

Land Use

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

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

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

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

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

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

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

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

MM 3.8-2 During project operation, if the event schedule conflicts with the monthly Flea Market held on the second Sunday of each month in the parking area at the south end of the Stadium, the RBOC shall make an alternative location available to the Flea Market or schedule an alternate day for the Flea

Market, and, when feasible, shall provide the operators of the Flea Market at least 90 days' written notice of the unavailability of the parking area and the location and date of the rescheduled Flea Market operation.

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

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

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

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

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

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

The proposed project would add a net of approximately 816,000 square feet of use to the existing Stadium, and would create a more massive, taller, state-of-the-art, modern Stadium. Therefore, the physical design of the Stadium would represent a substantial change in the intensity of development in the Central Arroyo. From a land use standpoint, the proposed project represents an intensification of use of the existing Stadium, and introduces a large, visibly modern facility into a setting that is primarily park-like and contains a large residential component representative of traditional Pasadena architecture. Therefore, while the proposed project would not change the type of development in the area, as there are other recreational facilities in the Central Arroyo, it would result in an adverse impact to the Central Arroyo because of the substantial intensity (including nearly 1 million square feet of new building area, increased building height and massing, and increased frequency of large-scale events) of the proposed development. This would be a significant and unavoidable impact.

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

Noise

Impact 3.9-1	Construction activities associated with the proposed project would not generate or expose persons off site to excessive ground borne vibration.
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Construction activities that would occur under the proposed project have the potential to generate low levels of ground borne vibration. Given that the residential properties nearest to the Stadium are located approximately 200 feet away from the nearest parking lot, based on vibration attenuation rates, vibration levels experienced by these residential uses would be less than 75 VdB. In addition, heavy trucks would also be used to transport materials to and from the project site when construction activities occur. Based on coordination with the City of Pasadena Department of Transportation, the construction haul route would include use of Seco Street, Mountain Street, and the I-210 (Foothill) Freeway. These trucks typically generate ground borne vibration velocity levels of around 63 VdB. These levels could reach 72 VdB where trucks pass over bumps in the road. In both instances, the resulting ground borne vibration velocity levels would be less than the Federal Railway Administration's 80 VdB vibration impact threshold for residences. Therefore, construction during the implementation of the proposed project would not expose off-site persons to excessive ground borne vibration or ground borne noise levels, and this impact would be less than significant.

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

Impact 3.9-2	Mechanical equipment installed and operated at the proposed project site would not expose noise-sensitive land uses to noise levels that exceed City standards.
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Large HVAC systems associated with the Stadium could result in noise levels that average between 50 and 65 dBA L_{eq} at 50 feet from the equipment. The property lines of the nearest residential uses, which are located on North Arroyo Boulevard east of Rosemont Avenue, are located approximately 200 feet from the edge of the nearest Stadium parking lots (Lot B and D) and 600 feet from the edge of the Stadium. As such, the new mechanical equipment installed and operated at the Stadium would not expose the nearby residential uses to noise levels that exceed the City's 70 dBA CNEL exterior standard for single-family residential uses. In addition, the noise levels from the new HVAC systems are not anticipated to be greater than the current noise levels generated by the existing HVAC systems. The new HVAC systems would be more state-of-the-art and energy efficient than the existing systems, and would be upgraded to exceed industry standards. Thus, the new systems would likely generate lower noise levels. As such, while implementation of the Project would increase the overall occurrence of noise from the Stadium's HVAC systems over the course of a year due to additional operation associated with the increase in displacement events that would be held at the Stadium, the noise levels generated from the new HVAC

systems would be less per event than the existing systems because of improvements in their design. Therefore, this impact would be less than significant.

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

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

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

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

Impact 3.9-4	Truck trips resulting from construction of the proposed project would not generate noise levels along Seco Street and Mountain Street that exceed the standards established in the City of Pasadena Noise Regulations.
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Noise levels generated by construction trucks could reach approximately 67.4 dBA L_{eq} at 50 feet. Residential uses located along Seco Street and Mountain Street would be exposed to noise levels below the City's standard. As such, impacts associated with truck trips during construction of the proposed project would be less-than-significant.

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

Impact 3.9-5	Construction activities associated with the proposed project could generate noise levels that exceed the standards established in the City of Pasadena Noise Regulations.
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During each stage of project construction there would be a different mix of equipment operating, and noise levels would vary based on the amount of equipment in operation and the location of the activity. The uses nearest the Project site that are sensitive to construction noise are the single-family dwelling units that are located along residential street segments surrounding the general vicinity of the Stadium. The property lines of the nearest residential uses are located approximately 200 feet from the edge of the Stadium's nearest parking lots (Lot B and D) and 600 feet from the edge of the Stadium. Construction activities occurring at the parking area located immediately east of the Stadium could reach approximately 74 dBA L_{eq} during the daytime at the property lines of these residential uses. These noise levels would not exceed the City's standard. In addition, construction activities at the Project site would also be limited to the hours of 7:00 A.M. to 9:00 P.M. on Monday through Saturday in accordance with the City's Noise Ordinance. As such, the impact associated with construction noise would be less than significant.

Pile driving may occur during construction of the proposed project. According to the United States Environmental Protection Agency (EPA), peak noise levels resulting from pile driving could range between 95 to 107 dBA L_{eq} at 50 feet. As noise levels would diminish at a rate of approximately 6 dBA per doubling of distance, the potential noise level associated with pile driving would range from 77 to 89 dBA L_{eq} at 400 feet from the Stadium, and from 71 to 83 dBA at 800 feet from the Stadium. As such, the nearest residential uses that are located approximately 600 feet from the Rose Bowl Stadium could experience noise levels from pile driving that exceed the City's noise level standard. Implementation of MM 3.9-1 would require the use of site-specific noise attenuation measures, including the use of "quiet" pile driving technology, to reduce the noise levels generated from pile driving at the project site. In addition, implementation of MM 3.9-2 would also require the issuance of proper noticing procedures by the Project developer prior to the issuance of the building permit to inform the public of when pile driving activities would occur. Furthermore, in accordance with the City's Noise Ordinance, the operation of pile driving equipment at the Project site would not occur between the hours of 9:00 P.M. of one day and 7:00 A.M. of the next day or between the hours of 9:00 P.M. of Saturday and 7:00 A.M. of Monday. With implementation of the mitigation measures and adherence to the City's Noise Ordinance pertaining to pile driving, this impact would be reduced to a less-than-significant level.

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

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

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

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

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

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

Impact 3.9-6	Operation of the proposed project could generate noise levels that exceed the standards established in the City of Pasadena Noise Regulations.
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The Project would result in the rehabilitation of the existing Stadium to allow use by a National Football League (NFL) team. While implementation of the Project would expose the nearby residential uses to noise generated from the Stadium's loudspeaker system on more occasions over the course of a year due to the additional displacement events that would be held at the Stadium, the volume generated from the loudspeaker system per event would be less because of acoustic improvements implemented in the design of the new system. However, to ensure that the noise level generated from the proposed loudspeaker system would meet the City's Noise Regulations, MM 3.9-3 would be implemented, which requires the periodic monitoring of Stadium noise levels, and, if deemed necessary, the subsequent

modification of the sound system at the Stadium to reduce the noise levels. Implementation of MM 3.9-3 would reduce potential impacts from the Stadium sound system to a less-than-significant level.

