

Parks and Recreation Committee Member Comments

October 4, 2012

Don Rix

Absence of a baseline study, the EIR gives estimates for annual use adding up all of the visitors and dividing by 365 that is 7,800 visitors per day. The Final EIR should obtain some solid figures for how many people use the central arroyo and these facilities on a weekend day.

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Ann Schied

(see full letter)

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Notification was not adequate. There should be wider notification and a delay to allow more people to comment. The EIR is silent on historic resources, despite the fact that historic resources will be impacted by additional air pollution, traffic and noise generated by the additional displacement events. These include the Prospect Park historic district, the old Pasadena historic district, arroyo terrace district, Markham place and Bellefontaine historic districts, lower arroyo seco historic district and the arroyo seco national register historic district.

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The lower arroyo seco is not considered in the report and there is no analysis of impacts on that area. There has not been a recent study of habitat and air pollution and noise pollution concentrate on impacts on human beings but fails to assess damage to the natural world. Air pollution and noise measurements do not consider the topography of the arroyo which is depressed and generally windless. These factors may cause different impacts than the rest of Pasadena. There are 30-40 storm drains that drain into the soil that channel runoff. Nine of the drains are from south arroyo boulevard, which is a major traffic street. An analysis of impacts on water quality is lacking in the draft EIR. The displacement of recreational activities is a serious problem. Pasadena residents want more open space for passive recreation and are less interested in spectator sports.

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The figures on parking in the report vary the numbers on 2.0-16 and 3.7-1 are not the same. How will parking in Old Pasadena be accomplished where there is a significant commercial activity? Buses may transport more people, but also generate diesel pollution and that is not addressed in the report. Buses idle up to 2-3 hours generating odors, health effects and noise.

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The Hahamonga and Lower Arroyo Master Plans were not looked at for consistency they are important features of the Arroyo Master Plan and have different purposed and goals, the potential impacts need to be addressed.

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Donna Estacio

Without a proposal from the NFL it is hard to evaluate the impacts in the EIR. The mitigation measures in the recreation section need to be more fully developed. How will that happen? Time of day impacts are absent from this report. If there are night games are aquatic center impacts less than during day games. It would be great to comment if any of the assumptions from Farmer's Field overlap with this EIR.

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Don Rix

The EIR should give the best numbers they can rather than estimates for the year. To say those people will go somewhere else ignores the fact that the arroyo is unique. Other parks do not have all of the same features. Alternatives for all of the activities do not exist anywhere.

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Patricia Keane

There should be some additional analysis of where those users would go, the identification of impacts to the sites they would utilize. Repairs to the other fields, should have a plan for how the repairs will take place. There is a mention of a traffic demand management, but it feels like deferred analysis to not spell out with detail what could be done to more fully mitigate the significant and unavoidable impacts. The City has a responsible to mitigate as much as possible, there is not enough detail related to traffic mitigation. Tailoring measures are likely already known because there are similar events occurring, but the measures are not included in the EIR. There is nothing encouraging the use of transit. Some of the language in the mitigation measures is permissive rather than mandatory, that should be fixed.

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Kelley Holmes

Concern for displacement of the users, it will go somewhere, would like to see a mitigation measure that a portion of the revenue the city realizes be set aside to maintain and enhance the arroyo, specifically giving priority to areas most impacted in the City. If we are asking adult leagues to go somewhere else then those fields should be maintained to a higher standard because it is the City's agreement with the NFL that causes them to be displaced. The repair to the turf needs to be detailed and all turf areas that will have vehicular use should be addressed. The impact on kidspace and the aquatic center, they have events that are major fundraisers that would be precluded on weekends, could result in a falloff of supporters.

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Rita Mareno

Pasadena does not do traffic well. The time of the year of the displacement a lot of activities are on the weekends because it gets dark earlier. The recreational activities cannot be moved to other facilities, the

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other parks cannot absorb more soccer playing and so forth. There are not enough fields in the city. Some uses can move but there will be impacts to other parks due to the increased use. More people will require more staff or programs and there will be a cost.

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Chair Thom Mrozek

The ULI report made certain findings about the condition in the central arroyo. To say the turf will be restored in a day is ridiculous. To repair a divot takes seven to 10 days. That is not addressed to the extent that it should in this document.

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Letter No. 14: Recreation and Parks Commission Member Comments

City of Pasadena
Parks and Recreation Committee
October 2, 2012

Response 14-1

The comment relates to the need for a baseline study of recreational users. Refer to **Response 8-8**.

Response 14-2

Refer to **Response 12-8**.

Response 14-3

Refer to **Topical Response 2** regarding historic resources.

