

EXHIBIT A

Findings and Facts in Support of Findings

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:

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 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.¹

Pursuant to the requirements of CEQA, the City Council hereby makes the following environmental findings in connection with the proposed Project. These findings are based upon evidence presented in the record of these proceedings, both written and oral, the DEIR, and all of its contents, the Comments and Responses to Comments on the EIR, and staff and consultants' reports presented through the hearing process, which comprise the Final EIR.

II. Project Objectives.

As set forth in the EIR, the proposed Project is intended to achieve a number of objectives (the "Project Objectives"), as follows:

A. Recognize that the long term physical viability of the historic Rose Bowl Stadium depends heavily on securing its financial future, so that there is an adequate source of funds separate from City funds and Brookside Golf Course revenue for regular and necessary upkeep, maintenance, and improvements to the Stadium. This immediate need is particularly driven by the changing extra-large venue scene in

¹ Cal. Pub. Res. Code § 21081; 14 Cal. Code Regs. § 15091.

the southern California area, with competition for users of the Rose Bowl coming from locations such as the newly renovated Dodger's Stadium, the soon-to-be renovated Los Angeles Coliseum, the proposed NFL stadium(s) (Inglewood, Carson, downtown Los Angeles), the recently renovated Forum, and other similar sites;

B. Allow for the Arroyo Seco Music and Art Festival ("the Festival") to occur and to be held annually in the spring/summer in the City of Pasadena at the "Project site" on a long-term basis;

C. Enhance the reputation and prestige of the City of Pasadena as a center for the performing arts and continue the Rose Bowl's reputation for hosting world class special events;

D. Allow the City of Pasadena and local businesses to realize the substantial economic benefits provided by the Arroyo Seco Music and Arts Festival on a long term, annual basis;

E. Provide a location with ambience that is suitable for a major music and arts festival by ensuring an outdoor setting of ample space with several stages to allow for multiple performances over multiple days; and

F. Capitalize on regional transportation systems and shuttles from remote parking locations to reduce Festival traffic in the vicinity of the Project site to the extent feasible.

III. Background

The Rose Bowl is currently limited by the Arroyo Seco Public Lands Ordinance of the City of Pasadena Municipal Code (the "Ordinance") to no more than 12 displacement events (attendance exceeding 20,000) per year, unless the City Council makes certain findings. Such events occur primarily on the weekends, although concerts, football championship (BCS) games, and soccer events are often held during the week. The proposed Project would amend the Ordinance to increase the number of displacement events from 12 to 15 per year without further approval of the Pasadena City Council to allow for the three day Arroyo Seco Music and Arts Festival ("Festival"). The Amendment to the Ordinance would allow the City to enter into a license agreement with an event operator to host the Festival on an annual basis. The details of the Festival are as described in the FEIR and in the License Agreement with Anschutz Entertainment Group (AEG), the Festival operator, which would extend for a 10 year period with two five-year extension options, for a total of up to 20 years. The Ordinance would also be amended to increase the allowed uses of Brookside Golf Course to include displacements events and amplified sound. The Rose Bowl would

continue to host other displacement events such as concerts, football games, and international soccer games with the total number of displacement events not to exceed 15 per year. The proposed Festival could not occur in the same calendar year as any National Football League (NFL) regular season game if the City were to reach an agreement with the NFL to play at the Rose Bowl Stadium.

Under the proposed License Agreement, AEG would host a three-day Music and Arts Festival on an annual basis at the Rose Bowl Stadium and parts of the Brookside Golf Course (over a Friday, Saturday, and Sunday). The annual Festival is anticipated to include up to four music stages; a theatre performance stage; art displays; concession stands for merchandise sales, food, and drink; and cultural programming representative of Pasadena and the local environs. It is anticipated that the four stages, some of which would be in tents, would be erected inside the Rose Bowl Stadium and on the Brookside Golf Course, with amplified sound occurring at each stage. A multipurpose field known as Area H would be used for parking for year one and would house a stage as an optional location in subsequent years. The annual Music and Arts Festival would have a capacity of up to 93,000 attendees daily (including employees). The first year of the Festival would be limited to 78,400 daily attendees (including employees) over two days (Saturday and Sunday). Setup activities would occur over 2 weeks leading up to the Festival, and breakdown activities would occur over 1 week following the Festival.

As described below, there are five off-site parking and shuttle locations that would be used for the proposed Project: three are located in Pasadena, one in Arcadia, and another in Los Angeles. The Parsons Pasadena building is 1.4 miles southeast of the Rose Bowl in immediate proximity to I-210 and is located in proximity to commercial and office use buildings. Pasadena City College (PCC) is 4 miles to the southeast and covers approximately 1 square mile. Residential uses are located adjacent to PCC to the east and south, and commercial and community support uses are located to the west and north. A satellite PCC campus is located 5.5 miles to the east and is adjacent to residential uses to the west, north, and east, with commercial uses to the south. The Santa Anita Park is located 9 miles to the southeast in Arcadia, and is located at a major commercial mall; surrounding land uses include the Los Angeles County Arboretum and Botanical Gardens to the north, the Santa Anita Golf Course to the east, and adjacent residential uses surrounding each side of the park. The USC University Park Campus is 14 miles to the southwest in Los Angeles and is surrounded by commercial uses and on-site student housing.

A Festival Operations Plan (FOP) would be prepared by the Festival operator as required by the proposed Agreement. The FOP would be submitted annually to the Rose Bowl Operating Company (RBOC) and the City Manager for distribution to the appropriate various City Departments for review and approval prior to the

commencement of the Festival. The Agreement would require the Festival operator to submit refinements to the FOP and the Site Plan annually to the RBOC for review and approval. The specific content of each FOP may change over time to provide flexibility in the planning of the Festival, to allow for improvements in operations, and to reflect changes in technology, as currently occurs each year with regard to other displacement events. The FOP would be prepared by the Festival operator and would be required to supplement the existing overall Event Staging Plan provided by the Rose Bowl Stadium. The FOP would enhance the Event Staging Plan by including the following component parts:

- Private Security Operations Plan
- Traffic Management Plan
- Waste Management Plan
- Sound Management Plan
- Neighborhood Management and Communication Plan
- Facilities Maintenance Plan

The FOP may include additional components to ensure that the Festival operates in accordance with the Agreement and with the RBOC and City's standards, as well as the most up-to-date technology and operational systems.

In addition to these Plans submitted as part of the overall FOP, the Pasadena Fire Department (PFD) and PPD would prepare and/or update the following Plans for public safety services to be provided by the City:

- PPD Operations Plan
- Emergency Operations Plan
- Rose Bowl Emergency Plan

The proposed Project does not include any physical changes to the Rose Bowl Stadium or any of the surrounding features. It would not increase or decrease the seating available at the Stadium, nor does it increase or decrease associated parking. The Project does not include any ground disturbing or excavation activities, any interior or exterior renovation to the Rose Bowl, or any new permanent structures on the Project site.

IV. Effects Determined to be Less Than Significant/No Impact in the Initial Study/Notice of Preparation.

The City of Pasadena issued a Notice of Preparation (NOP) and conducted an Initial Study to determine the potential environmental effects of the Project. In the

course of this evaluation, the Project was found to have no impact in certain impact categories because a project of this type and scope would not create such impacts or because of the absence of project characteristics producing effects of this type. The following effects were determined not to be significant or to be less than significant for the reasons set forth in the Initial Study, and were not analyzed in the EIR because they require no additional analysis to determine whether the effects could be significant.

A. AESTHETICS

1. The Project will not have a substantial adverse impact on a scenic vista.
2. The Project will not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.
3. The Project will not substantially degrade the existing visual character or quality of the site and its surroundings.

B. AGRICULTURAL RESOURCES

1. The Project will not convert prime farmland, unique farmland, or farmland of statewide importance to non-agricultural use.
2. The Project will not conflict with existing zoning for agricultural use or a Williamson Act contract.
3. The Project does not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned as Timberland Production.
4. The Project does not result in the loss of forest land or conversion of forest land to a non-forest use.
5. The Project does not involve other changes in the existing environment that, due to their location or nature, could result in conversion of Farmland to non-agricultural use.

C. AIR QUALITY

1. The Project would not conflict with or obstruct implementation of the applicable air quality plan.
2. The Project would not create objectionable odors affecting a substantial number of people.

D. BIOLOGICAL RESOURCES

1. The Project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status in local or regional plans, policies or regulations, or by California Department of Fish and Game or U.S. Fish and Wildlife Service.
2. The Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies or regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.
3. The Project would not have a substantial adverse effect of federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
4. The Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

E. CULTURAL RESOURCES

1. The Project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.
2. The Project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
3. The Project would not disturb any human remains, including those interred outside of formal ceremonies.

