name Terri Colpo (Jenni Lopez)
 Address 1784 Craigs Ave
 City Altadena Zip 91001

Email (optional) _____

354

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- Displacing the Rose Bowl Flea Market and disrupting its schedule.

Name MICHAEL WHITE
 Address P.O. Box 1902
 City Stano City, CA Zip 91614-0902

Email (optional) _____

355

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- Displacing the Rose Bowl Flea Market and disrupting its schedule.

Name NICOLE GARR
Address 11018 Belfield AVE
City Downey Zip 90241
Email (optional) SMILEZ@AOL.COM

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- Flooding our streets with football traffic every weekend for half the year, impacting neighborhoods and degrading our quality of life.
- Displacing the Rose Bowl Flea Market and disrupting its schedule.

Name MICHAEL W. WALKINS
Address 2449 MOHAWK ST. #5
City PASADENA Zip 91107
Email (optional)

I AM OPPOSED TO THE NFL COMING TO PASADENA AND URGE THE CITY COUNCIL TO VOTE NO!

I am particularly opposed to:
- Shutting residents and recreational users out of the Arroyo one weekend day, every weekend, from August to January - more than half the weekends every year.
- Allowing more than 800,000 square feet of new construction in the Arroyo, around and on top of the Rose Bowl, and ruining the original National Historic Landmark stadium.
- Flooding our streets with football traffic every weekend for half the year, impacting neighborhoods and degrading our quality of life.
- Displacing the Rose Bowl Flea Market and disrupting its schedule.

Name Leigh Grapenthien
Address 295 W. California Blvd. #3
City PASADENA Zip 91105
Email (optional)

I AM OPPOSED TO THE NFL COMING TO PASADENA AND URGE THE CITY COUNCIL TO VOTE NO!

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- Shutting residents and recreational users out of the Arroyo one weekend day, every weekend, from August to January - more than half the weekends every year.
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- Flooding our streets with football traffic every weekend for half the year, impacting neighborhoods and degrading our quality of life.
- Displacing the Rose Bowl Flea Market and disrupting its schedule.

Name KSLIZ WALKINS
Address 2449 MOHAWK ST. #5
City PASADENA Zip 91107
Email (optional)

I AM OPPOSED TO THE NFL COMING TO PASADENA AND URGE THE CITY COUNCIL TO VOTE NO!

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 Shutting residents and recreational users out of the Arroyo one weekend day, every weekend, from August to January - more than half the weekends every year.
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 Flooding our streets with football traffic every weekend for half the year, impacting neighborhoods and degrading our quality of life.
 Displacing the Rose Bowl Flea Market and disrupting its schedule.

Name TERRY SANDERSON
Address 410 So. GRAND AVE.
City PASADENA Zip 91105

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 Displacing the Rose Bowl Flea Market and disrupting its schedule.

Name THE MARLESEY SANDERSON
Address 410 So. GRAND AVE.
City PASADENA Zip 91105

Email (optional) _____

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 Displacing the Rose Bowl Flea Market and disrupting its schedule.

Name Janelle Morton
Address 711 W California Blvd.
City Pasadena Zip 91105

Email (optional) _____

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 Shutting residents and recreational users out of the Arroyo one weekend day, every weekend, from August to January - more than half the weekends every year.
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 Flooding our streets with football traffic every weekend for half the year, impacting neighborhoods and degrading our quality of life.
 Displacing the Rose Bowl Flea Market and disrupting its schedule.

Name ELIZABETH BOOR
Address 1132 WELLINGTON
City PASADENA Zip 91103

Email (optional) board@earthlink.net

357
I AM OPPOSED TO THE NFL COMING TO PASADENA
AND URGE THE CITY COUNCIL TO VOTE NO!

I am particularly opposed to:

- Shutting residents and recreational users out of the Arroyo one weekend day, every weekend, from August to January - more than half the weekends every year.
- Allowing more than 800,000 square feet of new construction in the Arroyo, around and on top of the Rose Bowl, and ruining the original National Historic Landmark stadium.
- Flooding our streets with football traffic every weekend for half the year, impacting neighborhoods and degrading our quality of life.
- Displacing the Rose Bowl Flea Market and disrupting its schedule.

Name GREGORY & CAUDICE MILLER
Address 745 N. PASADENA AVE. #4
City PASADENA Zip 91103
Email (optional) gandcm@charter.net

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Name Geo Banamy
Address 1056 N. Holliston
City Pasadena Zip 91104
Email (optional) geo@banamyassociates.com

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Name Margaret A. Allen
Address 481 S. Orange Grove #2
City Pasadena Zip 91105
Email (optional) _____

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Name Steven Neelund Jygal
Address 1217 Linda Vista Ave
City Pasadena Zip 91103
Email (optional) _____

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Name PETER WILSON
 Address 731 S. EUCLID AVE.
 City PASADENA Zip 91104
 Email (optional) _____

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Name Barbara Kelford
 Address 660 E Elizabeth St
 City Pasadena Zip 91104
 Email (optional) _____

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Name ASANT SALEMBIER
 Address 470 W. HIGHLAND AVE
 City SACRAMENTO Zip 91024
 Email (optional) ASALEMBIERC@OL.COM

** I can't believe that this is really being given serious consideration!*

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- Displacing the Rose Bowl Flea Market and disrupting its schedule.

Name Anthony S. Cook
 Address 242 W. Wilson Ave
 City Pasadena Zip 91104

Email (optional) _____

The NFL changes its mind too often. I'm not sure we won't be left high and dry.

MEETING PROJECT OBJECTIVES

The purpose of this statement is to facilitate the determination whether the proposed project achieves three of the five stated project objectives.

The attached resolution—consisting of seven pages of resolution marked “Attachment A” and a longer document entitled, “Findings and Facts in Support of Findings” and marked “Exhibit A”—is proposed for Council certification of the EIR for the Rose Bowl renovation project.

To review project conformity with the project objective reading, “**To improve traffic and parking conditions in the Arroyo**”, please refer to pages 57 and 63-68.

To review project conformity with the project objective reading, “**To preserve the setting and integrity of the Arroyo Seco**”, please refer to pages 17-22, 31-34, 37, 49, 51, 57 and 59-61.

To review project conformity with the project objective reading, “**To maintain the national historic status of the Rose Bowl without impacting the ability to make the improvements necessary for long term continued use**”, please refer to pages 22, 24, and 35-36.

RESOLUTION NO. 05-R-

RESOLUTION OF THE CITY COUNCIL OF THE CITY OF PASADENA CERTIFYING THE ENVIRONMENTAL IMPACT REPORT FOR THE ROSE BOWL STADIUM RENOVATION PROJECT; MAKING ENVIRONMENTAL FINDINGS PURSUANT TO THE CALIFORNIA ENVIRONMENTAL QUALITY ACT; ADOPTING A STATEMENT OF OVERRIDING CONSIDERATIONS; AND ADOPTING A MITIGATION MONITORING PROGRAM

THE CITY COUNCIL OF THE CITY OF PASADENA HEREBY FINDS AND RESOLVES AS FOLLOWS:

Section 1. The City Council is considering a proposal to renovate the Rose Bowl Stadium (the "Stadium") in connection with a lease of the Stadium to the National Football League (the "Project"). The City Council has been presented with a conceptual design for the renovation of the Stadium and a term sheet of the principal terms for the lease with the National Football League. A Draft Environmental Impact Report dated February 2, 2005 (the "Draft EIR") was prepared for the Project. In accordance with the California Environmental Quality Act ("CEQA") (Cal. Pub. Res. Code §21000 *et seq.*) and the State CEQA Guidelines (the "Guidelines") (14 Cal. Code Regs. §15000 *et seq.*), the City analyzed the Project's potential impacts on the environment.

Section 2. Pursuant to Section 15063 of the Guidelines, the City prepared an Initial Environmental Study (the "Initial Study") for the Project. The Initial Study concluded that there was substantial evidence that the Project might have a significant environmental impact on several specifically identified resources and governmental services, including aesthetics, biological resources, hazards and hazardous materials, land-use and planning, aesthetics, transportation/circulation, air quality, noise, cultural resources, geology and soils,

population and housing, public services and utilities, hydrology and water quality, and recreation.

Section 3. Pursuant to Guidelines Sections 15064 and 15081, and based upon the information contained in the Initial Study, the City ordered the preparation of an environmental impact report for the Project. The City contracted with an independent consultant for the preparation of the environmental impact report and, on October 18, 2004, prepared and sent a Notice of Preparation of the Draft EIR to responsible, trustee, and other interested agencies and persons in accordance with Guidelines Section 15082(a).

Section 4. The City circulated the Draft EIR, together with technical appendices (the "Appendices"), to the public and other interested persons between February 2, 2005 and March 21, 2005, for a 45-day public comment period. During the public comment period, a public hearing was held to solicit comments on the Draft EIR and various commissions held public meetings concerning the Draft EIR and provided comments on the document.

Section 5. During the public comment period the City received written and oral comments on the Draft EIR. The City prepared written responses to all written comments and many oral comments received on the Draft EIR and made revisions to the Draft EIR, as appropriate, in response to those comments. The City distributed written responses to comments on the Draft EIR in accordance with the provisions of Public Resources Code Section 21092.5. The written responses to comments were also made available for public review before the commencement of the hearing on the certification of the Draft EIR. After reviewing the responses to comments and the revisions to the Draft EIR, the City concluded that the

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information and issues raised by the comments and the responses thereto did not constitute new information requiring recirculation of the Draft EIR.

Section 6. The City Council held a duly noticed public hearing on the EIR and the Project on May 9, 2005 (the "Hearing"). In response to comments on the Draft EIR from the public and City commissions, staff has presented in its report to the City Council an additional mitigation measure (the "design mitigation") that would reduce impacts to aesthetics and cultural resources. In general, the design mitigation would involve a change to the design of the Project to preserve the character defining elements of the north end of the Stadium, including the historic berm, and the view of the exterior of the Stadium from the north. The change would also better preserve the view to the north from the interior of the Stadium and would reduce the aesthetic impact to the view of the Stadium from the east by including a new berm at the plaza level which would reference the historic berm to be removed. As demonstrated in the EIR, the environmental impacts of the design mitigation are no greater than the environmental impacts of the Project, as originally proposed and mitigated and the design mitigation would reduce impacts in two impact areas.

Section 7. The Final Environmental Impact Report (the "EIR") is comprised of: the Draft EIR, including Appendices, dated February 2, 2005; the Comments and Responses to Comments on the Draft EIR, including revisions to the Draft EIR, contained in Volume 2 and dated April 28, 2005; and Errata to the Final Environmental Impact Report for the Rose Bowl Stadium Renovation Project dated May 9, 2005 which includes an analysis of the design mitigation.

Section 8. The findings made in this resolution are based upon the information and evidence set forth in the EIR and upon other substantial evidence that has been presented at the Hearing and in the record of the proceedings. The documents, staff reports, technical studies, appendices, plans, specifications, and other materials that constitute the record of proceedings on which this resolution is based are on file and available for public examination during normal business hours in the Department of Planning and Development and with the Director of Planning and Development, who serves as the custodian of these records.

Section 9. The City Council finds that agencies and interested members of the public have been afforded ample notice and opportunity to comment on the EIR and that the comment process has fulfilled all requirements of State and local law.

Section 10. The City Council has independently reviewed and considered the contents of the EIR prior to deciding whether to approve the Project. The City Council hereby finds that the EIR reflects the independent judgment of the City and the City Council. The City Council further finds that the additional information provided in the staff reports, in the responses to comments received after circulation of the Draft EIR, and in the evidence presented in written and oral testimony presented at the Hearing, does not constitute new information requiring recirculation of the EIR under CEQA. None of the information presented to the City Council after circulation of the Draft EIR has deprived the public of a meaningful opportunity to comment upon a substantial environmental impact of the Project or a feasible mitigation measure or alternative that the City has declined to implement.

Section 11. The City Council finds that the comments regarding the Draft EIR and the responses to those comments have been received by the City; that the City Council

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received public testimony regarding the adequacy of the EIR; and that the City Council, as the decision-making body for the lead agency, has reviewed and considered all such documents and testimony prior to acting on the Project. Pursuant to Guidelines Section 15090, the City Council hereby certifies that the EIR has been completed in compliance with CEQA.

Section 12. Based upon the EIR and the record before the City Council, the City Council finds that the Project will not cause any significant environmental impacts after mitigation except in the areas of Aesthetics, short-term Air Quality impacts during construction, Cultural Resources, Land Use, Noise, Recreation, and Traffic. Explanations for why the impacts other than those identified in this Section were found to be less than significant are contained in the Environmental Findings set forth in Exhibit A to this resolution and are more fully described in the EIR and the Initial Study (included as Appendix A to the EIR).

Section 13. Based upon the EIR and the record before the City Council, the City Council finds that the Project will create significant unavoidable impacts to Aesthetics, short term Air Quality during construction, Cultural Resources, Land Use, Noise, Recreation, and Traffic. All feasible mitigation measures for these impacts have been adopted. These significant impacts are further described in the "Findings and Facts In Support of Findings" set forth in Exhibit A, which is attached hereto and is incorporated herein by reference, and in the EIR. The changes or alterations required in, or incorporated into, the Project with respect to these impacts, and a brief explanation of the rationale for this finding with regard to the identified impacts, are contained in Exhibit A. Further explanation for these determinations may be found in the EIR.

Section 14. The EIR describes, and the City Council has fully considered, a reasonable range of alternatives to the Project. These alternatives include “Alternative 1 – the No Project Alternative,” “Alternative 2 – the Increased Displacement Events Alternative,” “Alternative 3 – the Alternate Design Alternative,” and “Alternative 4 – the Historic Restoration Alternative.” With respect to each of the alternatives analyzed in the EIR, the City Council hereby makes the findings set forth in Exhibit A. The City Council expressly finds that each of the alternatives identified in the EIR either would not sufficiently achieve the basic objectives of the Project, would do so only with unacceptable adverse environmental impacts, or is not feasible. Accordingly, and for any one of the reasons set forth in Exhibit A, attached hereto and incorporated herein by this reference, or set forth in the record, the City Council finds that specific economic, social, or other considerations make infeasible each of the Project alternatives and each is hereby rejected. The City Council further finds that a good faith effort was made to incorporate alternatives into the preparation of the EIR, and that all reasonable alternatives were considered in the review process of the EIR and the ultimate decision on the Project.

Section 15. For the impacts identified in the EIR, or otherwise in the record, as “significant and unavoidable,” the City Council hereby adopts the “Statement of Overriding Considerations” set forth in Exhibit B, which is attached hereto and is hereby incorporated by reference. The City Council finds that each of the overriding benefits, by itself, would justify proceeding with the Project despite any significant and unavoidable impacts identified in the EIR or asserted to be significant in the record of proceedings.

Section 16. The City Council hereby adopts the mitigation measures set forth in Exhibit C, attached hereto and incorporated herein by this reference as well as the design mitigation described above and set forth in the Errata pages of the EIR, and imposes each

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mitigation measure as a condition of Project approval. The City Council further adopts the "Mitigation Monitoring and Reporting Program" which is presented as Exhibit C, attached hereto and incorporated herein by reference. City staff shall implement and monitor the mitigation measures as described in Exhibit C.


Section 17. The City Clerk shall certify to the adoption of this resolution, and shall cause this resolution and her certification to be entered in the Book of Resolutions of the Council of this City.

Adopted at the meeting of the City Council on the day of May 2005, by the following vote:

AYES:
NOES:
ABSENT:
ABSTAIN:

Jane L. Rodriguez
City Clerk

APPROVE AS TO FORM:



Michele B. Bagneris
City Attorney

EXHIBIT A

Findings and Facts In Support Of Findings

Section I. Introduction.

The California Environmental Quality Act ("CEQA") and the State CEQA Guidelines (the "Guidelines") provide that no public agency shall approve or carry out a project for which an environmental impact report has been certified which identifies one or more significant effects on the environment that will occur if a project is approved or carried out unless the public agency makes one or more of the following findings regarding the potential mitigation of these impacts:

- a. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects identified in the EIR.
- b. Such changes or alterations are within the responsibility or jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
- c. Specific economic, social, or other considerations make infeasible the mitigation measures or project alternatives identified in the EIR.

Pursuant the requirements of CEQA, the City Council hereby makes the environmental findings set forth below. These findings are based upon evidence presented in the record of proceedings, both written and oral, the EIR, and staff and consultants' reports prepared and presented to the City Council.

Section II. Project Objectives.

As set forth in the EIR, the objectives of the Project include:

- To facilitate long term economic viability of the Rose Bowl Stadium by attracting a long-term tenant;
- To provide modern, state-of-the-art amenities to enhance the patron experience and upgrade safety features
- To improve traffic and parking conditions in the Arroyo;
- To preserve the setting and integrity of the Arroyo Seco;
- To maintain the National Historic Landmark status of the Rose Bowl without impairing the ability to make the improvements necessary for long term continued use.

Section III. Potentially Significant Environmental Impacts

The following environmental impact issue areas were examined in the EIR: (1) Aesthetics; (2) Air Quality; (3) Biological Resources; (4) Cultural Resources; (5) Geology/Soils; (6) Hazards and Hazardous Materials; (7) Hydrology/Water Quality; (8) Land Use/Planning; (9) Noise and Vibration; (10) Public Services; (11)

Recreation; (12) Traffic, Parking, and Circulation; and (13) Utilities and Service Systems. The findings, impacts, and mitigation measures that are applicable to the Project are set forth below.

A. Aesthetics

Impact 3.1-1 The proposed project could result in a substantial adverse effect on a scenic vista.

There are no designated scenic vistas in the Arroyo Seco designated in the City of Pasadena Comprehensive General Plan, nor is the Arroyo Seco visible from the Angeles Crest Highway, the nearest designated scenic highway. However, the open space corridor provided by the Arroyo Seco, which runs from the upper reaches in the Angeles National Forest south to the City's southern boundary, is considered to be one of the most scenic areas in the region. The City of Pasadena Comprehensive General Plan contains a scenic highway diagram that depicts Linda Vista Avenue and the Foothill Freeway as Los Angeles County Recommended Scenic Highways (unofficial). Linda Vista Avenue and the Foothill Freeway extend the length of the Upper Arroyo Seco, the Central Arroyo Seco and the northern portion of the Lower Arroyo Seco. The Stadium is approximately 0.25 mile from the Foothill Freeway. There are limited views of the Stadium from the Foothill Freeway, and, therefore, the proposed project would not significantly affect views from this recommended scenic highway.