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

MM 3.9-3

- (a) *Prior to installation of the new sound system, the project operator shall present noise analysis to the City that demonstrates that the new sound system will meet the City's Noise Regulations.*
- (b) *Stadium noise level in the residential areas surrounding the project site shall be monitored periodically during the first year of operation by the operator in cooperation with the City.*
- (c) *Based on the monitoring results, the operator shall modify operation of the loudspeaker system to reduce noise levels observed at the residential areas to meet City Noise Regulations. Modifications may include adjustments to volumes or relocation of individual loudspeakers and shall ensure any necessary modifications provide the maximum feasible reduction of noise to the surrounding community.*
- (d) *Prior to the first special event associated with an NFL football game at the Stadium, the operator shall retain a qualified acoustical consultant to develop noise performance standards for the Stadium loudspeaker system to minimize noise effects at the residential areas surrounding the Rose Bowl. The performance standards shall specify a noise limit and may include suggestions for sound equipment orientation or other measures. The performance standards shall be subject to review and approval by the Director of Community Development.*

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

Impact 3.9-7	Operation of the proposed project could expose nearby noise-sensitive land uses to substantial temporary or periodic increases in ambient noise levels from roadway operations.
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The ambient noise levels during a weekend event at the Stadium would increase at nearby residential locations. The Project would increase local noise levels by a maximum of 11.7 dBA during the weekend event peak traffic period. Overall, ten roadway segments would experience a significant increase of 5.0 dBA L_{eq} or more during the weekend peak traffic period. This impact is significant and unavoidable. Reducing this impact to a less-than-significant level would require a substantial reduction in the number of vehicles that are associated with the Project. No measures are considered feasible to accomplish this.

Finding: Other than the mitigation for traffic that is described below, no feasible mitigation is available to reduce impacts related to roadway noise levels generated by vehicles, and this impact would remain significant and unavoidable.

Impact 3.9-8	The increase in local traffic volumes during weekdays resulting from implementation of the proposed project would cause a substantial periodic increase in roadway noise levels.
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The proposed project would increase noise levels at residential locations adjacent to roadways surrounding the project site. Weekday events would increase ambient noise levels. Roadways in the project vicinity include a mix of "rush-hour" traffic that is not typical of weekend traffic. With this added mix of rush-hour traffic combined with the traffic from a weekday event, noise levels for the weekday event would be similar if not identical to the weekend impacts discussed above. Reducing this impact to a less-than-significant level would require a substantial reduction in the number of vehicles that are associated with the proposed project. No measures are considered feasible to accomplish this.

Finding: Other than the mitigation described below related to traffic, no feasible mitigation is available to reduce impacts related to roadway noise levels generated by vehicles, and this impact would remain significant and unavoidable.

Impact 3.9-9	The increase in local traffic volumes during weekdays and weekends resulting from implementation of the proposed project would cause a substantial periodic increase in roadway noise levels.
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The Project would increase local noise levels by a maximum of 7.1 dBA CNEL for weekday events (Salvia Canyon Rd. east of Linda Vista Ave. and N. Arroyo Blvd. east of Rosemont Ave.) and 11.5 dBA CNEL for weekend events (Salvia Canyon Rd. east of Linda Vista Ave.). The project EIR states that a permanent (i.e. long-term operational) increase of 5.0 dBA CNEL over ambient noise levels is substantial and significant. MMs 3.12-1 and 3.12-2 (see below) would be required but would not sufficiently reduce traffic-related impacts on noise levels.

Finding: Other than the mitigation described below related to traffic, no feasible mitigation is available to reduce impacts related to roadway noise levels, and this impact would remain significant and unavoidable.

Public Services

Impact 3.10-1	When fully operational, the estimated increase in visitor population as a result of project implementation could increase the demand for fire protection services, but would not require the construction of new or physically altered facilities to accommodate the increased demand and maintain acceptable fire flows.
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The proposed project would not by itself require new, expanded, or altered fire protection services or facilities to maintain the current level of service. Due to the fact that the proposed project will significantly improve the fire and life safety features of the current site (i.e., provision of upgraded paramedic station on site) and at the same time reduce the overall occupant load of the Stadium, the Pasadena Fire Department anticipates a less-than-significant impact on their ability to deliver a quality fire and life safety response to the Project area.

The water pipeline system in the Project area would be upgraded as part of the proposed Project. In addition, all development plans are reviewed by the Fire Department prior to construction to ensure that adequate fire flows would be maintained (including localized pipe upgrades or connections that might be required to connect new buildings to the system), and that an adequate number of fire hydrants would be provided in the appropriate locations in compliance with the California Fire Code. As such, impacts associated with the provision of fire protection services are considered less than significant.

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

Impact 3.10-2	When fully operational, the estimated increase in visitor population as a result of project implementation could impact police service levels within the Project area, but would not require the construction of new or physically altered police facilities to accommodate the increased demand.
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The Project would increase the number of events as well as average attendance. Review by the Pasadena Police Department suggests that the Project site, when fully operational, would impact police service levels provided by the Event Planning Section of the PPD. However, the Project would not impact day-to-day service to the Stadium or the immediate area. In addition, the Department will assist developers and City staff in formulating a security plan that encompasses all Stadium and associated facilities renovation. Therefore, while additional police resources may be required on major event days, there would be no need for expansion of police facilities, and impacts to police services with regard to increased visitor population and number of events annually would be considered less than significant. MM 3.10-1 requires the developer to work with the Pasadena Police Department and the City to formulate a security plan for the Stadium renovation, while MM 3.10-2 requires the use of increased security features for the project,

such as video surveillance systems. Implementation of MM 3.10-1 and MM 3.10-2 would reduce this less-than-significant impact to police services even further.

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

MM 3.10-1 Prior to issuance of a building permit, the City and the developer shall consult with the Pasadena Police Department to develop a security plan indicating detailed Crime Prevention Design and event security measures, including specific duties with regard to prohibition of tailgating activities other than in areas specified for that purpose, and shall incorporate the Department's recommendations into the Plan.

MM 3.10-2 The operator of the proposed project shall provide sufficient private-sector security (licensed, uniformed, and insured) and video surveillance camera systems to meet the Project's needs and include coverage for all of the project area in order to prevent crime and offset potential impacts to police services.

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

Recreation

Impact 3.11-1	Implementation of the Project would not increase the population and would not result in the increased use of parks and recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated.
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The Project is not expected to increase the City's population or, by itself, increase demand on parks. However, the increase in major (displacement) events at the Stadium may interfere with the use of the Arroyo by casual recreation users. Some of these users will engage in other activities due to the major event, others will alter their schedule to use the Arroyo at a different time and others might choose to engage in their same recreation activity, at the same time, but in a different location. Among those who choose to use a different location, those who use other park locations would be expected to be distributed over various facilities so that no one facility would be burdened such that substantial physical deterioration of the facility would occur or be accelerated.