F. ENERGY

1. The Project will not conflict with any adopted energy conservation plans.
2. The Project will not use non-renewable resources in a wasteful and inefficient manner.

G. GEOLOGY AND SOILS

1. The Project will not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - a. Rupture of a known earthquake fault;
 - b. Strong seismic ground shaking;
 - c. Seismic-related ground failure, including liquefaction; or
 - d. Landslides.
2. The Project will not result in substantial soil erosion or the loss of topsoil.
3. The Project will not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, nor result in on- or off-site landslides, lateral spreading, subsidence, liquefaction or collapse.
4. The Project will not be located on expansive soil, creating substantial risks to life or property.
5. The Project will not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

H. HAZARDOUS AND HAZARDOUS MATERIALS

1. The Project will not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
2. The Project will not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.
3. The Project will not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

4. The Project will not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.
5. The Project is not located within an airport land use plan or, where such plan has not been adopted, within two miles of a public airport or public use airport, and thus the Project would not result in a safety hazard for people residing in the Project area.
6. The Project is not located within the vicinity of a private airstrip.
7. The Project will not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
8. The Project will not expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are subject to urbanized areas or where residences are intermixed with wildlands.

I. HYDROLOGY AND WATER QUALITY

1. The Project will not violate any water quality standards or waste discharge requirements.
2. The Project will not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).
3. The Project will not substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site.
4. The Project will not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site.

5. The Project will not create or contribute runoff water, which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.
6. The Project will not otherwise substantially degrade water quality.
7. The Project will not place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map.
8. The Project will not place structures within a 100-year flood hazard area that would impede or redirect flood flows.
9. The Project will not expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam.
10. The Project will not result in inundation by seiche, tsunami, or mudflow.

J. LAND USE AND PLANNING

1. The Project will not conflict with any applicable habitat conservation plan or natural community conservation plan.

K. MINERAL RESOURCES

1. The Project will not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.
2. The Project will not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

L. NOISE

1. The Project will not result in a substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project.
2. The Project is not located within an airport land use plan and therefore would not expose people residing or working in the Project area to excessive noise levels.

3. The Project is not within the vicinity of a private airstrip and would not expose the people residing or working in the Project area to excessive noise levels.

M. POPULATION AND HOUSING

1. The Project will not induce substantial population growth in the area either directly or indirectly.
2. The Project will not displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.
3. The Project will not displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

N. PUBLIC SERVICES

1. The Project will not result in a substantial adverse physical impact associated with the provision of new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios.
2. The Project will not result in a substantial adverse physical impact associated with the provision of new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios.
3. The Project will not result in a substantial adverse physical impact associated with the provision of new or physically altered "other public facilities" including roads, transit, and utility systems (including water and sewer infrastructure), as well as other general public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios.

O. RECREATION

1. The Project does not include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment.

P. TRAFFIC AND TRANSPORTATION

1. The Project will not result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.

Q. UTILITIES AND SERVICE SYSTEMS

1. The Project will not exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.
2. The Project will not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental impacts.
3. The Project will not require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.
4. The Project will not require new or expanded entitlements to provide sufficient water supplies to serve the Project.
5. The Project will result in a determination by the wastewater treatment provider, which serves or may serve the Project, that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments.
6. The Project will be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs.
7. The Project will comply with federal, state, and local statutes and regulations related to solid waste.

V. Effects Determined to be Less Than Significant without Mitigation in the EIR.

The EIR found that the proposed Project would have a less than significant impact without the imposition of mitigation on a number of environmental topic areas listed below. For some of these environmental topics, regulatory measures will be imposed as mitigation measures and are detailed in the Mitigation Monitoring and

Reporting Program, and will have the effect of ensuring that the less than significant impacts remain less than significant. A less than significant environmental impact determination was made for each of the following topic areas listed below, based on the more expansive discussions contained in the Final EIR.

A. AESTHETICS

1. The Project would not substantially degrade the existing visual character or quality of the site and its surroundings.

B. AIR QUALITY

1. The Project would not expose sensitive receptors in the vicinity of the Project to substantial pollutant concentrations.

C. BIOLOGICAL RESOURCES

1. The Project will not cause cumulative impacts to biological resources.

D. CULTURAL RESOURCES

1. The Project will not cause a substantial adverse change in the significance of known historical resources as defined in Section 15064.5 of the CEQA Guidelines.
2. The Project will not cause cumulative impacts to cultural resources.

E. GREENHOUSE GAS EMISSIONS

1. The Project will not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases.

F. LAND USE

1. The Project will not physically divide an established community.
2. The Project will not conflict with the City's General Plan, Central Arroyo Master Plan, Zoning Code, or other adopted land use plan that applies to the Project site and is adopted for the purpose of avoiding or mitigating an environmental effect.

3. The Project will not cause any cumulative impacts to land use planning.

G. NOISE

1. The Project will not result in the exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
2. The Project will not result in the exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels.

H. PUBLIC SERVICES

1. The Project will not result in the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection and emergency services.
2. The Project will not result in the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection services.
3. The Project will not result in any cumulative impacts related to public services.

I. RECREATION

1. The Project will not increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated.
2. The Project will not increase the demand for parks and recreational facilities such that additional facilities are required, thus resulting in substantial adverse physical impacts.

J. TRAFFIC AND TRANSPORTATION

1. The Project will not substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
2. The Project will not result in inadequate emergency access.
3. The Project will not conflict with adopted policies, plans or programs regarding, nor decrease the safety of, public transit, bicycle, or pedestrian facilities, but would decrease the performance of such facilities.

K. WATER

1. The Project will not result in insufficient water supplies available to serve the Project from existing entitlements and resources, or need new or expanded entitlements.

VI. Potentially Significant Environmental Impacts Determined to be Mitigated to a Less Than Significant Level.

The EIR identified the potential for the Project to cause significant environmental impacts in the areas of aesthetics, air quality, biological resources, greenhouse gas emissions, noise, recreation, and traffic and circulation.

The City Council finds that the feasible mitigation measures for the Project identified in the Final EIR would reduce the Project's impacts to certain Aesthetics and Biological Resources areas to a less than significant level, as described below. The Project's significant and unavoidable impacts are discussed in Section VII. In Section 19 of this Resolution, the City Council adopts all of the feasible mitigation measures for the Project described in the Final EIR as conditions of approval of the Project and incorporates those into the Project.

A. AESTHETICS

1. Potentially Significant Impacts to Light and Glare

The Project has the potential to create a new source of light and glare and thereby affect surrounding sensitive receptors. It was determined that the luminance measurements that would be experienced at Sensitive Receptors 3 and 8 would exceed the City of Pasadena threshold of 1.0 foot-candle and therefore, lighting impacts would be considered potentially significant. However, with the incorporation of mitigation

measure AES-1 and AES-2 described below, any impact will be reduced to a less than significant level.

a. Findings

Changes or alterations have been required in, or incorporated into, the Project that avoid or substantially lessen any potential impacts regarding light and glare. Specifically, the following measures are imposed upon the Project to ensure a less than significant impact:

Mitigation Measure AES-1: Directional light sources shall be aimed primarily downward (60 degrees or less from nadir) or upward (45 degrees or less from zenith) and not outward (the angles between), which is classified as the Project Glare Zone. Directional light sources shall not be aimed in the Project Glare Zone. The aiming requirement applies to all static and moving directional lighting, with the exception of movable lighting on stages or for stage performances. Moving lighting for stage performances including follow spot lighting may sweep angles outside of this range provided the center beam aiming terminates within the project boundary. No automatic or manually controlled movable lighting may sweep from downward to upward aiming if the center beam aiming terminates outside of the project boundary at any time.

Mitigation Measure AES-2: The project operator shall implement the following Project Design Features to control light trespass at the site boundary and at sensitive receptor property lines. Additionally, the Project Design Features shall restrict glare by limiting aiming angles of directional light sources, the luminous intensities of all light sources, and the intensities of light that may be emitted from architectural surfaces and signage. The Project Design Features shall include, but are not limited to, the following:

- Stage Performance Lighting
 - Lighting for on-stage performances may include but is not limited to house lighting for the audience, fixed stage lighting, follow spot lights, moving stage lights, color effects, and video displays. These features must comply with the specifications established in Mitigation Measure AES-1.