The proposed project would alter the views of the San Gabriel Mountains from both inside the Stadium and looking down on the Stadium from both sides of the Arroyo. The new structure would be greater in mass than the existing Stadium, and the increased height would interfere with scenic vistas from various viewpoints.

Mitigation Measures: The following mitigation measures will be required to lessen the impact.

MM 3.1-3 *Consistent with the implementation methods MM3.3-2a (see Section 3.3 Biology) and the provisions of the Tree Protection Ordinance, the City of Pasadena shall also require that any Replacement Tree Canopy Coverage (for removed or damaged trees) be concentrated on the east side of the Stadium. Also, replacement plantings (24 in. box minimum) of one tree for every one lost or removed shall be installed along the edges of existing hardscape parking lots within the Arroyo. In addition, vines shall be planted to grow to be permanently secured to vertical building wall surfaces on the east side of the Stadium. At retaining walls, vines and shrubs shall be installed and spaced so as to completely cover walls when mature. All plantings shall be implemented in accordance with a City approved landscape plan. Planting off site within the Arroyo shall be done under the direction of the City.*

MM 3.1-3 (a) *The project operator shall prepare a landscape plan for improvements to the perimeter areas of Parking Lots B, D, F, I, J-East, J-West, K, and M for City approval prior to the issuance of grading permits. The landscape improvements shall include the planting of trees (minimum of 24 in. box, planted 30 feet on center or equivalent as determined by the City) with complementary ground cover and supporting irrigation system. The improvements shall be completed prior to issuance of occupancy permits to the tenant.*

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MM 3.1-3 (b) *The project operator shall prepare a hardscape plan for improvements to Parking Lots J-East and J-West for City approval prior to the issuance of grading permits. The improvements shall include the installation of a hard drivable surface that remains permeable (such as turf block) and developed to industry standards. The improvements shall be completed prior to issuance of occupancy permits to the tenant.*

In addition to the mitigation measures identified in the EIR, the City Council has also adopted the design mitigation that will further reduce the impacts described above. However, even with implementation of these mitigation measures, significant and unavoidable impacts related to scenic views and the Stadium viewing experience would remain.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen some of the significant environmental effect as identified in the Final EIR, but the impact resulting from substantial degradation of the visual quality and character related to the Stadium viewing experience and scenic views remain significant and unavoidable.

Impact 3.1-2	The proposed project could substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a scenic highway.
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The project site does not contain rock outcroppings, and effects on the historic Stadium are addressed in Section 3.4 (Cultural Resources); this analysis addresses other scenic resources, specifically trees. The project site contains over 250 trees of varying size and type within the project boundaries. Some of these trees would require removal with construction of the proposed project. As described in Chapter 2 (Project Description), and as modified by the design mitigation, a portion of the landscaped berms around the Stadium would be removed. Much of the area adjacent to the Stadium would be enhanced with pedestrian amenities, allowing access around the entire Stadium via a concentric path beyond the security fence that would mimic the elliptical seating bowl. Plazas and entries would be landscaped with trees and plantings matching those that are on site.

While the project would comply with the City Tree Protection Ordinance, (see Section 3.3, Biology), the effect of removing and/or relocating these trees is identified here also as a potentially significant impact on visual resources. While construction phases would be expected to result in short-term impacts to scenic resources during construction, there would be no significant long-term impacts in conjunction with related projects in the vicinity of the Arroyo Seco.

Mitigation Measures: The following mitigation measures will be required to lessen the impact. MM 3.1-3 would address tree removal/relocation and would reduce this impact to less than significant. MM 3.1-1 and MM 3.1-2 would address short-term construction impacts and would reduce this impact to less than significant.

MM 3.1-1 *The City of Pasadena shall require construction contractors to strictly control the staging of construction equipment and the cleanliness of construction equipment stored or driven beyond the limits of the construction work area as a means of minimizing temporary degradation of the visual character of surrounding areas and the associated impact to aesthetics. Prior to completion of final plans and specifications, the City of Pasadena shall review the plans and specifications to ensure that all construction vehicles and equipment shall be parked in designated staging areas when not in use. Vehicles shall be kept clean and free of mud and dust before leaving the project site. Completion of this measure shall be monitored and enforced by the City of Pasadena.*

MM 3.1-2 *The City of Pasadena shall require construction contractors to provide temporary screening from the public view, around construction work areas, for all improvements that require grading during construction and enhancement, as a means of minimizing the temporary effects to the visual character of the surrounding area and the associated impacts to aesthetics.*

MM 3.1-3, MM 3.3-1, and MM 3.3-2 would also apply.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the final EIR.

Impact 3.1-3	<u>The proposed project would result in new sources of increased light and glare from new lighting systems.</u>
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New lighting systems include field lighting and scoreboard lighting. To address spill illumination and environmental glare from proposed field lighting systems, the project would include high performance sports light fixtures that improve the efficiency of the light beam from each sports fixture to 55 percent compared to the older style sports fixtures of 22 percent. The illumination is focused on the field and does not spill light outside the seating bowl. Data has shown that less than 3 foot-candles can be achieved one thousand feet from the Stadium and less than 1 foot-candle of illumination three thousand feet from the Stadium. (Three and 1 foot-candle is comparable to normal street lighting in most residential streets in most cities.) As originally proposed and as modified by the design mitigation, the scoreboard would be oriented in such a way as to minimize light and glare impacts on the surrounding land uses. The project will also include new fixture technology that has developed a black interior trim to reduce and eliminate 80 to 90 percent of the glare from lighting that could occur at night.

Lighting would be placed along the east and west roofs of the new suite level structures; therefore, it is expected that light that would escape the confines of the Stadium would be somewhat reduced. Since the heights of the east and west structures would be the same, each structure would be anticipated to

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essentially block the view of the light blocks on the opposite side from view outside the Stadium. With design features intended to reduce light spill from the Stadium and implementation of MM 3.1-4 through MM 3.1-8, this impact would be reduced to a less-than-significant level and effects on the nighttime environment from new lighting would be minimized.

Glare could occur from building materials utilized in the new structures and could affect recreational users of the site and vicinity and drivers on local roadways such as Linda Vista Avenue, West Drive, Rosemont Drive, and Arroyo Boulevard. Construction materials would include glass, concrete, stucco, wood, core-ten steel, and other materials compliant with City design guidelines and architectural standards. To ensure that glare from the new structure would not adversely affect recreational users or drivers to the site and vicinity, MM 3.1-9 has been identified. Implementation of MM 3.1-9 would reduce impacts related to increased glare to less than significant.

Mitigation Measures: The following mitigation measures will be required to lessen light and glare impacts from new lighting systems.

- MM 3.1-4 Security lighting for the project shall be designed to minimize light migration in accordance with this measure. The City of Pasadena shall specify the lighting type and placement on the project site to ensure that the effects of security lighting are limited as a means of minimizing night lighting and the associated impacts to aesthetics. Prior to completion of final plans and specifications, the City of Pasadena shall review the plans and specifications to ensure that all light fixtures will use glare-control visors, arc tube suppression caps, and will use a photometric design that maintains 70 percent of the light intensity in the lower half of the light beam. Completion of this measure shall be monitored and enforced by the City of Pasadena.*
- MM 3.1-5 Prior to opening the Stadium with the newly proposed lighting, the Applicant shall test the installed field-lighting system to ensure that lighting meets operating requirements in the Stadium and minimizes obtrusive spill lighting in the Stadium facility. Testing would include light-meter measurements at selected locations in the vicinity to measure spill lighting from field-lighting fixtures, permit adjustment of lighting fixtures, and confirm that spill-lighting effects would not exceed 3 foot-candles 1,000 feet from the Stadium perimeter and no more than 1 foot-candle 3,000 feet from the Stadium perimeter.*
- MM 3.1-6 Stadium lighting and advertising (including signage) shall be oriented in such a manner to reduce that amount of light shed onto sensitive receptors and incorporate "cut-off" shields as appropriate to minimize any increase in lighting at adjacent properties.*
- MM 3.1-7 All interior floodlights, exterior parking lot, and other security lighting shall be directed away from sensitive receptors and towards the specific location intended for illumination. State-of-the-art fixtures shall be used, and all lighting shall be shielded to minimize the production of glare and light spill onto both existing and proposed residential units on the adjacent hillsides. A lighting design plan shall be submitted to the City for approval at plan check.*

MM 3.1-8 Landscape illumination and exterior sign lighting shall follow the City's Municipal Code guidelines and be accomplished with low-level unobtrusive fixtures.

MM 3.1-9 All facilities shall emphasize the natural setting and use of natural materials. Building color shall be warm and earth-toned. Non-reflective materials shall be used on the exterior surfaces. Where appropriate, arroyo stone shall be incorporated into the design.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Impact 3.1-4 The proposed project could result in new sources of increased light and glare from the new scoreboard and advertising systems.

Some oblique views of the scoreboards would be apparent to the residences on the east and west sides of the Stadium. The video board technology that would be used would ensure that reflection and glare from the scoreboards and advertising media would be directed towards the viewing stands and interior of the Stadium. These oblique views are not likely to reflect more light than the existing scoreboard. Although the new scoreboards would be larger than the existing scoreboards, their design would help to shield views of the scoreboards from the outside of the Stadium, would direct their lighting, and therefore, this impact would be considered less than significant with implementation of MM 3.1-6, above. Furthermore, implementation of the design mitigation will relocate the scoreboards to minimize impacts on views from inside and outside the Stadium.

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Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

Impact 3.1-5 Implementation of the proposed project would substantially adversely impact the visual character or quality of the existing architectural features of the Rose Bowl Stadium.

The proposed structure and new site layout would significantly alter the design character of the existing Stadium. The proposed new structure would have included east and west side luxury suites that would mirror each other as well as a roofline that would reach to 105 feet. The evenness and regularity of the new structure design is contrary to the elliptical shape, uneven height (with the Press Box), and low-intensity design of the existing Rose Bowl Stadium. In addition, the open concourse that surrounds the Stadium would become enclosed with the 105-foot-tall structure removing the current "setback" and pulling the Stadium flush into the surrounding vegetation. These changes are considered to constitute a significant and unavoidable impact. Implementation of MM 3.1-9, above, as well as the design mitigation would reduce this impact, although not to less-than-significant levels.

Finding: Changes or alterations have been required in, or incorporated into, the project that substantially lessen the significant environmental effect as identified in the Final EIR, although the degradation of the existing visual quality and character of the Rose Bowl would remain significant and unavoidable.

Impact 3.1-6 Implementation of the proposed project would substantially adversely impact the existing visual character or quality of the viewing experience from within the Stadium.

Views to the south, west, and north as currently seen from within the Stadium would be altered. Existing views of treetops and rugged hillsides and ridgelines would be mostly obstructed with construction of the 105-foot-tall concourse and suite levels, lighting structures, and other components of the project. This is a significant and unavoidable impact of the project. Implementation of the design mitigation would reduce this impact by reducing the bulk of the structure on the east side and restoring views to the north from within the Stadium. However, impacts would not be reduced to a level of insignificance.

Finding: The project would significantly eliminate views of treetops, hillsides, and ridgelines as seen from within the Stadium. This impact is significant and unavoidable, as no feasible mitigation would reduce this impact to a level of insignificance.

B. Air Quality

Impact 3.2-1 The proposed project would be consistent with the AQMP, and would not interfere with attainment of air quality standards.

The 1997 Air Quality Management Plan (AQMP) was prepared to accommodate growth, to reduce the high levels of pollutants within the areas under the jurisdiction of the South Coast Air Quality

Management District (SCAQMD), to return clean air to the region, and to minimize the impact on the economy. Projects that are considered to be consistent with the AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. The project is consistent with all adopted land use designations for the site. Therefore, the proposed project would be consistent with the AQMP employment forecasts for the Arroyo Verdugo and San Gabriel Valley subregions, and it would not jeopardize attainment of State and federal ambient air quality standards.

Finding: As proposed, the project would have less-than-significant impacts on air quality standards and no mitigation would be necessary.

Impact 3.2-2 Project implementation is not anticipated to significantly affect local air quality.

The simplified CALINE4 screening procedure was used to predict future CO concentrations at the study-area intersections in 2008, when all cumulative development in the area of the project is expected to be completed. The results of these calculations for special events held on weekdays and weekends show that future CO concentrations near these intersections would not exceed federal or State ambient air quality standards. CO hotspots are not predicted to exist near these intersections in the future and the contribution of project traffic-related CO at these intersections would not be considered significant.

Finding: As proposed, the project would have less-than-significant impacts on local air quality and no mitigation would be necessary.

Impact 3.2-3 Project implementation would not release significant amounts of toxic air contaminants.

Toxic or carcinogenic air pollutants are not expected to occur in any meaningful amounts in conjunction with operation of the proposed land uses within the project site. During construction, incidental amounts of toxic substances such as oils, solvents, and paints would be used. These substances would comply with all applicable SCAQMD rules for their manufacture and use. When completed and operational, only common forms of hazardous or toxic substances typically used, stored, or sold in conjunction with normal operation and maintenance of the proposed uses would be present in small quantities. Based on the common uses expected on the site and anticipated construction operations, potential impacts associated with the release of toxic air contaminants would be less than significant.

Finding: As proposed, the project would have less-than-significant impacts related to toxic air contaminants and no mitigation would be necessary.

Impact 3.2-4 Project implementation would not create objectionable odors affecting nearby sensitive receptors.

The project does not propose, and would not facilitate, uses that are significant sources of objectionable odors. The most likely potential sources of odor associated with the proposed project would result from

construction equipment exhaust during construction activities or the storage of operation-related solid waste. Given the short-term and temporary nature of construction activities, as well as the standard construction requirements imposed on the applicant, impacts associated with construction-generated odors would be less than significant. Any project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the City's solid waste regulations, and operational waste would not be significantly greater in amount than under current conditions.

Finding: As proposed, the project would have less-than-significant impacts related to objectionable odors and no mitigation would be necessary.

Impact 3.2-5	Site preparation and construction activities would contribute to an existing air quality violation (NO_x and PM₁₀ only).
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Construction emission calculations, which assume that appropriate dust control measures would be implemented during each phase of development as required by SCAQMD Rule 403—Fugitive Dust, indicate construction-related activities would generate daily emissions of NO_x during the demolition and grading phase that exceed SCAQMD significance thresholds, while PM₁₀ emissions would exceed SCAQMD significance thresholds during the grading phase. Therefore, with respect to NO_x and PM₁₀ emissions, this impact, while short-term in nature, contributes to an existing air quality violation and would be significant and unavoidable. MMs 3.2-1 and 3.2-2 would lessen the severity of this impact, but not to a less-than-significant level.

MM 3.2-1 *The project builder(s) shall develop and implement a construction management plan, as approved by the City of Pasadena, which includes the following measures recommended by the SCAQMD, or equivalently effective measures approved by the City of Pasadena:*

- *Configure construction parking to minimize traffic interference*
- *Provide temporary traffic controls during all phases of construction activities to maintain traffic flow (e.g., flag person)*
- *Schedule construction activities that affect traffic flow on the arterial system to off-peak hours to the degree practicable*
- *Consolidate truck deliveries when possible*
- *Maintain equipment and vehicle engines in good condition and in proper tune as per manufacturers' specifications and per SCAQMD rules, to minimize exhaust emissions*
- *Use methanol- or natural gas-powered mobile equipment and pile drivers instead of diesel to the extent commercially practical*
- *Use propane- or butane-powered on-site mobile equipment instead of gasoline to the extent commercially practical*

MM 3.2-2

The project builder(s) shall implement all rules and regulations by the Governing Board of the SCAQMD that are applicable to the development of the Project (such as Rule 402—Nuisance and Rule 403—Fugitive Dust) and that are in effect at the time of development. The following measures are currently recommended to implement Rule 403—Fugitive Dust. These measures have been quantified by the SCAQMD as being able to reduce dust generation between 30 and 85 percent depending on the source of the dust generation:

- *Water trucks will be utilized on the site and shall be available to be used throughout the day during site grading and excavation to keep the soil damp enough to prevent dust from being raised by the operations*
- *Wet down the areas that are to be graded or that are being graded and/or excavated, in the late morning and after work is completed for the day*
- *All unpaved parking or staging areas, or unpaved road surfaces shall be watered three times daily or have chemical soil stabilizers applied according to manufacturers' specifications*
- *Enclose, cover, water twice daily, or apply approved soil binders to exposed piles (i.e., gravel, sand, and dirt) according to manufacturers' specifications*
- *The construction disturbance area shall be kept as small as possible*
- *All trucks hauling dirt, sand, soil, or other loose materials shall be covered or have water applied to the exposed surface prior to leaving the site to prevent dust from impacting the surrounding areas*
- *Wheel washers shall be installed where vehicles enter and exit unpaved roads onto paved roads and used to wash off trucks and any equipment leaving the site each trip*
- *Streets adjacent to the project site shall be swept at the end of the day if visible soil material is carried over to adjacent roads*
- *Wind barriers shall be installed along the perimeter of the site*
- *All excavating and grading operations shall be suspended when wind speeds (as instantaneous gusts) exceed 25 miles per hour over a 30-minute period*
- *A traffic speed limit of 15 miles per hour shall be posted and enforced for the unpaved construction roads (if any) on the project site*

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Remediation operations, if required, shall be performed in stages concentrating in single areas at a time to minimize the impact of fugitive dust on the surrounding area

Finding: As proposed, the project would have significant and unavoidable impacts related to construction emissions.

Impact 3.2-6 Project implementation would exceed daily operational emissions thresholds.

The analysis of operational emissions from the project was prepared utilizing the URBEMIS 2002 computer model recommended by the SCAQMD. The results of calculations for additional special events show that operational emissions associated with those events would exceed SCAQMD thresholds. Although MM 3.2-1 and MM 3.2-2 would be required for the project, these measures would not be sufficient to reduce impacts to less than significant levels. There are no other feasible mitigation measures that could reduce operational air emissions from the project, and impacts would be significant and unavoidable.

Finding: The project would result in significant and unavoidable impacts related to operational emissions.