Response 14-4

The comment states there is no analysis of impact on the lower arroyo. Refer to **Response 15-10** for the methodology for analyzing recreation impacts. Refer to **Response 51-3** for the methodology for analyzing air quality impacts. Refer to **Response 11-28** and **Response 11-29** for the methodology for analyzing traffic impacts.

Response 14-5

Air quality impacts were analyzed according to SCAQMD guidelines and accepted methodology. No guidelines or procedures are available for suitably analyzing air quality impacts on flora or fauna other than human beings. Likewise, local topography was taken into account to the extent recommended by current SCAQMD guidelines for analyzing air quality impacts. Impacts were found to be significant. Also, please refer to **Response 51-3**.

Response 14-6

The relationship between topography, weather, and air pollutant concentrations can be complicated and difficult to fully analyze. For example, high temperatures in canyon areas often create strong updrafts along the canyon walls that would tend to quickly flush any air pollutants in the canyon out into the surrounding areas as opposed to concentrating pollutants within the canyon. Nevertheless, as discussed in **Response 2-6**, the contaminants generated by the project are not expected to exceed the local significance thresholds set by the SCAQMD (LSTs). Emissions that are below the LSTs are not expected to cause an exceedance of the most stringent applicable federal or state ambient air quality standard regardless of wind conditions. With regard to noise impacts within the Arroyo, the noise analysis is based on measurements taken in the Arroyo during football games played at the Rose Bowl.

Response 14-7

Refer to **Response 11-19**. Potential impacts to groundwater and surface waters as a result of project implementation were addressed in the Initial Study for the proposed project, which is provided in Appendix 1.0 of the Draft EIR. As stated in the Initial Study, the pollutants expected to occur as result of additional displacement events would be typical urban pollutants, and compliance with the City's Standard Urban Stormwater Mitigation Plan (SUSMP) would ensure that impacts are less than significant.

Response 14-8

Please see Draft EIR section 3.6 for a discussion of recreation impacts. The comment addresses general subject areas, which received extensive analysis in the Draft EIR. The comment does not raise any specific issue regarding that analysis and, therefore, no more specific response can be provided or is required. However, the comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 14-9

The comment points to a typographical error. Section 2.0 of the Final EIR has been updated to reflect the correct parking availability as 21,518. See Section 2.0 Corrections and Additions.

Response 14-10

[The commenter questions how parking in Old Pasadena will be accomplished where there is a significant commercial activity. The commenter states that buses may transport more people, but generate diesel pollution that is not addressed in the report. The commenter states that buses idle up to 2-3 hours generating odors, health effects, and noise.]

Buses were included in the air quality analysis as a portion of the vehicle fleet traveling to the Rose Bowl. There is no information indicating that buses would idle for 2 to 3 hours.

The traffic study does acknowledge that some people may choose to park in parking facilities located in the Old Pasadena and Civic Center area (Page 3.7-106), however, the project does not rely on parking available in Old Pasadena and the Civic Center area to meet its parking demand. As described under Mitigation Measure MM 3.7-5 on Page 3.7-106 of the Draft EIR, "parking operators shall monitor parking demand on game days to ensure sufficient supply is available to meet parking demand around the Rose Bowl. If excess parking demand is anticipated, stacked parking will be implemented as needed in one or more of the following parking lots to ensure that there is sufficient supply to meet demand:

- Lot H

- Lot BD 2 & 3
- Lot 1 A
- Lot 1
- Lot 2
- Lot 3
- Lot 4
- Lot 5
- Lot 6
- Lot 7
- Lot 8A
- Lot 9
- Lot 10

The use of stacked parking at these lots can increase parking supply by up to approximately 3,000 spaces." A total parking demand of 27,689 spaces is estimated on a weekday game and 25,633 spaces on a weekend game. With additional 3,000 spaces from stacked parking at the aforementioned parking lots, the project parking supply is estimated at 29,018 spaces (Central Arroyo = 21,518 spaces + Parsons' = 4,500 spaces + Stacked parking at specific lots in the Central Arroyo = 3,000 spaces), which is determined to be sufficient to meet its parking demand on both weekday and weekend games.

With respect to comment regarding the number of parking spaces available at the Central Arroyo, page 3.7-1 of the Draft EIR correctly refers to the available parking at 21,518 spaces in the Central Arroyo. The reference page 2.0-16 is a typographic error and has been corrected to say "21,518."

Response 14-11

Refer to **Response 9-6** regarding land use plans.

Response 14-12

Please see **Topical Response 1** regarding the adequacy of the Project Description.

Response 14-13

Based on comments received on the Draft EIR including suggested mitigation measures, several mitigation measures have been revised and new mitigation measures have been included in the Final EIR. Refer to **Response 8-11**, **Response 8-13**, **Response 8-15**, and **Response 8-43**, above.

