

**CITY OF PASADENA
PLANNING DIVISION
HALE BUILDING
175 NORTH GARFIELD AVENUE
PASADENA, CA 91109-7215**

INITIAL STUDY

In accordance with the Environmental Policy Guidelines of the City of Pasadena, this analysis, the associated "Master Application Form," and/or Environmental Assessment Form (EAF) and supporting data constitute the Initial Study for the subject project. This Initial Study provides the assessment for a determination whether the project may have a significant effect on the environment.

SECTION I – PROJECT INFORMATION

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|----------------------------------------|---------------------------------------------------------------------------------------------|
| 1. Project Title: | Rose Bowl – Amendment to CIP funding for new locker rooms |
| 2. Lead Agency Name and Address: | City of Pasadena, Planning Division
175 North Garfield Avenue
Pasadena, CA 91109-7215 |
| 3. Contact Person and Phone Number: | Ariel Socarras, 626-744-7101
asocarras@cityofpasadena.net |
| 4. Project Location: | 1001 Rose Bowl Drive, Pasadena, California |
| 5. Project Sponsor's Name and Address: | Rose Bowl Operating Company
1001 Rose Bowl Drive
Pasadena, California 91103 |
| 6. General Plan Designation: | Open Space |
| 7. Zoning: | Open Space |

8. Description of the Project: The proposed project is Amendment to the Capital Improvement Program (CIP) for funding to implement the requirements of the lease between the University of California (UCLA) and the RBOC to allow the UCLA football team to continue to use the Rose Bowl Stadium for its home games. As part of the lease, the following capital improvements will take place: Existing Rose Bowl locker rooms under the south end of the stadium will be demolished and replaced with a new media room while a new subterranean locker room will be constructed under the plaza level directly south of the south end of the stadium between vehicular field access tunnels 23A and 28A. Accessibility will be improved with a new direct elevator access to the media room. A landscaping and tree replacement plan will be developed (for future approval) to enhance and improve the pedestrian access to the Court of Champions being removed to allow construction to proceed. Seismic strengthening to bring the stadium up to the University of California Seismic Policy requirements has already been accomplished. A previous Negative Declaration for the stadium improvements and lease agreement was approved in January 2004. The previous Negative Declaration did not analyze the impacts of the improvements as now proposed so a new Initial Study has been prepared to correspond to the proposed amendment to the CIP.

The existing locker room facilities used by the UCLA football team were originally constructed in 1927, but have undergone alterations at three different points (1937, 1960 and 1982) since that time. The attached plans show existing and proposed conditions in the vicinity of the existing locker room facilities. Due to the current state of the facilities and as a contractual provision of the lease between UCLA and the RBOC, the

changes to the facility are required. The following is a description of the revised plans for the locker room improvements:

- The existing subterranean locker room facilities located between tunnel 23A and tunnel 28A would be demolished and replaced with larger, more modern facilities as part of the proposed project. The proposed new locker room facilities will remain subterranean, constructed below the south end of the stadium (under the Court of Champions) between field access tunnel 23A and tunnel 28A and would not be visible from the exterior of the stadium. The Court of Champions will be temporarily removed during construction, and will be replaced afterwards. Two of four previously altered and non-significant stone retaining walls/planters in front of the Court of Champions will be removed to allow for the construction of the locker rooms. The existing trees will be relocated to the greatest extent feasible (to the satisfaction of the Zoning Administrator the planters will be replaced using the same arroyo stone, and new trees will be planted within the planters. The existing space is approximately 24,435 square feet in size and would be expanded to approximately 43,530 square feet of useable area. The additional useable space is based on a reorganization of existing space and the addition of a second subterranean level. The attached plans show the proposed location and layout of the locker room facilities. Although the proposed facilities would be larger in size than the existing locker room facilities, there would be no increase in the intensity of use of the Rose Bowl following completion of the proposed project.

The design team has been working on the construction document for the previous locker room project while the construction management team reviewed the feasibility of constructing it within the contract parameters of the 20 year lease agreement with UCLA. The previous locker room design was entirely underneath the footprint of the existing stadium. In continuing to analyze the constraints of constructing the project entirely beneath the stadium, the architects have developed the revised proposal which meets all of the specifications and requirements of the lease agreement while also allowing the Rose Bowl to deliver brand new facilities, in place of rehabilitated facilities. The new structure will be entirely underground, beneath the Court of Champions. The new design will allow the improvements to be configured and arranged without the constraints caused by structural elements within the present locker room. The new design will also provide flexibility in meeting the contractual requirements of constructing the facility between football seasons. The new locker room proposal benefits the RBOC (and ultimately the City of Pasadena) by decreasing the risk from unforeseen conditions related to rehabilitating the existing structure in two phases during two off-seasons versus the ability to complete the entire project in one phase without interruption of the 2006 football season.

Along with the ongoing maintenance of the Rose Bowl, the stadium has been evaluated over the years and seismic strengthening has enhanced portions of the stadium that were recognized as deficient. In addition to the locker room expansion/conversion, seismic strengthening was required under the new lease. The seismic strengthening work has been completed.