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

Impact 3.11-2	The proposed project would significantly interfere with or preclude use of existing recreational facilities in the Central Arroyo.
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Due to an additional maximum of thirteen displacement events at Rose Bowl Stadium (mostly occurring on weekends and in the Fall, which are both times of high demand), Lot H, Brookside Park, and Brookside Golf Course, would be unavailable and the Rose Bowl Aquatics Center would have limited availability for recreational use by the public for specified hours for up to an additional 13 days per year. Lot H would still continue to host soccer games and other recreational activities, but would be parked

during displacement events and, thus, unavailable to recreational users for major Stadium events. Brookside Park ball diamond and park areas as well as Brookside Golf Course would also be parked and unavailable to the public for recreation during displacement events. In addition, the availability of the Aquatics Center would be limited, since major event Stadium parking would restrict this facility's parking inventory. The increase in unavailability of Lot H, Brookside Park, Brookside Golf Course, and Rose Bowl Aquatic Center during major Stadium events due to parking needs would increase the number of days these facilities would be unavailable for use by the general public and would, therefore, result in a significant and unavoidable impact to recreational access within the Central Arroyo. The City Council has included within the project recreational benefits to counterbalance these impacts. Those recreational benefits are hereby incorporated into the Final EIR as mitigation measure 3.11-5.

The North Brookside Golf Course would remain open for normal play during construction of the proposed project. In order to keep the South course at par 72 during construction, the 18th hole will be modified to include a shortened fairway (from 450 yards to 150 yards) and lowered par (4 to 3). The South course will remain open for play during construction. However, with other golf courses available in the area, this loss of recreational access would be temporary and, therefore, less than significant. During project implementation, the golf courses would be closed more frequently due to the increased number of displacement events and attendance parking requirements. Hiking/equestrian trails (i.e., Arroyo Seco Trail, also know as Rim of the Valley Trail) and pedestrian/bicycle paths (i.e., the streets adjacent to the Brookside Golf Course and Rose Bowl that operate as a recreation loop) that traverse the Central Arroyo would be significantly affected by such major Stadium events due to heavy vehicle and pedestrian Stadium traffic crossing these paths. Implementation of MM 3.11-1 and MM 3.11-2 would reduce recreational access impacts to hiking/equestrian trails and pedestrian/bicycle paths within the Central Arroyo to a less-than-significant impact.

The scheduling of events in the Central Arroyo would be adjusted to accommodate the use of the area by the NFL. The only exception to this NFL priority would be related to the Tournament of Roses uses, which would require use of the Stadium for the Rose Bowl game and Stadium parking areas for activities related to the Rose Parade. Implementation of MM 3.11-3 would ensure that NFL scheduling would not interfere with this century-old celebration.

Mitigation Measures: The following mitigation measures will be required to reduce potential impacts related to recreation resources and scheduling of Arroyo Seco events.

- MM 3.11-1 The RBOC shall ensure that the Arroyo Seco Trail (also known as the Rim of the Valley Trail) and the Recreation Loop shall remain open during construction and operation of the proposed project.*
- MM 3.11-2 Notification of major Stadium events shall be posted by the RBOC along the Arroyo Seco Trail and Recreation Loop at least thirty (30) days prior to the events; notice for playoff games may be less than 30 days and shall be posted as soon as possible*

- MM 3.11-3 *The City and the NFL shall ensure, through provisions in the lease agreement, that the Tournament of Roses and Rose Bowl game activities will be accommodated in a manner consistent with traditional operating circumstances, needs, and locations.*
- MM 3.11-4 *The project operator or its designees shall be responsible for timely repair of damaged turf areas as a result of parking during displacement events.*
- MM3.11-5 *As the City receives revenue from the project, the City shall use that revenue to implement the following improvements to offset recreation impacts:*
- Install artificial turf on an existing sports field within the City*
 - Construct a field at Sycamore Grove in Hahamonga Park as described in the City's Capital Improvement Plan*
 - Construct a multi use field at Hahamonga Park as described in the City's Capital Improvement Plan*
 - Construct a new field at Robinson Park as described in the City's Capital Improvement Plan*
 - Restore trail and rock walls in the Lower Arroyo as described in the Lower Arroyo Master Plan*
 - Invest in maintenance, security and/or other improvements to make school grounds available for non-organized recreational use*

Finding: Required mitigation would adequately reduce recreational impacts related to hiking/equestrian trails and pedestrian/bicycle paths and scheduling of Arroyo Seco events to a level of insignificance. However, no feasible mitigation would reduce to insignificance impacts related to decreased availability of certain facilities in the Arroyo Seco, and this impact would remain significant and unavoidable. Nevertheless, recreational improvements have been included in the Project to offset recreational impacts.

Transportation/Traffic

Impact 3.12-1 **Construction activities associated with the proposed project may temporarily obstruct access to the project site, but would not eliminate emergency access to the project site.**

The Project, as required by law, would continue to provide adequate access for emergency vehicles and appropriate evacuation routes within the project area. In addition, the City has prepared an Emergency Plan for the Stadium (1998), which provides specific guidelines in the event of a major emergency at the Stadium during which it is occupied. Furthermore, during construction of the Project, temporary road or lane closures that would potentially block emergency access and/or evacuation routes are not anticipated to occur. The Project site is located within an urbanized area in the Central Arroyo Seco in the City of Pasadena and multiple access points are available, including major access routes such as Orange Grove

Boulevard, Rosemont Avenue, Seco Street, and Interstate 210. The presence of multiple alternative routes around the project site minimizes the potential for interference with emergency routes during construction. Although a part of Rose Bowl Drive (a dead-end street) will be modified on its west side for use as a construction staging area, all of the construction staging and improvements would occur off-street. Thus, no alteration to existing access roads would occur from construction activities associated with the proposed project. Since no major streets with through traffic road closures are anticipated during construction activities, coupled with adherence to the existing Emergency Plan for the Stadium, implementation of the Project would not interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, this impact would be less than significant, and no mitigation is required.

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

Impact 3.12-2	Implementation of the proposed project would not substantially increase hazards associated with a design feature or incompatible uses.
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Implementation of the Project entails the renovation of the existing Stadium. The Project would not involve the construction of new roads, alteration of the existing street network, or the introduction of a new land use. During an NFL game at the Stadium, the special event traffic management strategies currently used for UCLA Football events would also be utilized, which includes the use of reversible lane operations and the diversion of traffic onto different routes. These traffic management strategies would continue to be implemented under the direction of the Pasadena Police Department, and varying strategies would be employed based on the anticipated attendance figures. As these traffic control measures are currently being used at the Project site and have not created hazardous conditions, their use for the Project would not represent an increase in hazards associated with a design feature. Therefore, this impact would be less than significant.

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

Impact 3.12-3	The proposed project would provide adequate parking for a weekday and weekend sold-out special event at the Rose Bowl.
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The provision of 18,000 parking spaces will be adequate to accommodate a maximum attendance of 75,000 persons at the Stadium during a weekday or weekend sold-out special event given the availability of 3,125 spaces at the Parsons complex. The Project parking scheme has been designed to minimize off-site parking impacts beyond what typically occurs under the existing special event conditions. Impacts related to event parking would thus be less than significant.

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

Impact 3.12-4 Parking supply associated with the Tournament or Roses operations in the City of Pasadena would not be adversely affected by the proposed project.

