Attachment A Comparison of Project Components

Comparison of Project Components—FEIR, SEIR, and 2010 Project

(All figures represent net new sf)

Project Component	Original Project 2005 FEIR	Revised Project 2008 SEIR	Proposed Project 2010
Field/Service			
North End (Lounges, Food Service)	156,000	30,000	5,090
South End—within existing structure (Hall of Fame Store, Lounges, Toilets)	57,000	20,000	15,990
Stadium Plaza/Plaza Concourse Level "A"			
Club Lounge, Administration	75,000	0	7,654
Administration	8,000	8,000	8,000
General Concourse, North, East, and West (Toilets, Concessions, Concourse, Vertical Circulation)	137,000	280,000	38,136
General Concourse, South—within existing structure (Concessions, Tickets, Commissary)	31,000	100,000	15.296
Press Box Level "B"			
Kitchen/Circulation	75,000	0	12,442
Administration	8,000	0	0
General Concourse, North and East (Toilets, Concessions, Concourse, Vertical Circulation)	118,000	0	0
Mid-Level/Hall of Fame			
Vertical Circulation	Inc. above	7,000	0
Press Box Level "C"			
Expansion Seating, Circulation	96,000	0	13,457
Club Lounge/Concession	75,000	0	14,580
Horizon (Options A and C)			
Circulation	Inc. above	51,000	0
Premium Club/Loge Seats Level "D"			
Lounge, Circulation, Lobby	N/A	40,000	37,184
Suite Level "E"		· · · · · · · · · · · · · · · · · · ·	
Luxury Suites	78,000	24,000	17,095
Other (National Broadcast Booth, Food Service, Vertical Circulation, Lobby)	18,000	24,000	19,157
Suite Level "F"			
VIP Luxury Suites/Seats	79,000	6,000	3,540
Other (Food Service, Vertical Circulation, Lobby)	17,000	12,000	32,712
Media Facilities	Inc. below	30,000	0
Suite Level "G"			
Luxury Suites	61,000	0	0
Media Facilities	20,000	0	11,190
Other (Food Service, Vertical Circulation, Lobby)	15,000	0	5,359
Tunnels & Walkways (net new square footage)	0	16,800	22,204
Interior Concourse	0	128,000	15,990
Concourse at Grade (Pavement)	0	0	46,714
Grand Total All Levels	1,124,000 sf	776,800 sf	326,509 sf

SOURCE: Rose Bowl Operating Company 2010

 $^{^{}lpha}$ Includes 816,000 sf of new area and 308,000 sf of renovated area

^b This represents the maximum square footage that could be developed under Option C

Attachment B Comparison of Impacts on Cultural Resources



Memorandum

Date: FINAL April 28, 2010

To: City of Pasadena

Contact: Erin Clark, Associate Planner, Economic Development

From: Barbara Lamprecht and Rick Starzak, Senior Architectural Historians

Subject: Evaluation/Comparison of Impacts on Historical Resources,

Revised 2010 Project

Rose Bowl, City of Pasadena

Background

In March 2009 the City of Pasadena commissioned ICF Jones & Stokes to compare the potential impacts of an updated project proposal with a previous project and two alternatives for renovation of the Rose Bowl in the City of Pasadena. The previous project was analyzed in the Historical Resources Technical Report (HRTR) and Supplemental Environmental Impact Report (EIR), certified in 2008. The Revised Project, provided to ICF Jones & Stokes as a written project description "Proposed Revised Project" (attached), has some changes from the previous project description. The City of Pasadena requested a Technical Memorandum to evaluate the changes relevant to the potential effects on the Rose Bowl Stadium as a historical resource.

The objective of this Memorandum is to make sure that the historical resource, a National Historic Landmark, is properly treated for California Environmental Quality Act (CEQA) compliance. Thus, Section 15064.5 of the CEQA Guidelines, *Determining the Significance of Impacts to Historical Resources and Unique Archaeological Resources*, which includes the application of the Secretary's Standards for considering impacts on historical resources, has again been applied to the Revised Concept.

Previously analyzed and certified conditions that remain unchanged in the revised concept have not been reviewed. This includes the Hall of Fame/stadium store; the small reduction in numbers of seats, seat replacement; the renovated Press Box; improvements to the playing field and field lighting, and the removal of ancillary structures around the base of the stadium.