The current locker room facilities are inadequate to meet the needs of modern football teams, and the improvements are necessary by the City of Pasadena and the UCLA Athletic Department as part of the 20-year agreement. The seismic upgrading was needed to meet the UC Seismic Standards. Therefore, these improvements are required as part of UCLA's lease at the Rose Bowl.

During construction of the locker rooms and renovation of the storage area, approximately 84,000 cubic yards of material, including demolition debris and excavated soil, would be removed from the project site and disposed of at an approved landfill/disposal site. Construction activities attributed to the proposed project would occur for a period of approximately eight months, beginning around May 2006. Construction activities would be phased so as to minimize interference with events and activities conducted at the Rose Bowl stadium during the construction period. An air quality analysis was prepared for the original project and lease agreement. The project being analyzed

under this Initial Study does not involve an increase in subterranean development. The only change is the location of the locker rooms and the at-grade changes at the Court of Champions to support the new locker rooms below.

9. Surrounding Land Uses and Setting: North – Open Space/Golf Course; South – Open Space/Brookside Park; East – Parking/Residential; West – Golf Course/Residential.
10. Other public agencies whose approval is required (e.g. permits, financing approval, or participation agreement):
 1. Rose Bowl Operating Company – Advisory recommendation to City Council on lease;
 2. City of Pasadena, City Council– Approval of lease;
 3. Design Review Commission – Advisory recommendation to City Council on modifications to Rose Bowl; and,
 4. Zoning Hearing Officer – Decision of Conditional Use Permit for physical changes to Rose Bowl.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

X	Aesthetics		Geology and Soils		Population and Housing
	Agricultural Resources		Hazards and Hazardous Materials		Public Services
	Air Quality		Hydrology and Water Quality		Recreation
X	Biological Resources		Land Use and Planning		Transportation/Traffic
	Cultural Resources		Mineral Resources		Utilities and Service Systems
	Energy		Noise		Mandatory Findings of Significance

DETERMINATION: (to be completed by the Lead Agency)

On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	
I find that, although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described on an attached sheet have been added to the project. A MITIGATED NEGATIVE DECLARATION will be prepared.	X
I find that the proposed MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.	
I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment., but at least effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards , and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.	
I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.	

Prepared By/Date _____

Reviewed By/Date _____

Printed Name _____

Printed Name _____

Negative Declaration/Mitigated Negative Declaration adopted on: _____

Adoption attested to by: _____
Printed name/Signature Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect is significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Unless Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less than Significant Impact." The Lead Agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section 20, "Earlier Analysis," may be cross-referenced).
- 5) Earlier analysis may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. See CEQA Guidelines Section 15063(c)(3)(D). Earlier analyses are discussed in Section 20 at the end of the checklist.
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier documents and the extent to which address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

- 8) The explanation of each issue should identify:
- a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significant

SECTION II - ENVIRONMENTAL CHECKLIST FORM

1. BACKGROUND.

Date checklist submitted: November 21, 2005
 Department requiring checklist: Planning & Development
 Case Manager: Ariel Socarras, Planner

2. ENVIRONMENTAL IMPACTS. (explanations of all answers are required):

Potentially Significant Impact	Significant Unless Mitigation is Incorporated	Less Than Significant Impact	No Impact
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3. AESTHETICS. Would the project:

a. *Have a substantial adverse effect on a scenic vista?* ()

WHY? The Rose Bowl is located in an area which has views of the nearby hills and ridgelines. This area contains structures ranging from 1 to 5 stories in height and trees, which partially obstruct these scenic views. Open space areas and a golf course are located to the north of the project site with additional open space and Brookside Park to the south, parking lots and residences to the east, and the remainder of the golf course with single family residences located to the west.

The proposed project involves the modification of the locker room facilities for the existing Rose Bowl stadium, which would not impact any scenic vista as defined in the 1994 final EIR for the Land Use and Mobility Elements of the City of Pasadena General Plan. The new locker room facilities will not be visible from above ground, would not extend beyond the current shape and footprint of the Rose Bowl stadium and would be designed in a manner consistent with the existing visual character of the Rose Bowl stadium. Because the size and shape of the new facilities would be contained within the framework of the Rose Bowl stadium, potential aesthetic impacts to scenic vistas associated with implementation of the proposed project would be less than significant, and no mitigation measures would be required.

b. *Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?* ()

WHY? The only designated state scenic highway in the City of Pasadena is the Angeles Crest Highway (State Highway 2), which is located north of Arroyo Seco Canyon in the extreme northwest portion of the City. The project site is not within the viewshed of the Angeles Crest Highway, and not along any scenic roadway corridors identified in the City's General Plan documents. Therefore, the proposed project would have no impacts to state scenic highways or scenic roadway corridors.