C. Biological Resources

Impact 3.3-1 Project implementation would impact a relatively small area of primarily developed and/or landscaped ground that has limited wildlife movement function.

The proposed project would alter the landscaped areas and enlarge the developed areas directly adjacent to the bowl. These actions would not alter the Arroyo channel, or include significant amounts of fencing or other structures that would significantly reduce the movement of wildlife through or across the site from the current levels. Although the proposed project would result in increased usage and human presence of the project area, it is unlikely that the design components of the proposed project would significantly interfere with any known migratory wildlife corridors, impede the use of native wildlife nursery sites, or significantly alter the current disturbance regime. Therefore impacts to wildlife movement would be less than significant.

Finding: As proposed, the project would have less-than-significant impacts related to wildlife movement.

Impact 3.3-2 Implementation of the proposed project would not impact non-sensitive wildlife species.

As the majority of the proposed project site is developed and ornamental vegetation, the amount of habitat for wildlife that would be affected by implementation of the proposed project is quite small. The majority of the site is landscaped and thus many of the wildlife species that do occur on site are highly mobile and will be able to temporarily relocate from the relatively small area of impact to the adjoining

larger areas of land. Other, less mobile individuals in the impact areas will be lost during project implementation. As the golf course water hazard is artificial in structure and hydrology, and is subject to high levels of disturbance and pollutants from the golf course, it is unlikely that wildlife would utilize this as habitat. The project impacts to non-sensitive wildlife species would be less than significant, as the loss of these species would not do the following:

- Cause a substantial reduction of the habitat of a wildlife species
- Produce a drop in a wildlife population below self-sustaining levels
- Eliminate a plant or animal community
- Cause a reduction or restriction of the number or range of a rare or endangered plant or animal
- Have a substantial affect on a rare or endangered species of animal or plant or the habitat of the species

As such, impacts to non-sensitive wildlife species would be less than significant.

Finding: As proposed, the project would have less-than-significant impacts related to non-sensitive wildlife species.

Impact 3.3-3	Construction and operation of the proposed project could have direct and indirect effects upon the hydrology and aquatic habitat quality of the Arroyo Seco.
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Grading for construction of the project has the potential to increase erosion and subsequent deposition of soil particles into the Arroyo Seco channel. Additionally, surface water runoff containing excess fertilizers or other chemicals could alter the aquatic community or the water quality of the Arroyo Seco by altering the nutrient regime. Toxics contained in herbicides, insecticides, and fungicides used to maintain landscaping could also result in direct kill of aquatic and riparian plants and animals within the channel.

Runoff produced during and after construction is subject to National Pollution Discharge Elimination System Regulations, (NPDES) as well as local water quality and runoff standards. Therefore, the Applicant will be required to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP). California Stormwater Best Management Practices (BMPs) for Construction Activity, as prepared by the California State Stormwater Quality Task Force, will also need to be incorporated into the construction plans. BMPs for Municipal Activities would be incorporated into a long-term site management program which, when implemented, would reduce operation-related impacts from sedimentation and contaminant loading to an insignificant level. Implementation of NPDES and County BMPs and compliance with state and federal clean water regulations would ensure that the impacts of construction and operation of the proposed project would be less than significant.

Finding: Due to State and federal pollution prevention requirements, the project would have less-than-significant impacts on the hydrology and aquatic habitat quality of the Arroyo Seco.

Impact 3.3-4 Implementation of the project would not result in impacts to special status or sensitive plant species.

No endangered, rare, threatened, or special status plant species (or associated habitats) designated by the U.S. Fish and Wildlife Service, California Department of Fish and Game, or California Native Plant Society were known to occur or found within the project site. In addition, focused surveys for sensitive species identified under the Arroyo Seco Master Plan failed to identify any occurrence within the site; thus, there would be no impact to special status plant species or sensitive habitats.

Finding: The project would not impact special status or sensitive species.

Impact 3.3-5 Implementation of the project would not, through habitat modifications, result in a potential loss of special-status bat species breeding/roost in the project vicinity.

Although not observed during any of the surveys, two species of bats—the pallid bat (*Antrozous pallidus*) and California mastiff bat (*Eumpos perotis californicus*), which are listed as California Species of Special Concern—have the potential to forage within the project area. No breeding or roosting habitat suitable for these species exists on the site. While foraging habitat in the vicinity of the project is present for bats, the lack of roosting habitat in the vicinity would be expected to keep their population densities very low, though population numbers for bats in the area are unknown. Due to the probable low population numbers of foraging bats in the area and the very low probability of project-related impact to foraging bats, impacts would be less than significant.

Finding: The project as proposed would not impact special-status bat species.

Impact 3.3-6 Implementation of the project could, through habitat modifications, result in a potential reduction in nesting opportunities for resident and migratory avian species of special concern, including raptors or the loss of an active avian nest.

Some sensitive species, such as the white-tailed kite, and migratory avian species and other raptors, such as the red tailed hawk (*Buteo jamaicensis*), may use portions of the site and adjacent areas during breeding season; these species are protected under the Migratory Bird Treaty Act. Project implementation and construction-related activities including, but not limited to, grading, materials lay down, facilities construction, and construction vehicle traffic may result in the disturbance of nesting and/or wintering special status species such as the loggerhead shrike and white-tailed kite which each have a moderate or greater probability of occurring within the proposed project area. The loss of a special status species, an occupied nest, or substantial interference with roosting and foraging opportunities for migratory species of special concern or raptors as a result of construction or demolition activities, would constitute a

potentially significant impact. However, this impact would be reduced to a less-than-significant level through the implementation of MM 3.3-1.

Mitigation Measures: The following mitigation measure will be required to reduce potential impacts on nesting birds.

MM 3.3-1 *To ensure that avian species of concern, protected migratory species and raptor species are not injured or disturbed by construction in the vicinity of nesting habitat, the following measures shall be implemented:*

- *When feasible, all tree removal shall occur between August 30 and February 15 to avoid the breeding season of any raptor species that could be using the area, and to discourage hawks or bats from nesting/roosting in the vicinity of an upcoming construction area. This period may be modified with the authorization of the CDFG; or if it is not feasible to remove trees outside this window then, prior to the beginning of mass grading, including grading for major infrastructure improvements, during the period between February 15 and August 30, all trees and potential burrowing owl habitat within 350 feet of any grading or earthmoving activity shall be surveyed for active raptor nests or burrows by a qualified biologist no more than 30 days prior to disturbance. If active raptor nests are found, and the site is within 350 feet of potential construction activity, a fence shall be erected around the tree at a distance of up to 350 feet, depending on the species, from the edge of the canopy to prevent construction disturbance and intrusions on the nest area. The appropriate buffer shall be determined by the City in consultation with CDFG.*
- *No construction vehicles shall be permitted within restricted areas (i.e., raptor protection zones), unless directly related to the management or protection of the legally protected species.*
- *In the event that a nest is abandoned, despite efforts to minimize disturbance, and if the nestlings are still alive, the developer shall contact CDFG and, subject to CDFG approval, fund the recovery and hacking (controlled release of captive reared young) of the nestling(s).*
- *If a legally protected species nest is located in a tree designated for removal, the removal shall be deferred until after August 30th, or until the adults and young of the year are no longer dependent on the nest site as determined by a qualified biologist.*

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the potentially significant environmental effect on nesting birds.

Impact 3.3-7	Implementation of the proposed project could be inconsistent with Pasadena's Tree Ordinance in that the proposed project would cause the loss of native and/or specimen trees.
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Implementation of the proposed project could result in the removal of approximately 250 public trees, which would be a potentially significant impact, as removal of or damage to the public trees could violate

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the Pasadena Tree Ordinance. The project developer would be required to submit a tree replacement and relocation plan to the City for approval prior to issuance of a grading permit. Strict adherence to Best Management Practices and successful implementation of a comprehensive mitigation and monitoring plan, as outlined in MM 3.1-3 (above), MM 3.3-2a, MM 3.3-2b, and MM 3.3-2c would reduce potential impacts to these protected tree species to less-than-significant levels. In addition, the design mitigation will reduce the number of trees subject to removal and relocation.

Mitigation Measures: The following mitigation measures will be required to reduce potential impacts on protected trees.

MM 3.3-2(a) The Applicant, prior to being issued a grading permit, shall submit a tree report prepared by a certified arborist that meets the requirements of the Pasadena City Tree Ordinance identifying trees to be removed and trees to be saved. It shall specifically identify, by number according to the tree inventories prepared in March 2004 and March 2005, all trees that are candidates for relocation as well as the best and most feasible locations where the trees shall be replanted. It shall also include the preparation and submission of a tree protection and replacement plan. The tree replacement plan shall include replanting for increased canopy and include a minimum replacement ratio for removed or damaged trees of 1:1. Native plant species shall be used to the maximum extent feasible. The plan shall be prepared and approved by the City prior to grading or construction and shall include the following:

- *Identification of specific Best Management Practices for those trees to be relocated, including specific removal and replanting procedures to maximize successful relocation.*
- *The details and procedures required to prepare the restoration site for planting (i.e. grading, soil preparations, soil stocking, etc.).*
- *The methods and procedures for the installation of the plant materials.*
- *Guidelines for the maintenance of the mitigation site during the establishment phase of the plantings. The maintenance program shall contain guidelines for the control of nonnative plant species and the replacement of plant species that have failed to recolonize.*
- *The revegetation plan shall provide for monitoring to evaluate the growth of the trees. Annual monitoring of the replacement trees shall occur for the first five years after which it shall be performed on the seventh and tenth year. Specific success criteria for replaced trees shall include the following:*
- *For a replacement ratio greater than 1:1: 90 percent or more of the transplanted/replacement trees surviving 10 years after transplantation with overall no net loss of trees*
- *For a replacement ratio of 1:1: 100 percent survival*
- *Contingency plans and appropriate remedial measures shall also be outlined in the replacement plan should the plantings fail to meet designated success criteria and planting goals.*

When construction activities occur near protected tree species that are proposed to be saved, Best Management Practices (BMPs) to avoid damage to the trees shall be implemented, and verified by the developer. The BMPs will include, but are not limited to (1) installing protective fencing prior to and during construction, using wire mesh or plastic barrier fencing placed at 2.25 times the canopy of the tree; (2) avoiding disturbance and trenching within the tree drip line; (3) maintaining the surface grade around the tree; and (4) prohibiting the placement of paving or landscaping requiring summer irrigation in the vicinity of trees.

MM 3.3-2(b) A drainage plan shall be designed in such a way as to avoid changes to hydrology in the vicinity of the protected trees.

MM 3.3-2(c) Construction staging areas shall be designated on the construction plans and parking, loading, and grading during all construction activities prohibited within the root zone of the protected trees.

MM 3.1-3 also applies to this impact.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the potentially significant environmental effect on protected trees.

Impact 3.3-8 Increases in nighttime illumination could disturb nighttime activities of local wildlife species, and alter local species composition.

Nighttime illumination is known to adversely impact animals in natural areas. It can disturb or disrupt resting, foraging, nesting, and breeding behavior and cycles. Project operation would increase the number of nighttime light sources on site. If unchecked, this light, where proximal to natural areas, could adversely impact the wildlife of the area.

Any potential disruption to breeding, foraging, or resting cycles, as well as alteration of the behavior of wildlife species remaining on site as a result of increased nighttime lighting and glare would be considered a significant impact. As such, implementation of MM 3.3-3 would be required to reduce these impacts to less-than-significant levels.

Mitigation Measure: The following mitigation measure will be required to reduce potential impacts from nighttime illumination.

MM 3.3-3 All lighting along the perimeter of natural areas such as the channel shall be downcast luminaries with light patterns directed away from natural areas, as coordinated with a certified lighting engineer and project biologist.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the potentially significant environmental impacts from nighttime illumination.

D. Cultural Resources

Impact 3.4-1 Construction activities associated with implementation of the proposed project could cause a substantial adverse change in the significance of an archaeological resource.

Archaeological materials have been recovered or recorded in the vicinity of the project site, and Native American activity is considered likely to have occurred adjacent to the flow channel, in the area now occupied by the Stadium. Consequently, ground-disturbing activities associated with construction of the proposed project would have the potential to damage or destroy archaeological resources. However, because the development under the proposed project would occur on a previously developed site (within the footprint of the existing Stadium and associated development) that has already been subject to disturbance for existing structures or infrastructure, the likelihood of encountering archaeological resources on the project site is considered very low. Nevertheless, MM 3.4-1(a) and MM 3.4-1(b) require implementation of provisional measures in the event that archaeological resources are identified, which would reduce this impact to a less-than-significant level. Implementation of MM 3.4-1(a) and MM 3.4-1(b) would further reduce less-than-significant impacts on archaeological resources by requiring an instructional program to assist construction personnel in identifying archaeological resources and requiring the scientific recovery and evaluation of any archaeological resources that could be encountered, which would ensure that important scientific information that could be provided by these resources regarding history or prehistory is not lost.

Mitigation Measures: The following mitigation measures will be required to reduce potential impacts on archaeological resources.

MM 3.4-1(a) Prior to site preparation or grading activities, the Applicant shall retain a qualified (ROPA-listed) archaeologist to inform construction personnel of the potential for encountering unique archaeological resources and the regulatory framework of cultural resources protection. All construction personnel shall be instructed to stop work within 50 feet of a potential discovery until a qualified (ROPA-listed) archaeologist assesses the significance of the find and implements appropriate measures to protect or scientifically remove the find. Construction personnel shall also be informed that unauthorized collection of archaeological resources is prohibited.

MM 3.4-1(b) The Applicant shall retain a qualified archaeologist to provide spot-checks—on a schedule approved by the City—during grading and excavation activity and to be available on-call in the event of a discovery. In the event of a discovery, the archaeologist shall first determine whether an archaeological resource uncovered during construction is a “unique archaeological resource” under Public Resources Code Section 21083.2(g). If the archaeological resource is determined to be a “unique archaeological resource,” the archaeologist shall formulate a mitigation plan in consultation with the City that satisfies the requirements of Section 21083.2.

If the archaeologist determines that the archaeological resource is not a unique archaeological resource, the archaeologist shall record the site and submit the recordation form to the California

Historic Resources Information System South Central Coastal Information Center, and no further investigation of the particular find would be required.

The archaeologist shall prepare a report of the results of any study prepared as part of a mitigation plan, following accepted professional practice. Copies of the report shall be submitted to the City and to the California Historic Resources Information System South Central Coastal Information Center.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the potentially significant environmental impacts on archaeological resources.

Impact 3.4-2	<u>Construction activities associated with implementation of the proposed project could directly or indirectly result in damage to, or the destruction of, unique paleontological resources on the site.</u>
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Nearby area rock units have the potential to yield significant paleontological specimens that contributed to scientific understanding of the distant past, and are considered paleontologically sensitive. Fossils from these units could be considered unique resources due to the potential to yield information important in history or prehistory. Although extensive disturbance of the soils underlying the Stadium occurred as a result of construction of the Stadium, paleontological resources could still be present in areas deeper than where initial excavation occurred, as Older Alluvium is initially observed at depths of about 5 feet. Therefore, construction-related, earth-disturbing activities resulting from implementation of the proposed project could reach a depth sufficient to damage or destroy fossils in these rock units. Because fossils that could be present could be considered unique archaeological resources, due to their scientific value, this damage or destruction would be considered a potentially significant impact. However, MM 3.4-2(a) and MM 3.4-2(b) require spot monitoring of earth-disturbing activities, as well as additional provisional measures if paleontological resources are identified. Implementation of MM 3.4-2(a) and MM 3.4-2(b) would reduce potentially significant impacts on paleontological resources to a less-than-significant level by requiring an instructional program to inform construction personnel regarding paleontological resources and the laws protecting the resources, as well as by requiring the scientific recovery and evaluation of any paleontological resources or unique geologic features that could be encountered, which would ensure that important scientific information that could be provided by these resources regarding history or prehistory is not lost.

Mitigation Measures: The following mitigation measures will be required to reduce potential impacts on paleontological resources.

MM 3.4-2(a) *Prior to site preparation or grading activities, the Applicant shall retain a qualified paleontologist to inform construction personnel of the potential for encountering paleontological resources and the regulatory framework of cultural resources protection. All construction personnel shall be*

instructed to stop work within 50 feet of a potential discovery until a qualified paleontologist assesses the significance of the find and implements appropriate measures to protect or scientifically remove the find. Construction personnel shall also be informed that unauthorized collection of paleontological resources is prohibited.

MM 3.4-2(b) *The Applicant shall retain a qualified paleontologist to provide spot-checks—on a schedule approved by the City—during grading and excavation activities and, in the event of a discovery, shall first determine whether a paleontological resource uncovered during construction meets the definition of a “unique archaeological resource” under Public Resources Code Section 21083.2(g). If the paleontological resource is determined to be a “unique archaeological resource,” the paleontologist shall formulate a mitigation plan in consultation with the campus that satisfies the requirements of Section 21083.2.*

If the paleontologist determines that the paleontological resource is not a unique resource, the paleontologist shall record the site and submit the recordation form to the Natural History Museum of Los Angeles County, and no further investigation of the particular find would be required.

The paleontologist shall prepare a report of the results of any study prepared as part of a mitigation plan, following accepted professional practice. Copies of the report shall be submitted to the City and to the Natural History Museum of Los Angeles County.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the potentially significant environmental impacts on paleontological resources.

Impact 3.4-3	Construction activities associated with implementation of the proposed project could result in the disturbance of human remains, including those interred outside of formal cemeteries.
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No formal cemeteries are known to have occupied the project site; however, inhumations have been associated with archaeological contexts in the Arroyo Seco. As described above in Environmental Setting, although the presence of additional archaeological resources within the bowl footprint is considered unlikely, the potential exists for such resources to be present and for excavation during construction activities to disturb these resources. As required by law, provisional measures must be implemented if human remains are discovered on the project site: In the event of the discovery of a burial, human bone, or suspected human bone, all excavation or grading in the vicinity of the find must halt immediately and the area of the find must be protected. The Los Angeles County Coroner must be immediately notified of the find and must comply with the provisions of P.R.C. Section 5097 with respect to Native American involvement, burial treatment, and re-burial, if necessary. Measures required by the Public Resources Code would ensure that this impact remains less than significant by ensuring appropriate examination, treatment, and protection of human remains. No mitigation is required.