Summary

To summarize our findings, the proposed changes to the project description largely impose limits where previously there were none, and all proposed work in the current project description (attached as Addendum 1) would fall within the envelope of the project as previously described. As set forth in the project description, where there are changes and certain assumptions can safely be made, the effect on the historical resource would be the same or less than that previously described and certified.

Comparison of 2008 and 2010 Findings

Below is the comparison of 2008 and 2010 findings with discussions.

The No-Build Alternative

2008/2010 Discussion

The No-Build Alternative would not result in a significant effect on the Rose Bowl. The Rose Bowl would retain its National Historic Landmark status. This alternative would not have an indirect effect on any other historical resource in the study area. The No-Build Alternative has not changed in the 2010 Revised Concept.

Impact of No-Build,

Finding, 2008 Project:

Not Significant

Finding, 2010 Revised Concept:

Not Significant

General Aspects (applicable to all Options) of Project, 2008 and 2010

2008/2010 Discussion

There is very little change between the 2008 and 2010 introductions to each project description. These introductions describe blanket aspects of the Project applicable to all Options. The 2010 introduction includes more specific language; places limitations on soil removal and excavation;

permits renovation of facilities once proposed to be demolished, and introduces other restorative measures.

- The 2010 introduction of the project description now permits the partial renovation of the existing and previously analyzed Press Box, rather than its complete demolition and replacement that was part of the 2008 project. Since the 2010 introduction reduces the changes imposed on the historical resource, they do not rise to the level of significant impact.
- The historic scoreboard at the south end would be "retained, repaired, and partially restored rather than simply "retained" and the proposed new video display system at the north end would create less of a visual change than previously described.
- The restitution of two field tunnels (7A and 15A, more fully described below) rather than the previously analyzed demolition of these two tunnels.

None of the general changes in the introduction of the 2010 revised project description would affect the parallel findings of the 2008 analysis.

Option A: Construction of New Towers, New Concourse at the Horizon Level 2008 Discussion

The 2008 Option A introduced a new horizon level at the rim of the existing stadium; new additional exit aisles located midway between existing aisles in the upper half of the stadium; four new vertical circulation towers, a new (previously analyzed) press box, and new restrooms and concessions constructed at the perimeter fence line. Analysis determined that these measures would substantially alter the Rose Bowl's appearance in three places, at the rim, at the base, and at the circumference (with the horizon-level concourse; the four large vertical circulation towers and ancillary requisite supports, and the increased density and visual opacity of the peripheral buildings (restrooms and concession buildings), which would diminish the understanding of the Bowl as Myron Hunt intended, as a free-standing object in the landscape. Additionally, this Option required a substantial loss of historical fabric, including the Arroyo stone walls, berms and terraces, as well as extant landscaping fabric.

Cumulatively, these measures would materially impair the Rose Bowl's ability to convey its historical significance and could jeopardize its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA as well as its status as a National Historic Landmark. Option A was found to result in a substantial adverse change to the Rose Bowl under CEQA because the project would cause "alteration of the resource or its immediate surroundings such that the significance of [the] historical resource would be materially impaired" (CEQA Section 15064.5(b) (1).

Finding, 2008 Option A

Significant

2010 Discussion

The **2010 Option A** is virtually unchanged. Additional language specifies the exact location of additional exit aisles noted above. It also includes language that reserves the right to renovate as well as replace the (previously analyzed) 1992 press box, indicating a possible reuse of existing structure, which would have a possible lesser impact than 2008 Option A.

However, the major components of Option A such as the horizon level, the four substantially sized circulation towers and the location and density of the peripheral buildings are unchanged. Those are the components which would most impair the significance of the Rose Bowl and thus would continue to be an adverse change under CEQA. Therefore, the finding is unchanged.

Finding, 2010 Option A

Significant

Option B: Tunnel Widening and Internal Concourse

2008 Discussion

The 2008 Option B/B.1 did not include the horizon-level concourse and vertical supports for the concourse, so the aerial view of the bowl's elliptical rim, a principal character-defining feature, would not change. The underside and a higher percentage of the existing Arroyo stone berm walls, terraces and landscaping would be retained and/or restored. Thus, important views of the Rose Bowl would be more visible and available to the public in the 2008 project than the existing condition now affords. Option B/B.1 did include two fewer and smaller circulation towers on the west elevation, an area previously and substantially altered and analyzed and certified in the previous EIR; therefore, this was not re-analyzed in 2008.