Based on a review of current plans and information on file at the RBOC pertaining to the annual Tournament of Roses/Rose Bowl Family Event Festival, it was determined that a total of approximately 940 parking spaces are utilized for the activities associated with this annual event (e.g., Kick-off/VIP Luncheon (Tournament VIP Tailgate Party), Corporate Hospitality & President's Parties, Float Decorating, etc.). In addition, the traffic study for the Project indicated that based on comments received throughout the public scoping process, a large scale event would not be scheduled during Tournament of Roses main operations/activities (e.g., from main set-up to take down). While some float decorating does occur in early December at the northern side of Parking Lot I, this area is limited to a 100-foot by 270-foot structure tent (approximately 90 parking spaces), with viewing taking place only on the four days prior to the Rose Parade. In the event that a home game or another special event is scheduled during this period (the second or third week in December) ample parking would be available with an expected attendance of 65,000 persons. As a major event would not coincide with the Tournament of Roses main operations/activities (e.g., from set-up to take down), significant impacts to existing Tournament of Roses operations (i.e., use of adjacent parking areas) are not anticipated to occur. This would be a less-than-significant impact.

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

Impact 3.12-5 The proposed project would not conflict with adopted policies supporting alternative transportation (e.g., bus turnouts, bicycle racks).

The Project would not substantially increase the demand for alternative transportation services except temporarily during high-attendance events, and would not interfere with existing or planned transit routes. A specific evaluation of the existing shuttle operation and a review of potential route alternatives determined that none of the shuttle route alternatives were superior to the existing route in that additional significant impacts to the surrounding street system would be expected and many of the roadways would not be suitable for shuttle buses due to either width, design, or grade issues. The current shuttle route has been in use for UCLA football games and other selected large scale special events at the Stadium for a period of time, use of this shuttle operation by the Project would not conflict with any other existing or planned transit routes, and would also not conflict with game traffic. Furthermore, Project implementation is anticipated to be consistent with local policies related to transportation, including the SCAG Regional Comprehensive Plan and Guide and the City of Pasadena General Plan Mobility Element. Therefore, this impact would be less than significant.

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

Impact 3.12-6 Construction activities associated with the proposed project would not result in significant adverse impacts on traffic and circulation in the project vicinity.

Renovation of the Stadium would generate traffic from construction worker travel, as well as the arrival and departure of trucks delivering construction materials to the site and the removal of debris generated by on-site demolition activities. With required City approvals, as well as the construction management practices, impacts due to construction activity would be minimized to the extent feasible. This impact would be less than significant.

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

Impact 3.12-7 Implementation of the proposed project would result in significant adverse impacts on traffic and circulation at the study intersections during both weekday and weekend special events at the Rose Bowl Stadium.

The proposed project is expected to create significant impacts at 20 of the 26 study intersections under the weekday special event evening arrival and/or departure peak hours; at 18 of the 26 study intersections under the weekend special event A.M. arrival and/or P.M. departure peak hours; and at 13 of the 26 study intersections under the weekend special event A.M. arrival and/or P.M. departure peak hours. While implementation of MM 3.12-1 would reduce the significant impacts at some of the impacted study intersections during both the weekday and weekend special events to a less-than-significant level, most of the impacted study intersections would remain significantly impacted per the City's significant impact criteria. As such, impacts on traffic and circulation at the study intersections during both weekday and weekend special events at the Stadium associated with the Project would be significant and unavoidable.

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

MM 3.12-1 *The traffic control measures and traffic management strategies currently employed during large-scale events at the Stadium (i.e., UCLA football games) shall continue to be implemented along with new strategies during the weekday and weekend special events associated with the Project to effectively move vehicles into and out of the Rose Bowl Stadium parking areas. These traffic management strategies include the following:*

Offset/Reversible Traffic Flow Along Key Street Segments

Continue to provide offset traffic flow along Salvia Canyon Road, Seco Street (both near Rosemont Avenue and just north of Linda Vista Avenue) and Rosemont Avenue. Traffic cones and barricades will be placed to provide an additional lane for motorists offset from the normal centerline (e.g., two inbound and two outbound lanes become three inbound and one outbound lane).

Use of Police Helicopter to Assist Traffic Control Operations

A City of Pasadena Police helicopter is utilized to assist traffic control operations staff on the ground for events that are anticipated to draw more than 20,000 persons. Police personnel should continue to be positioned at key traffic decision points on the perimeter of the arrival/departure travel routes. Arriving traffic can be diverted to another travel route to obtain a better distribution of parking loading, as the traffic personnel are in direct radio contact with the Police helicopter and the police stationed in the Rose Bowl Traffic Control Center (located in the press box).

Command Center at the Rose Bowl Stadium

The Rose Bowl Stadium renovation will include upgrades to provide a state-of-the-art traffic command center that will be linked to the traffic management center in City Hall. The traffic command center will be equipped with closed circuit television (CCTV) monitors with camera coverage of the entire Arroyo Seco, strategic locations within Pasadena and at shuttle stops.

Temporary Freeway Changeable Message Signs

Continue implementing the freeway changeable message signs for large scale events at the Stadium. These signs, in conjunction/coordination with the police helicopter and the Rose Bowl Stadium Traffic Control Command Center would divert arriving traffic to another travel route to obtain a better distribution of parking loading. Traffic personnel would also be in direct radio contact with the Police helicopter and the police stationed in the Rose Bowl Traffic Control Command Center (located in the press box).

Continue Utilization of Shuttle Buses from the Parsons Complex

Continue the current Rose Bowl Stadium shuttle program for major special events.

Wayfinding Guide Signs

Continue implementing the current wayfinding signage program that exists in the vicinity of the Rose Bowl Stadium.

Deployment of Traffic Control Officers at Key Intersections

Continue stationing traffic control officers at many of the key intersections during the weekday and weekend special events, so as to better direct predominant entering and exiting traffic flows. Based on coordination with the Pasadena Police Department, uniformed officers are typically deployed to approximately 30 posts at all major intersections in the Arroyo Seco and along roadways leading to and from the regional freeway system for UCLA football games to manage and direct the reversible lane operations.

Neighborhood Traffic Management

All residential streets surrounding the Arroyo Seco that are not designated as access to the Stadium shall continue to be closed to event traffic on special event days. This will continue to be implemented through the use of barricades at over 60 locations and will be manned by either Explorer Scouts (consistent with UCLA games), or by uniformed employees of the parking

management company. Patrols of the neighborhoods should occur and residents should be given a hotline number to call so as to report any event-related concerns to which patrols can respond.

Designated routes to and from the Arroyo Seco area should be signed approximately 72 hours in advance for temporary special event "No Parking", which will be enforced by towing. Residents of the neighborhoods surrounding the Arroyo Seco will continue to be able to obtain residential passes for their cars that allow free access to roadways otherwise closed via the implementation of barricades.

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

Initiate and implement the design of a pre-paid, pre-assigned on-site parking program for all season-ticket holders. This program would be implemented for all suite ticket holders, all club level season ticket holders, and some general admission season ticket holders. With this program, patrons would receive directions to a designated parking area via a designated travel route. Pre-paid parking could be demonstrated through the use of dashboard placards, and preferential parking in close proximity to the Stadium could be provided for suite ticket holders and club level ticket holders.