Finding: Due to applicable regulations, the project would have less-than-significant impacts on human remains.

Impact 3.4-4 Implementation of the proposed project could result in the physical demolition, destruction or substantial material alteration of some character defining features of the Rose Bowl, a historical resource, and could result in a substantial adverse change in the historic significance of the bowl.

The project as originally proposed would result in a significant effect on the Stadium because it would demolish character-defining features on the east side—including the arroyo stone retaining walls—and would materially alter in an adverse manner the east, north, and west elevations. The Stadium would continue in its capacity to house the Rose Bowl annual football game and would retain its association with the Tournament of Roses Association and Rose Parade, but the modified bowl would convey neither the historic appearance of the Stadium nor its design by Myron Hunt. This substantial adverse change in the significance of the Stadium would constitute a significant impact on this historical resource.

MM 3.4-3 (a)–(c) provide for design review and construction monitoring to ensure proper incorporation of contributing elements into the final design to the degree possible, protection of contributing elements to remain during construction activities, documentation of the existing condition of character-defining features that would be altered or demolished as a result of the proposed project, and appropriate replacement of the arroyo stone berms within the project footprint. However, implementation of these measures would only protect the character-defining features of the bowl that would remain under the proposed project, and would not reduce to a less-than-significant level the impact associated with the proposed demolition or substantial material alteration of other character defining features. Additionally, the design mitigation would further mitigate impacts associated with alteration of the Stadium by preserving portions of the historic arroyo stone berms, and preserving the character defining elements and views of the north side of the Stadium. Nevertheless, the impact would remain significant and unavoidable. A Historic Restoration Alternative to the project, described below, would reduce this impact to less than significant. However, this alternative is rejected as infeasible below.

Mitigation Measures: In addition to the design mitigation, the following mitigation measures will be required to reduce potential impacts on the historic integrity of the Stadium.

MM 3.4-3(a) Compliance with the Secretary of the Interior's Standards for Treatment of Historic Properties. MM 3.4-3(a) only applies to the existing character defining features of the Rose Bowl that are proposed for retention and does not apply to the new construction. The scope of work is currently conceptual and will be defined further as the project progresses. All work on elements of the Stadium to be retained shall be designed for maximum possible compliance with the Secretary of the Interior's Standards for Treatment of Historic Properties. This shall be accomplished through the oversight of an independent historic preservation consultant and City staff, as described below.

Historic Preservation Consultant. The City shall retain the services of a qualified historic preservation consultant with experience in architectural preservation. The historic preservation consultant shall review structural designs and construction activities that could potentially affect character-defining features as identified in this EIR and the Historic Structure Report. All reviews by the historic preservation consultant shall be carried out by a person or persons meeting the Secretary of the Interior's Professional Qualification Standards. Knowledge of historic architecture, materials, surface finishes, and historic restoration techniques is required. This consultant shall have a structural engineer and conservator available for consultation. The consultant's main responsibility shall be to monitor and advise the City regarding compliance with the Secretary of Interior's Standards with respect to elements of the Stadium that would be retained, as well as approved design criteria. Through a series of development, design, and specification review meetings, as well as construction monitoring, the historic preservation consultant shall work in conjunction with City and with the Applicant's project and construction management teams. In addition, the consultant shall review the historic record and photo documentation, protection of historic fabric, mock-ups, and test panels of treatments to historic fabric. In consultation with other experts, the consultant shall approve the materials and replica designs used in the restoration, rehabilitation and new construction related to the historic resources.

Construction Monitoring. On-site construction monitoring by a historic preservation consultant shall be undertaken throughout the construction phase to ensure protection of historic fabric and compliance with the Standards and approved design and construction documents. Monitoring will be scheduled based on potential construction impacts and specific scope of work and will vary between daily and weekly visits upon approval by the City. In addition, all submittals, mock-ups, and change orders that affect historic fabric shall be reviewed by the historic preservation consultant. On-site changes that might affect historic fabric shall be undertaken in consultation with the historic preservation consultant. If the historic preservation consultant determines that construction does not substantially conform to the approved criteria, the historic preservation consultant will immediately notify the City. The City will require any contractors, vendors etc. to take all reasonable measures to avoid or minimize harm to the property until the issue is resolved. The historic preservation consultant, design team, and construction management will work cooperatively and diligently to resolve issues in a timely manner.

MM 3.4-3(b) *Documentation. A Historical Resource Documentation Report shall be prepared for the Rose Bowl. The resources shall be described and photographed in a manner that conforms to Historic American Buildings Survey/Historic American Engineering Record (HABS/HAER) Level I documentation standards, as well as the HABS/HAER Guidelines for HABS Historical Reports. The documentation shall amend the photographic content of the existing HABS report for the Rose Bowl in the Library of Congress collection, focusing on those areas that would be directly affected by the proposed project. The documentation shall be donated to suitable repositories selected by the City, one of which shall include the main branch of the Pasadena Public Library.*

MM 3.4-3(c) *The arroyo stone berms and landscaping on the south side shall be photographed and recorded before removal and replaced in kind, replicating the original intent, look, and function.*

Finding: Changes or alterations have been required in, or incorporated into, the project that lessen some of the significant environmental effect as identified in the Final EIR, but the impact on the historic integrity of the Rose Bowl remain significant and unavoidable.

Impact 3.4-5 Implementation of the proposed project could result in direct and indirect effects to historical resources in the project vicinity, specifically, the Arroyo Seco (proposed) Cultural Landscape.

The Project as originally proposed would result in significant and unavoidable impacts to the integrity of the Lower Arroyo Seco Cultural Landscape. The Lead Agency has identified this area as a potential historical resource for the purposes of CEQA. The Stadium itself is a contributing feature of the Arroyo Seco Cultural Landscape, and significant changes on the Stadium would result in significant changes on the cultural landscape. This alteration would also substantially affect the appearance and historical significance of the cultural landscape and would, therefore, be considered a significant impact.

MMs 3.4-3(a)-(c) above provide for adherence to the Secretary of the Interior's Standards to the degree possible after adverse modifications to the structure have occurred, as well as for documentation of the existing condition of character-defining features that would be altered or demolished as a result of the proposed Project. Additionally, the design mitigation reduces the changes to the Stadium and the impact on the cultural landscape. However, implementation of mitigation would not reduce this impact to a less-than-significant level. A Historic Restoration Alternative to the project, described above, would sufficiently reduce this impact to less than significant. However, this alternative is rejected as infeasible below.

Finding: Changes or alterations have been required in, or incorporated into, the project that lessen some of the significant environmental effect as identified in the Final EIR, but the impact on the historic integrity of the Arroyo Seco Cultural Landscape remain significant and unavoidable.

E. Geology/Soils

Generally, the Project will decrease earthquake damage and life-safety hazards to employees and Stadium patrons presented by the current Stadium structure and would represent a beneficial impact.

Impact 3.5-1 Buildings and infrastructure associated with the implementation of the proposed project would be subject to potentially damaging seismically induced ground shaking during the life of the project.

From the review of regional and local geo-seismic conditions, it is probable that the project area will be subjected to at least one major earthquake during the useful economic life of the Project. The design earthquake for the project area is estimated to be an Mw 7.0 earthquake on the Sierra Madre Fault,

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creating peak horizontal ground accelerations as high as 0.7 g. The resulting vibration could cause damage to structural members of residential facilities and their associated infrastructure (primary effects), and could cause ground failures such as landslides in the hills or liquefaction and/or dynamic settlement in alluvium and poorly compacted fill (secondary effects). As stipulated in the Pasadena Municipal Code, buildings and infrastructure are required to reduce the exposure to potentially damaging seismic vibrations through seismic-resistant design, in conformance with California Building Code Seismic Zone 4 requirements (the most stringent in the state). Adherence to the Building Code ensures the maximum practicable protection available for users of buildings and infrastructure and their associated trenches, slopes, and foundations.

MM 3.5-1 would require the use of site-specific ground motion criteria, as described in the current Pasadena Building Code Chapters 16, 18, and A33, and reviewed by the City's California-registered geotechnical and/or structural engineer, to be incorporated in the design of trenches, slopes, foundations and structures for the project. The Building Code requires implementation of this measure. As outlined below, this measure would assure the City that the potential impacts of ground shaking would be less than significant.

Mitigation Measure: The following mitigation measure will be required to reduce potential impacts related to seismically induced ground shaking.

MM 3.5-1 The renovation shall incorporate site-specific ground motion criteria, as described in the current Pasadena Building Code Chapters 16, 18, and A33, and reviewed by the City's California-registered geotechnical and/or structural engineer, in the design of trenches, slopes, foundations, and structures for the project. Implementation of this measure is required by the Building Code and includes the following provisions:

- *The minimum seismic-resistant design standards for all proposed facilities shall conform to the California Building Code Seismic Zone 4 Standards*
- *Additional seismic-resistant earthwork and construction design criteria shall be incorporated in the project as necessary, based on the site-specific recommendations of a California Certified Engineering Geologist in cooperation with California-registered geotechnical and structural engineering professionals*
- *During site preparation, the registered geotechnical professional shall be on the site to supervise implementation of the recommended criteria*
- *The California Certified Engineering Geologist consultant shall prepare an "as built" map/report, to be filed with the City, showing details of the site geology, the location and type of seismic-restraint facilities, and documenting the following requirements, as appropriate*

- *Engineering analyses shall demonstrate satisfactory performance of compacted fill or natural unconsolidated sediments which either forms part or all of the support for any structures, especially where the possible occurrence of liquefiable soils exists*
- *Access roads, foundations, and underground utilities in fill or alluvium shall be designed to accommodate settlement or compaction estimated by the site-specific geotechnical investigations of the geotechnical consultant*

Finding: Building Code requirements and implementation of required MM 3.5-1 will avoid significant impacts related to seismic ground shaking.

Impact 3.5-2 The use of expansive, weak or slide-prone soils for foundation or roadway support without prior treatment could create unstable soil conditions at the construction site, thus threatening the integrity of completed construction.

The existence of expansive, compressible, and corrosive soils does not appear to be a major occurrence in the project area. Slide-prone soils are not common on the project site. Nevertheless, the creation of building pads or access road bases using unsuitable or unstable soils for fill has the potential to create future problems of foundation settlement and road or utility line disruption if the soils are not specifically engineered for stability.

MM 3.5-2 would require site-specific soil suitability analysis and stabilization procedures, as well as design criteria for foundations during the design phase for each site where the existence of unsuitable soil conditions is known or suspected. This mitigation would be included in construction drawings and specifications prior to approval of final project plans and issuance of building permits, and would ensure that the impact of weak soils would be less than significant.

Mitigation Measure: The following mitigation measure will be required to reduce potential impacts related to expansive, weak, or slide-prone soils.

MM 3.5-2 *Site-specific soil suitability analysis and stabilization procedures, and design criteria for foundations and road bases (described in the current Pasadena Building Code Chapters 16, 18, and A33) shall be required, as recommended by a California-registered soil engineer, during the design phase for each site where the existence of unsuitable soil conditions is known or suspected. During the design phase, where the existence of unsuitable soil conditions is known or suspected, the developer's registered soil engineering consultant shall provide documentation to the City that:*

- *Site-specific soil suitability and stability analyses have been conducted in the area of the proposed foundations and road bases to establish the design criteria for appropriate foundation or road base type and support*
- *The recommended criteria have been incorporated in the design of foundation*
- *During grading, the registered soils professional shall be on the site to do the following:*

- *Observe areas of potential soil unsuitability or instability*
- *Supervise the implementation of soil remediation or reconstruction programs*
- *Verify final soil conditions prior to setting the foundations*
- *The registered soils engineering consultant shall prepare an "as built" map/report, to be filed with the City, showing details of the site soils, the location of foundations, retaining walls, sub-drains, clean-outs, etc., and the results of suitability/stability analyses and compaction tests.*

Finding: Implementation of required MM 3.5-2 will avoid significant impacts related to expansive, weak, or slide-prone soils.

Impact 3.5-3	Construction activities on the project site would not result in increased potential for short- or long-term increases in erosion.
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Because the project would involve grading of an area greater than one acre, it is required to apply for a National Pollutant Discharge Elimination System (NPDES) permit from the Regional Water Quality Control Board. The NPDES permit will be required to cover infrastructure installation. Displacement of soil will be controlled by the City's grading ordinances (CBC Chapters 18 and A33 as adopted in Chapter 14.04.010 of the Pasadena Building Code) relating to grading and excavation. Soil erosion after construction will be controlled by implementation of an approved landscape and irrigation plan. Standard engineering techniques and implementation of MM 3.5-3 would ensure that impacts would be less than significant.

Mitigation Measure: The following mitigation measure will be required to reduce potential impacts related to erosion.

MM 3.5-3 *The following actions shall be taken:*

To the extent practicable, project site grading shall be scheduled for the dry season (April through September). In addition, NPDES permit requirements shall be fulfilled prior to issuance of building permits. The developer shall submit a soil erosion and sedimentation control plan for the project to the City of Pasadena prior to grading, subject to the following recommendations:

- *The Erosion and Sediment Transport Control Plan (as part of the overall SWPPP) shall be submitted, reviewed, implemented, and inspected as part of the approval process for the grading plans*
- *The Plan shall be designed by the developer's erosion control consultant, using concepts similar to those formulated by the State of California, as appropriate, based on the specific erosion and sediment transport control needs of the site where grading, excavation, and construction is to occur. Those concepts include some that apply generally to the entire project area and some that would be appropriate only for specific sites. The possible methods are not necessarily limited to the following items:*

- *Confine grading and activities related to grading (demolition, excavation, construction, preparation and use of equipment and material storage areas and staging areas) to the dry season, whenever possible*
- *Locate staging areas outside streams and drainage ways*
- *Keep the lengths and gradients of constructed slopes (cut or fill) as low as possible*
- *Discharge grading and construction runoff into small drainages at frequent intervals to avoid buildup of large potentially erosive flows*
- *Prevent runoff from flowing over unprotected slopes*
- *Keep disturbed areas (areas of grading and related activities) to the minimum necessary for demolition or construction of the project*
- *Keep runoff away from disturbed areas during grading and related activities*
- *Stabilize disturbed areas as quickly as possible, either by vegetative or mechanical methods*
- *Direct runoff over vegetated areas prior to discharge into public storm drainage systems, whenever possible*
- *Trap sediment before it leaves the site with such techniques as check dams, sediment ponds, or siltation fences*
- *Use interceptor ditches, drainage swales, or detention basins to prevent storm runoff from transporting sediment into drainage ways and to prevent sediment-laden runoff from leaving any disturbed areas*
- *Install silt fences to prevent sedimentation in areas adjacent to grading and down gradients into drainage ways. Design fences using the Universal Soil Loss Equation to calculate their proper storage capacity. The contractor shall implement installation prior to mass grading and other soil disturbing construction activities on site*
- *The contractor shall be responsible for the removal and disposal of all project-related sedimentation in off-site retention ponds*
- *Use landscaping and grading methods that lower the potential for down-stream sedimentation. Modified drainage patterns, longer flow paths, encouraging infiltration into the ground, and slower stormwater conveyance velocities are examples of effective methods*
- *Control landscaping activities carefully with regard to the application of fertilizers, herbicides, pesticides, or other hazardous substances. Provide proper instruction to all landscaping personnel on the construction team*
- *During the installation of the erosion and sediment transport control structures, the erosion control professional shall be on the site to supervise the implementation of the designs, and*

the maintenance of the facilities throughout the demolition, grading, and construction period.

Finding: Building Code and NPDES requirements and implementation of required MM 3.5-3 will avoid significant impacts related to erosion.

F. Hazards and Hazardous Materials

Impact 3.6-1	Implementation of the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
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Hazardous materials would be used in varying amounts during construction and operation of the proposed project. Construction workers and attendees could be exposed to hazards associated with accidental releases of hazardous materials, which could result in adverse health effects. Hazardous materials regulations, which are codified in Titles 8, 22, and 26 of the CCR, and their enabling legislation set forth in Chapter 6.95 of the Health and Safety Code, were established at the State level to ensure compliance with federal regulations to reduce the risk to human health and the environment from the routine use of hazardous substances. These regulations must be implemented by employers/businesses, as appropriate, and are monitored by the State (e.g., OSHA in the workplace or DTSC for hazardous waste) and/or local jurisdictions (e.g., the Pasadena Fire Department). Compliance with applicable federal and State laws and regulations that are administered and enforced by the Pasadena Fire Department would reduce impacts associated with the routine use, storage, and transportation of hazardous materials at the Project to a less-than-significant level.

Finding: No significant impact will result, and no mitigation is required.

Impact 3.6-2	Implementation of the proposed project would require the demolition of several existing structures that could contain lead-based paint, asbestos, PCBs, or other types of hazardous materials. If not properly handled, the demolition process could result in the release of hazardous materials to the environment, potentially affecting the health and safety of workers and the public.
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Due to the age of the Stadium, some components could contain hazardous materials that may require special handling. Such materials include lead, asbestos, polychlorinated biphenyls (PCBs), or other hazardous substances. Construction workers involved in demolition activities could also come into contact with fixtures containing PCBs or other hazardous materials. In addition to human contact, improper removal of these substances could result in accidental releases that could contaminate soil or result in improper disposal. Various State and federal regulations and guidelines pertaining to abatement of, and protection from, exposure to asbestos and lead have been adopted for demolition activities. These requirements include SCAQMD Rules and Regulations pertaining to asbestos abatement,

Title 8 of the California Code of Regulations pertaining to lead and asbestos, the Code of Federal Regulations pertaining to asbestos, and lead exposure guidelines provided by the U.S. Department of Housing and Urban Development (HUD). PCBs are regulated under the federal Toxic Substances Control Act, and any PCB-containing materials must be disposed of as hazardous waste. In California, asbestos and lead abatement must be performed and monitored by contractors with appropriate certifications from the State Department of Health Services. In addition, the California Occupational Safety and Health Administration (Cal/OSHA) has regulations concerning the use of hazardous materials, including requirements for safety training, availability of safety equipment, hazardous materials exposure warnings, and emergency action and fire prevention plan preparation. Compliance with these regulations would ensure that construction workers and the general public would not be exposed to any unusual or excessive risks related to hazardous materials during construction activities. As such, impacts associated with the exposure of construction workers and the public to hazardous materials during demolition activities would be less than significant.