- Video or static image displays, projected or direct display, shall comply with applicable illuminated signage requirements contained in the Illuminated Signage Lighting section contained in this mitigation measure.
- Special Feature Lighting
 - Stroboscopic lighting shall be mounted within and with its lighting generally contained within tents, fully enclosed structures, or the Rose Bowl Stadium. Stroboscopic lighting outside of these areas shall require approval by the RBOC and must at least meet the requirements of mitigation measure AES-1.
 - Exterior laser show lighting shall be aimed within 45 degrees of zenith. Laser shows within tents or other enclosed spaces may use lower aiming angles if all lasers terminate within the enclosure at all times.
 - Lighting for art installations must adhere to Project Design Features relative to the specific lighting elements of the piece. Deviations from design features must be approved by the RBOC and must at least meet the requirements of mitigation measure AES-1.
 - Catenary Lighting, or light strings, shall use low intensity lamps or shielding. Unshielded omnidirectional catenary mounted light sources shall be rated for no more than 450 lumens each (the equivalent lumen output of a 40W incandescent bulb). Catenary mounted light sources with shielding to prevent upward light shall be rated for no more than 1700 lumens each (the equivalent lumen output of a 100W incandescent bulb).
 - Other lighting equipment installed to uplight site features, shall be shielded to prevent spill light. Uplights for trees shall be aimed within 25 degrees of zenith. Uplighting features may be used as an

alternative or complimentary to functional area lighting as a means to assist in wayfinding.

- Temporary Structure Lighting
 - General lighting equipment mounted within covered structures may be provided to primarily light areas within the structure with center beam candlepower of fixtures aimed within the structure. No more than 2 foot-candles of spill light from interior structure lighting is allowed 20 feet beyond the footprint of the structure and no more than 1.0 foot-candle at the project boundary.
 - Facade lighting of the temporary structures must result in an average facade illuminance of no greater than 10 cd/m^2 . This value is the product of the design average illuminance (in lux) and reflectance factor divided by pi.
 - Signage associated with temporary structures must comply with the sign lighting requirements set forth in the Illuminated Signage Lighting section contained in this mitigation measure
- Functional Area
 - Lighting provided specifically for safety and security at the Project perimeter or other areas may not provide more than 1.0 fc horizontally or vertically 10 feet beyond the project boundary; safety and security lighting shall not create significant impacts for glare and spill light at residential receptors except temporarily during medical, fire, or similar emergency events.
 - All other functional area lighting must comply with Mitigation Measure AES-1, or the Catenary Lighting Requirements within the Special Feature Lighting section of this mitigation measure.

- Illuminated Signage Lighting
 - Backlighted signs and direct view LED signs shall be specified, dimmed, or otherwise controlled to limit the average luminance to no greater than 800cd/m² no later than the beginning of Astronomical Twilight (approximately one hour after sunset in the summertime in Pasadena, CA).

b. Facts in Support of Findings

The proposed Project would result in additional lighting beyond what is currently used at the Rose Bowl for other displacement events. During the 3-day Festival, nighttime illumination levels that extend from the Project site would temporarily increase. Nighttime illumination levels around the Project site are largely dark during non-event nights; however, during displacement events, lighting is increased and can include small-scale and intermittent fireworks displays, stage lighting, stage pyrotechnics, various wayfinding and safety lighting throughout the area, and portable generator lighting rigs located throughout the parking and staging areas.

Implementation of Mitigation Measures AES-1 and AES-2 will reduce impacts associated with directionality of temporary light sources, including from stage performances, special features, temporary structures, functional areas, and illuminated signage. Mitigation Measures AES-1 and AES-2 limit the angles of adjustment for directional lighting equipment from which light crosses the site boundary. All static and moving directional light sources shall not be aimed in the Project Glare Zone. Thus, impacts are reduced to a less-than-significant level. While there would be an increase in nighttime illumination levels during the Festival, beyond other displacement events, it would only occur once a year for a 3-day period, and thus would be temporary. Other entertainment lighting, such as stage lighting, art installations, tent and temporary structure lighting, and illuminated signage, would generally be directed interior to the Festival site. Under the Mitigation Measures, no movable lighting may sweep upward if the center beam terminates outside of the project boundary. With these mitigation measures in place, the light and glare from the Project would not be directly visible from sensitive receptors at levels that would cause illumination levels or glare in excess of thresholds.

For the reasons discussed in the EIR in Impact discussion Section 3.1, Aesthetics, with implementation of Mitigation Measure AES-1 and AES-2, the proposed Project would result in less than significant impacts after mitigation with regard to light and glare.

B. BIOLOGICAL RESOURCES

1. Potentially Significant Impact to Nesting Birds

The Project has the potential to interfere with the movement of native, resident, or migratory wildlife avian species or with established native resident or migratory wildlife corridors. However, with the incorporation of Mitigation Measure BIO-1 described below, any impacts to nesting birds will be reduced to a less than significant level.

a. Findings

Changes or alterations have been required in, or incorporated into, the Project that avoid or substantially lessen any potential impact to biological resources. Specifically, the following measure is imposed upon the Project to ensure a less than significant impact:

Mitigation Measure BIO-1: Impacts to nesting birds protected by the MBTA and California Fish and Game Code will be avoided through implementation of the following measures:

- A pre-activity nesting bird survey shall be conducted prior to the onset of the Festival each year, within a maximum of 14 days prior to Project setup activities, by a qualified biologist. The survey shall be conducted by a qualified biologist within all suitable nesting habitat located within the Nesting Bird Survey Area, as shown in Figure 3.3-1, which includes a 250-foot survey buffer around the Festival site to account for all potentially nesting birds on and in the immediate vicinity of the Project site. If no nesting birds are found, the Project may commence without potential impacts to nesting birds.
- If any active nest is observed during the pre-activity survey, a suitable buffer shall be established around the nest as determined by a qualified biologist to ensure no direct or indirect impacts occur to the nest. Many avian species that would nest in the area are accustomed to urban environments and regular activities that occur at the Rose Bowl Stadium; therefore, the buffer distance will be determined based on the location of the nest as well as the species tolerance to human presence. A qualified biologist

will monitor the nesting activity after the buffer is delineated and during typical Project-related noises to verify that the buffer is adequately placed and to confirm that breeding is not compromised by the Project. Any excessive noise or lighting that could potentially impact the nest shall be directed away from the nest to the greatest extent feasible. On-site monitoring during the 2-week setup, the 3-day Festival, and 1-week breakdown may also be required as determined by the qualified biologist based on sensitivity of the species and proximity to Festival activities. The buffer shall remain in place for the duration the nest is active as determined by a qualified biologist.

b. **Facts in Support of Findings**

The Project site and immediate surroundings contain landscaped and regularly maintained trees as a part of the Brookside Golf Course and Rose Bowl facilities. The landscaped trees and infrastructure on the Project site, and the native vegetation surrounding the site, provide suitable nesting habitat for avian species protected under the Migratory Birds Treaty Act (MBTA). Avian species that could build a nest on the Project site, and particularly within the Festival site, are species that would typically occur in disturbed and upland habitats, as well as urban environments, and would be highly accustomed to a high level of human presence, noise, and light disturbance associated with regular ongoing activities within the Central Arroyo Seco. Project-related activities (setup, operation, and takedown) that occur during the general nesting season of February through August may result in potential indirect impacts (e.g., excessive noise, lighting or human presence that can inhibit nesting activity) to nesting birds. These temporary indirect effects are considered a potentially significant impact to nesting birds.

However, with incorporation of Mitigation Measure BIO-1, impacts will be reduced to a less than significant level. Pre-activity nesting bird surveys will be conducted prior to Festival activities each year. Since a qualified biologist will identify potentially impacted nests and establish a suitable buffer around the nest, if determined necessary, no direct or indirect impacts would occur. The qualified biologist will monitor the nesting activity after the buffer is delineated and during typical Project-related activities to verify that the buffer is adequately placed. In sum, implementation of Mitigation Measure BIO-1 would result in less than significant impacts to nesting birds.

VII. Significant and Unavoidable Impacts

In the areas of air quality, greenhouse gas emissions, noise, recreation, and transportation, circulation and parking, there are instances where environmental impacts would remain significant and unavoidable even after mitigation. These areas are described below.