Design and Implementation of Pre-Assigned Ingress Travel Routes

With implementation of this measure, patrons would receive directions to a designated parking area via a designated travel route in advance of an event.

Marketing/Public Information /Media Outreach Programs

A comprehensive marketing effort should be undertaken so as to provide event patrons with ample public information regarding transportation issues, aimed at reducing impacts associated with the Project to the greatest extent possible. The target audiences would be season ticket holders that purchase pre-paid parking passes, season ticket holders that park at the Parsons complex, single game ticket patrons, regional media, employees, charter bus operators, and area commuters.

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

Furthermore, key public messages should be provided via the established Rose Bowl Stadium website, public radio and other forms of media. These public announcements should include the following key messages: (1) arrive early, (2) vehicles should use the routes shown on their parking pass/placard, (3) if patrons do not have parking passes/placards, they should head to the Parsons

complex, (4) in the event of rain, consider parking at the Parsons complex, (5) the shuttle is a short route and it is an efficient and convenient alternative to driving, and (6) charter buses and other transit (i.e., Gold Line) are encouraged.

Deployment of Additional Traffic Control Officers at Key Intersections

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

Rosemont Ave. & Washington Blvd.

North Arroyo Blvd. & I-210 WB Ramps

North Arroyo Blvd. & I-210 EB Ramps

Lincoln Ave. & I-210 WB Ramps

I-210 EB Ramps & Mountain St.

I-210 WB Ramps & Mountain St.

Linda Vista Dr. & Highland Dr.

Linda Vista Dr. & Oak Grove Dr.

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

Enhanced Wayfinding Guide Sign Program

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

Consideration of Modifications to the Lot 9 Turf Area Access Point

An increase in the driveway/gate width for the Lot 9 turf parking area should be considered to increase efficiency associated with vehicular entry. The increased width may require slight modification to the existing rock walls.

Consideration of Additional Changeable Message Signs

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

MM 3.12-2 *Additional traffic control officers should be deployed during large scale special events at intersections within the Parsons complex vicinity and these efforts should be coordinated through the City's Police Department and integrated with Rose Bowl Stadium Traffic Control Command Center.*

MM 3.12-3 *Prior to issuance of grading permits, the project operator shall be required to develop a construction traffic management plan, to be approved by the City, that provides an overview of the project, lists the general contractor contact information, outlines contract responsibilities (e.g., mobilization, any demolition, excavation, grading or shoring work, concrete or steel placement work, etc.), construction hours, material storage and construction trailer locations, truck/haul routes, traffic control, parking, and clean-up.*

MM 3.12-4 *The project operator shall provide plans and specifications, prepared by a civil engineer, regarding any proposed modifications, improvements, or realignments to features in the public right-of-way or on adjacent public land and submit them to the City for approval. The submission shall be made in a timely manner and City approval granted before the issuance of grading permits.*

Finding: **Changes or alterations have been required in, or incorporated into, the project that lessen some of the significant environmental effect related to intersection traffic flow, but this impact would remain significant and unavoidable.**

Impact 3.12-8	Utilization of off-site parking at the Parsons complex during the weekday P.M. arrival peak period would result in significant adverse impacts on traffic and circulation at the study intersections in the vicinity of the complex.
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In the vicinity of the Parsons complex, the Project is expected to create significant impacts at six of the nine intersections studied under the weekday special event P.M. arrival peak hour. As increased traffic volumes are anticipated to occur only during large special events on an occasional basis, permanent, physical improvement measures are not recommended at the above intersections (e.g., traffic signal modifications, roadway widenings, etc.). While implementation of MM 3.12-2 would require that additional traffic control officers be deployed during large scale special events and that these efforts be coordinated through the City's Police Department and integrated with the Stadium Traffic Control Command Center, it would not reduce the impacts at the six study intersections during the weekday special event P.M. arrival peak hour to a less-than-significant level. As such, this impact would be significant and unavoidable.

MMs 3.12-1 and 3.12-2 would also apply to this impact.

Finding: Changes or alterations have been required in, or incorporated into, the project that lessen some of the significant environmental effect related to intersection traffic flow in the vicinity of the Parsons complex, but this impact would remain significant and unavoidable.

Impact 3.12-9 Implementation of the proposed project would result in significant adverse impacts on average daily traffic on specified street segments.

Street segments are forecast to increase in average daily traffic (ADT) volume by five percent or more on days of major events at the Project site. On non-event weekdays and weekends, these roadways operate well within their desired range of daily vehicular trips and significantly below their theoretical capacities. Therefore, specific physical mitigation measures (e.g., roadway widenings, additional travel lanes, etc.) to provide additional capacity are not recommended. Nonetheless, since street segments during major special event conditions would remain significantly impacted per the City's significant impact criteria upon implementation of the Project, this impact is considered to be significant and unavoidable. MMs 3.12-1 and 3.12-2 would also apply to this impact but would not reduce the impact to a less-than-significant level.

Finding: Changes or alterations have been required in, or incorporated into, the Project that lessen some of the significant environmental effects, but this impact would remain significant and unavoidable.

Impact 3.12-10 Implementation of the proposed project would impair implementation of the highway congestion management plan.

The proposed project is expected to incrementally increase the forecast traffic volumes and corresponding volume/capacity (V/C) ratios at the analyzed Congestion Management Plan (CMP) intersections. Based on the CMP significant impact criteria, a project-related impact is anticipated at the intersection of Arroyo Parkway and California Boulevard during the weekday P.M. arrival peak hour. Due to the nature of the proposed project, it is anticipated that up to three special events per year may be held on a weekday evening at the Rose Bowl Stadium. Consequently, physical improvement measures such as roadway widenings, roadway restripings, or traffic signal modifications are not recommended at the intersection of Arroyo Parkway and California Boulevard for traffic conditions that are atypical and are anticipated to occur only a few times a year. However, as the impact at the intersection of Arroyo Parkway and California Boulevard would remain unmitigated per Intersection Capacity Utilization (ICU) criteria during the weekday P.M. arrival peak hour, this is considered to be a significant and unavoidable impact. MMs 3.12-1 and 3.12-2 would also apply to this impact but would not reduce the impact to a less-than-significant level.

Finding: Changes or alterations have been required in, or incorporated into, the Project that lessen some of the significant environmental effects, but this impact would remain significant and unavoidable.

Utilities and Service Systems

Impact 3.13-1	Implementation of the proposed project would not exceed wastewater treatment requirements of the Regional Water Quality Control Board.
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The City requires a wastewater discharge permit for industrial facilities and certain commercial facilities that plan to discharge industrial wastewater to the City's sewage collection and treatment system. The purpose of the wastewater discharge permit program is to ensure the City's compliance with the NPDES program, as administered by the Regional Water Quality Control Board (RWQCB), for all facilities discharging to navigable waters of surface water of the state, including sewage treatment plants. The renovation of the Stadium would comply with all provisions of industrial wastewater permits, if required, which regulate discharges. Therefore, implementation of the proposed project would not exceed applicable wastewater treatment requirements of the RWQCB with respect to discharges to the sewer system or stormwater system. A less-than-significant impact would occur, and no mitigation is required.