Finding: Due to applicable regulations, no significant impact will result, and no mitigation is required.

Impact 3.6-3	Implementation of the proposed project would not emit hazardous emissions or hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
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Chandler School, which is an independent kindergarten through eighth grade school, is located within ¼ mile of the project site. However, the Stadium has operated on the project site, within ¼ mile of the Chandler School, since the school was founded in 1950, and the Project would generally represent the continuation of an existing condition. Renovation of the Stadium would not introduce new hazardous materials. No significant hazardous materials (e.g., paints, solvents, cleaning products, pesticides, and herbicides) are used on the site and no significant increase in the use of these materials would occur with implementation of the Project; the renovation would not introduce additional types of hazardous materials that are not currently used on the Project site. Compliance with applicable regulations and policies would minimize any potential risk associated with the increased use of hazardous materials under the construction and operation of the Project. This impact would, therefore, be considered less than significant.

Finding: No significant impact will result, and no mitigation is required.

Impact 3.6-4	Construction and operation of the proposed project would not expose workers or visitors to a safety hazard from helipad operations.
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Both the Los Angeles County Fire Department and Pasadena Police Department each operate a helipad near the Hahamongna Watershed Park, which is located north of the Stadium. During construction activities, workers could be exposed to a safety hazard from helipad operations. In addition, during

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Project operation, the increase in event attendees would place additional people at risk to this existing safety hazard. However, any potential safety hazard to existing area residents from helipad operations would otherwise remain unchanged from current conditions, as the Project would not increase the frequency of or alter helipad operations. The likelihood of an accident occurring at the same time as a Stadium event is considered remote. While the Project could result in an increase in event attendees, thus exposing more persons to potential safety risks posed by helipad operations, the infrequency of helicopter arrivals and departures, along with the low rate of helicopter accidents nationwide and compliance with all FAA regulations related to aircraft and pilot safety, such as pilot training, aircraft inspection and certification, and air traffic control, would ensure that this impact is less than significant.

Finding: No significant impact will result, and no mitigation is required.

Impact 3.6-5 Implementation of the proposed project would not interfere with response and/or evacuation requirements in the case of an emergency.

As required by law, the proposed project would continue to provide adequate access for emergency vehicles and appropriate evacuation routes, as well as regulate the storage of flammable and explosive materials and their transport within the project area. Additionally, the proposed project would comply with applicable Uniform Fire Code regulations for issues including fire protection systems and equipment, general safety precautions, water supplies and distances from structures to fire hydrants. Further, the proposed project would be required to provide sufficient water pressure and fire flows for the project area.

The City has prepared an Emergency Plan for the Stadium (1998), which is designed to provide specific guidelines in the event of a major emergency at the Stadium during which it is occupied. During construction of the Project, temporary road or lane closures, which could potentially block emergency access and/or evacuation routes, are not anticipated to occur. The proposed project site is located within an urbanized area in the Central Arroyo Seco in the City of Pasadena and multiple access points are available. The presence of multiple alternative routes around the Project site minimizes the potential for interference with emergency routes during construction. It should be noted that a part of Rose Bowl Drive (a dead-end street) will be modified on its west side and will be used for construction staging. Because no major streets with through traffic road closures are anticipated during construction activities, coupled with adherence to the existing Emergency Plan, implementation of the Project would not interfere with an adopted emergency response plan or emergency evacuation plan. This impact is considered less than significant, and no mitigation is required.

Finding: No significant impact will result, and no mitigation is required.

Impact 3.6-6 Operation of the proposed project would not expose people to a significant risk of loss, injury, or death involving wildland fires

The San Rafael Hills surround the Central Arroyo to the south and west, which contain large areas of native chaparral and other vegetation. Therefore, the surrounding areas are considered a high-risk fire zone. Implementation of the Project would place additional people at risk of loss, injury, or death as a result of wildland fires. However, although the Stadium is within a low fire hazard severity zone, the Project would be subject to existing fuel modification guidelines, which would substantially minimize the potential for both on-site and off-site fires to impact the Project property. Continued compliance with these guidelines greatly reduces the movement of a potential fire to the Project site. Thus, considering the Project site is located in a low wildfire hazard zone, coupled with the fact that renovation activities would not materially increase the risk of wildland fire and would improve evacuation capabilities in the event of such a fire, impacts are considered less than significant.

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Finding: No significant impact will result, and no mitigation is required.

G. Hydrology/Water Quality

Impact 3.7-1 Construction and operation of the proposed project would not violate any water quality standards, waste discharge requirements, or other water quality standards.

The construction activities would result in land-disturbing activities such as demolition of existing structures, excavation, and trenching for utility infrastructure installation. When portions of the project site are excavated or otherwise disturbed by construction activities, the potential for mud and discharge from the site will substantially increase during a rainstorm. Post-construction project activities could also contain contaminants that would affect water quality in that operation of the Project would result in stormwater runoff from the site entering the local storm drain system, and then being discharged eventually into the Pacific Ocean. The Project will be subject to the provisions of the NPDES General Permit for Construction Activity. Under this permit, the developer will be required to eliminate or reduce non-stormwater discharges and to develop and implement a Stormwater Pollution Prevention Plan (SWPPP) that includes minimum control measures for stormwater. The proposed project would also need to comply with the various Standard Urban Stormwater Management Plan (SUSMP) requirements, which include, but are not limited to, measures to control peak runoff rates from the site, use of xeriscape on site, stenciling and signage on all storm drain inlets and catch basins within the project area to prohibit dumping, screening of trash container areas to prevent off-site transport of trash, the provision of a plan to ensure ongoing maintenance for permanent BMPs, and the inclusion of post construction structural or treatment control BMPs designed to mitigate the volume of runoff produced from a 0.75-inch storm event prior to its discharge to a stormwater conveyance system. City policies with regard to trash removal after Stadium events involves waste disposal immediately following all events. As such, with the obtainment of the required NPDES permits and implementation of local regulations prior to construction of the Project, continuation of City policies with regard to refuse and litter clean-up after Bowl events, and compliance with the Statewide General Construction Activity Stormwater Permit, construction and operation impacts associated with water quality would be less than significant. Furthermore, implementation of MM-3.7-1 and MM 3.7-2, which requires the incorporation of BMPs into the proposed project site design to minimize pollutants associated with stormwater quality, would further reduce this less-than-significant impact.

Mitigation Measures: The following mitigations measure will be required to reduce potential impacts on water quality.

MM 3.7-1 Prior to the issuance of a grading permit, the project developer shall file a Notice of Intent (NOI) with the State and comply with the requirements of the NPDES General Construction Permit, including the preparation of a SWPPP and a SUSMP incorporating BMPs for construction and post-construction control of runoff. A Civil Engineer shall prepare the SWPPP and SUSMP for City review and approval. The plans shall reduce the discharge of pollutants, including sediment,

to the maximum extent practical using management practices, control techniques and systems, design and engineering methods, and such other provisions that are appropriate. The plans shall include applicable post-construction measures such as the following:

- Control of impervious area runoff, including installation of detention basins, retention areas, filtering devices, energy dissipaters, pervious drainage systems, porous pavement alternatives
- Implement regular sweeping of impervious surfaces such as streets and driveways
- Use of efficient irrigation practices
- Provision of infiltration trenches and basins
- Linings for urban runoff conveyance channels
- Vegetated swales and strips
- Protection of slopes and channels
- Landscape design such as xeriscape or other design minimizing use of fertilizers

MM 3.7-2

Prior to the issuance of a grading permit, the developer shall submit and obtain approval of construction drainage and erosion control plans in connection with site grading activities. The control measures contained in the plan shall be approved by the City of Pasadena prior to starting construction. The plans shall serve as the basis for the construction portion of the SWPPP and shall include the applicable measures such as the following:

- Diversion of off-site runoff away from the construction site
- Prompt revegetation of proposed landscaped areas
- Perimeter sandbagging and silt fences and/or temporary basins to trap sediment
- Regular sprinkling of exposed soils to control dust during construction
- Installation of a minor retention basin(s) to alleviate discharge of increase flows
- Specifications for construction waste handling and disposal, including wheel washing activities
- Erosion control measures maintained throughout the construction period
- Construction stabilized construction entrances to avoid trucks from imprinting debris on City roadways
- Construction timing to minimize soil exposure to storm events
- Training of subcontractors on general site housekeeping

- *The SWPPP is a "live" document and shall be kept current by the person responsible for its implementation.*

Finding: Due to applicable regulations and required mitigation, no significant impact will result.

Impact 3.7-2 The proposed project will not substantially degrade or deplete groundwater resources in the Raymond Basin.

The proposed project site overlays the Raymond groundwater basin. Natural recharge to the basin is primarily from percolation of flow from the Arroyo Seco, a tributary of the Los Angeles River, and by Eaton Canyon, Santa Anita Canyon and other streams in the watershed of the San Gabriel River. The Arroyo Seco stream contributes approximately one third of the natural replenishment of the aquifer (City of Pasadena 2003). Natural recharge is augmented by the City of Pasadena's spreading of water through infiltration ponds in portions of the upper Arroyo Seco. The proposed project will not reduce flow to the Arroyo Seco or its recharge basins. Consequently, there will be no impact on groundwater recharge or depletion of groundwater supplies.

Finding: No significant impact will result, and no mitigation is required.

Impact 3.7-3 The proposed project is not expected to substantially alter the existing drainage pattern of the site or area in a manner that would result in substantial erosion or siltation on or off site.

During construction of the proposed project, drainage patterns and grading will alter surface drainage characteristics, which may temporarily increase erosion and sediment transport. The General Construction Permit requires preparation of a Stormwater Pollution Prevention Plan with construction BMPs to prevent erosion and off-site sediment transport. This, along with the incorporation of MM 3.7-1 and MM 3.7-2, will result in less than significant impacts during construction. Post construction activities would also be subject to terms and conditions of the applicable portions of the NPDES permit as well as the SUSUMP BMPs which are designed to reduce operational discharges that would reduce water quality of receiving waters to less-than-significant levels. Thus impacts would be less than significant, and no further mitigation would be required.

Finding: Due to applicable regulations, no significant impact will result, and no mitigation is required.

Impact 3.7-4 Implementation of proposed project would not substantially alter site drainage patterns, substantially increase the rate or amount of surface runoff, or result in flooding either on or off site.

As stated above, no development would occur that would alter the Arroyo Seco channel, and the proposed drainage patterns associated with the project, including the replacement of permeable surfaces with impermeable surfaces, would not substantially increase runoff volume as implementation of the

proposed project is estimated to slightly increase impermeable surfaces due to removal of some landscaping and replacement with building structures. This incremental increase in flows is not considered substantial and would not, by itself, result in flooding or substantially alter site drainage patterns, particularly because, as described above, new flows would be directed to the upgraded storm drainage system that would be designed to meet the City's and county's standards. This impact would be less than significant and no mitigation is required.

Finding: No significant impact will result, and no mitigation is required.

Impact 3.7-5 Implementation of the proposed project would not expose people or structures to a significant risk involving flooding due to the failure of Devil's Gate Reservoir.

Devil's Gate Dam is located north of the proposed project site. While a catastrophic failure of this structure could, under worst-case scenarios, result in flooding in the project area, the possibility of failure due to seismic or other factors is considered by the Los Angeles Department of Water & Power (LADWP) to be extremely remote and speculative. In addition the proposed project would not alter any hydrological conditions that would increase the risk of dam failure/site inundation over that which currently exists within the Project site. This impact would, therefore, be less than significant. No mitigation is required.

Finding: No significant impact will result, and no mitigation is required.

Impact 3.7-6 Implementation of the proposed project would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche.

A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. The closest enclosed basin to the project site is the Devil's Gate Reservoir; however, according to the LADWP, no seiche at a LADWP facility has ever been recorded, even during the Northridge Earthquake, and the LADWP does not consider seiches to be a potentially significant hazard. As such, significant inundation by seiches on the proposed Project site would not be expected to occur, and, as the proposed project would not alter any conditions that would increase the risk of significant inundation by seiches over that which currently exists within the Project site, this impact would be less than significant. No mitigation is required.

Finding: No significant impact will result, and no mitigation is required.

Impact 3.7-7 Development of the Rose Bowl Stadium Renovation Project would increase impervious surfaces in the project area, which would exceed the capacity of existing stormwater drainage systems and require expansion or construction of existing storm drainage facilities.

Development of the Project would increase impervious surfaces in the Project area. The originally proposed Project would involve rehabilitation of the existing Stadium with improvements amounting to

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approximately 816,000 square feet. Around the perimeter of the Stadium, many trees in the terraced planters would be removed. With the removal of some landscaping, the amount of impervious surfaces on the project site would increase. This increase in impervious surfaces within the project area is anticipated to increase stormwater runoff. Consequently, this increase in stormwater runoff as a result of project implementation could result in a potentially significant impact in terms of existing stormwater drainage systems capacity due to the current condition and capacity of the storm drain system.

MM 3.7-1 and 3.7-2 above would assist in the control of construction and post-construction stormwater runoff into the storm drains, minimizing the impacts to the storm drain system. In addition, implementation of MM 3.13-2 (see below) would address storm drain deficiencies for the proposed project, and would ensure adequate stormwater capacity. Impacts related to capacity of existing stormwater drainage systems would be reduced to a less-than-significant level by these measures.

Finding: Due to required mitigation, no significant impact will result.

H. Land Use

Impact 3.8-1	The proposed project would not be incompatible with adjacent land uses or cause a substantial adverse change in existing land use patterns
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Because the Stadium would continue its current use, project implementation would not cause an adverse change in the existing land use pattern of the project area.

Finding: No significant impact will result, and no mitigation is required.

Impact 3.8-2	The proposed project would be consistent with applicable land use plans.
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The Project elements are consistent with the City's current land use designation of Open Space under the Land Use Diagram, and zone OS (Open Space) as specified in the City of Pasadena Municipal Code. Additionally, for the reasons discussed in the EIR, the project is consistent with the General Plan.

Finding: No significant impact will result, and no mitigation is required.

Impact 3.8-3	The proposed project could interfere with existing other uses of the immediate area.
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The Stadium parking area at the south end is utilized on a monthly basis for the Rose Bowl Flea Market, held the second Sunday of each month. Construction staging and other construction activities could interfere with this monthly event if provisions were not made for relocation of the Flea Market. This represents a potentially significant impact to operators of the Flea Market. However, MM 3.8-1 provides that an alternative location will be provided to accommodate the Flea Market if construction of the Project results in unavailability of the parking lot areas currently utilized for this purpose. With implementation of this mitigation measure, this impact would be reduced to a less-than-significant level.

During project operation, it is possible that an NFL game could be held on a second Sunday, parking for which could interfere with monthly Flea Market operations. However, MM 3.8-2 provides that the RBOC shall work with the NFL and other tenants to avoid scheduling events on the second Sunday of the month to avoid this impact.

Mitigation Measures: The following mitigation measures will be required to reduce potential impacts related to conflict with surrounding land uses.

MM 3.8-1 *If the parking areas that currently accommodate the monthly Flea Market are unavailable due to construction of the proposed project, the RBOC shall make an alternate location available, and shall notify the Flea Market operators in writing at least 90 days in advance of any such unavailability as well as to advise of the alternative location.*

MM 3.8-2 *During project operation, if the event schedule conflicts with the monthly Flea Market held on the second Sunday of each month in the parking area at the south end of the Stadium, the RBOC shall make an alternative location available to the Flea Market or schedule an alternate day for the Flea Market, and, when feasible, shall provide the operators of the Flea Market at least 90 days' written notice of the unavailability of the parking area and the location and date of the rescheduled Flea Market operation.*

MM 3.8-3 *The City and the NFL shall ensure, through provisions in the lease agreement, that the Tournament of Roses and Rose Bowl game activities will be accommodated in a manner consistent with traditional operating circumstances, needs, and locations. (This is the same as MM 3.11-3)*

Finding: Due to required mitigation, no significant impact will result.

Impact 3.8-4 The proposed project would adversely affect adjacent neighborhoods.

Surrounding communities experience increased automobile and bus congestion and associated noise immediately before and for one to two hours after games. The proposed project would result in an increase in displacement events annually, which would increase the potential for occurrence of these adverse impacts. MMs 3.12-1 and 3.12-2 below would be required but would not sufficiently reduce traffic-related impacts on land use compatibility. MM 3.7-1, MM 3.7-2, MM 3.10-1, and MM 3.10-2 also apply to this impact.

Finding: Changes or alterations have been required in, or incorporated into, the project that lessen some of the significant environmental effect as identified in the Final EIR, but the land use impact on the adjacent neighbors would remain significant and unavoidable.

Impact 3.8-5 Due to increased building area and frequency of use, the proposed project would substantially alter the type or intensity of development in the immediate area.

The proposed project would add a net of approximately 816,000 square feet of use to the existing Stadium, and would create a more massive, taller, state-of-the-art, modern Stadium. Therefore, the

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physical design of the Stadium would represent a substantial change in the intensity of development in the Central Arroyo. From a land use standpoint, the proposed project represents an intensification of use of the existing Stadium, and introduces a large, visibly modern facility into a setting that is primarily park-like and contains a large residential component representative of traditional Pasadena architecture. Therefore, while the proposed project would not change the type of development in the area, as there are other recreational facilities in the Central Arroyo, it would result in an adverse impact to the Central Arroyo because of the substantial intensity (including nearly 1 million square feet of new building area, increased building height and massing, and increased frequency of large-scale events) of the proposed development. This would be a significant and unavoidable impact.

Finding: Changes or alterations have been required in, or incorporated into, the project that lessen some of the significant environmental effect as identified in the Final EIR, but the impact on development intensity would remain significant and unavoidable.

I. Noise

Impact 3.9-1 Construction activities associated with the proposed project would not generate or expose persons off site to excessive ground borne vibration.