A. AIR QUALITY

1. Project-Generated Criteria Pollutant Emissions

The Project is expected to generate total criteria pollutant emissions that exceed the SCAQMD Regional Emissions Significance Thresholds.

a. Findings

Changes or alterations have been required in, or incorporated into, the Project to lessen air quality impacts. Nonetheless, the proposed Project is anticipated to have a significant impact. For the setup and breakdown activities, the estimated unmitigated daily operational emissions exceed applicable SCAQMD thresholds for reactive organic gases (ROG), oxides of nitrogen (NO_x), and carbon monoxide (CO). The 3-day (operational) unmitigated emissions would exceed ROG, NO_x, CO, and particulate matter (PM₁₀ and PM_{2.5}). Even with mitigation measures incorporated, the impacts related to these pollutants will remain significant and unavoidable.

There are no feasible mitigation measures that would reduce potentially significant air quality impacts to a less than significant level and no feasible measures, other than those listed below, which would reduce this impact to any material extent:

Mitigation Measure AIR-1: Impacts related to setup, breakdown, and operational emissions of ROG, NO_x, and CO.

- For onsite equipment greater than 50 HP, all engines shall be certified as EPA Tier 4 or greater engines, be retrofitted to comply with the emissions standards of the Tier 4 engine, or if it is determined that such equipment is unavailable, the Festival operator shall document that a good faith effort has been made to obtain such equipment as they are unavailable and that the equipment used meets the next highest EPA Tiered emission standards. This measure reduces ROG, NO_x, and CO emissions from all aerial lifts, air compressors, cranes, and forklifts used onsite.

- All gasoline powered passenger golf carts used onsite shall be replaced with electric golf carts. This measure reduces ROG, NOx, and CO emissions from all gasoline powered golf carts.
- While the Festival cannot dictate the vehicle fleets of the vendors and contractors used during the Festival, preference shall be shown to vendors and contractors that have efficient and cleaner fuel equipment, and who can demonstrate commitment to using that equipment for the Festival.
- The vehicle fleet and mechanical equipment used during the Festival shall utilize the latest technologies available to the satisfaction of RBOC. To account for advances in future technology, every five years the Festival operator shall submit a report to the RBOC identifying technological advancements in vehicle fleets and mechanical equipment implemented in Festival setup, operations, and breakdown, that result in a reduction in emissions. In addition, the report shall include a detailed equipment list for all golf carts used onsite verifying that they are electric or "clean" powered as well as a list of vendor and contractor fleet and equipment information as provided by the vendors and contractors and a reason for the selection of each shall be included.

Mitigation Measure GHG-1: Project-related emissions of greenhouse gases. For on-road shuttle vehicles used during operation of the Project, the Festival operator shall reduce greenhouse gas emissions to the maximum extent feasible through a mix of the following: the use of a maximum number of shuttle vehicles feasible that burn fuels such as Diesel High Performance Renewable (HPR), compressed natural gas (CNG), or equivalent emission reducing technology to the maximum extent feasible; and the purchase or other obtainable and verifiable GHG emissions credits of up to a combined total of up to 4,700 metric tons of CO_{2e} to offset GHG emissions associated with the Project. On an annual basis, prior to holding the Festival, the Festival operator shall submit to the RBOC an evaluation of its ability to reduce greenhouse gas emissions through use of alternative fuel shuttle vehicles to below the SCAQMD significance threshold, and the how much will be offset by mitigation credits. On an annual basis, the RBOC and the Festival operator shall discuss the utilization of new or different technologies or policies to further reduce impacts to below the SCAQMD significance threshold.

b. **Facts in Support of Findings**

The proposed Project would include a two-week setup period and one-week breakdown period for the Festival's outdoor stages, vendor tents/stands, and other Festival-related amenities. Setup and breakdown activities associated with the Project would generate pollutant emissions from the following activities: vendor trips, employees traveling to and from the Project site, and fuel combustion by on-site construction equipment. The maximum daily construction emissions generated by the Project's worst-case construction scenario would exceed SCAQMD's daily significance threshold for ROG, NO_x, and CO.

Further, implementation of the proposed Project would result in short-term regional emissions of criteria air pollutants and ozone precursors associated with area sources and mobile emissions during project operation. The Project would result in short-term regional emissions of criteria pollutants that would exceed the SCAQMD's applicable thresholds for ROG, NO_x, CO, PM₁₀ and PM_{2.5}. The primary source of emissions during project operation would be due to vehicular travel by passenger vehicles, shuttles, and vendor trips.

Implementation of Mitigation Measure AIR-1 and GHG-1 would reduce the maximum daily construction emissions of ROG to below the daily threshold. NO_x and CO emissions, however, would still exceed SCAQMD's daily significance threshold during setup and breakdown activities. These emissions are primarily from onsite equipment that is less than 50 HP, as well as vendor trucks. The project does not have control over regulating emissions of vendor trucks. Therefore, there are no additional mitigation measures that could reduce these impacts and the project impacts related to construction (setup and breakdown activities) would remain significant and unavoidable for NO_x and CO.

With respect to three-day operational emissions, ROG, NO_x, CO, PM₁₀ and PM_{2.5} would still exceed SCAQMD's significance thresholds after mitigation primarily because of attendee, employee, and vendor vehicle trips over which the Project has no regulatory control. As stated above, Mitigation Measures AIR-1 and GHG-1 would reduce operational emissions of ROG to below daily thresholds. Mitigation Measure GHG-1 would reduce operational emissions of PM₁₀ and PM_{2.5} to some extent; however, they would still remain significant and unavoidable.

No additional mitigation measures would be available or feasible to reduce operational impacts related to NO_x, CO, PM₁₀ and PM_{2.5}. Therefore, even with incorporation of Mitigation Measure AIR-1, impacts would remain significant and unavoidable with regard to NO_x and CO for setup/breakdown and with regard to ROG, NO_x, CO, PM₁₀ and PM_{2.5} for the 3-day Festival (operational).

2. Cumulative Net Increase of Criteria Pollutants

The Project is expected to result in a cumulatively considerable net increase of criteria pollutants for which the region is considered "non-attainment" under an applicable federal or state ambient air quality standard. Implementation of Mitigation Measure AIR-1 and GHG-1 would reduce cumulative impacts; however, they would remain significant and unavoidable for ROG, NO_x, CO, PM₁₀ and PM_{2.5}.

a. Findings

Changes or alterations have been required in, or incorporated into the Project to lessen Project and cumulative air quality impacts. Nonetheless, the proposed Project is anticipated to have a cumulatively considerable net increase of criteria pollutants. Even with mitigation measures incorporated, the impacts to these criteria pollutants will remain significant and unavoidable.

There are no feasible mitigation measures that would reduce potentially significant cumulative air quality impacts to a less than significant level and no feasible measures, other than those listed in Section VII, A.1 above, which would reduce this impact to a less than significant level.

b. Facts in Support of Findings

The primary source of criteria pollutant emissions for the proposed Project would be generated from the Festival setup and breakdown activities. Operational emissions (over the three days of the Festival) associated with the proposed Project also would exceed the SCAQMD's thresholds of significance for ROG, NO_x, CO, PM₁₀, and PM_{2.5} even with the implementation of Mitigation Measure AIR-1 and GHG-1. Therefore, the Project could conflict with SCAQMD's air quality planning efforts for nonattainment pollutants and would result in a cumulatively considerable net increase in nonattainment pollutants during operations.

As such, the Project's contribution to emissions for non-attainment criteria pollutants would be cumulatively considerable. Thus, cumulative air quality impacts are considered a significant and unavoidable impact.

B. GREENHOUSE GAS EMISSIONS

1. Exceed Greenhouse Gas Emissions Screening Thresholds

The proposed Project has the potential to exceed the greenhouse gas emissions screening thresholds of the SCAQMD.

a. **Findings**

Changes or alterations have been required in, or incorporated into, the Project to lessen greenhouse gas emissions impacts. Nonetheless, the proposed Project is anticipated to have a significant impact because the operational (3-day) emissions would exceed the SCAQMD's 3,000 metric tons of carbon dioxide equivalents (MT CO_{2e}) screening threshold. Even with mitigation measures incorporated, the impacts related to GHG emissions will remain significant and unavoidable.