Additionally, two original tunnels, field tunnels dedicated for athletes' field access (7a, adjacent to 7 on the northeast, and 15a, on the northwest), would be demolished.

Option B/B.1 also included doubling the width (but not the height) of up to 28 of the existing tunnel access openings (the label used for openings on the Bowl's exterior). It was determined that, "While a visible change in width would occur, the center lines for the tunnels would not change, and thus the overall symmetry of Myron Hunt's design would be retained. As proposed in 2008, the tunnel access openings would be the same shape and height as they are today, with their new concrete surrounds detailed and finished to match the existing concrete surrounds. This change follows the Standards with regard to rehabilitation of historic buildings, particularly given the need to meet safety and access requirements, and will be considered mitigated to having a less-than-significant impact on this historical resource and an acceptable alteration."

Additionally, Option B/B.1 included an important change that was fully described in the Historical Resources Technical Document, April 2008. This is the enlarging (almost doubling) and reconfiguring the shape of all the vomitoria (the label used for openings on the Bowl's interior). While an obvious change from the existing condition, it was determined that the equally altered, larger vomitoria as proposed did not materially alter in an adverse way the ability of the Rose Bowl to convey its historical significance because all the vomitoria were altered in the same way, preserving Myron Hunt's original symmetrical layout, location of center lines, and the number of vomitoria on the interior, all of which contribute to the Classical consistency and symmetry of the Bowl's character, whether considering a view from the Bowl's interior, from the exterior, or as an aerial view.

The 2008 effects analysis reasoned that "as the [Secretary of the Interior] Standards note, 'deteriorated historic features shall be repaired rather than replaced.' While 'deteriorated' typically refers to a decline in a material, the inability of the current configuration of the tunnels to meet egress requirements [was interpreted in the 2008 HRTR] as a deterioration in its ability to function safely." The 2008 analysis thus determined that "this change in the size and shape of the vomitoria follows the Standards with regard to rehabilitation of historic buildings, particularly given the need to meet safety and access requirements, and will be considered

mitigated to having a less-than-significant impact on this historical resource and an acceptable alteration.

In addition to the lack of horizon-level concourse and the changes to the (external) tunnel access openings and the (internal) vomitoria, the 2008 Option B/B.1 also included an internal concourse with amenities ranging from a width of 50 to a maximum 80 feet wide following the ellipse of the Bowl. It was determined that the internal concourse proposed under Option B/B.1 would not be visible from the interior and thus would have no impact here.

However, the 2008 finding of No Significant Impact was qualified to include mitigation of the impact to historic fabric. It required that any historic fabric and material to be demolished and reconstructed, including all tunnel entrances, vomitoria, Arroyo stone berms, stone terraces, and landscaping, be executed following HABS recordation and documentation, the Secretary of the Interior's Standards, and the supervision of a qualified architectural historian or a licensed and qualified historical resources architect. [See the HRTR for comprehensive mitigation remarks.] The 2008 finding was additionally qualified in that the concrete risers – the historic material and form of the concrete Bowl itself – would be retained and preserved.

The inclusion of the internal concourse in the 2008 project description also permitted many of the restrooms and concession buildings to be located in the interior of the Bowl, thus affording traditional and public views of the Bowl's base and circumference.

Finding, 2008 Option B/B.1 with Mitigation

Not Significant

2010 Discussion

The **2010 Option B** is similar to the 2008 project. It differs in that "in addition to utilizing the widened stadium tunnels, this project proposes to re-introduce the usage of the existing north and south end field access tunnels (7A, 15A, 23A, and 28A) for ingress and egress for the public patrons in the lower seating sections, along the east and west sidelines."

These long-dormant field openings, original to the Myron Hunt design and originally used primarily for athletes entering and exiting the field as well as some service functions, would restore their historical function as pedestrian passageways, now available to the public, and

therefore newly contribute to the historic character of the Rose Bowl. Thus, this action would not create a significant effect under CEQA.

The changes proposed to vomitoria (the label used for openings on the Bowl's interior) are addressed in the 2010 Option B Project Description, as follows "up to twenty-eight existing access tunnels would be doubled in width to provide additional exiting capacity. Tunnels selected for widening will respect the existing longitudinal symmetry of the Rose Bowl." [1] The reasoning for the 2008 significance finding regarding the vomitoria rested on the retention of the identical symmetry of these openings, an important character-defining feature of the Rose Bowl that is well-known to the public. Although fewer tunnels will likely be widened as a result of the 2010 Option B, as long as the work respects the existing longitudinal symmetry, the changes to the vomitoria would be an acceptable alteration under CEQA, and that is consistent with the previous CEQA finding.