All of the trees on the property are protected under the City's Tree Protection Ordinance because they are public trees. Therefore, the removal of any of the trees will require the approval of a Tree Removal Permit. A report prepared by a certified arborist has determined that the project will affect 25 26 trees. ~~Three~~ Six of the 25 26 trees are recommended to be removed. The remaining 22 20 are recommended to be relocated elsewhere on the property. The ~~three~~ six trees that will be removed are ~~two~~ four Coast Live Oaks and a two Eucalyptus trees. The ~~two~~ four Oak trees to be removed are relatively small and in fair to poor condition,

and relocation of these trees should not be attempted. The two Eucalyptus trees is are too large for potential relocation.

The 22 20 trees to be relocated include ~~four~~ two Oak trees and 18 Palm trees. These trees, particularly the Palm trees, are defining elements in the Rose Bowl's landscape. The transplanting of the Oaks may leave a tree less vital and self-sustaining, which will require increased care. The Palm trees are in good condition with strong structural attributes, which make successful relocation likely.

The Court of Champions on the south side of the stadium will be temporarily removed during construction. It will be reconstructed at the exact same location afterwards. The two existing arroyo stone planters will be removed to allow for the construction of the locker rooms. As mitigation for these impacts, the existing trees in the planters will be relocated to the greatest extent feasible, as discussed above. Also, the planters will be replaced using the same arroyo stone, and new trees will be planted in the planters subject to a landscape plan to be reviewed and approved by the City's Zoning Administrator. With the proposed mitigation measures, impacts will be reduced to a less than significant level:

Aesthetics 1: All tree removals shall adhere to the requirements of the Tree Protection Ordinance, which require a tree removal permit for each tree to be removed. The applicant shall replant all trees on site, to the greatest extent possible, and to the satisfaction of the Zoning Administrator. A final landscape plan showing the proposed re-location of trees, and all new trees shall be approved by the Zoning Administrator prior to issuance of a building permit for the project.

Aesthetics 2: All planters (stone retaining walls) removed in front of the Court of Champions shall be reconstructed using the existing Arroyo stone. Landscaping of the planters shall be subject to the Zoning Administrator approval of a Landscape Plan prior to the issuance of building permits. The final schematic and construction drawings shall also be reviewed and approved by Historic Resources Group (as Historic Preservation Monitor) to ensure minimal impacts on character-defining features, and compatibility of design details, materials and finishes on the exterior of the new features and design spaces prior to the issuance of building permits..

c. *Substantially degrade the existing visual character or quality of the site and its surroundings?* ()

WHY? The proposed project would involve the replacement of the existing locker room facilities located underneath the existing stands at the Rose Bowl stadium. There are no height and mass limits set by the Zoning Code in the Open Space Zoning District. The height and mass limits are set through the Conditional Use Permit (CUP) procedure. Any structures proposed within the Open Space Zoning District that differ from the height and mass limitations of the adjacent zoning districts must have the approval of a CUP to be built. The CUP process allows for individual consideration of such structures and imposition of specific conditions to lessen impacts of proposed structures on neighboring zoning districts and their uses. The adjacent zoning districts allow for single family residential structures and uses. Demolition of the existing locker rooms and construction of the new facilities would require approval of a CUP and would be subject to advisory review and recommendation to the City Council by the Design Review Commission.

Further, the proposed location of the locker rooms is underneath the south end of the stadium just south of the Court of Champions and will not be visible from the surrounding areas. The proposed facilities would be designed in a manner consistent with the existing visual character of the Rose Bowl stadium, in terms of building materials and color.

The removal of the existing arroyo stone planters and trees will have an impact on the setting along the south side of the stadium. As mitigation for these impacts, the existing trees in the planters will be relocated to the greatest extent feasible, as discussed above. Also, the planters will be replaced using the same arroyo stone, and new trees will be planted in the planters. The new planters and respective landscaping

will be subject to review and approval as part of the Conditional Use Permit process, and by the City's Zoning Administrator prior to the issuance of building permits. See response 3.b. for mitigation measures

d. *Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?* ()

WHY? Exterior and interior lights and reflective building materials may be potential sources of light and glare. However, the proposed project would provide exterior lighting that is similar to that which is currently present at the site. Further, the proposed project would be required to comply with the standards in the City Zoning Code Section 17.40.260 that regulate glare and outdoor lighting. Therefore, the proposed project would not have a significant impact on light and glare and no mitigation measures would be required.

The proposed project would not cast shadows since it would be located underneath the existing Rose Bowl stadium, and no significant impact is expected to occur.

4. AGRICULTURAL RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project.

a. *Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?* ()

WHY? The City of Pasadena is a developed urban area surrounded by hillsides to the north and northwest. The western portion of the City contains the Arroyo Seco, which runs from north to south through the City. It has commercial recreation, park, natural and open space. The City contains no prime farmland, unique farmland, or farmland of statewide importance, as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency.

b. *Conflict with existing zoning for agricultural use, or a Williamson Act contract?* ()

WHY? The City of Pasadena has no land zoned for agricultural use other than commercial nurseries being allowed by right in the CG (General Commercial) and IG (General Industrial) zones and conditionally in the CO (Office Commercial), CL (Limited Commercial), OS (Open Space) and PS (Public-Semi Public) Zoning Districts.

c. *Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?* ()

WHY? There is no known farmland in the City of Pasadena; therefore the proposed project would not result in the conversion of farmland to a non-agricultural use.

5. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

a. *Conflict with or obstruct implementation of the applicable air quality plan?* ()

WHY? The City of Pasadena is within the South Coast Air Basin (SCAB), which is bounded by the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east, and the Pacific Ocean to the south and west. The air quality in the SCAB is managed by the South Coast Air Quality Management District (SCAQMD).

The SCAB has a history of recorded air quality violations and is an area where both state and federal ambient air quality standards are exceeded. Because of the violations of the California Ambient Air Quality Standards (CAAQS), the California Clean Air Act requires triennial preparation of an Air Quality Management Plan (AQMP). The AQMP analyzes air quality on a regional level and identifies region-wide attenuation methods to achieve the air quality standards. These region-wide attenuation methods include regulations for stationary-source polluters; facilitation of new transportation technologies, such as low-emission vehicles; and capital improvements, such as park-and-ride facilities and public transit improvements.

The most recently adopted plan is the 2003 AQMP, adopted on August 1, 2003. This plan is the South Coast Air Basin's portion of the State Implementation Plan (SIP). This plan is designed to achieve the 5 percent annual reduction goal of the California Clean Air Act.

The SCAQMD understands that southern California is growing. As such, the AQMP accommodates population growth and transportation projections based on the predictions made by the Southern California Association of Governments (SCAG). Thus, projects that are consistent with employment and population forecasts are consistent with the AQMD.

In addition to the region-wide AQMP, the City of Pasadena participates in a sub-regional air quality plan – the West San Gabriel Valley Air Quality Plan. This plan, prepared in 1992, is intended to be a guide for the 16 participating cities, and identifies methods of improving air quality while accommodating expected growth.

The proposed project is consistent with the Zoning and General Plan Land Use designations for the site. As a result, the project is consistent with the growth expectations for the region. The proposed project is therefore consistent with the AQMP and the West San Gabriel Valley Air Quality Plan, and would have no associated impacts.

b. *Violate any air quality standard or contribute to an existing or projected air quality violation?* ()

WHY? Due to its geographical location and the prevailing off shore daytime winds, Pasadena receives smog from downtown Los Angeles and other areas in the Los Angeles basin. The prevailing winds, from the southwest, carry smog from wide areas of Los Angeles and adjacent cities, to the San Fernando Valley and to Pasadena in the San Gabriel Valley where it is trapped against the foothills. For these reasons, the potential for adverse air quality in Pasadena is high.

As discussed above, the City of Pasadena is located in a non-attainment area, an area that frequently exceeds national ambient air quality standards. However, the project itself does not meet the SCAQMD's land use threshold for significant air emissions (since it would entail modification of an existing use and not

a new development), according to SCAQMD's 1993 updated CEQA Air Quality Handbook (CEQA Handbook).

Construction of the proposed project would generate air emissions from: (1) dust generated from demolition, grading and site preparation; (2) hydrocarbon emissions from paint and asphalt; (3) exhaust emissions from powered construction equipment; and, (4) motor vehicle emissions associated with construction activities.

Construction-phase air quality impacts were analyzed quantitatively utilizing construction emissions estimation worksheets. The worksheets follow methodology outlined in the CEQA Handbook and utilize emissions factors found in the EMFAC-2002 air emissions models and CARB Emission Inventory Publication number MO99-32.3. The air quality analysis was prepared as part of the previous negative declaration for the project. However, the revised project is substantially similar to the project that was analyzed under the original air quality study. The original air quality analysis is sufficient to analyze the impacts of the proposed project.

The air emissions calculations assume that construction emissions would last approximately eight months and would vary day to day depending on the activities being performed. Fugitive dust emissions would vary depending on the level and type of activity, silt content of soil, and prevailing weather. Some fugitive dust would be larger-diameter particles that would settle out of the atmosphere close to the site of the actual activity. Smaller-diameter dust would remain suspended for longer periods and would include PM₁₀. Fugitive dust emissions were calculated utilizing emissions factors found in Table 11.9-1 of U.S. EPA's AP-42 compilation of emissions factors and SCAQMD CEQA Air Quality Handbook.

In addition to fugitive dust, project construction would also result in emissions of other criteria air pollutants, including ROG and NO_x, due to combustion of fuel for heavy equipment operation, truck trips, and construction worker trips. ROG would be emitted during painting and asphalt laying operations.

Construction activities would include the demolition of existing locker room facilities, grading and site preparation, and building construction. Currently, it is estimated that demolition would last approximately 16 weeks, and that site preparation and building construction would last approximately 16 weeks. Building construction could occur while site preparation is occurring on another portion of the site. Total construction time is anticipated to last approximately eight months.

Demolition

Prior to construction, the existing locker room facilities would be removed from the proposed project site. As mentioned above, demolition is expected to last approximately 16 weeks and would involve the use of one backhoe, one loader, and one welder. It is further assumed that 30 employees would travel to and from the job site, a maximum of 64 haul truck round trips per day would be necessary, and water and dump trucks would travel five miles each per day at the job site. As shown in Table 1, emissions associated with this phase of construction would not exceed SCAQMD significance criteria.