There are no feasible mitigation measures that would reduce potentially significant greenhouse gas emissions impacts to a less than significant level and no feasible measures, other than those listed below, which would reduce this impact to any material extent:

Mitigation Measure GHG-1: Project-related Emissions of Greenhouse Gases. For on-road shuttle vehicles used during operation of the Project, the Festival operator shall reduce greenhouse gas emissions to the maximum extent feasible through a mix of the following: the use of a maximum number of shuttle vehicles feasible that burn fuels such as Diesel High Performance Renewable (HPR), compressed natural gas (CNG), or equivalent emission reducing technology to the maximum extent feasible; and the purchase or other obtainable and verifiable GHG emissions credits of up to a combined total of up to 4,700 metric tons of CO_{2e} to offset GHG emissions associated with the Project. On an annual basis, prior to holding the Festival, the Festival operator shall submit to the RBOC an evaluation of its ability to reduce greenhouse gas emissions through use of alternative fuel shuttle vehicles to below the SCAQMD significance threshold, and how much will be offset by mitigation credits. On an annual basis, the RBOC and the Festival operator shall discuss the utilization of new or different technologies or policies to further reduce impacts to below the SCAQMD significance threshold.

b. **Facts in Support of Findings**

The setup and breakdown activities would result in the usage of onsite equipment, as well as worker and delivery vehicles to complete the tasks, which would result in annual emissions of 545.37 MT CO_{2e}. During the three-day operation of the event, operational emissions associated with vehicle travel, including personal cars, shuttle buses, and vendor trip emissions, as well as onsite area source emissions such as consumer product uses, and energy consumption associated with use of the Rose Bowl Stadium, would result in annual emissions of 7,149 MT CO_{2e}. The operational emissions alone, even without the incorporation of setup/breakdown emissions, would be considered a significant impact. With inclusion of the set-up/tear-down annual

emissions, the total annual emissions would equal 7,695 MT CO₂e, and would exceed the SCAQMD's 3,000 MT CO₂e screening threshold. Therefore, Project impacts to GHG emissions would be significant.

Implementation of Mitigation Measure GHG-1 would reduce the GHG emissions generated by the proposed Project through the use of alternative fuels such as Diesel High Performance Renewable or compressed natural gas. Under Mitigation Measure GHG-1, if possible, the Festival operator would purchase emissions credits to reduce Project emissions by at least 4,700 MT CO₂e to reach the 3,000 MT CO₂e threshold. The RBOC and Festival operator will coordinate annually to make sure that the Festival operator utilizes new or different technologies or policies, as they become available, to further reduce impacts to below the SCAQMD significance threshold.

Since the Festival operator may not be able to obtain enough commercially available alternative fuel shuttles or GHG offsets to demonstrate a reduction of 4,700 MT CO₂e, the mitigation may prove infeasible to fully mitigate potential impact, thus, Project-related GHG emissions would continue to represent a significant and unavoidable impact, even after the imposition of Mitigation Measure GHG-1.

2. Cumulative Net Increase of GHG Emissions

The emissions of GHG from the proposed Project would result in a significant impact above the SCAQMD screening threshold for GHG during project operations. The proposed Project-related incremental impact associated with GHG emissions would be cumulatively considerable and the cumulative impacts would be significant, even after implementation of Mitigation Measure GHG-1.

a. Findings

Changes or alterations have been required in, or incorporated into the Project to lessen cumulative greenhouse gas emissions impacts. Nonetheless, the proposed Project is anticipated to have a cumulatively considerable net increase of GHGs. Even with mitigation measures incorporated, the impacts to GHG will remain significant and unavoidable.

However, the ability of the Festival operator to obtain the necessary GHG reductions is uncertain. Because the successful implementation of Mitigation Measure GHG-1 cannot be substantiated at this time, this cumulative impact is considered significant and unavoidable.

b. **Facts in Support of Findings**

The emissions of GHG from the proposed Project would result in a significant impact above the SCAQMD screening threshold for GHG during project operations. Therefore, the proposed Project-related incremental impact associated with GHG emissions would be cumulatively considerable and the cumulative impact would be significant. Application of Mitigation Measure GHG-1 would reduce the Project's GHG emissions contribution; however, cumulative impacts would remain significant and unavoidable.

C. NOISE

1. **Expose Persons to Excess Traffic-Related Noise**

The Project is expected to temporarily increase ambient noise levels and expose persons to or generate noise levels that exceed standards with respect to mobile (traffic-related) noise.

a. **Findings**

The majority of analyzed roadway segments in the Project vicinity, including four of the five off-site parking lots would experience an increase in noise levels over their existing ambient conditions by 5 dBA or more as a result of the Project's traffic. Therefore, traffic noise impacts associated with Project operations would be significant.

No feasible mitigation measures are available to reduce the temporary increase of traffic-related noise.

b. **Facts in Support of Findings**

The EIR concluded that noise generated by the Festival (including construction, amplified stages, crowd noise, equipment, and onsite traffic) would not exceed the established threshold of 85 dBA. However, during the three-day Festival, off-site mobile noise sources (traffic on various roadways leading to the Project site and to the five off-site parking areas) by patrons and employees of the Festival would exceed noise thresholds.

The Project-related roadway noise levels were calculated along 23 off-site roadway segments in the vicinity of both the Project site and off-site parking lots. It was determined that 19 of the 23 analyzed intersections as well as four of the five off-site parking lots would experience an increase in noise levels over their existing ambient conditions by 5 dBA or more as a result of the Project's traffic, resulting in significant impacts. This increase would be limited in duration – i.e., to specific timeframes within

the 3-day period considered to be the peak arrival and peak departure times. This increase would not last the entirety of the three days. Regardless, noise impacts associated with the off-site traffic are considered to be significant.

There are no feasible mitigation measures to reduce the off-site traffic noise impacts given their extremely short duration. Conventional mitigation measures such as the erection of noise barrier walls to reduce the off-site traffic noise impacts are infeasible as the barriers will obstruct access to residential properties, and potentially result in other environmental impacts and thus are socially and economically infeasible. As such, the Project's traffic noise during the Festival operations would be significant and unavoidable.

2. Cumulative Net Increase in Traffic-Related Noise

The proposed Project is expected to result in a cumulatively considerable net increase in traffic-related noise impacts.

a. Findings

The Project and other related development in the area would produce traffic volumes (off-site mobile sources) that would contribute to roadway noise. The primary roadways leading to Project parking lots would be limited to ticketed patrons, meaning that cumulative off-site traffic noise impacts would be controlled mostly by Project-related traffic. Thus, the noise impacts due to the Project-related traffic would be cumulatively considerable. There are no feasible mitigation measures to reduce the off-site traffic noise impacts given their extremely short duration. As such, the Project's traffic cumulative noise during the Festival operations would be significant and unavoidable.

b. Facts in Support of Findings

While the noise level increases would be temporary in nature and would not result in a long-term increase in ambient noise, the Project and other related development in the area would produce traffic volumes (off-site mobile sources) that would contribute to roadway noise. Cumulative noise impacts due to off-site traffic are determined by comparing the projected increase in traffic noise levels from "existing" conditions to "future cumulative" conditions to the applicable significance criteria. The primary roadways leading to the Project parking lots would be limited to ticketed patrons. As such, cumulative noise impacts would primarily result from Project-related traffic, which would result in significant cumulative impacts. Therefore, it is conservatively concluded that the Project's off-site roadway noise impacts could incrementally contribute to a cumulatively considerable noise impact.

D. RECREATION

1. Cumulative Impacts to Recreation

The Project is expected to result in a cumulatively considerable net increase in the programmed and passive uses of other parks and recreational facilities within the City during displacement events.

a. Findings

Changes or alterations have been required in, or incorporated into the Project to attempt to lessen impacts to the existing recreational facilities in the Central Arroyo. Nonetheless, the proposed Project is anticipated to have a significant impact on these facilities because recreational users would be displaced from the Rose Bowl area on event days.

There are no feasible mitigation measures that would reduce the cumulative impacts to recreational facilities to a less than significant level and no feasible measures, other than those listed below, which would reduce this impact to any material extent.

Mitigation Measure REC-1: Cumulative Recreation Impacts. Prior to the first year of the Festival, the City shall develop a plan for monitoring citywide park use during Festival days (including setup and breakdown) and develop a strategy for repairing or improving parks and recreational areas as necessary to address potential increased usage and resulting physical deterioration that could occur on Festival days. Should any physical deterioration occur, the City shall be responsible for funding any repairs and/or improvements.

b. Facts in Support of Findings

Given the increase in displacement events as a result of the proposed Project (including the additional setup and breakdown time required for the use of Area H), the current use of recreational facilities within the City of Pasadena, and the projected increase in residential population due to cumulative projects, the Project has the potential to cumulatively increase the use of parks and recreational facilities within Pasadena. The use and potential deterioration of citywide parks and recreational facilities by displaced patrons would contribute to an overall increase in citywide recreational impacts. Mitigation Measure REC-1 would reduce impacts by monitoring park use during the first year of the Festival and developing a strategy to repair or improve parks and recreational areas as needed.