The 2008 Option B included excavating the north side of the Bowl to accommodate program areas such as the loading dock, stadium operations, administration, and food services operations. The 2010 Option B includes the option of excavating the south side of the Bowl as an alternative. The south side is the primary entrance to the Bowl and a character-defining feature. A determination of No Significant Effect for the 2010 Option B is qualified in that any removal and reconstruction of character defining features associated with the south side of the Bowl, defined in the HRTR and the certified SEIR be executed following HABS recordation and documentation, the Secretary of the Interior's Standards, and the supervision of a qualified architectural historian or a licensed and qualified historical resources architect.

The 2010 Option B also limits the amount of cubic yards of soil removed to accommodate the new structures to "a maximum of" 100,000. The 2008 report proposed moving that amount *per se* and was previously analyzed and did not have a significant effect with the required mitigation. The newly proposed limit would also not rise to a significant effect.

^[1] The existing Rose Bowl tunnel widths are symmetrical along the longitudinal, north-south axis, but not along the 50-yard line, east-west axis.

Like the 2008 Option B/B.1, the inclusion of the internal concourse in the 2010 Option B also permits additional restrooms, concession, and lounges to be located in the interior of the Bowl, thus affording traditional and public views of the Bowl's base and circumference.

Finding, 2010 Option B/B.1 with Mitigation

Not Significant

Option C: Horizon-Level Concourse, Tunnel Widening and Internal Concourse

2008 Discussion

Option A, which visually obscures some character defining features and substantially alters others, would result in a substantial adverse change on this resource and constitute a significant effect on the environment. While Option B/B.1 would result in acceptable alterations, it was determined that the 2008 Option C, combining options A and B, would cumulatively cause a substantial adverse change in this historical resource and a significant effect on the environment.

Finding, 2008 Option C

Significant

2010 Discussion

Apart from the inclusion of utilizing the dormant but historic field tunnels; the option of renovating as well as replacing the stadium club facilities, the limiting of the amount of cubic feet of soil that could be removed to 100,000, and the option to excavate the south side of the Bowl to accommodate underground programs, the 2010 Option C still would cumulatively cause a substantial adverse change in this historical resource and a significant effect on the environment.

Finding, 2010 Option C

Significant

Conclusion

Both the 2010 Option A and Option C are unchanged in having a Significant Effect on the Rose Bowl under CEQA.

The 2010 Option B with Mitigation, assuming the vomitoria are changed in ways that retain symmetry, would have the same or less than the effect previously described and would not have a Significant Effect on the Rose Bowl, which is consistent with the previous finding.

PROPOSED REVISED PROJECT

Renovations of the existing Rose Bowl stadium are proposed to continue to allow use by the UCLA Bruins football team, Rose Bowl Game, Bowl Championship Series (BCS) games, and soccer matches, as well as to bring the building systems up to current Building Code requirements.

The proposed revised project could reduce the Rose Bowl's existing maximum seating capacity of 92,500 by approximately 6,000 seats to accommodate necessary exiting improvements and upgrades. Seating capacity would remain sufficient to accommodate all existing events. Upon completion of the project, seating in the Rose Bowl would include general seating, club seating, loge box seating, and luxury suite seating. Different levels of amenities would be provided for each type of seating. As previously included in the FEIR, a Hall of Fame museum, which would include a stadium store ("gift shop"), is proposed either at the south end of the stadium, within the new west sideline structure, or on the east side of the stadium... The museum and gift shop would consist of up to 9,000 sf of museum space, 2,000 sf of retail store, and 2,000 sf for a coffee/snack area, and would be open Monday through Friday 8:00 A.M. through 6:00 P.M. and during special events. The project boundary includes generally the area inside the existing perimeter fence line, with limited minor extension outside the fence line.

With implementation of the revised project, the maximum number of displacement events (attendance exceeding 20,000) would remain unchanged, consistent with the provisions of Chapter 3.32 of the Pasadena Municipal Code pertaining to Arroyo Seco Public Lands. The playing field area would continue to accommodate football and international soccer. Approximately seven events would be for UCLA football games and up to two post-season collegiate games, including the Rose Bowl Game and periodic BCS Championship Game. The Rose Bowl could also continue to host other displacement events such as soccer matches, concerts, and revivals, with the total number of annual displacement events not exceeding 12 as allowed under current Code.