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

Impact 3.13-2	Implementation of the proposed project would not increase wastewater generation such that treatment facilities would be inadequate to serve the project's estimated demand in addition to the provider's existing commitments.
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Implementation of the Project would increase the amount of building space and number of events at the Stadium, which could result in the generation and discharge of additional wastewater requiring treatment at either Whittier Narrows or the Los Coyotes WRPs. However, development of the Project would not generate wastewater that would exceed the capacity of either the Whittier Narrows or the Los Coyotes wastewater treatment system in combination with the provider's existing service commitments. It is anticipated that the overall amount of wastewater generated would be increased over existing conditions as a result of the additional displacement events that would occur at the Stadium from implementation of the Project. However, these additional events would not exceed the daily capacity threshold of the wastewater treatment plants. Impacts would be less than significant.

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

Impact 3.13-3 Implementation of the proposed project would not require or result in construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Implementation of the Project would increase the amount of building space and the number of major events at the Stadium, which could result in the overall use of additional imported water requiring treatment. However, development of the proposed project would not increase water use that would exceed the capacity of the Weymouth Filtration Plant. The additional 38,300 gallons per day (gpd) (0.038 mgd) water demand that could result from implementation of the proposed project would be adequately treated by the Weymouth Filtration Plant. Assuming a worst-case scenario where all of the additional water demand would require treatment at the facility, coupled with the existing average summer demand at the plant, the proposed project's contribution to the water demand would constitute approximately 0.02 percent of the remaining 180 mgd capacity. Consequently, because the additional water could be treated at the facility and because the increase in water use over existing demand would be negligible, this impact would be less than significant, and no mitigation is required.

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

Impact 3.13-4 Implementation of the proposed project would have sufficient water supplies to serve the project from existing entitlements and resources.

The Project would result in a water demand of approximately 102,300 gpd. Compared to the 2002 water demand for the Stadium, which represents a worst-case scenario based upon available information, the proposed project would result in an increased water demand of approximately 38,300 gpd, or a 60 percent increase. The City's water use is approximately 32 mgd. Thus, the Stadium's 2002 water use represents approximately 0.2 percent of the City's total demand. Consequently, the project's projected demand of 102,300 gpd would represent approximately 0.3 percent of the City's total water use or 0.12 percent increase over the City's existing total water use. While implementation of the proposed project could increase overall water usage at the project site, the increase in water use would not significantly contribute to the overall projected increase in water use in the Pasadena Department of Water and Power service area. In addition, continued implementation of water recycling programs already in effect would reduce the need for increased water supply and, in turn, ease the need for new or expanded water entitlements or facilities. Therefore, impacts are considered less than significant, and no mitigation is required.

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

Impact 3.13-5 Implementation of the proposed project would not require the construction of new or expanded wastewater conveyance systems, the construction of which could cause significant environmental effects.

Development of the proposed project could increase the amount of wastewater transported by the sewer system by approximately 230,000 gpd (0.23 mgd or 44 percent). The projected increase in wastewater flows would represent approximately 11 percent of the remaining 2.1 mgd in the LACSD trunk sewer that serves the project site. Therefore, the existing sewer lines have adequate capacity to serve the projected increase in wastewater flows. In addition, as previously indicated, the City considers the local sewer system that serves the project site in good repair, and does not foresee the need to plan for any additional rehabilitation to the sanitary sewers in the next twenty years.

Further, as stated above for comparison reasons, it should also be noted that the existing Stadium can hold approximately 92,500 persons. Because the Stadium has held sold-out events in the past without any significant wastewater conveyance problems, it is anticipated that implementation of the proposed project, with sold-out capacity at approximately 75,000 seats, would also be adequately served by the existing infrastructure. Based on peak activity at the Stadium, which would dictate the maximum capacity needed in the system, wastewater generation would actually be reduced by approximately 175,000 gpd. Additional events at the Stadium would not affect the outcome of this analysis because the sewer lines operate on a daily capacity threshold. Renovation of the existing Stadium would not directly require extensions of the sewer lines on the project site to the existing conveyance systems, and would not require expanded conveyance systems. Consequently, although wastewater flow generated by the Project would be greater than the existing flow generated by the Stadium, peak flow should be reduced and no construction-related impacts would occur. Thus, impacts would be less than significant, and no mitigation is required.

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

Impact 3.13-6 The proposed project would be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs.

The projected increase of approximately 150 tons per year from the Project would represent a 1.3 percent increase in total commercial solid waste collected by the City's Street Maintenance & Integrated Waste Management Division (SMIWM) and transferred to the Scholl Canyon Landfill. As discussed previously, the servicing landfill has a remaining permitted capacity of 15.84 million cubic yards (approximately 7.62 million tons). The Project would represent a contribution of about one one-thousandth of one percent of the capacity of the landfill. In addition, according the SMIWM, implementation of the Project would not result in a significant impact on SMIWM collection or disposal capabilities. Although implementation of the Project could increase solid waste generation at the Project site, the existing permitted capacity of

the Scholl Canyon Landfill would be able to accommodate the waste that would be generated by the Project. Consequently, the Project would not result in the need for additional landfill capacity, and this impact would be less than significant. No mitigation is required.

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

Impact 3.13-7	Implementation of the proposed project would comply with federal, state, and local statutes and regulations related to solid waste.
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Structural demolition associated with implementation of the Project could generate substantial sources of refuse. In order to ensure continued compliance with requirements of AB 939, the additional solid waste generated during construction and operation of the proposed project would need to include provisions for recycling. Without recycling of some of the construction materials and refuse generated during operations, the project may compromise the City's efforts in reducing the amount of waste transported to the landfills.

However, the City enforces construction and demolition waste reduction by adhering to City Municipal Code Section 8.62 (Waste Management Plan for Certain Construction and Demolition Projects within the City of Pasadena), which also requires a 50 percent waste diversion rate on "covered projects." Covered projects include new structures, residential additions, and demolition of 1,000 square feet or more, and any tenant improvement of 3,000 square feet or more. A waste management plan and monthly progress reports must be submitted and approved by the City. Consequently, continued compliance with existing regulations and City policies would ensure a less than significant impact. No mitigation is required.

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

Impact 3.13-8	Implementation of the proposed project could require an increase in electricity and natural gas, but would not require the construction of new energy production or transmission facilities, the construction of which could cause significant environmental effects.
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Implementation of the proposed project would increase the intensity of development at the existing Stadium and correspondingly increase the demand for electricity and natural gas in the project area. The proposed project would increase demand by an additional 0.8415 MW/year of electricity and 1,189,320 Therms/year of natural gas. Connections to gas and electric utilities are currently provided on the Project site to serve the existing facility. Although the proposed project, given the magnitude of additional development, could result in increases in energy demand, electrical and natural gas supplies and infrastructure to support demand are generally provided as needed by the providers. Therefore, the proposed project would not substantially increase demands beyond available supply. In addition, if incremental extensions of existing transmission lines would be required to serve the new development, these improvements would be primarily within the urbanized portions of the project site or other built locations, construction would not be expected to cause additional significant environmental impacts.

Thus, development of the Project would have a less-than-significant impact on overall energy and gas consumption. Implementation of MM 3.13-1 would further ensure that this impact remains less than significant.

Mitigation Measure: The following mitigation measure will be required to ensure that potential impacts related to energy supply are less than significant.