Construction activities that would occur under the proposed project have the potential to generate low levels of ground borne vibration. Given that the residential properties nearest to the Stadium are located approximately 200 feet away from the nearest parking lot, based on vibration attenuation rates, vibration levels experienced by these residential uses would be less than 75 VdB. In addition, heavy trucks would also be used to transport materials to and from the project site when construction activities occur. Based on coordination with the City of Pasadena Department of Transportation, the construction haul route would include use of Seco Street, Mountain Street, and the I-210 (Foothill) Freeway. These trucks typically generate ground borne vibration velocity levels of around 63 VdB. These levels could reach 72 VdB where trucks pass over bumps in the road. In both instances, the resulting ground borne vibration velocity levels would be less than the Federal Railway Administration's 80 VdB vibration impact threshold for residences. Therefore, construction during the implementation of the proposed project would not expose off-site persons to excessive ground borne vibration or ground borne noise levels, and this impact would be less than significant.

Finding: No significant impact will result, and no mitigation is required.

Impact 3.9-2 Mechanical equipment installed and operated at the proposed project site would not expose noise-sensitive land uses to noise levels that exceed City standards.

Large HVAC systems associated with the Stadium could result in noise levels that average between 50 and 65 dBA L_{eq} at 50 feet from the equipment. The property lines of the nearest residential uses, which are located on North Arroyo Boulevard east of Rosemont Avenue, are located approximately 200 feet from the edge of the nearest Stadium parking lots (Lot B and D) and 600 feet from the edge of the Stadium. As

such, the new mechanical equipment installed and operated at the Stadium would not expose the nearby residential uses to noise levels that exceed the City's 70 dBA CNEL exterior standard for single-family residential uses. In addition, the noise levels from the new HVAC systems are not anticipated to be greater than the current noise levels generated by the existing HVAC systems. The new HVAC systems would be more state-of-the-art and energy efficient than the existing systems, and would be upgraded to exceed industry standards. Thus, the new systems would likely generate lower noise levels. As such, while implementation of the Project would increase the overall occurrence of noise from the Stadium's HVAC systems over the course of a year due to additional operation associated with the increase in displacement events that would be held at the Stadium, the noise levels generated from the new HVAC systems would be less per event than the existing systems because of improvements in their design. Therefore, this impact would be less than significant.

Finding: No significant impact will result; and no mitigation is required.

Impact 3.9-3	The operation of advertisement-related aircraft at the project site during special events would not expose people residing or working in the project area to excessive noise levels that exceed City standards.
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The area west of the Stadium is noise sensitive to aircraft. While the operation of event-related aircraft (such as blimps or banner aircrafts) already occur over the project area during existing special events at the Stadium (e.g., UCLA games) the frequency of these flights by advertisement-related aircrafts may increase as a result of implementation of the Project. The noise levels generated from the operation of these aircraft over the Project area are not considered to be of unusual nature and would not be of long duration. As these aircraft would use the same flight paths as those used by aircraft for the existing displacement events at the Stadium, they would not introduce new sources of noise to the residential uses below. Also, commercial and private aircraft commuting to or from airports within the southern California region (no airports are within Pasadena) pass over the City. Noise from event-related aircraft would generate less noise than commercial airplanes, the operation of these aircraft during special events at the Stadium are not anticipated to result in the exposure of people residing or working in the Project area to excessive noise levels that would exceed City standards.

Meetings are held with the various users of the airspace, including media and commercial operators to work out operational concerns and noise sensitivity issues. The area west of the Stadium is noise sensitive to aircraft. This is addressed by having the aircraft, including law enforcement and news media fly at a higher elevation. Typically, the City assigns altitudes to the aircraft involved; law enforcement at 2,000 feet, news media at 2,500 feet. This allows for a safe separation of aircraft that have different missions and lowers the impact on the neighborhoods.

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Finding: No significant impact will result, and no mitigation is required.

Impact 3.9-4 Truck trips resulting from construction of the proposed project would not generate noise levels along Seco Street and Mountain Street that exceed the standards established in the City of Pasadena Noise Regulations.

Noise levels generated by construction trucks could reach approximately 67.4 dBA L_{eq} at 50 feet. Residential uses located along Seco Street and Mountain Street would be exposed to noise levels below the City's standard. As such, impacts associated with truck trips during construction of the proposed project would be less-than-significant.

Finding: No significant impact will result, and no mitigation is required.

Impact 3.9-5 Construction activities associated with the proposed project could generate noise levels that exceed the standards established in the City of Pasadena Noise Regulations.

During each stage of project construction there would be a different mix of equipment operating, and noise levels would vary based on the amount of equipment in operation and the location of the activity. The uses nearest the Project site that are sensitive to construction noise are the single-family dwelling units that are located along residential street segments surrounding the general vicinity of the Stadium. The property lines of the nearest residential uses are located approximately 200 feet from the edge of the Stadium's nearest parking lots (Lot B and D) and 600 feet from the edge of the Stadium. Construction activities occurring at the parking area located immediately east of the Stadium could reach approximately 74 dBA L_{eq} during the daytime at the property lines of these residential uses. These noise levels would not exceed the City's standard. In addition, construction activities at the Project site would also be limited to the hours of 7:00 A.M. to 9:00 P.M. on Monday through Saturday in accordance with the City's Noise Ordinance. As such, the impact associated with construction noise would be less than significant.

Pile driving may occur during construction of the proposed project. According to the United States Environmental Protection Agency (EPA), peak noise levels resulting from pile driving could range between 95 to 107 dBA L_{eq} at 50 feet. As noise levels would diminish at a rate of approximately 6 dBA per doubling of distance, the potential noise level associated with pile driving would range from 77 to 89 dBA L_{eq} at 400 feet from the Stadium, and from 71 to 83 dBA at 800 feet from the Stadium. As such, the nearest residential uses that are located approximately 600 feet from the Rose Bowl Stadium could experience noise levels from pile driving that exceed the City's noise level standard. Implementation of MM 3.9-1 would require the use of site-specific noise attenuation measures, including the use of "quiet" pile driving technology, to reduce the noise levels generated from pile driving at the project site. In addition, implementation of MM 3.9-2 would also require the issuance of proper noticing procedures by the Project developer prior to the issuance of the building permit to inform the public of when pile driving activities

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would occur. Furthermore, in accordance with the City's Noise Ordinance, the operation of pile driving equipment at the Project site would not occur between the hours of 9:00 P.M. of one day and 7:00 A.M. of the next day or between the hours of 9:00 P.M. of Saturday and 7:00 A.M. of Monday. With implementation of the mitigation measures and adherence to the City's Noise Ordinance pertaining to pile driving, this impact would be reduced to a less-than-significant level.

Mitigation Measures: The following mitigation measures will be required to reduce potential impacts related to construction noise.

MM 3.9-1 *To mitigate potential pile driving or other extreme noise-generating impacts, a set of site-specific noise attenuation measures shall be completed under the supervision of a qualified acoustical consultant. This plan shall be submitted for review and approval by the City to ensure that feasible noise attenuation is achieved to satisfy standards contained in the City of Pasadena Noise Ordinance. These attenuation measures shall include as many of the following control strategies as feasible and shall be implemented prior to any required pile driving activities:*

- *Implement "quiet" pile driving technology (e.g., cast-in-drilled hole piles, soil-mix wall technology, shielded pile drivers, vibratory pile driving or pre-drilled pile holes), where feasible, in consideration of geotechnical and structural requirements and conditions*
- *Erect temporary plywood noise barriers around the entire construction site*
- *Adjust the scheduling and duration of pile driving*
- *Monitor the effectiveness of noise attenuation measures by taking noise measurements during pile driving activities*

MM 3.9-2 *Prior to the issuance of each building permit, along with the submission of construction documents, the Project developer shall submit to the City a list of measures to respond to and track complaints pertaining to construction noise. These measures shall include the following:*

- *A procedure for notifying City staff*
- *A plan for posting signs on the project site pertaining to permitted construction days and hours, complaint procedures, and who to notify in the event of a problem*
- *A listing of telephone numbers (during regular construction hours and off hours)*
- *The designation of an on-site construction complaint manager for the proposed project*
- *Notification of residents within 800 feet of the proposed project construction area at least 30 days in advance of pile-driving along with the estimated duration of the activity*

Finding: Due to required mitigation, no significant impact will result.

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Impact 3.9-6 Operation of the proposed project could generate noise levels that exceed the standards established in the City of Pasadena Noise Regulations.

The Project would result in the rehabilitation of the existing Stadium to allow use by a National Football League (NFL) team. While implementation of the Project would expose the nearby residential uses to noise generated from the Stadium's loudspeaker system on more occasions over the course of a year due to the additional displacement events that would be held at the Stadium, the volume generated from the loudspeaker system per event would be less because of acoustic improvements implemented in the design of the new system. However, to ensure that the noise level generated from the proposed loudspeaker system would meet the City's Noise Regulations, MM 3.9-3 would be implemented, which requires the periodic monitoring of Stadium noise levels, and, if deemed necessary, the subsequent modification of the sound system at the Stadium to reduce the noise levels. Implementation of MM 3.9-3 would reduce potential impacts from the Stadium sound system to a less-than-significant level.

Mitigation Measures: The following mitigation measures will be required to reduce potential impacts related to noise from events.

MM 3.9-3

- (a) *Prior to installation of the new sound system, the project operator shall present noise analysis to the City that demonstrates that the new sound system will meet the City's Noise Regulations.*
- (b) *Stadium noise level in the residential areas surrounding the project site shall be monitored periodically during the first year of operation by the operator in cooperation with the City.*
- (c) *Based on the monitoring results, the operator shall modify operation of the loudspeaker system to reduce noise levels observed at the residential areas to meet City Noise Regulations. Modifications may include adjustments to volumes or relocation of individual loudspeakers and shall ensure any necessary modifications provide the maximum feasible reduction of noise to the surrounding community.*
- (d) *Prior to the first special event associated with an NFL football game at the Stadium, the operator shall retain a qualified acoustical consultant to develop noise performance standards for the Stadium loudspeaker system to minimize noise effects at the residential areas surrounding the Rose Bowl. The performance standards shall specify a noise limit and may include suggestions for sound equipment orientation or other measures. The performance standards shall be subject to review and approval by the Director of Community Development.*

Finding: Due to required mitigation, no significant impact will result.

Impact 3.9-7 **Operation of the proposed project could expose nearby noise-sensitive land uses to substantial temporary or periodic increases in ambient noise levels from roadway operations.**

The ambient noise levels during a weekend event at the Stadium would increase at nearby residential locations. The Project would increase local noise levels by a maximum of 11.7 dBA during the weekend event peak traffic period. Overall, ten roadway segments would experience a significant increase of 5.0 dBA L_{eq} or more during the weekend peak traffic period. This impact is significant and unavoidable. Reducing this impact to a less-than-significant level would require a substantial reduction in the number of vehicles that are associated with the Project. No measures are considered feasible to accomplish this.

Finding: **Other than the mitigation for traffic that is described below, no feasible mitigation is available to reduce impacts related to roadway noise levels generated by vehicles, and this impact would remain significant and unavoidable.**

Impact 3.9-8 **The increase in local traffic volumes during weekdays resulting from implementation of the proposed project would cause a substantial periodic increase in roadway noise levels.**

The proposed project would increase noise levels at residential locations adjacent to roadways surrounding the project site. Weekday events would increase ambient noise levels. Roadways in the project vicinity include a mix of "rush-hour" traffic that is not typical of weekend traffic. With this added mix of rush-hour traffic combined with the traffic from a weekday event, noise levels for the weekday event would be similar if not identical to the weekend impacts discussed above. Reducing this impact to a less-than-significant level would require a substantial reduction in the number of vehicles that are associated with the proposed project. No measures are considered feasible to accomplish this.

Finding: **Other than the mitigation described below related to traffic, no feasible mitigation is available to reduce impacts related to roadway noise levels generated by vehicles, and this impact would remain significant and unavoidable.**

Impact 3.9-9 **The increase in local traffic volumes during weekdays and weekends resulting from implementation of the proposed project would cause a substantial periodic increase in roadway noise levels.**

The Project would increase local noise levels by a maximum of 7.1 dBA CNEL for weekday events (Salvia Canyon Rd. east of Linda Vista Ave. and N. Arroyo Blvd. east of Rosemont Ave.) and 11.5 dBA CNEL for weekend events (Salvia Canyon Rd. east of Linda Vista Ave.). The project EIR states that a permanent (i.e. long-term operational) increase of 5.0 dBA CNEL over ambient noise levels is substantial and significant.

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MMs 3.12-1 and 3.12-2 (see below) would be required but would not sufficiently reduce traffic-related impacts on noise levels.

Finding: Other than the mitigation described below related to traffic, no feasible mitigation is available to reduce impacts related to roadway noise levels, and this impact would remain significant and unavoidable.

J. Public Services

Impact 3.10-1 When fully operational, the estimated increase in visitor population as a result of project implementation could increase the demand for fire protection services, but would not require the construction of new or physically altered facilities to accommodate the increased demand and maintain acceptable fire flows.

The proposed project would not by itself require new, expanded, or altered fire protection services or facilities to maintain the current level of service. Due to the fact that the proposed project will significantly improve the fire and life safety features of the current site (i.e., provision of upgraded paramedic station on site) and at the same time reduce the overall occupant load of the Stadium, the Pasadena Fire Department anticipates a less-than-significant impact on their ability to deliver a quality fire and life safety response to the Project area.

The water pipeline system in the Project area would be upgraded as part of the proposed Project. In addition, all development plans are reviewed by the Fire Department prior to construction to ensure that adequate fire flows would be maintained (including localized pipe upgrades or connections that might be required to connect new buildings to the system), and that an adequate number of fire hydrants would be provided in the appropriate locations in compliance with the California Fire Code. As such, impacts associated with the provision of fire protection services are considered less than significant.

Finding: No significant impact will result, and no mitigation is required.

Impact 3.10-2 When fully operational, the estimated increase in visitor population as a result of project implementation could impact police service levels within the Project area, but would not require the construction of new or physically altered police facilities to accommodate the increased demand.

The Project would increase the number of events as well as average attendance. Review by the Pasadena Police Department suggests that the Project site, when fully operational, would impact police service levels provided by the Event Planning Section of the PPD. However, the Project would not impact day-to-day service to the Stadium or the immediate area. In addition, the Department will assist developers and City staff in formulating a security plan that encompasses all Stadium and associated facilities renovation. Therefore, while additional police resources may be required on major event days, there would be no need for expansion of police facilities, and impacts to police services with regard to increased visitor population and number of events annually would be considered less than significant. MM 3.10-1 requires

the developer to work with the Pasadena Police Department and the City to formulate a security plan for the Stadium renovation, while MM 3.10-2 requires the use of increased security features for the project, such as video surveillance systems. Implementation of MM 3.10-1 and MM 3.10-2 would reduce this less-than-significant impact to police services even further.

Mitigation Measures: The following mitigation measures will be required to reduce potential impacts related to police service.

MM 3.10-1 Prior to issuance of a building permit, the City and the developer shall consult with the Pasadena Police Department to develop a security plan indicating detailed Crime Prevention Design and event security measures, including specific duties with regard to control and monitoring of tailgating activities in surrounding neighborhoods and on the recreational trails, and shall incorporate the department's recommendations into the Plan.

MM 3.10-2 The operator of the proposed project shall provide sufficient private-sector security (licensed, uniformed, and insured) and video surveillance camera systems to meet the Project's needs and include coverage for all of the project area in order to prevent crime and offset potential impacts to police services.

Finding: Due to required mitigation, no significant impact will result.

K. Recreation

Impact 3.11-1	Implementation of the Project would not increase the population and would not result in the increased use of parks and recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated.
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The Project is not expected to increase the City's population or, by itself, increase demand on parks. However, the increase in major (displacement) events at the Stadium may interfere with the use of the Arroyo by casual recreation users. Some of these users will engage in other activities due to the major event, others will alter their schedule to use the Arroyo at a different time and others might choose to engage in their same recreation activity, at the same time, but in a different location. Among those who choose to use a different location, those who use other park locations would be expected to be distributed over various facilities so that no one facility would be burdened such that substantial physical deterioration of the facility would occur or be accelerated.

Finding: No significant impact will result, and no mitigation is required.

Impact 3.11-2	The proposed project would significantly interfere with or preclude use of existing recreational facilities in the Central Arroyo.
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Due to an additional maximum of thirteen displacement events at Rose Bowl Stadium (mostly occurring on weekends and in the Fall, which are both times of high demand), Lot H, Brookside Park, and Brookside Golf Course, would be unavailable and the Rose Bowl Aquatics Center would have limited

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availability for recreational use by the public for specified hours for up to an additional 13 days per year. Lot H would still continue to host soccer games and other recreational activities, but would be parked during displacement events and, thus, unavailable to recreational users for major Stadium events. Brookside Park ball diamond and park areas as well as Brookside Golf Course would also be parked and unavailable to the public for recreation during displacement events. In addition, the availability of the Aquatics Center would be limited, since major event Stadium parking would restrict this facility's parking inventory. The increase in unavailability of Lot H, Brookside Park, Brookside Golf Course, and Rose Bowl Aquatic Center during major Stadium events due to parking needs would increase the number of days these facilities would be unavailable for use by the general public and would, therefore, result in a significant and unavoidable impact to recreational access within the Central Arroyo.

The North Brookside Golf Course would remain open for normal play during construction of the proposed project. In order to keep the South course at par 72 during construction, the 18th hole will be modified to include a shortened fairway (from 450 yards to 150 yards) and lowered par (4 to 3). The South course will remain open for play during construction. However, with other golf courses available in the area, this loss of recreational access would be temporary and, therefore, less than significant. During project implementation, the golf courses would be closed more frequently due to the increased number of displacement events and attendance parking requirements. Hiking/equestrian trails (i.e., Arroyo Seco Trail, also known as Rim of the Valley Trail) and pedestrian/bicycle paths (i.e., the streets adjacent to the Brookside Golf Course and Rose Bowl that operate as a recreation loop) that traverse the Central Arroyo would be significantly affected by such major Stadium events due to heavy vehicle and pedestrian Stadium traffic crossing these paths. Implementation of MM 3.11-1 and MM 3.11-2 would reduce recreational access impacts to hiking/equestrian trails and pedestrian/bicycle paths within the Central Arroyo to a less-than-significant impact.

The scheduling of the events in Central Arroyo would be adjusted to accommodate the use of the area by the NFL. The only exception to this NFL priority would be related to the Tournament of Roses uses, which would require use of the Stadium for the Rose Bowl game and Stadium parking areas for activities related to the Rose Parade. Implementation of MM 3.11-3 would ensure that NFL scheduling would not interfere with this century-old celebration.