For most projects – e.g., commercial and residential development projects – a cumulatively considerable impact to recreational facilities would be mitigated through the payment of the City's Residential Impact Fee. A structured fee does not exist, however, for this type of temporary festival. Thus, the City will address any physical deterioration at the City's parks and recreational facilities by ensuring City funding for any necessary repairs and/or improvements after reviewing park and facility use during the first year of the Festival. Although the City plans to allocate funds for park repairs and improvements, cumulative recreation impacts must be considered significant and unavoidable since a structured fee does not exist for this type of event.

E. TRAFFIC, TRANSPORTATION, CIRCULATION AND PARKING

1. Significant Impacts to Traffic and Circulation

The Festival would temporarily increase the citywide average of vehicle miles traveled (VMT) per Capita and vehicle trips (VT) per Capita, thus resulting in significant impacts in the City of Pasadena. In addition, the Project would also significantly impact traffic at 18 intersections (weekday) and 13 intersections (weekend) in surrounding jurisdictions.

a. Findings

Changes or alterations have been required in, or incorporated into the Project to reduce impacts to the various intersections affected by the proposed Project. Even with mitigation measures incorporated, however, impacts too many of these intersections will remain significant and unavoidable.

Mitigation Measure TRA-1: The following identifies measures to mitigate the potential traffic impacts described in the EIR for Existing plus Project and Future plus Project scenarios. The Project shall develop a Project-specific traffic management plan that would be enacted and updated annually. This plan would be developed and updated based on the input from, at a minimum, the Rose Bowl Operating Company (RBOC), the Pasadena Department of Transportation (PDOT), and the Pasadena Police Department (PPD). The plan shall be developed choosing from the policies and measures from the list below:

- **Modifications to Standard Traffic Operations Plan.** Based on real-time fluctuations in event traffic, RBOC and the Festival operator shall coordinate directly with City of Pasadena and other affected local agencies traffic operations staff to coordinate traffic signal changes with variations in event traffic demand.

- The RBOC and Festival operator shall continue to add traffic control officers (TCO) on an as needed basis, and have the ability to use a “pickle” (a switch that allows the TCO to manually trigger the signal phasing changes) to adjust traffic signals before, during and after the event.
- The RBOC and Festival operator shall coordinate with the PPD, the PDOT, and Caltrans in placement of additional CMS signs to help facilitate ingress/egress on Festival days.

Coordination with Other Agencies, Providers and Residents

- The RBOC and Festival operator shall coordinate event management and traffic operations with the City of Arcadia on days in which the Festival is being held.
- The RBOC and Festival operator shall coordinate event management and traffic operations with the City of Los Angeles on days in which the Festival is being held.
- The RBOC and Festival operator shall coordinate event management and traffic operations with the Caltrans on days in which the Festival is being held.
- The RBOC and Festival operator shall coordinate with Metro and other local transit providers to ensure that transit service levels are adequate to meet the demand generated from the Project.
- The RBOC, the City of Pasadena and the Festival operator shall coordinate directly with taxi and TNC providers to ensure a smooth operation of these vehicles during the Festival.
- The RBOC and Festival operator shall develop an extensive local outreach program involving the local community/residents. This would be used to gather their input into the traffic management of the event amongst many Festival related considerations. The RBOC, City of Pasadena staff, and Festival operator shall assign a resident or residents to the role of a community liaison to the event management staff.

Promotion of Transit Usage

- The Festival operator shall provide fully- or partially-subsidized transit passes for Festival employees and attendees.

Promotion of Bicycle Usage

- The Festival operator shall provide a safe and secure bicycle valet system for Festival employees and attendees.

Incentivize Carpooling

- The RBOC and Festival operator shall provide preferential parking or reduced parking costs for vehicles/vanpools containing four or more people.
- The RBOC and Festival operator shall provide a carpool/vanpool program similar to the Coachella Festival "Carpoolchella" program. This program shall be widely publicized at a sufficient time in advance of the event, as well as when tickets are released for pre-sale/sale to the general public. This program shall provide incentives/prizes to participants, such as:
 - VIP Tickets
 - All access guest passes
 - Photo passes
 - VIP wristband upgrades
 - Merchandise vouchers

Development of Internet/Social Media/Mobile App Program

- The RBOC and Festival operator shall distribute the following information to Festival attendees and employees via the internet, printed media (newspapers/magazines), and social media to ensure the broadest distribution of information.
 - Festival/Event maps
 - Directions

- Americans with Disabilities Act (ADA) information
- Details on visiting/getting to the Festival
- Parking/transit/shuttle information
- The RBOC and Festival operator shall provide this information well in advance of the event in order to allow attendees/employees to plan how they will be getting to the event and to encourage ride sharing, carpooling, transit, and bicycle use.
- The Festival operator shall develop a smartphone/tablet/mobile application (“app”), or current technology equivalent, for the Festival. The app should be compatible with commonly used operating systems such as IOS (Apple), Android (Google) and Windows Phone (Microsoft). The app should provide the same data that is available on the event website/social media outlets, including real time information where appropriate. The app should allow attendees and employees to report specific incidents or events in real time (e.g., a traffic accident/collision, illegal camping, etc.).
- The Festival operator shall either develop parts of a Festival app or create a new app specifically developed for local residents. The app should allow residents to report specific incidents or events in real time (e.g., a traffic accident/collision, illegal camping, etc.).
- The Festival operator shall either develop parts of a Festival website or create a new website specifically developed for local residents. The website should allow residents to report specific incidents or events in real time (e.g., a traffic accident/collision, illegal camping, etc.).

Mitigation Measure TRA-2: Traffic Impacts: The Project operator shall develop a Transportation Report Card.

- The Festival operator and the RBOC shall develop an event-related Transportation Report Card. This would have the benefit of helping the RBOC, the City of Pasadena, and the Festival operator improve the management of event-related traffic to/from the Rose Bowl Stadium and off-site parking locations. The report card would encompass, but should not be limited to, the following items/data:
 - Event attendance information
 - Average vehicle occupancy (AVO) surveys

- Data on the number of vehicle (automobile and transit), pedestrian and bicycle incidents
 - Coordination with Caltrans regarding the interstate system and operations
 - Management of off-site parking locations and shuttle operations
 - Vehicle arrival and departure patterns/data
 - Social media and app usage
 - Information/data on additional transit services provided and ridership data
 - Vehicle, bicycle and pedestrian counts
- The report card shall also involve input from the local residents and their liaison as well as the PDOT and PPD.

The report card shall make recommendations for improvements and modifications to the traffic management and operations plan for subsequent Festival years.

There are no feasible mitigation measures that would reduce potentially significant impacts to intersections to a less than significant level and no feasible measures, other than Mitigation Measures TRA-1 and TRA-2, which would reduce this impact to any material extent.

b. **Facts in Support of Findings**

The Festival would generate a total (attendees and employees) of approximately 72,354 vehicular trips, of which an estimated 6,987 trips (6,323 inbound/664 outbound) would be generated during the arrival peak hour and 20,791 trips (1,991 inbound/18,800 outbound) would be generated during the departure peak hour on both a weekday and weekend day. This would result in a temporary increase in the citywide average of VMT per Capita and VT per Capita, thus resulting in significant impacts.

The LOS analysis for the existing plus Project and the future (2016) plus Project scenarios determined that the Festival would significantly impact traffic at 18 intersections on a weekday and 13 intersections on a weekend day. The LOS analysis for the future (2026) plus Project scenario determined that the Festival would significantly impact traffic at 21 intersections on a weekday and 15 intersections on a weekend day. The LOS analysis of future (2035) plus Project scenario determined that

the Festival would significantly impact traffic at 21 intersections on a weekday and 16 intersections on a weekend day.

In addition, implementation of the Project would result in temporary impacts to CMP arterial intersections. The LOS analysis for the future (2026) plus Project scenario determined that the Festival would significantly impact one intersection. The LOS analysis for the future (2035) plus Project scenario for determined that the Festival would significantly impact two intersections.

Under Mitigation Measure TRA-1, the Project would be required to develop a Project-specific traffic management plan that would be enacted and updated annually. The plan would be developed and updated based on the input from, at minimum, the Rose Bowl Operating Company (RBOC), the Pasadena Department of Transportation (PDOT), the Pasadena Police Department (PPD), which would include modifications to standard traffic operations plan, the addition of traffic control officers on an as-needed basis, and coordination with PPD, PDOT, and Caltrans in placement of additional CMS signs to help facilitate ingress/egress on Festival days.

Mitigation Measure TRA-2 would require the development of an annual transportation report card that would make recommendations for improvements and modifications to the traffic management and operations plan for subsequent Festival years. Mitigation Measures TRA-1 and TRA-2 would be implemented, which would help improve overall circulation issues in the City of Pasadena and surrounding jurisdictions resulting from the proposed Project. However, even with implementation of these measures, the traffic impacts would remain significant and unavoidable.