MM 3.13-1 Project design and construction shall be coordinated with SCG and the City's Department of Water & Power, and improvements provided if necessary in order to ensure that connections are adequate and capacity is available to accommodate estimated demand for gas and electric utilities.

Finding: No significant impact will result, and required mitigation would ensure that impacts would not be significant.

Impact 3.13-9 Development of the Rose Bowl Stadium Renovation Project could incrementally increase impervious surfaces in the project area, which could require expansion or construction of existing storm drainage facilities.

The two main storm drains in the vicinity of the Stadium have recently been modernized. However, the remainder of the Stadium drainage system does not meet current needs. Many of the corrugated metal pipes around the Stadium have collapsed and City engineers cannot confirm the location of many older lines. Although flooding is not experienced on the field during the occasional rainstorms in the area, these surrounding deficiencies in the storm drain system could pose flooding problems in the Project area. Consequently, the increase in impervious surfaces in the project area and subsequent increase in storm water runoff as a result of the project, although not anticipated to be considerable, is considered potentially significant in view of the current condition and capacity of the storm drain system.

Implementation of MM 3.13-2 would address storm drain deficiencies for the proposed Project, and would require the developer to either pay in-lieu fees or provide on-site improvements in order to ensure that storm drain lines and connections are adequate and capacity is available to accommodate the anticipated increase in stormwater flows. As these improvements would be primarily within the urbanized portions of the Project site or other built locations (i.e., streets) construction would not be expected to cause additional significant environmental impacts. Thus, impacts would be reduced to a less-than-significant level.

Mitigation Measure: The following mitigation measure will be required to ensure that potential impacts related to storm drainage are less than significant.

MM 3.13-2 The developer shall provide a storm drainage analysis to ensure that storm drain lines and connections are adequate and that capacity is available to accommodate the anticipated increase in stormwater flows. If the report provides recommendations for on-site storm drainage improvements, the recommendations must be followed and implemented. If found that off-site

improvements would be necessary, the developer shall pay in-lieu fees to the City for the future construction of those facilities.

Finding: Mitigation has been required that substantially lessens or avoids the significant impact.

Section IV. Project Alternatives

The alternatives identified in the EIR either would not sufficiently achieve the basic objectives of the Project or would do so only with unacceptable adverse environmental or social impacts. Accordingly, and for any one of the reasons set forth herein or in the record of these proceedings, the City Council finds that specific economic, social, or other considerations make infeasible each of the Project alternatives identified in the EIR and each is hereby rejected. The City Council finds that the Project, with mitigation (including the design mitigation), represents the combination of features that best achieves the Project's objectives while minimizing environmental impacts and maximizing public benefits. The City Council further finds that a good faith effort was made to incorporate alternatives into the preparation of the EIR, and that a reasonable range of alternatives were considered in the review process of the EIR and the ultimate decision on the Project.

The EIR analyzed a total of four (4) alternatives to the proposed Project. The alternatives considered were: "Alternative 1 – the No Project Alternative," "Alternative 2 –the Increased Displacement Events Alternative," "Alternative 3 – the Alternate Design Alternative," and "Alternative 4 – the Historic Restoration Alternative." Other alternatives were considered, but not analyzed because they did not meet the basic project objectives or were determined to be infeasible for the reasons described in the EIR.

5.1. Alternative 1 – The No Project Alternative

1. Summary of Alternative

Under Alternative 1, the Stadium would not be improved except for improvements required by the current lease agreement with UCLA. These improvements include the following: (1) an upgrade and expansion of the locker rooms and provision of adjacent storage, (2) an upgrade and expansion of the media room, and (3) an upgrade of the Stadium structure to meet the requirements of the University of California Seismic Safety Policy for purchased and leased buildings. Under Alternative 1, there would be no increase to the number of major (displacement) events at the Stadium. That number would remain at twelve.

2. Reasons For Rejecting Alternative

Although Alternative 1 would avoid many, if not all, of the significant environmental impacts associated with the Project, Alternative 1 would fail to meet important Project objectives and is infeasible for social reasons. Alternative 1 would not involve a long-term tenant of the Stadium that could facilitate long-term economic viability. Thus, the City will continue to be required to devote significant revenues to subsidize Stadium improvements, maintenance and operations, including \$12 million for improvements

required by the current lease with UCLA and approximately \$550,000 annually for capital improvements. If these funds were not devoted to the Stadium, these funds would otherwise be available to the general fund in order to meet public health, safety and welfare needs. Additionally, Alternative 1 would not include the modernization of the Stadium to provide state-of-the-art amenities that would enhance the experience of those patronizing the Stadium. For each of these reasons, the City Council finds that Alternative 1 is infeasible for social policy reasons.

The City Council hereby finds that each of the reasons set forth above would be an independent ground for rejecting Alternative 1 as infeasible and by itself, independent of any other reason, would justify rejection of Alternative 1 as infeasible.

Alternative 2 – The Increased Displacement Events Alternative

1. Summary of Alternative

Under Alternative 2, the Stadium would not be improved, except for improvements required by the current lease agreement with UCLA. These improvements include the following: (1) an upgrade and expansion of the locker rooms and provision of adjacent storage, (2) an upgrade and expansion of the media room, and (3) an upgrade of the Stadium structure to meet the requirements of the University of California Seismic Safety Policy for purchased and leased buildings. Also under Alternative 2, there would be an increase in the number of major (displacement) events at the Stadium to twenty-five. This would potentially accommodate more events to increase revenue generated by the Stadium.

2. Reasons For Rejecting Alternative

Alternative 2 would avoid impacts to cultural resources, but would have similar event day impacts on traffic, air quality, noise, and recreation. While increasing the number of displacement events at the Stadium would potentially generate more revenue, there does not appear to be a demand by users for twenty-five major events at the Stadium that would generate sufficient revenue to meet the operating, maintenance and capital needs of the Stadium. As described in the EIR, the Rose Bowl Operating Company has been attempting for several years to identify a long term tenant or special event that would generate sufficient revenue to make the Stadium self sustaining. The Rose Bowl Operating Company has been unable to do so. Therefore, simply increasing the number of permitted major events at the Stadium, without renovation or a long-term tenant, will not meet the basic project objective of long-term economic viability. Thus, the City will continue to be required to devote significant revenues to subsidize Stadium improvements, maintenance and operations, including \$12 million for improvements required by the current lease with UCLA and approximately \$550,000 annually for capital improvements. If these funds were not devoted to the Stadium, these funds would otherwise be available to the general fund in order to meet public health, safety and welfare needs. Additionally, Alternative 2 would not include the modernization of the Stadium to provide state-of-the-art amenities that would enhance the experience of those patronizing the Stadium. For each of these reasons, the City Council finds that Alternative 2 is infeasible for social policy reasons.

Additionally, the Stadium would not be renovated to reduce the number of seats in the Stadium. Therefore, traffic, noise and air quality impacts associated with the most popular events at the Stadium, such as the Tournament of Roses football game and the UCLA vs. USC football game, would be greater

under this Alternative than the proposed Project due to the greater number of patrons attending the event and the resulting increase in the number of vehicles being driven to the event.

The City Council hereby finds that each of the reasons set forth above would be an independent ground for rejecting Alternative 2 as infeasible and by itself, independent of any other reason, would justify rejection of Alternative 2 as infeasible.