TABLE 1: ANTICIPATED CONSTRUCTION EMISSIONS

Air Pollutant	Demolition	Site Grading and Building Construction	Significance Criteria
Carbon Monoxide (CO)	31.18 lbs./day	28.00 lbs./day	550 lbs./day
Reactive Organic Compounds (ROC)	5.21 lbs./day	5.14 lbs./day	75 lbs./day
Nitrogen Oxides (NO _x)	80.03 lbs./day	76.32 lbs./day	100 lbs./day
Particulates (PM ₁₀)	12.47 lbs./day	21.94 lbs./day	150 lbs./day

Source: ESA 2003, South Coast Air Quality Management District.

Site Preparation and Building Construction

Site preparation and building construction activities are anticipated to last approximately 16 weeks. During this phase, it is estimated that one scraper, one roller, two compactors, one excavator, one welder, two backhoes, one loader, one mortar mixer, one grader, one paver, and one trencher would work for various time periods at the proposed project site. It is further assumed that 30 employees would travel to and from the job site, 10 haul truck round trips would be necessary, water and dump trucks would travel 5 miles each per day at the job site.

As shown in Table 1, total construction emissions would not exceed SCAQMD significance thresholds. Therefore, construction of the proposed project would have a less than significant impact on air quality. The construction activities listed below, while not required to mitigate a significant adverse impact, would further minimize the potential impacts of the proposed project. The following actions will also be made conditions of approval to the CUP that is required for the project:

1. All trucks hauling soil, sand, and other loose materials shall be covered or maintain at least two feet of freeboard.
2. The contractor shall pave, water (at least three times daily), or apply non-toxic soil stabilizers on all unpaved access roads, parking areas, and staging areas at construction sites.
3. The contractor shall sweep all paved access roads, parking areas, and staging areas at construction sites daily with water sweepers.
4. The contractor shall sweep streets daily with water sweepers if visible soil material is carried onto adjacent public streets.
5. The contractor shall hydroseed or apply non-toxic stabilizers to inactive construction areas.
6. The contractor shall enclose, cover, water (at least twice daily), or apply non-toxic soil binders to exposed stockpiles (dirt, sand, etc.).
7. The contractor shall limit traffic speeds on unpaved roads to a maximum of 15 miles per hour.
8. The contractor shall install sandbags or other erosion control measures to prevent silt runoff to public roadways during rainy season construction (November through April).
9. The contractor shall replant vegetation in disturbed areas as quickly as possible.

- 10. All construction equipment shall be properly tuned and maintained.
- 11. General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. During construction, trucks and vehicles in loading or unloading queues shall be kept with their engines off, when not in use, to reduce vehicle emissions.
- 12. Construction activities shall be staged and scheduled to avoid emissions peaks, and discontinued during second-stage smog alerts.

Operations

The proposed project would not generate operational emissions beyond existing levels because the proposed project involves the replacement of the existing locker room facilities with new facilities and no expansion of use. No additional vehicular trips are anticipated as a result of project implementation. Therefore, operational emissions would not increase as a result of project implementation.

c. *Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)? ()*

WHY? As stated above, the City of Pasadena is within the South Coast Air Basin (SCAB), which is a non-attainment area for nitrogen dioxide (NO₂) and fine particulates matter (PM₁₀). Any addition of these pollutants or their precursors in excess of SCAQMD CEQA thresholds of significance would result in a significant project and cumulative impact. By this standard, the proposed project would not cause a cumulatively considerable increase in NO₂ and/or PM₁₀ during construction and/or operation, as demonstrated in Item 5.b.

d. *Expose sensitive receptors to substantial pollutant concentrations? ()*

WHY? SCAQMD defines sensitive receptors as residential areas, schools, playgrounds, health care facilities, day care facilities, and athletic facilities. There are residences located in the immediate vicinity of the Rose Bowl. However, as shown in the answers to questions 5.a. and 5.b. above, the modifications to the locker room facilities would not violate the SCAQMD established thresholds of significance for air emissions either during construction or operation. Short-term construction activities would not generate sufficient traffic congestion that could create CO hot spots. The proposed project is a continuation of an existing use and includes the replacement of the existing locker room facilities, and no additional trips would be generated by project operation. There are no other sources of air pollution associated with the proposed project. Therefore, construction and operational activities would have a less-than-significant impact on local sensitive receptors.

e. *Create objectionable odors affecting a substantial number of people? ()*

WHY? The proposed project is a continuation of an existing use and would not be anticipated to generate odors during operational activities that would impact neighboring land uses. During construction, certain construction activities, such as paving with asphalt, would create odors that may be detectable. However, any odors created at the project site would be temporary and short-term. Additionally, by virtue of compliance with the City of Pasadena's noise restrictions, construction activities would be limited to daytime hours, when there is generally a good occurrence of air mixing. Hence, any objectionable odors created during construction activities would be considered temporary and less-than-significant. No mitigation measures would be required.