The Project would not result in cumulative impacts related to other projects in the Arroyo area, however, reflective of regional traffic growth and land use development in the vicinity of the study areas, long-term traffic cumulative impacts would occur in future conditions as to intersections, freeways, and transit over the three days festival period. These impacts, even with identified mitigation, would remain significant and unavoidable.

Given the temporary nature of the Project, permanent physical improvements are not feasible to reduce the temporary traffic impacts, as impacts would only occur during a limited time (select times during a three-day period annually). In addition, expansion of roadways in the Project area would be inconsistent with General Plan policies that disfavor such infrastructure expansions in the Central Arroyo, and thus, would not constitute feasible mitigation. The Project is, at bottom, an annual event, which is different from a more typical development project. This difference makes the ongoing, year to year, review of mitigation measures based on actual experiences at the site and in the area appropriate and necessary for this Project. Nonetheless, even with the

mitigation incorporated from Mitigation Measures TRA-1 and TRA-2, the Project impacts to traffic and circulation will be significant and unavoidable.

VIII. Project Alternatives.

The City Council considered a range of reasonable alternatives for the proposed Project including, Alternative 1 – No Festival Alternative (No Project), Alternative 2 – Revised Festival Layout, Alternative 3 – Reduced Capacity Festival, and Alternative 4 – No Increase in Displacement Events.

The City Council considered a two-day festival, however, based on analysis in the EIR, and information in appendix A of the Final EIR, a two-day festival would not allow for a world class event that would enable the Project to meet the objectives, and thus is infeasible.

Alternatives 1, 2, 3 and 4 were analyzed in the EIR and are discussed below. In addition, the basis for rejecting each of these alternatives as infeasible is discussed.

A. ALTERNATIVE 1 – NO PROJECT

1. Summary of Alternative

Under this alternative, the City would assume that there would be no License Agreement between RBOC and AEG to host the 3-day Arroyo Seco Music and Arts Festival on an annual basis. This alternative would not amend the Pasadena Municipal Code, Chapter 3.32, the "Arroyo Seco Public Lands Ordinance," and the number of displacement events allowed annually at the Rose Bowl Stadium without further City Council approval would remain 12 per year, unless certain findings are made.

2. Reasons for Rejecting Alternative: Infeasibility

The No Festival Alternative would result in no temporary change to visual character or quality of the Project site or surrounding area as there would be no long-term license agreement with the Festival operator to allow the Festival to occur at the Project site over a three day period for up to 20 years. Further, there would be no temporary increase in light and glare emissions under Alternative 1, unlike the impacts associated with the proposed Project. Similarly, there would be no impacts to biological resources or cultural resources under this Alternative 1.

Alternative 1 would eliminate the significant and unavoidable air quality impacts of the proposed Project. In addition, Alternative 1 would eliminate any greenhouse gas impacts. Under Alternative 1, noise generated by the currently permitted 12 displacement events would continue. However, the additional 3-day displacement event

of the proposed Project would not be allowed so temporary increases in ambient noise levels from Project-related traffic would be avoided. Thus, Alternative 1 would eliminate the traffic related noise impacts.

Land use impacts under this Alternative 1 would continue to be consistent with historical use. As there would be no additional displacement events under Alternative 1, there would be less of an impact with regard to the demand for off-site recreational facilities that may lead to accelerated facility deterioration, as associated with the proposed Project.

Alternative 1 would not require any additional police, fire, or emergency services above the current level. Thus, impacts to such public services would be less than those of the Project. Similarly, Alternative 1 would not impact recreational users of the Central Arroyo, and thus the significant unavoidable cumulative recreation effect of the Project would be avoided under this Alternative.

Alternative 1 would not generate any additional trips and thus, current event patterns would continue without change. Thus, impacts to transportation, circulation, and parking would be avoided under Alternative 1.

Finally, under Alternative 1, there would be no increase in water demand associated with the Festival. Thus, impacts related to water supply under the No Project Alternative would be less than the proposed Project.

Although Alternative 1 avoids the significant and unavoidable Project impacts, the City Council finds that this Alternative is socially infeasible because it fails to fulfill the fundamental project objective, which includes recognizing the long-term physical viability of the historic Rose Bowl Stadium, securing economic benefits, and enhancing the reputation and prestige of the City of Pasadena as a center for the performing arts.

The City Council hereby finds that the reason set forth above for rejecting Alternative 1 as infeasible, by itself, and independent of any other reason, justifies rejection of Alternative 1.

B. ALTERNATIVE 2 – REVISED FESTIVAL LAYOUT

1. Summary of Alternative

Under this Alternative 2, the main stage would be relocated from Area H to Lot K. After the first year of the Festival, the main stage located within the Rose Bowl that would move out to Area H under the proposed Project, instead would be moved to Lot K under Alternative 2. Stages B, C, and D on the Brookside Golf Course would not be

moved. Setup, operation and breakdown of the Revised Festival Layout Alternative would remain consistent with that of the proposed Project, however, the phased closure of Area H, would not occur. Instead, Lot K, which is a surface parking lot with no recreation uses, would be closed from the beginning of the setup period until the closure of breakdown period. This Alternative 2 would serve the same number of patrons (93,000 visitors, including employees), and would have the same operational details as described as part of the proposed Project.

2. Reasons for Rejecting Alternative: Infeasibility

Under this alternative, the main stage location would move from Area H to Lot K. The overall amount and types of lighting associated with a stage in Lot K would be the same as the lighting assumed under the proposed Project. In this scenario, lighting potentially would be directed more internally to the Project site and directed to the north. Accordingly, the lighting may be slightly less visible from sensitive receptors under Alternative 2 than it would be under the proposed Project. However, overall, there would be similar impacts as with the proposed Project with regard to light and glare.

Since Alternative 2 would not reduce the number of patrons (and therefore, vehicle trips) expected, it would result in similar impacts to ROG, NO_x, CO, PM₁₀ and PM_{2.5} emissions from mobile sources, as the proposed Project. Further, this Alternative 2 would not reduce the annual GHG emission increase, and GHG impacts would remain significant and unavoidable for both the proposed Project and Alternative 2.

Alternative 2 would result in similar impacts as the proposed Project in regard to biological resources and cultural resources as the operational details would not change.

Regarding noise levels, traffic-related noise would remain as significant and unavoidable, as the number of vehicle trips would not change. However, Alternative 2 would result in increased noise levels with the stage at Lot K. Sound levels at this stage would exceed the noise limits set forth in the General Plan (85 dBA from the property line), which would result in new significant and unavoidable impacts that would not occur with the proposed Project. Therefore, the Revised Festival Layout Alternative would result in greater impacts than the proposed Project's less-than-significant impact in regards to on-site operational noise.

Under Alternative 2, the number of displacement events and number of attendees would remain the same as the proposed Project. The slight modifications to stages would not affect the ability of fire, police and emergency response provided to access the site. Impacts related to public services would be similar to the proposed project. Further, impacts with regard to land use would remain the same.

Alternative 2 would relocate the main stage from Area H to Lot K, which would allow Area H to remain open for recreational uses during the two week setup and one week breakdown period. Under Alternative 2, Area H closures would be limited to the 3 days of the Festival. Thus, the significant and unavoidable cumulative impacts related to the potentially accelerated deterioration of recreational facilities that might occur under the proposed Project would be avoided under Alternative 2.

Under Alternative 2, the proposed number of displacement events allowed, the Festival hours, and number of attendees (93,000 including employees) would remain the same as the proposed Project. Therefore, this Alternative would not reduce the overall number of vehicle trips generated by the Project and impacts related to traffic and circulation would remain similar to the significant and unavoidable impacts identified for the proposed Project.

Finally, under Alternative 2, impacts to water supplies would result in similar less-than-significant impacts as the proposed Project.

This alternative would result in new significant and unavoidable impacts with regard to Festival-generated noise as it would exceed standards set forth in the Noise Element and Noise Ordinance and, thus, would also conflict with the City's General Plan. While this impact could be avoided by amending the City's Noise Element to allow for greater noise levels, an amendment of this type would be required to be evaluated through a separate CEQA process. While the significant and unavoidable cumulative recreation impacts that would occur under the proposed Project would be avoided under Alternative 2, cumulative recreation impacts under the proposed Project would be reduced because of the implementation of Mitigation Measure REC-1. Thus, even under the proposed Project, the City will ensure that any offsite impacts to recreational facilities are addressed, as they currently are during all displacement events. Therefore, the tradeoff of significant and unavoidable impacts from recreation to noise is not preferred.