Alternative 3 – The Alternate Design Alternative

1. Summary of Alternative

Under Alternative 3, the Stadium would be leased to the NFL and the Stadium would be modernized to include many of the comforts and amenities associated with contemporary stadiums. This alternative would eliminate the mid-level concourse on the east and north sides of the bowl. In order to meet the first two basic project objectives without the mid level concourse, this Alternative would instead include construction of a concourse below grade that would contain patron amenities such as restrooms, restaurants, lounges, souvenir shops and other services. In order to develop this below grade concourse, the exterior structure of the Stadium would be reinforced and its earth filled interior hollowed out to traverse the existing lengthy entrance tunnels. 120 to 140 luxury suites would be constructed above the east and west rims of the Stadium, but would be no higher than the existing press box and luxury suite structure on the west side of the Stadium. This alternative involves an increase to the number of major (displacement) events at the Stadium to twenty-five and this alternative involves a lease with the NFL as a long term tenant to facilitate economic viability of the Stadium.

2. Reasons For Rejecting Alternative

Alternative 3 would appear to meet several basic Project objectives. However, representatives of the NFL have presented testimony that this alternative fails to include several features of state-of-the-art stadiums.

Additionally, the Alternate Design Alternative would involve increased air quality impacts during construction from additional excavation. Furthermore, as described by Hammes Company in a memorandum to the Director of Planning, this alternative would involve risk to worker safety and the historic fabric of the Stadium due to a complicated shoring process to convert the seating bowl structure from one that is supported by earthen berms to one that is supported by structures.

The Hammes Company memorandum also explains that this Alternative would reduce seating capacity for existing tenants during phased construction, which would reduce capacity for UCLA football games to 58,000 for one season and as low as 43,000 for a second season.

Finally, the primary benefits to this alternative are reduced impacts in the areas of aesthetics and cultural resources. However, implementation of the proposed design mitigation will achieve the same benefits on the north side of the Stadium and some of the aesthetic benefits on the east side of the stadium without the impacts to air quality, risk to workers and the historic structure, and impacts to the UCLA football season. The design mitigation will also not require substantial additional construction costs or loss of revenue from the reduction in the number of luxury suites.

The City Council hereby finds that each of the reasons set forth above would be an independent ground for rejecting Alternative 3 as infeasible and by itself, independent of any other reason, would justify rejection of Alternative 3 as infeasible for environmental or social policy reasons.

Alternative 4 – The Historic Restoration Alternative

1. Summary of Alternative

Under Alternative 4, the Stadium would not be initially improved except for improvements required by the current lease agreement with UCLA. These improvements include the following: (1) an upgrade and expansion of the locker rooms and provision of adjacent storage, (2) an upgrade and expansion of the media room, and (3) an upgrade of the Stadium structure to meet the requirements of the University of California Seismic Safety Policy for purchased and leased buildings. Additionally, under Alternative 4, restoration of the character defining features of the Stadium would be undertaken periodically as funding would become available. There would be no increase to the number of major (displacement) events at the Stadium. That number would remain at twelve.

2. Reasons For Rejecting Alternative

Alternative 4 would meet the objective of preserving the setting and integrity of the Stadium, but would not meet the basic Project objectives of facilitating the long-term economic viability of the Stadium and modernizing the Stadium to provide state-of-the-art amenities that would enhance the experience of those patronizing the Stadium. Thus, the City will continue to be required to devote significant revenues to subsidize Stadium improvements, maintenance and operations, including \$12 million for improvements required by the current lease with UCLA and approximately \$550,000 annually for capital improvements. If these funds were not devoted to the Stadium, these funds would otherwise be available to the general fund in order to meet public health, safety and welfare needs. Additionally, Alternative 4 would not include the modernization of the Stadium to provide state-of-the-art amenities that would enhance the experience of those patronizing the Stadium. For each of these reasons, the City Council finds that Alternative 4 is infeasible for social policy reasons.

The City Council hereby finds that each of the reasons set forth above would be an independent ground for rejecting Alternative 4 as infeasible and by itself, independent of any other reason, would justify rejection of Alternative 4 as infeasible.

EXHIBIT 5

Statement of Overriding Considerations

The following Statement of Overriding Considerations is made in connection with the approval of the Project.

CEQA requires the decision-making agency to balance the economic, legal, social, technological or other benefits of a project against its unavoidable environmental risks when determining whether to approve the project. If the benefits of the project outweigh the unavoidable adverse effects, those effects may be considered acceptable. CEQA requires the agency to provide written findings supporting the specific reasons for considering a project acceptable when significant impacts are unavoidable. Such reasons must be based on substantial evidence in the EIR or elsewhere in the administrative record. Those reasons are provided in this Statement of Overriding Considerations.

The City Council finds that the economic, social and other benefits of the Project outweigh the significant and unavoidable impacts identified in the EIR and in the record. In making this finding, the City Council has balanced the benefits of the Project against its unavoidable impacts and has indicated its willingness to accept those adverse impacts. The City Council finds that each one of the following benefits of the Project, independent of the other benefits, warrant approval of the Project notwithstanding the unavoidable environmental impacts of the Project.

A. The Project will allow the City to avoid significant costs in connection with the maintenance and operation of the Stadium, thus freeing City funds for other important public purposes.

1. Approval of the Project will mean that the City will no longer be obligated to expend approximately \$12 million for Stadium improvements required under the current lease agreement with UCLA and will save an estimated \$18 million in debt service costs over a sixteen year period.

2. Approval of the Project will mean that the City will avoid spending approximately \$550,000 per year for ongoing capital maintenance improvements to the Stadium.

3. Approval of the Project will ultimately result in a management agreement with the NFL for the Rose Bowl Stadium. The management agreement will allow the City to avoid approximately \$3,000,000 in Stadium operational costs per year. Although these operational costs are offset in part by revenues that currently flow to the City and would now flow to the NFL as Stadium manager, it is estimated that the City will save approximately \$1.8 million over a 16 year period as a result of this management agreement.

B. The Project will modernize the Stadium to improve the experience of those patronizing Stadium events.

1. The Project will improve accessibility to the Stadium for disabled patrons.

2. The Project will improve egress from the Stadium in the event of an emergency by reducing the maximum number of patrons within the Stadium and increasing the number of egress routes from the seating areas.

3. The Project will increase the distance between rows of seats, thus providing for a more comfortable experience for patrons.

C. The update and modernization of the Stadium will be financed with private funds. The Project provides that the NFL will pay for the improvements described in paragraph B above as well as other improvements to modernize the Stadium and to provide increased amenities for Stadium patrons. Improvements planned by the NFL are expected to result in an investment of between \$500 million and \$600 million in this public facility.

D. Based on reports from the Anderson School of Management at UCLA and the City's Director of Finance, the Project is expected to generate substantial revenue to the City of Pasadena and Pasadena businesses due to possessory interest taxes, other taxes and fees and the economic stimulus provided by NFL games at the Stadium.

E. The Project will include significant recreation benefits to offset recreation impacts, including the construction of additional recreation fields, the improvement of a sports field with artificial turf, and an investment in school facilities to accommodate non-organized recreational uses.