The proposed revised project would include limited demolition of existing ancillary structures around the base of the stadium and the perimeter structures at the fence line, along with removal of asphalt surfacing and landscaping. Removal, retention, and reconstruction of the stone terraces and planting material adjacent to the stadium would also occur as required by the project design. A new structure containing the stadium's club and associated support facilities would be constructed outside, but connected to, the existing seating bowl along the west side of the stadium. The shallow wings of the press box structure would be removed and the center portion of the structure will be selectively demolished as necessary and replaced with a new and partially renovated three-level structure that includes club levels, suite levels, and press facilities on the west side of the stadium only. A lighted animated ribbon sign would be attached on the interiorfacing façade of each level of the press box. In total, a maximum of approximately 340,000 square feet (sf) of existing structures and paved areas would be demolished. It should be noted that this structure would be within the development envelope (i.e., length, width, and height) analyzed in the previous SEIR. In addition, no lighting intensities greater than those previously analyzed would be included in the revised project. Therefore, the renovated suite/press box component of the proposed project requires no further analysis in this SEIR.

New restroom and concession buildings (and possibly a structure housing the proposed Hall of Fame museum and stadium gift shop) would be constructed against the fence line between the entry gates. Improvements to the entry plaza with new paving and landscaping would formalize the south end of the stadium as the main entrance, and the historic neon "Rose Bowl" sign would

be preserved. Plazas and entries would be landscaped with trees and planting matching those that are on site. The proposed project would include improvements to spectator facilities, circulation elements, press box/media facilities, administrative facilities, lighting systems, stadium services, and stadium systems. All existing ancillary buildings immediately outside the seating bowl containing restrooms and concessions could be demolished in part or in total. Again, it should be noted that all proposed improvements are substantially similar to or at a less intense level than those analyzed in the previous SEIR, including improvements to field lighting¹, the proposed restored historic south end scoreboard along with the replacement of the north end (30'H x 100'L) video display system.²

While some seats would be removed to accommodate the proposed renovations, new premium seating would be increased within the west sideline structure to offset seat removal, with the result that the revised project's seating capacity would remain relatively unchanged.

Emergency exiting from the stadium would be improved by one of two options, or a combination of both:³

Option A: Construction of a New Concourse at the Horizon Level

This option would involve the installation of additional exit aisles inside the stadium located midway between existing aisles. These aisles would extend from the stadium cross aisle (Row 28) up to a new horizon level concourse (Row 77) constructed at the rim of the existing stadium that would be connected to the plaza level concourse by vertical circulation towers at four locations, one on each side of the new and/or renovated press box structure and two on the east side of the stadium. The horizon-level concourse would be constructed along the entire rim of the stadium and would extend around the interior of the stadium at the south end so as to preserve the appearance of the south facade, similar to the previous project. The concourse would extend horizontally approximately 22 feet from the existing bowl rim. The new concourse would be supported by independent support structures outside the stadium, such as columns, that would not attach directly to the exterior of the existing stadium. Excavation and partial removal of the landscaped earthen berms at the base of the stadium would be required to accommodate the new west-side structure, vertical circulation towers, and Horizon-Level supports. The stone terraced walls would be retained, reinstalled, or reconstructed on site to the maximum extent feasible. Trees would be replaced with similar species in new landscaped areas. This option would require removal of approximately 2,800 stadium seats. With the exception of the vertical access towers, this option would be substantially the same as what was proposed for the Horizon Level under the previous NFL proposal. Under this option, restrooms and concession buildings would be constructed just inside the perimeter fence line, facing inward toward the stadium.

Option B: Tunnel Widening and Internal Concourse

Under this option, up to twenty-eight existing access tunnels would be doubled in width to provide additional exiting capacity (the tunnels currently accommodate only 54 percent of the appropriate capacity per existing Code requirements). The renovation would require appropriate

¹ "The top of the light rack would be located approximately five feet above the proposed roof of the new structure." SOURCE: FEIR, Section 2.4.3, page 2-36.