Mitigation Measures: The following mitigation measures will be required to reduce potential impacts related to hiking/equestrian trails and pedestrian/bicycle paths and scheduling of Arroyo Seco events.

- MM 3.11-1 *The RBOC shall ensure that the Arroyo Seco Trail (also known as the Rim of the Valley Trail) and the Recreation Loop shall remain open during construction and operation of the proposed project.*
- MM 3.11-2 *Notification of major Stadium events shall be posted by the RBOC along the Arroyo Seco Trail and Recreation Loop at least thirty (30) days prior to the events; notice for playoff games may be less than 30 days and shall be posted as soon as possible*

MM 3.11-3 *The City and the NFL shall ensure, through provisions in the lease agreement, that the Tournament of Roses and Rose Bowl game activities will be accommodated in a manner consistent with traditional operating circumstances, needs, and locations.*

MM 3.11-4 *The project operator or its designees shall be responsible for timely repair of damaged turf areas as a result of parking during displacement events.*

Finding: Required mitigation would adequately reduce recreational impacts related to hiking/equestrian trails and pedestrian/bicycle paths and scheduling of Arroyo Seco events to a level of insignificance. However, no feasible mitigation would reduce to insignificance impacts related to decreased availability of certain facilities in the Arroyo Seco, and this impact would remain significant and unavoidable.

L. Transportation/Traffic

Impact 3.12-1 Construction activities associated with the proposed project may temporarily obstruct access to the project site, but would not eliminate emergency access to the project site.
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The Project, as required by law, would continue to provide adequate access for emergency vehicles and appropriate evacuation routes within the project area. In addition, the City has prepared an Emergency Plan for the Stadium (1998), which provides specific guidelines in the event of a major emergency at the Stadium during which it is occupied. Furthermore, during construction of the Project, temporary road or lane closures that would potentially block emergency access and/or evacuation routes are not anticipated to occur. The Project site is located within an urbanized area in the Central Arroyo Seco in the City of Pasadena and multiple access points are available, including major access routes such as Orange Grove Boulevard, Rosemont Avenue, Seco Street, and Interstate 210. The presence of multiple alternative routes around the project site minimizes the potential for interference with emergency routes during construction. Although a part of Rose Bowl Drive (a dead-end street) will be modified on its west side for use as a construction staging area, all of the construction staging and improvements would occur off-street. Thus, no alteration to existing access roads would occur from construction activities associated with the proposed project. Since no major streets with through traffic road closures are anticipated during construction activities, coupled with adherence to the existing Emergency Plan for the Stadium, implementation of the Project would not interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, this impact would be less than significant, and no mitigation is required.

Finding: No significant impact will result, and no mitigation is required.

Impact 3.12-2 Implementation of the proposed project would not substantially increase hazards associated with a design feature or incompatible uses.

Implementation of the Project entails the renovation of the existing Stadium. The Project would not involve the construction of new roads, alteration of the existing street network, or the introduction of a

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new land use. During an NFL game at the Stadium, the special event traffic management strategies currently used for UCLA Football events would also be utilized, which includes the use of reversible lane operations and the diversion of traffic onto different routes. These traffic management strategies would continue to be implemented under the direction of the Pasadena Police Department, and varying strategies would be employed based on the anticipated attendance figures. As these traffic control measures are currently being used at the Project site and have not created hazardous conditions, their use for the Project would not represent an increase in hazards associated with a design feature. Therefore, this impact would be less than significant.

Finding: No significant impact will result, and no mitigation is required.

Impact 3.12-3 The proposed project would provide adequate parking for a weekday and weekend sold-out special event at the Rose Bowl.

The provision of 18,000 parking spaces will be adequate to accommodate a maximum attendance of 75,000 persons at the Stadium during a weekday or weekend sold-out special event given the availability of 3,125 spaces at the Parsons complex. The Project parking scheme has been designed to minimize off-site parking impacts beyond what typically occurs under the existing special event conditions. Impacts related to event parking would thus be less than significant.

Finding: No significant impact will result, and no mitigation is required.

Impact 3.12-4 Parking supply associated with the Tournament or Roses operations in the City of Pasadena would not be adversely affected by the proposed project.

Based on a review of current plans and information on file at the RBOC pertaining to the annual Tournament of Roses/Rose Bowl Family Event Festival, it was determined that a total of approximately 940 parking spaces are utilized for the activities associated with this annual event (e.g., Kick-off/VIP Luncheon (Tournament VIP Tailgate Party), Corporate Hospitality & President's Parties, Float Decorating, etc.). In addition, the traffic study for the Project indicated that based on comments received throughout the public scoping process, a large scale event would not be scheduled during Tournament of Roses main operations/activities (e.g., from main set-up to take down). While some float decorating does occur in early December at the northern side of Parking Lot I, this area is limited to a 100-foot by 270-foot structure tent (approximately 90 parking spaces), with viewing taking place only on the four days prior to the Rose Parade. In the event that a home game or another special event is scheduled during this period (the second or third week in December) ample parking would be available with an expected attendance of 65,000 persons. As a major event would not coincide with the Tournament of Roses main operations/activities (e.g., from set-up to take down), significant impacts to existing Tournament of Roses operations (i.e., use of adjacent parking areas) are not anticipated to occur. This would be a less-than-significant impact.

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Finding: No significant impact will result, and no mitigation is required.

Impact 3.12-5 The proposed project would not conflict with adopted policies supporting alternative transportation (e.g., bus turnouts, bicycle racks).

The Project would not substantially increase the demand for alternative transportation services except temporarily during high-attendance events, and would not interfere with existing or planned transit routes. A specific evaluation of the existing shuttle operation and a review of potential route alternatives determined that none of the shuttle route alternatives were superior to the existing route in that additional significant impacts to the surrounding street system would be expected and many of the roadways would not be suitable for shuttle buses due to either width, design, or grade issues. The current shuttle route has been in use for UCLA football games and other selected large scale special events at the Stadium for a period of time, use of this shuttle operation by the Project would not conflict with any other existing or planned transit routes, and would also not conflict with game traffic. Furthermore, Project implementation is anticipated to be consistent with local policies related to transportation, including the SCAG Regional Comprehensive Plan and Guide and the City of Pasadena General Plan Mobility Element. Therefore, this impact would be less than significant.

Finding: No significant impact will result, and no mitigation is required.

Impact 3.12-6 Construction activities associated with the proposed project would not result in significant adverse impacts on traffic and circulation in the project vicinity.

Renovation of the Stadium would generate traffic from construction worker travel, as well as the arrival and departure of trucks delivering construction materials to the site and the removal of debris generated by on-site demolition activities. With required City approvals, as well as the construction management practices, impacts due to construction activity would be minimized to the extent feasible. This impact would be less than significant.

Finding: No significant impact will result, and no mitigation is required.

Impact 3.12-7 Implementation of the proposed project 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.

The proposed project is expected to create significant impacts at 20 of the 26 study intersections under the weekday special event evening arrival and/or departure peak hours; at 18 of the 26 study intersections under the weekend special event A.M. arrival and/or P.M. departure peak hours; and at 13 of the 26 study intersections under the weekend special event A.M. arrival and/or P.M. departure peak hours. While implementation of MM 3.12-1 would reduce the significant impacts at some of the impacted study intersections during both the weekday and weekend special events to a less-than-significant level, most of the impacted study intersections would remain significantly impacted per the City's significant impact

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criteria. As such, impacts on traffic and circulation at the study intersections during both weekday and weekend special events at the Stadium associated with the Project would be significant and unavoidable.

Mitigation Measure: The following mitigation measure will be required to reduce potential impacts related to intersection traffic flow.

MM 3.12-1 *The traffic control measures and traffic management strategies currently employed during large-scale events at the Stadium (i.e., UCLA football games) shall continue to be implemented along with new strategies during the weekday and weekend special events associated with the Project to effectively move vehicles into and out of the Rose Bowl Stadium parking areas. These traffic management strategies include the following:*

Offset/Reversible Traffic Flow Along Key Street Segments

Continue to provide offset traffic flow along Salvia Canyon Road, Seco Street (both near Rosemont Avenue and just north of Linda Vista Avenue) and Rosemont Avenue. Traffic cones and barricades will be placed to provide an additional lane for motorists offset from the normal centerline (e.g., two inbound and two outbound lanes become three inbound and one outbound lane).

Use of Police Helicopter to Assist Traffic Control Operations

A City of Pasadena Police helicopter is utilized to assist traffic control operations staff on the ground for events that are anticipated to draw more than 20,000 persons. Police personnel should continue to be positioned at key traffic decision points on the perimeter of the arrival/departure travel routes. Arriving traffic can be diverted to another travel route to obtain a better distribution of parking loading, as the traffic personnel are in direct radio contact with the Police helicopter and the police stationed in the Rose Bowl Traffic Control Center (located in the press box).

Command Center at the Rose Bowl Stadium

The Rose Bowl Stadium renovation 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.

Temporary Freeway Changeable Message Signs

Continue implementing the freeway changeable message signs for large scale events at the Stadium. These signs, in conjunction/coordination with the police helicopter and the Rose Bowl Stadium Traffic Control Command Center would divert arriving traffic to another travel route to obtain a better distribution of parking loading. Traffic personnel would also be 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).

Continue Utilization of Shuttle Buses from the Parsons Complex

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Continue the current Rose Bowl Stadium shuttle program for major special events.

Wayfinding Guide Signs

Continue implementing the current wayfinding signage program that exists in the vicinity of the Rose Bowl Stadium.

Deployment of Traffic Control Officers at Key Intersections

Continue stationing traffic control officers at many of the key intersections during the weekday and weekend special events, so as to better direct predominant entering and exiting traffic flows. Based on coordination with the Pasadena Police Department, uniformed officers are typically deployed to approximately 30 posts at all major intersections in the Arroyo Seco and along roadways leading to and from the regional freeway system for UCLA football games to manage and direct the reversible lane operations.

Neighborhood Traffic Management

All residential streets surrounding the Arroyo Seco that are not designated as access to the Stadium shall continue to be closed to event traffic on special event days. This will continue to be implemented through the use of barricades at over 60 locations and will be manned by either Explorer Scouts (consistent with UCLA games), or by uniformed employees of the parking management company. Patrols of the neighborhoods should occur and residents should be given a hotline number to call so as to report any event-related concerns to which patrols can respond.

Designated routes to and from the Arroyo Seco area should be signed approximately 72 hours in advance for temporary special event "No Parking", which will be enforced by towing. Residents of the neighborhoods surrounding the Arroyo Seco will continue to be able to obtain residential passes for their cars that allow free access to roadways otherwise closed via the implementation of barricades.

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

Initiate and implement the design of a pre-paid, pre-assigned on-site parking program 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. Pre-paid parking could be demonstrated through the use of dashboard placards, and preferential parking in close proximity to the Stadium could be provided for suite ticket holders and club level ticket holders.

Design and Implementation of Pre-Assigned Ingress Travel Routes

With implementation of this measure, patrons would receive directions to a designated parking area via a designated travel route in advance of an event.

Marketing/Public Information /Media Outreach Programs

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A comprehensive marketing effort should be undertaken so as to provide event patrons with ample public information regarding transportation issues, aimed at reducing impacts associated with the 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.

Season ticket holders who purchase on-site parking would 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. In addition, season ticket holders that park off site or take transit should be provided with informational brochures containing detailed information on parking access and shuttle bus operations.

Furthermore, key public messages should be provided via the established Rose Bowl Stadium website, public radio and other forms of media. These 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.

Deployment of Additional Traffic Control Officers at Key Intersections

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

Rosemont Ave. & Washington Blvd.

North Arroyo Blvd. & I-210 WB Ramps

North Arroyo Blvd. & I-210 EB Ramps

Lincoln Ave. & I-210 WB Ramps

I-210 EB Ramps & Mountain St.

I-210 WB Ramps & Mountain St.

Linda Vista Dr. & Highland Dr.

Linda Vista Dr. & Oak Grove Dr.

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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). For those locations involving freeway ramps, coordination with Caltrans and/or the California Highway Patrol (CHP) will continue to be necessary.

Enhanced Wayfinding Guide Sign Program

Implement an enhanced wayfinding program as part of the Project. The wayfinding program should be developed in consultation with the cities of Pasadena and La Canada-Flintridge, 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 Stadium area, information regarding access to the regional freeway system should also be enhanced. The enhanced wayfinding plan should be guaranteed prior to the issuance of the building permit for the Project and would be implemented prior to Project completion.

Consideration of Modifications to the Lot 9 Turf Area Access Point

An increase in the driveway/gate width for the Lot 9 turf parking area should be considered to increase efficiency associated with vehicular entry. The increased width may require slight modification to the existing rock walls.

Consideration of Additional Changeable Message Signs

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

- MM 3.12-2 *Additional traffic control officers should be deployed during large scale special events at intersections within the Parsons complex vicinity and these efforts should be coordinated through the City's Police Department and integrated with Rose Bowl Stadium Traffic Control Command Center.*
- MM 3.12-3 *Prior to issuance of grading permits, the project operator shall be required to develop a construction traffic management plan, to be approved by the City, that provides an overview of the project, lists the general contractor contact information, outlines contract responsibilities (e.g., mobilization, any demolition, excavation, grading or shoring work, concrete or steel placement work, etc.), construction hours, material storage and construction trailer locations, truck/haul routes, traffic control, parking, and clean-up.*
- MM 3.12-4 *The project operator shall provide plans and specifications, prepared by a civil engineer, regarding any proposed modifications, improvements, or realignments to features in the public right-of-way or on adjacent public land and submit them to the City for approval. The submission shall be made in a timely manner and City approval granted before the issuance of grading permits.*

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Finding: Changes or alterations have been required in, or incorporated into, the project that lessen some of the significant environmental effect related to intersection traffic flow, but this impact would remain significant and unavoidable.

Impact 3.12-8 Utilization of off-site parking at the Parsons complex during the weekday P.M. arrival peak period would result in significant adverse impacts on traffic and circulation at the study intersections in the vicinity of the complex.

In the vicinity of the Parsons complex, the Project is expected to create significant impacts at six of the nine intersections studied under the weekday special event P.M. arrival peak hour. As increased traffic volumes are anticipated to occur only during large special events on an occasional basis, permanent, physical improvement measures are not recommended at the above intersections (e.g., traffic signal modifications, roadway widenings, etc.). While implementation of MM3.12-2 would require that additional traffic control officers be deployed during large scale special events and that these efforts be coordinated through the City's Police Department and integrated with the Stadium Traffic Control Command Center, it would not reduce the impacts at the six study intersections during the weekday special event P.M. arrival peak hour to a less-than-significant level. As such, this impact would be significant and unavoidable.

MMs 3.12-1 and 3.12-2 would also apply to this impact.

Finding: Changes or alterations have been required in, or incorporated into, the project that lessen some of the significant environmental effect related to intersection traffic flow in the vicinity of the Parsons complex, but this impact would remain significant and unavoidable.

Impact 3.12-9 Implementation of the proposed project would result in significant adverse impacts on average daily traffic on specified street segments.

Street segments are forecast to increase in average daily traffic (ADT) volume by five percent or more on days of major events at the Project site. 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. Nonetheless, since street segments during major special event conditions would remain significantly impacted per the City's significant impact criteria upon implementation of the Project, this impact is considered to be significant and unavoidable. MMs 3.12-1 and 3.12-2 would also apply to this impact but would not reduce the impact to a less-than-significant level.

Finding: Changes or alterations have been required in, or incorporated into, the Project that lessen some of the significant environmental effects, but this impact would remain significant and unavoidable.

Impact 3.12-10 Implementation of the proposed project would impair implementation of the highway congestion management plan.

The proposed project is expected to incrementally increase the forecast traffic volumes and corresponding volume/capacity (V/C) ratios at the analyzed Congestion Management Plan (CMP) intersections. Based on the CMP significant impact criteria, a project-related impact is anticipated at the intersection of Arroyo Parkway and California Boulevard during the weekday P.M. arrival peak hour. Due to the nature of the proposed project, it is anticipated that up to three special events per year may be held on a weekday evening at the Rose Bowl Stadium. Consequently, physical improvement measures such as roadway widenings, roadway restripings, or traffic signal modifications are not recommended at the intersection of Arroyo Parkway and California Boulevard for traffic conditions that are atypical and are anticipated to occur only a few times a year. However, as the impact at the intersection of Arroyo Parkway and California Boulevard would remain unmitigated per Intersection Capacity Utilization (ICU) criteria during the weekday P.M. arrival peak hour, this is considered to be a significant and unavoidable impact. MMs 3.12-1 and 3.12-2 would also apply to this impact but would not reduce the impact to a less-than-significant level.

Finding: Changes or alterations have been required in, or incorporated into, the Project that lessen some of the significant environmental effects, but this impact would remain significant and unavoidable.

M. Utilities and Service Systems

Impact 3.13-1 Implementation of the proposed project would not exceed wastewater treatment requirements of the Regional Water Quality Control Board.

The City requires a wastewater discharge permit for industrial facilities and certain commercial facilities that plan to discharge industrial wastewater to the City's sewage collection and treatment system. The purpose of the wastewater discharge permit program is to ensure the City's compliance with the NPDES program, as administered by the Regional Water Quality Control Board (RWQCB), for all facilities discharging to navigable waters of surface water of the state, including sewage treatment plants. The renovation of the Stadium would comply with all provisions of industrial wastewater permits, if required, which regulate discharges. Therefore, implementation of the proposed project would not exceed applicable wastewater treatment requirements of the RWQCB with respect to discharges to the sewer system or stormwater system. A less-than-significant impact would occur, and no mitigation is required.

Finding: Due to applicable regulations, no significant impact will result, and no mitigation is required.

Impact 3.13-2 Implementation of the proposed project would not increase wastewater generation such that treatment facilities would be inadequate to serve the project's estimated demand in addition to the provider's existing commitments.