The City Council hereby finds that the reasons set forth above, as grounds for rejecting Alternative 2 as infeasible, are by themselves, and independent of any other reason, justification for the rejection of Alternative 2.

C. ALTERNATIVE 3 – REDUCED CAPACITY FESTIVAL

1. Summary of Alternative

The Reduced Capacity Festival Alternative would limit the number of attendees to a maximum of 61,819 people, including employees, in comparison to the 93,000 for the proposed Project (a decrease of 31,181 people). This reduction is based on a 33

percent reduction in VMT and a 25 percent reduction in VT. Inclusive of attendee and employee trips, the Reduced Capacity Festival Alternative would generate 47,624 vehicular daily trips, with 4,831 vehicular trips during the arrival peak hour and 14,357 vehicular daily trips during the departure peak hour. Under this Alternative, the number of attendees would be reduced, but the physical boundaries of the Festival, amount and location of Festival equipment and stage orientation would remain the same as the proposed Project. Setup, operation, and breakdown of the Reduced Capacity Festival Alternative would remain consistent with that of the proposed Project. Under this Alternative, the Agreement with AEG and the Pasadena Municipal Code Amendment would still occur consistent with that for the proposed Project.

2. Reasons for Rejecting Alternative: Infeasibility

Under this Alternative, the number of attendees would be reduced, but the physical boundaries of the Festival, amount and location of Festival equipment and stage orientation would remain the same as the proposed Project. Therefore, impacts to visual character and quality, light and glare would remain the same as the proposed Project.

Alternative 3 would result in reduced traffic and therefore reduced emissions of criteria pollutants from mobile sources. While operational emissions of ROG, NO_x, CO, PM₁₀, and PM_{2.5} would be reduced, they would still remain significant and unavoidable, after implementation of mitigation measures. Similarly, while GHG emissions would be reduced (to 5,826 MT CO₂E), they would still exceed thresholds and remain significant and unavoidable.

While the overall number of Festival attendees would be lower thus potentially reducing the level of human-related disturbance to nesting birds, as well as decreased general levels of activity and noise, the overall Project boundaries and increase in disturbance would remain. Therefore, the overall potential impact from this alternative would be relatively similar to the proposed Project, and could be reduced with implementation of Mitigation Measure BIO-1.

Because the Project boundaries (and disturbance area) would remain the same as the proposed Project, impacts to historic resources would result in similar less-than-significant impacts as the proposed Project.

Under the Reduced Capacity Festival Alternative, the number of displacement events would remain the same, however the number of attendees would be reduced. Thus, impacts related to consistency with adopted land use plans would result in similar less-than-significant impacts as the proposed Project.

This alternative would limit the number of attendees to a maximum of 61,819 attendees and 2,838 employees. The Reduced Capacity Festival would include similar on-site noise sources in the same layout as the proposed Project. Thus, noise levels generated by the on-site sources would be similar to the proposed Project and would result in less-than-significant impacts. Due to the reduction in the number of attendees under the Reduced Capacity Festival Alternative, noise levels generated by off-site traffic would be reduced, but still remain significant.

Under the Reduced Capacity Festival Alternative, the decrease in attendance would require fewer PPD and PFD personnel on Festival days. The number of private security staff hired by the Festival operator would remain the same as under the proposed Project. The number of PPD required for traffic management would be slightly reduced because traffic would be reduced. Impacts from Alternative 3 would be lower than the less-than-significant impacts of the proposed Project.

Under Alternative 3, the Project boundaries (including use of Area H) and the number of displacement events would remain the same as the proposed Project. Thus, the significant and unavoidable cumulative impacts related to recreational uses would be similar to that of the proposed Project.

Given the reduced number of attendees to a maximum of 61,819 attendees and 2,838 employees under the Reduced Capacity Festival Alternative, VMT and VT would be reduced; however, traffic impacts would still remain significant and unavoidable both within the City of Pasadena and at locations outside the City.

Alternative 3 would reduce attendance by 33 percent, and thus, demand for water would be less than that of the proposed Project by roughly 33 percent, or 306,306 gallons of water. While the overall impact would remain less than significant, like the proposed Project, the water demands would be less than the proposed Project.

Alternative 3 would not reduce any significant and unavoidable impacts of the proposed Project to a level of insignificance. Moreover, Alternative 3 would reduce the number of ticket sales by roughly 30,000 tickets and therefore, Alternative 3 would result in less revenue generation for the Rose Bowl. By generating less revenue, Alternative 3 does not accomplish the Project objective of securing the Rose Bowl's financial future or its long-term physical viability. Thus, the City Council finds that Alternative 3 would reduce the economic value of the Project, as documented in the "Economic Impact of the Arroyo Seco Music and Arts Festival on the City of Pasadena", dated February 2016, without the benefit of eliminating any significant and unavoidable impacts to the environment.

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.

D. ALTERNATIVE 4 – NO INCREASE IN DISPLACEMENT EVENTS

1. Summary of Alternative

Under Alternative 4, the RBOC would enter into an Agreement with AEG to host a 3-day Festival, however, the amendment to increase the number of displacement events allowed at the Rose Bowl would not occur. The Festival would therefore take place within the existing 12 displacement events per year allowed by the Ordinance without further approval by the City Council. The physical boundaries of the Festival as well as the setup/breakdown and operational details would remain the same as the proposed project. This Alternative would still include the Amendment to the Pasadena Municipal Code to allow displacements event uses within the Brookside Golf Course. All setup, operation, and breakdown details of Alternative 4 would remain consistent with that of the proposed Project.

2. Reasons for Rejecting Alternative: Infeasibility

Under Alternative 4, the physical boundaries of the Festival and stage orientation would remain the same as the proposed project, thus, impacts to visual character, light and glare would be similar to the proposed Project.

As Alternative 4 would result in the same amount of traffic as the proposed Project and, thus, emissions from mobile sources, the significant and unavoidable air quality and greenhouse gas impacts of Alternative 4 would remain the same as the proposed Project.

Alternative 4 would not result in an increase in displacement events at the Project, but the Project would still result in potential indirect impacts to biological resources. Impacts would be considered similar to those of the proposed Project.

Alternative 4 would change the allowed uses on the golf course to allow for uses other than golf and parking, however the Festival would occur within the existing number of displacement events allowed by the current Arroyo Seco Public Lands Ordinance. Impacts to historic resources from the existing site conditions to that of Alternative 4 would result in similar less-than-significant impacts as the proposed Project.

Under Alternative 4, the Festival would occur within the 12 displacement events allowed by the Arroyo Seco Public Lands Ordinance. Impacts would be consistent with the adopted land use plans and would be similar and less than significant as with the proposed Project.

Noise impacts under Alternative 4 would be similar to the levels forecast for the proposed Project (less than significant for the 3-day Festival with respect to operational noise and significant and unavoidable for off-site mobile source traffic noise).

Under Alternative 4, the number of attendees would remain the same as the proposed Project, therefore police, fire and other emergency personnel would be required on Festival days for crowd management and traffic control. Impacts related to public services would be similar to the proposed Project. Recreation impacts would also be similar to the proposed Project under Alternative 4 because of the similar setup and breakdown timing, and therefore, cumulative impacts on recreational facilities would remain significant and unavoidable.

The Festival boundaries, festival operational hours, and number of attendees and staff would remain the same under Alternative 4 as under the proposed Project. Given the similarities, impacts related to traffic and circulation from the existing conditions to that of Alternative 4 would result in similar significant and unavoidable impacts as the proposed Project with regard to traffic and circulation. Similarly, under Alternative 4, the water demand for this alternative would be the same as the less-than-significant impacts for the proposed Project.

Alternative 4 would reduce impacts with regard to cumulative recreation impacts of the proposed Project; however, they would remain cumulatively significant and unavoidable. Additionally, the City will be responsible for implementing REC-1 and ensuring that any offsite impacts are addressed, as they currently are during all displacement events and with the proposed Project.

With the exception of minor reductions with respect to cumulative recreational impacts, Alternative 4 has similar impacts as the proposed Project. Alternative 4 reduces the revenue generation potential of the Rose Bowl, however, by maintaining the current number of allowable displacement events. As such, Alternative 4 would not accomplish the Project objective of securing the Rose Bowl's financial future or its long-term physical viability. Thus, the City Council finds that Alternative 4 would reduce the economic value of the Project, without the benefit of eliminating any significant and unavoidable impacts to the environment.

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.