6. BIOLOGICAL RESOURCES. Would the project:

- a. *Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?*

()

WHY? The project site is located in a developed urban area, within the existing fenceline of the Rose Bowl facility. No known unique, rare or endangered plant or animal species or habitats are located on or near the site. No impact would occur, and no mitigation measures would be required.

All of the trees on the property are protected under the City's Tree Protection Ordinance because they are public trees. Therefore, the removal of any of the trees will require the approval of a Tree Removal Permit. A report prepared by a certified arborist has determined that the project will affect ~~25~~ 26 trees. ~~Three~~ Six of the ~~25~~ 26 trees are recommended to be removed. The remaining ~~22~~ 20 are recommended to be relocated elsewhere on the property. The ~~three~~ six trees that will be removed are ~~two~~ four Coast Live Oaks and a two Eucalyptus trees. The ~~two~~ four Oak trees to be removed are relatively small and in fair to poor condition, and relocation of these trees should not be attempted. The two Eucalyptus trees is are too large for potential relocation. The ~~22~~ 20 trees to be relocated include ~~four~~ two Oak trees and 18 Palm trees. These trees, particularly the Palm trees, are defining elements in the Rose Bowl's landscape. The transplanting of the Oaks may leave a tree less vital and self-sustaining, which will require increased care. The Palm trees are in good condition with strong structural attributes, which make successful relocation likely.

Mitigation measures are required as part of the Aesthetics analysis (response 3.b.) to ensure that a landscape plan is approved by the Zoning Administrator that shows the existing trees are relocated on-site to the greatest extent feasible, and that the replaced planters are landscaped with acceptable species. The plan must be approved by the Zoning Administrator prior to the issuance of building permits for the project. As part of the mitigation measures, skilled tree maintenance workers must be contracted to take care of the Oak Trees.

- b. *Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?* ()

WHY? The Final EIR for the adopted 1994 Land Use and Mobility Elements maps the natural communities with in the City's boundaries. No designated natural communities are located within the boundaries of the project site. There are no known existing plant communities on or near the site. No impact would occur, and no mitigation measures would be required.

- c. *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? ()*

WHY? The project site is located in a developed urban area. There is no known naturally occurring wetland habitat in the vicinity of the project site. No impact would occur, and no mitigation measures would be required.

- d. *Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? ()*

WHY? The project site is located in a developed urban area. The proposed project involves the continuation of an existing use and would not involve the dispersal of wildlife nor result in a barrier to migration or movement. No impact would occur, and no mitigation measures would be required.

- e. *Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? ()*

WHY? The only local ordinance protecting biological resources in the City of Pasadena is Ordinance No. 6896 "City Trees and Tree Protection Ordinance". All of the trees on the property are protected under the City's Tree Protection Ordinance because they are public trees. Therefore, the removal of any of the trees will require the approval of a Tree Removal Permit. A report prepared by a certified arborist has determined that the project will affect 25 26 trees. ~~Three~~ Six of the 25 26 trees are recommended to be removed. The remaining 22 20 are recommended to be relocated elsewhere on the property. The ~~three~~ six trees that will be removed are ~~two~~ four Coast Live Oaks and a two Eucalyptus trees. The ~~two~~ four Oak trees to be removed are relatively small and in fair to poor condition, and relocation of these trees should not be attempted. The two Eucalyptus trees is are too large for potential relocation. The 22 20 trees to be relocated include ~~four~~ two Oak trees and 18 Palm trees. These trees, particularly the Palm trees, are defining elements in the Rose Bowl's landscape. The transplanting of the Oaks may leave a tree less vital and self-sustaining, which will require increased care. The Palm trees are in good condition with strong structural attributes, which make successful relocation likely.

The removal and/or relocation of the existing trees are required to comply with the City's Tree Protection Ordinance. As mitigation for the impacts of removal of protected trees, the existing trees in the planters will be relocated to the greatest extent feasible, as discussed above. Also, the planters will be replaced using the same arroyo stone, and new trees will be planted in the planters. The new planters and respective landscaping will be subject to review and approval as part of the Conditional Use Permit process, and by the City's Zoning Administrator prior to the issuance of building permits.

See response 3 b for the proposed mitigation measures.

- f. *Conflict with the provisions of an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or state habitat conservation plan? ()*

WHY? Currently, there are no adopted Habitat Conservation or Natural Community Conservation Plans within the City of Pasadena. There are also no approved local, regional or state habitat conservation plans.