Implementation of the Project would increase the amount of building space and number of events at the Stadium, which could result in the generation and discharge of additional wastewater requiring treatment at either Whittier Narrows or the Los Coyotes WRPs. However, development of the Project would not generate wastewater that would exceed the capacity of either the Whittier Narrows or the Los Coyotes wastewater treatment system in combination with the provider's existing service commitments. It is anticipated that the overall amount of wastewater generated would be increased over existing conditions as a result of the additional displacement events that would occur at the Stadium from implementation of the Project. However, these additional events would not exceed the daily capacity threshold of the wastewater treatment plants. Impacts would be less than significant.

Finding: No significant impact will result, and no mitigation is required.

Impact 3.13-3 Implementation of the proposed project would not require or result in construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Implementation of the Project would increase the amount of building space and the number of major events at the Stadium, which could result in the overall use of additional imported water requiring treatment. However, development of the proposed project would not increase water use that would exceed the capacity of the Weymouth Filtration Plant. The additional 38,300 gallons per day (gpd) (0.038 mgd) water demand that could result from implementation of the proposed project would be adequately treated by the Weymouth Filtration Plant. Assuming a worst-case scenario where all of the additional water demand would require treatment at the facility, coupled with the existing average summer demand at the plant, the proposed project's contribution to the water demand would constitute approximately 0.02 percent of the remaining 180 mgd capacity. Consequently, because the additional water could be treated at the facility and because the increase in water use over existing demand would be negligible, this impact would be less than significant, and no mitigation is required.

Finding: No significant impact will result, and no mitigation is required.

Impact 3.13-4 Implementation of the proposed project would have sufficient water supplies to serve the project from existing entitlements and resources.

The Project would result in a water demand of approximately 102,300 gpd. Compared to the 2002 water demand for the Stadium, which represents a worst-case scenario based upon available information, the proposed project would result in an increased water demand of approximately 38,300 gpd, or a

60 percent increase. The City's water use is approximately 32 mgd. Thus, the Stadium's 2002 water use represents approximately 0.2 percent of the City's total demand. Consequently, the project's projected demand of 102,300 gpd would represent approximately 0.3 percent of the City's total water use or 0.12 percent increase over the City's existing total water use. While implementation of the proposed project could increase overall water usage at the project site, the increase in water use would not significantly contribute to the overall projected increase in water use in the Pasadena Department of Water and Power service area. In addition, continued implementation of water recycling programs already in effect would reduce the need for increased water supply and, in turn, ease the need for new or expanded water entitlements or facilities. Therefore, impacts are considered less than significant, and no mitigation is required.

Finding: No significant impact will result, and no mitigation is required.

Impact 3.13-5 Implementation of the proposed project would not require the construction of new or expanded wastewater conveyance systems, the construction of which could cause significant environmental effects.

Development of the proposed project could increase the amount of wastewater transported by the sewer system by approximately 230,000 gpd (0.23 mgd or 44 percent). The projected increase in wastewater flows would represent approximately 11 percent of the remaining 2.1 mgd in the LACSD trunk sewer that serves the project site. Therefore, the existing sewer lines have adequate capacity to serve the projected increase in wastewater flows. In addition, as previously indicated, the City considers the local sewer system that serves the project site in good repair, and does not foresee the need to plan for any additional rehabilitation to the sanitary sewers in the next twenty years.

Further, as stated above for comparison reasons, it should also be noted that the existing Stadium can hold approximately 92,500 persons. Because the Stadium has held sold-out events in the past without any significant wastewater conveyance problems, it is anticipated that implementation of the proposed project, with sold-out capacity at approximately 75,000 seats, would also be adequately served by the existing infrastructure. Based on peak activity at the Stadium, which would dictate the maximum capacity needed in the system, wastewater generation would actually be reduced by approximately 175,000 gpd. Additional events at the Stadium would not affect the outcome of this analysis because the sewer lines operate on a daily capacity threshold. Renovation of the existing Stadium would not directly require extensions of the sewer lines on the project site to the existing conveyance systems, and would not require expanded conveyance systems. Consequently, although wastewater flow generated by the Project would be greater than the existing flow generated by the Stadium, peak flow should be reduced and no construction-related impacts would occur. Thus, impacts would be less than significant, and no mitigation is required.

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Finding: No significant impact will result, and no mitigation is required.

Impact 3.13-6 The proposed project would be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs.

The projected increase of approximately 150 tons per year from the Project would represent a 1.3 percent increase in total commercial solid waste collected by the City's Street Maintenance & Integrated Waste Management Division (SMIWM) and transferred to the Scholl Canyon Landfill. As discussed previously, the servicing landfill has a remaining permitted capacity of 15.84 million cubic yards (approximately 7.62 million tons). The Project would represent a contribution of about one one-thousandth of one percent of the capacity of the landfill. In addition, according the SMIWM, implementation of the Project would not result in a significant impact on SMIWM collection or disposal capabilities. Although implementation of the Project could increase solid waste generation at the Project site, the existing permitted capacity of the Scholl Canyon Landfill would be able to accommodate the waste that would be generated by the Project. Consequently, the Project would not result in the need for additional landfill capacity, and this impact would be less than significant. No mitigation is required.

Finding: No significant impact will result, and no mitigation is required.

Impact 3.13-7 Implementation of the proposed project would comply with federal, state, and local statutes and regulations related to solid waste.

Structural demolition associated with implementation of the Project could generate substantial sources of refuse. In order to ensure continued compliance with requirements of AB 939, the additional solid waste generated during construction and operation of the proposed project would need to include provisions for recycling. Without recycling of some of the construction materials and refuse generated during operations, the project may compromise the City's efforts in reducing the amount of waste transported to the landfills.

However, the City enforces construction and demolition waste reduction by adhering to City Municipal Code Section 8.62 (Waste Management Plan for Certain Construction and Demolition Projects within the City of Pasadena), which also requires a 50 percent waste diversion rate on "covered projects." Covered projects include new structures, residential additions, and demolition of 1,000 square feet or more, and any tenant improvement of 3,000 square feet or more. A waste management plan and monthly progress reports must be submitted and approved by the City. Consequently, continued compliance with existing regulations and City policies would ensure a less than significant impact. No mitigation is required.

Finding: No significant impact will result, and no mitigation is required.

Impact 3.13-8 Implementation of the proposed project could require an increase in electricity and natural gas, but would not require the construction of new energy production or transmission facilities, the construction of which could cause significant environmental effects.

Implementation of the proposed project would increase the intensity of development at the existing Stadium and correspondingly increase the demand for electricity and natural gas in the project area. The proposed project would increase demand by an additional 0.8415 MW/year of electricity and 1,189,320 Therms/year of natural gas. Connections to gas and electric utilities are currently provided on the Project site to serve the existing facility. Although the proposed project, given the magnitude of additional development, could result in increases in energy demand, electrical and natural gas supplies and infrastructure to support demand are generally provided as needed by the providers. Therefore, the proposed project would not substantially increase demands beyond available supply. In addition, if incremental extensions of existing transmission lines would be required to serve the new development, these improvements would be primarily within the urbanized portions of the project site or other built locations, construction would not be expected to cause additional significant environmental impacts. Thus, development of the Project would have a less-than-significant impact on overall energy and gas consumption. Implementation of MM 3.13-1 would further ensure that this impact remains less than significant.

Mitigation Measure: The following mitigation measure will be required to ensure that potential impacts related to energy supply are less than significant.

MM 3.13-1 *Project design and construction shall be coordinated with SCG and the City's Department of Water & Power, and improvements provided if necessary in order to ensure that connections are adequate and capacity is available to accommodate estimated demand for gas and electric utilities.*

Finding: No significant impact will result, and required mitigation would ensure that impacts would not be significant.

Impact 3.13-9 Development of the Rose Bowl Stadium Renovation Project could incrementally increase impervious surfaces in the project area, which could require expansion or construction of existing storm drainage facilities.

The two main storm drains in the vicinity of the Stadium have recently been modernized. However, the remainder of the Stadium drainage system does not meet current needs. Many of the corrugated metal pipes around the Stadium have collapsed and City engineers cannot confirm the location of many older lines. Although flooding is not experienced on the field during the occasional rainstorms in the area, these surrounding deficiencies in the storm drain system could pose flooding problems in the Project area. Consequently, the increase in impervious surfaces in the project area and subsequent increase in

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storm water runoff as a result of the project, although not anticipated to be considerable, is considered potentially significant in view of the current condition and capacity of the storm drain system.

Implementation of MM 3.13-2 would address storm drain deficiencies for the proposed Project, and would require the developer to either pay in-lieu fees or provide on-site improvements in order to ensure that storm drain lines and connections are adequate and capacity is available to accommodate the anticipated increase in stormwater flows. As these improvements would be primarily within the urbanized portions of the Project site or other built locations (i.e., streets) construction would not be expected to cause additional significant environmental impacts. Thus, impacts would be reduced to a less-than-significant level.

Mitigation Measure: The following mitigation measure will be required to ensure that potential impacts related to storm drainage are less than significant.

MM 3.13-2 *The developer shall provide a storm drainage analysis to ensure that storm drain lines and connections are adequate and that capacity is available to accommodate the anticipated increase in stormwater flows. If the report provides recommendations for on-site storm drainage improvements, the recommendations must be followed and implemented. If found that off-site improvements would be necessary, the developer shall pay in-lieu fees to the City for the future construction of those facilities.*

Finding: Mitigation has been required that substantially lessens or avoids the significant impact.

Section IV. Project Alternatives

The alternatives identified in the EIR either would not sufficiently achieve the basic objectives of the Project or would do so only with unacceptable adverse environmental or social impacts. Accordingly, and for any one of the reasons set forth herein or in the record of these proceedings, the City Council finds that specific economic, social, or other considerations make infeasible each of the Project alternatives identified in the EIR and each is hereby rejected. The City Council finds that the Project, with mitigation (including the design mitigation), represents the combination of features that best achieves the Project's objectives while minimizing environmental impacts and maximizing public benefits. The City Council further finds that a good faith effort was made to incorporate alternatives into the preparation of the EIR, and that a reasonable range of alternatives were considered in the review process of the EIR and the ultimate decision on the Project.

The EIR analyzed a total of four (4) alternatives to the proposed Project. The alternatives considered were: "Alternative 1 – the No Project Alternative," "Alternative 2 –the Increased Displacement Events Alternative," "Alternative 3 – the Alternate Design Alternative," and "Alternative 4 – the Historic Restoration Alternative." Other alternatives were considered, but not analyzed because they did not meet the basic project objectives or were determined to be infeasible for the reasons described in the EIR.

5.1. *Alternative 1 – The No Project Alternative*

1. Summary of Alternative

Under Alternative 1, the Stadium would not be improved except for improvements required by the current lease agreement with UCLA. These improvements include the following: (1) an upgrade and expansion of the locker rooms and provision of adjacent storage, (2) an upgrade and expansion of the media room, and (3) an upgrade of the Stadium structure to meet the requirements of the University of California Seismic Safety Policy for purchased and leased buildings. Under Alternative 1, there would be no increase to the number of major (displacement) events at the Stadium. That number would remain at twelve.

2. Reasons For Rejecting Alternative

Although Alternative 1 would avoid many, if not all, of the significant environmental impacts associated with the Project, Alternative 1 would fail to meet important Project objectives and is infeasible for social reasons. Alternative 1 would not involve a long-term tenant of the Stadium that could facilitate long-term economic viability. Thus, the City will continue to be required to devote significant revenues to subsidize Stadium improvements, maintenance and operations, including \$12 million for improvements required by the current lease with UCLA and approximately \$550,000 annually for capital improvements. If these funds were not devoted to the Stadium, these funds would otherwise be available to the general fund in order to meet public health, safety and welfare needs. Additionally, Alternative 1 would not include the modernization of the Stadium to provide state-of-the-art amenities that would enhance the experience of those patronizing the Stadium. For each of these reasons, the City Council finds that Alternative 1 is infeasible for social policy reasons.

The City Council hereby finds that each of the reasons set forth above would be an independent ground for rejecting Alternative 1 as infeasible and by itself, independent of any other reason, would justify rejection of Alternative 1 as infeasible.

Alternative 2 – The Increased Displacement Events Alternative

1. Summary of Alternative

Under Alternative 2, the Stadium would not be improved, except for improvements required by the current lease agreement with UCLA. These improvements include the following: (1) an upgrade and expansion of the locker rooms and provision of adjacent storage, (2) an upgrade and expansion of the media room, and (3) an upgrade of the Stadium structure to meet the requirements of the University of California Seismic Safety Policy for purchased and leased buildings. Also under Alternative 2, there would be an increase in the number of major (displacement) events at the Stadium to twenty-five. This would potentially accommodate more events to increase revenue generated by the Stadium.

2. Reasons For Rejecting Alternative

Alternative 2 would avoid impacts to cultural resources, but would have similar event day impacts on traffic, air quality, noise, and recreation. While increasing the number of displacement events at the

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Stadium would potentially generate more revenue, there does not appear to be a demand by users for twenty-five major events at the Stadium that would generate sufficient revenue to meet the operating, maintenance and capital needs of the Stadium. As described in the EIR, the Rose Bowl Operating Company has been attempting for several years to identify a long term tenant or special event that would generate sufficient revenue to make the Stadium self sustaining. The Rose Bowl Operating Company has been unable to do so. Therefore, simply increasing the number of permitted major events at the Stadium, without renovation or a long-term tenant, will not meet the basic project objective of long-term economic viability. Thus, the City will continue to be required to devote significant revenues to subsidize Stadium improvements, maintenance and operations, including \$12 million for improvements required by the current lease with UCLA and approximately \$550,000 annually for capital improvements. If these funds were not devoted to the Stadium, these funds would otherwise be available to the general fund in order to meet public health, safety and welfare needs. Additionally, Alternative 2 would not include the modernization of the Stadium to provide state-of-the-art amenities that would enhance the experience of those patronizing the Stadium. For each of these reasons, the City Council finds that Alternative 2 is infeasible for social policy reasons.

Additionally, the Stadium would not be renovated to reduce the number of seats in the Stadium. Therefore, traffic, noise and air quality impacts associated with the most popular events at the Stadium, such as the Tournament of Roses football game and the UCLA vs. USC football game, would be greater under this Alternative than the proposed Project due to the greater number of patrons attending the event and the resulting increase in the number of vehicles being driven to the event.

The City Council hereby finds that each of the reasons set forth above would be an independent ground for rejecting Alternative 2 as infeasible and by itself, independent of any other reason, would justify rejection of Alternative 2 as infeasible.

Alternative 3 – The Alternate Design Alternative

1. Summary of Alternative

Under Alternative 3, the Stadium would be leased to the NFL and the Stadium would be modernized to include many of the comforts and amenities associated with contemporary stadiums. This alternative would eliminate the mid-level concourse on the east and north sides of the bowl. In order to meet the first two basic project objectives without the mid level concourse, this Alternative would instead include construction of a concourse below grade that would contain patron amenities such as restrooms, restaurants, lounges, souvenir shops and other services. In order to develop this below grade concourse, the exterior structure of the Stadium would be reinforced and its earth filled interior hollowed out to traverse the existing lengthy entrance tunnels. 120 to 140 luxury suites would be constructed above the east and west rims of the Stadium, but would be no higher than the existing press box and luxury suite structure on the west side of the Stadium. This alternative involves an increase to the number of major (displacement) events at the Stadium to twenty-five and this alternative involves a lease with the NFL as a long term tenant to facilitate economic viability of the Stadium.

2. Reasons For Rejecting Alternative

Alternative 3 would appear to meet several basic Project objectives. However, representatives of the NFL have presented testimony that this alternative fails to include several features of state-of-the-art stadiums.

Additionally, the Alternate Design Alternative would involve increased air quality impacts during construction from additional excavation. Furthermore, as described by Hammes Company in a memorandum to the Director of Planning, this alternative would involve risk to worker safety and the historic fabric of the Stadium due to a complicated shoring process to convert the seating bowl structure from one that is supported by earthen berms to one that is supported by structures.

The Hammes Company memorandum also explains that this Alternative would reduce seating capacity for existing tenants during phased construction, which would reduce capacity for UCLA football games to 58,000 for one season and as low as 43,000 for a second season.

Finally, the primary benefits to this alternative are reduced impacts in the areas of aesthetics and cultural resources. However, implementation of the proposed design mitigation will achieve the same benefits on the north side of the Stadium and some of the aesthetic benefits on the east side of the stadium without the impacts to air quality, risk to workers and the historic structure, and impacts to the UCLA football season. The design mitigation will also not require substantial additional construction costs or loss of revenue from the reduction in the number of luxury suites.

The City Council hereby finds that each of the reasons set forth above would be an independent ground for rejecting Alternative 3 as infeasible and by itself, independent of any other reason, would justify rejection of Alternative 3 as infeasible for environmental or social policy reasons.

Alternative 4 – The Historic Restoration Alternative

1. Summary of Alternative

Under Alternative 4, the Stadium would not be initially improved except for improvements required by the current lease agreement with UCLA. These improvements include the following: (1) an upgrade and expansion of the locker rooms and provision of adjacent storage, (2) an upgrade and expansion of the media room, and (3) an upgrade of the Stadium structure to meet the requirements of the University of California Seismic Safety Policy for purchased and leased buildings. Additionally, under Alternative 4, restoration of the character defining features of the Stadium would be undertaken periodically as funding would become available. There would be no increase to the number of major (displacement) events at the Stadium. That number would remain at twelve.

2. Reasons For Rejecting Alternative

Alternative 4 would meet the objective of preserving the setting and integrity of the Stadium, but would not meet the basic Project objectives of facilitating the long-term economic viability of the Stadium and modernizing the Stadium to provide state-of-the-art amenities that would enhance the experience of those patronizing the Stadium. Thus, the City will continue to be required to devote significant revenues to subsidize Stadium improvements, maintenance and operations, including \$12 million for improvements required by the current lease with UCLA and approximately \$550,000 annually for capital improvements. If these funds were not devoted to the Stadium, these funds would otherwise be

available to the general fund in order to meet public health, safety and welfare needs. Additionally, Alternative 4 would not include the modernization of the Stadium to provide state-of-the-art amenities that would enhance the experience of those patronizing the Stadium. For each of these reasons, the City Council finds that Alternative 4 is infeasible for social policy reasons.

The City Council hereby finds that each of the reasons set forth above would be an independent ground for rejecting Alternative 4 as infeasible and by itself, independent of any other reason, would justify rejection of Alternative 4 as infeasible.