² "The existing scoreboard and advertisement structures would be removed and replaced with a new scoreboard and video system at the north end, approximately 30 feet high and 380 feet long. New advertising panels would be incorporated within this structure. The existing scoreboard housing at the south end would be retained." SOURCE: FEIR, Section 2.4.3, page 2-36

³ For purposes of this analysis, the maximum development scenario whereby both the horizon level would be constructed and all twenty-eight tunnels widened is assumed, although it is likely that fewer tunnels would be widened if the horizon concourse is constructed.

shoring of the tunnels to allow for expansion, excavation, and reconstruction and resurfacing of the tunnel walls, along with the installation of additional exit aisles as noted above inside the stadium. In addition to utilizing the widened stadium tunnels, this project proposes to re-introduce the usage of the existing north and south end field access tunnels (7A, 15A, 23A, and 28A) for ingress and egress for the public patrons in the lower seating sections, along the east and west sidelines. This option would also require removal of approximately 6,000 stadium seats. Stone terraced walls between the existing tunnel entrances on the exterior of the stadium would be partially removed to accommodate the wider tunnels. Some existing landscaping and trees would also require removal to accommodate the expanded widths. The stone terraced walls and trees would be retained, replaced, or reconstructed on site to the maximum extent feasible. This option would allow the construction of restroom and concession structures to be built under the stadium. This would require additional shoring of the stadium to allow for expansion, excavation, and reconstruction for the new structures. This option could require the addition of approximately 80,000 cubic yards of soil to be removed from the site. Additional restroom, concession facilities, and lounges will be located within the internal concourse. The number of ancillary structures that would be constructed at plaza level outside along the fence line would be similar to those under Option A. No additional seat loss is anticipated with the inclusion of the internal concourse.

Excavation for building foundations would take place on the west side to accommodate the stadium's new and renovated club lounges, suites, and associated support facilities. On the south side of the stadium, excavation would occur to accommodate underground program areas such as additional public restrooms, stadium operations, administration, and food service operations. In total, a maximum of approximately 100,000 cubic yards of soil would be removed to accommodate the new structures. Any disturbed areas would be covered with paving and/or landscaping to match other public and surrounding areas.

Option C: Horizon-Level Concourse, Tunnel Widening, and Internal Concourse

This option represents a hybrid of Options A and B: the horizon-level concourse would be constructed, but some or all of the existing tunnels would also be widened, along with utilizing the existing north and south field access tunnels (7A, 15A, 23A, and 28A) to provide even greater exiting capacity. This option would require the equivalent level of excavation, landscape and stone berm removal as identified for options A and B, above. Up to 6,000 seats could be removed under this option if all twenty-eight tunnels were to be widened.

Excavation for building foundations would take place on the west side to accommodate the stadium's new and renovated club lounges, suites, and associated support facilities, and on the north and east sides to accommodate the new horizon level. On the south side of the stadium, excavation would occur to accommodate underground program areas such as additional public restrooms, stadium operations, administration, and food service operations. In total, a maximum of approximately 100,000 cubic yards of soil would be removed to accommodate the new structures. Any disturbed areas would be covered with paving and/or landscaping to match other public and surrounding areas.

The baseline analysis and thresholds for access, traffic circulation, and parking as considered in the previously certified FEIR and SEIR for the Rose Bowl Stadium Renovation Project would apply fully to the revised project and the updated environmental analysis. This project description assumes no changes to the existing traffic access, circulation, and parking conditions.

Attachment C Comparison of Impacts on Traffic/Transportation

MEMORANDUM - CITY OF PASADENA DEPARTMENT OF TRANSPORTATION

DATE:

April 27, 2010

TO:

Steve Mermell

Assistant City Manager

FROM:

Mike Bagheri

Transportation Planning and Development Manager

RE:

Updated Rose Bowl Stadium Renovation Project

(Final EIR and Final Supplemental EIR, State Clearinghouse No.

2004101073)

DOT has been asked to comment on the potential traffic impacts and relative impact findings of an updated project proposal for renovation of the Rose Bowl in the City of Pasadena. The main objective of the revised project is to make sure that the historical resource, a National Historic Landmark, is properly treated for California Environmental Quality Act (CEQA) compliance.

As the revised project's overall seating capacity would not increase, and could be reduced by up to 4,000 seats, and because the number of annual displacement events would remain at 12, it is reasonable to conclude that the previous traffic analysis findings in the environmental impacts reports do not change.

Please feel free to contact me if you need additional information.

CC:

Fred Dock, Director of Transportation

John Poindexter, Planning and Development Manager