7. CULTURAL RESOURCES. Would the project:

a. Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5? ()

WHY? The proposed project is a continuation of an existing use, involving the demolition of the existing locker room facilities, and the construction of new locker room facilities under the plaza level directly south of the south end of the stadium between vehicular tunnels 23A and 28A. Two of four previously altered and non-significant stone retaining walls/planters in front of the Court of Champions will be removed to allow for the construction of the locker rooms. The proposed project was evaluated by Historic Resources Group for consistency with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings. The results of that evaluation are contained in the following Table:

Item No.	Work Item	Feature Impacted	Evaluation
1	Removal of existing locker room building at south end and the addition of a new building of the same volume to be used for media rooms.	Locker room building originally built in 1927, but was altered, rebuilt and remodeled in 1937, 1960 and 1982.	The current locker room building is not character-defining. Its removal will not impact the stadium's historic integrity.
2	Addition of a locker room building underneath the plaza level to the south of the stadium with access tunnels into the south end of the stadium.	The terraced berm between tunnels 24A and 27A will be penetrated. Approximately 20 feet of berm will be impacted. The new construction will necessitate the excavation of the plaza level from tunnel 23A to 28A impacting the Court of Champions built in 1989.	The terraced berm at the south end is not character-defining. A partial removal will not impact the stadium's historic integrity. The Court of Champions is not character-defining. Its temporary removal for construction of the locker rooms will not impact the stadium's historic integrity.
3	Addition of elevator to the west of tunnel 23A.	A portion of the terraced berm to the west of tunnel 23A and a portion of the nonsignificant retaining wall to the west of tunnel 23A.	The terraced berm and the retaining wall to the west of tunnel 23A are not character-defining. A partial removal will not impact the stadium's historic integrity.
4	Removal and replacement of previously altered and nonsignificant retaining walls under the south end of the stadium.,	Will impact previously altered and nonsignificant retaining walls.	The terraced berms at the south end and Arroyo stone retaining walls on the west side are not character-defining. Their removal will not impact the stadium's historic integrity.

The Standards for Rehabilitation and an evaluation of the proposed work with respect to each Standard are listed below.

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.

There is no change in use. Therefore, the work is consistent with Standard 1.

2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.

The proposed work will remove an insubstantial percentage of distinctive materials and features that characterize the stadium – board-formed concrete posts and beams. The work is consistent with Standard 2. The proposed alternative will not remove any board-formed concrete posts and beams, and remains consistent with Standard 2.

3. Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.

The proposed work does not include any changes that can be confused with significant features. Therefore, the work is consistent with Standard 3.

4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.

Refer to Standard 2 above. Features that are proposed to be removed are not significant. Therefore, the work is consistent with Standard 4.

5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.

The proposed work removes an insubstantial percentage of board-formed concrete posts and beams. Therefore, the work is consistent with Standard 5. The proposed alternative will not remove any board-formed concrete posts and beams, and remains consistent with Standard 5.

6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.

No replacement in lieu of repair is proposed. Therefore, the work is consistent with Standard 6.

7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.

The proposed work will not utilize any chemical treatments. Therefore, the proposed work will not cause damage, and is consistent with Standard 7.

8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.

At this phase of the project, it appears possible and feasible to monitor any ground disturbing activity for identification and protection of archeological resources. Therefore, the proposed work is consistent with Standard 8.

9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated

from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.

The proposed design for additions appears to be compatible and differentiated in concept. The additions are subterranean and not visible to the public. The proposed work is consistent with Standard 9. The proposed alternative is less substantial, less visible, has less impact on spatial relationships, and remains consistent with Standard 9.

10. New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

The proposed new construction is subterranean and outside of the stadium footprint. Therefore, the proposed work is consistent with Standard 10.

Based on this analysis, Historic Resources Group determined that the alternative project remains consistent with the Standards for Rehabilitation.

Historic Resources Group recommends that as part of the proposed project, the final schematic and construction drawings be reviewed with Historic Resources Group (as Historic Preservation Monitor) to ensure minimal impacts on character-defining features, and compatibility of design details, materials and finishes on the exterior of the new features and design spaces.

No other buildings, structures, natural features, works of art or similar objects on the site having a significant historic value to the City would be demolished, relocated, removed, or significantly altered by the project. Based on the results of the historical evaluation performed for the proposed project, the lack of additional historic resources in the vicinity of the project site, and the steps to be taken to prevent damage to the historic and structural integrity of the Rose Bowl, implementation of the proposed project would create a less than significant impact on historic resources.

b. *Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?* ()

WHY? There are no known prehistoric or historic archaeological sites on the project site. If any such sites are encountered during grading or construction of the project, all grading or construction efforts, which would disturb these sites, would cease. An archaeologist would be notified and provisions for recording and excavating the site would be made in compliance with Section 15064.5 of the State CEQA Guidelines.

c. *Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?* ()

WHY? There are no records of any significant paleontological resources in the City of Pasadena. Therefore, no paleontological resources would be impacted by the proposed project, due in part to the fact that the proposed project is contained within the footprint of the existing Rose Bowl stadium. In addition, no unique geologic features are located within the boundaries of the project site. If any such sites are encountered during grading or construction of the project, all grading or construction efforts, which would disturb these sites, would cease. A paleontologist would be notified and provisions for recording and excavating the site would be made in compliance with Section 15064.5 of the State CEQA Guidelines.

d. *Disturb any human remains, including those interred outside of formal ceremonies?* ()

WHY? There are no known human remains on the site. If any remains are encountered during project implementation the Los Angeles County Coroner would be contacted. No impact would occur, and no mitigation measures would be required.

8. ENERGY. Would the proposal:

a. *Conflict with adopted energy conservation plans?* ()

WHY? The project would not conflict with the 1983 adopted Energy Element of the General Plan. The proposed project is a continuation of an existing use, and replacement of the locker room facilities would be within the intensity allowed by conditions imposed by the CUP process in accordance with the Zoning Code and envisioned in the City's approved General Plan. Further, the project would comply with the energy standards in the California Energy Code, Part 6 of the California Building Standards Code (Title 24). Measures to meet these performance standards may include high-efficiency Heating Ventilation and Air Conditioning (HVAC) and hot water storage tank equipment, lighting conservation features, higher-than-required rated insulation and double-glazed windows.

b. *Use non-renewable resources in a wasteful and inefficient manner?* ()

Why? The proposed project is a continuation of an existing use and therefore would not create a demand for substantial, additional energy. Construction of the project would result in a short-term insignificant consumption of oil-based energy products. However, the additional amount of resources used would not cause a significant reduction in available supplies.

Because of the increase in square footage of the locker room facilities, the proposed project may result in an incremental increase in consumption of electrical energy per day of operation. However, UCLA would only use the facility 16 days per year (6 games, 6 pre-game practice days and 4 practice days) and would not increase its staffing or team size upon completion of the proposed project. There would be no increase in UCLA's use of the facility beyond that allowed under the current lease. Other patrons of the Rose Bowl would continue to use the locker rooms during the year an estimated 10 to 15 days. According to the City of Pasadena Department of Water and Power, sufficient electrical energy supplies are available from existing mains, lines and substations in the area. Therefore, the incremental increase would create a less than significant impact with respect to electrical energy consumption. This increase in electrical consumption would be further reduced by meeting the above-referenced energy standards. Measures to meet these performance standards may include high efficiency Heating Ventilation and Air Conditioning (HVAC) and hot water storage tank equipment, lighting conservation features, higher than required rated insulation and double-glazed windows. The energy conservation measures would be prepared by the developer and shown on a building plan(s). This plan would be submitted to the Water and Power Department and Building Official for review and approval prior to the issuance of a building permit. Installation of energy-saving features would be inspected by a City Inspector prior to issuance of a Certificate of Occupancy.

Similar to electrical consumption, occupation of the project would result in an insignificant increase in the consumption of natural gas due to the increase in square footage. This consumption would be lessened by adherence to the performance standards of California Energy Code, Part 6 of the California Building Standards Code Title 24.

In addition, the proposed project would result in a minimal increase in water consumption due to the increase in square footage of the locker room facilities. As mentioned above, UCLA would only use the facility 16 days per year. Other patrons of the Rose Bowl would use the locker rooms during the year an estimated 10 to 15 days. Therefore, no increase in the intensity of use of the Rose Bowl would occur following project implementation. This less than significant impact would be further reduced during drought periods by the applicant adhering to the Water Shortage Procedures Ordinance, which restricts water consumption to 90% of expected consumption during each billing period. Installation of plumbing would be inspected by a Building Division Code Enforcement Inspector prior to issuance of a Certificate of Occupancy.

9. GEOLOGY AND SOILS. Would the project:

a. *Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:*

i. *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. ()*

WHY? According to the 2002 adopted Safety Element of the City’s General Plan, the San Andreas Fault is a “master” active fault and controls seismic hazard in Southern California. This fault is located approximately 21 miles north of Pasadena.

The County of Los Angeles and the City of Pasadena are both affected by Alquist-Priolo Earthquake Fault Zones. Pasadena is in four USGS Quadrants, the Los Angeles, and the Mt. Wilson quadrants were mapped for earthquake fault zones under the Alquist-Priolo Act in 1977. The Pasadena and Condor Peak USGS Quadrangles have not yet been mapped per the Alquist-Priolo Act.

Adjacent to and partially in the City of Pasadena are two faults, considered active, the Sierra Madre primarily north of the City and the Raymond Fault primarily south of the City. The 2002 Safety Element of the General Plan considers the Sierra Madre Fault to be in a Fault Hazard Management Zone and the Raymond Fault to be in an Alquist-Priolo Earthquake Fault Zone. Within the southwest portion of the City, the Eagle Rock Fault is considered potentially active.

The potential exists for people and property to be exposed to the hazards of seismic activity in most of California. The proposed project is a continuation of an existing use and would not increase the risk of exposing people or structures to potential substantial adverse effects involving the rupture of a known earthquake fault. As mentioned in the project description, the Rose Bowl stadium has completed seismic strengthening, including additional sheer walls and support beams, to minimize the potential risk to patrons of the Rose Bowl to such adverse effects. In terms of the proposed locker room facilities, the risk of earthquake damage would be minimized because the new structure would be built according to the Uniform Building Code and other applicable codes, including the University of California Seismic Policy, and would be subject to inspection during construction. Structures for human habitation must be designed to meet or exceed California Uniform Building Code standards for Seismic Zone 4. Therefore, since the proposed project would be designed in a manner consistent with all applicable codes and policies, including the University of California Seismic Policy, impacts associated with project implementation would be less than significant, and no mitigation measures would be required.

ii. *Strong seismic ground shaking? ()*