Response 14-14

The comment indicates that impacts to recreational uses could vary based on the time of day of an NFL event. The analysis in the Draft EIR assumes that access to recreational uses such as the Aquatic Center and Kidspace would be lost up to 8 hours prior to the event. Most games would start at 1:00 PM. Regardless of the start/end time of the games, users of the Rose Bowl would be displaced from the area for approximately 14 hours (8 hours prior, 4 hour event, and 2 hours after the event) on each event day. It is possible that users could return to the Rose Bowl after an event. For a 1:00 PM kickoff the game would end around 5:00 PM and most patrons would be out of the Rose Bowl by 7:00 PM. However, there would likely still be traffic limiting accessibility. Further, resources such as Kidspace and the Aquatic Center require staff for maintenance and supervision during operating hours. Due to the limited accessibility, it is expected that both venues would choose to remain closed for the day. Therefore, although it is possible that users could access the Rose Bowl for recreational activity either before or after the games, due to the duration of inaccessibility (approximately 14 hours) for purposes of this analysis it is assumed that the impact would last for the entire day.

The comment also requests information on the similarities in the assumptions included in the Draft EIR with the Farmer's Field EIR. The Farmer's Field project includes construction of a new multi-purpose stadium, new convention space, and two parking structures. Although both projects include the use of a stadium by the NFL, the scope of the Farmer's Field project is far greater than the use of an existing stadium by the NFL. As such, it would not be particularly useful to readers of the Draft EIR to compare the two environmental documents due to the vast differences in scope.

Response 14-15

Refer to **Response 12-9**, above for a discussion of the displaced park users. Several mitigation measures have been revised or added to the Final EIR. These measures include **MM 3.6-1**, **MM 3.6-2**, and **MM 3.6-5**.

Response 14-16

This comment requests additional information on the displacement of recreational users and also suggests a plan should be included for the repair of grassy areas used for parking. Refer to **Response 12-9** for a discussion of displaced uses. Several mitigation measures have been revised or added to the Final EIR. These measures include **MM 3.6-1**, **MM 3.6-2**, and **MM 3.6-5**.

Response 14-17

The traffic study provides a detailed summary of mitigations considered for significantly impacted intersections. A number of mitigations are proposed as part of the traffic study. These include operational improvements at individual intersections; transit mitigation and transportation demand management strategies. Operational improvements include deployment of traffic control officers and use of traffic control devices to increase traffic flow capacity through an intersection. Transportation demand management includes strategies to incentivize use of alternative modes of transportation among others to reduce the number of vehicular trips to Rose Bowl.

Response 14-18

To encourage the use of transit, the proposed project proposes the following:

- **Shuttle bus park-and-ride** - A shuttle bus park-and-ride at the Parson's facility. A total of 4,500 spaces are provided at this facility for event days. Patrons can park their vehicle and board the exclusive shuttle bus to travel to/from Rose Bowl. The shuttle travels on a partially exclusive route to/from Rose Bowl.
- **Charter Bus Service** – The EIR recommends that Rose Bowl explore interest in charter bus services from season ticket holders and other potential users. This type of private service could be provided from locations such as downtown Los Angeles and neighboring cities in response to demand. The Rose Bowl may encourage charter bus service by providing preferential/subsidized bus parking at the Rose Bowl.
- **Public Information** - The RBOC will also enlist the use of social media, the internet, and other methods to encourage the use of transit to the events.

Response 14-19

All mitigation measures are considered to be mandatory.

Response 14-20

Refer to **Response 12-9** for a discussion of displaced users. Although not required to mitigate a significant impact, Mitigation Measure **MM 3.6-5** has been included in the project to address maintenance of parks in Pasadena.

Response 14-21

Mitigation Measure **MM 3.6-1** has been revised to address repair of grassy areas around the Rose Bowl.

Response 14-22

The comment suggests evaluation of potential fundraising impacts on the Aquatic Center and the Kidspace Museum. The comment overstates the impact of the project on fundraising events for these

institutions. The project would only preclude on-site fundraisers on 13 days per year for a maximum of five years. The project would not preclude fundraising events on weekends. CEQA requires a discussion of potential physical impacts that could result from a project. The loss of revenue or fundraising dollars for the Kidspace Museum and the Aquatic Center due to constraints on on-site fundraising events on 13 days per year is not expected to result in a physical impact.

Response 14-23

The comment indicates there would be costs associated with maintenance of nearby parks that could experience increased use by displaced users of the Rose Bowl. Although the EIR does not anticipate a significant environmental impact on nearby parks, please see Mitigation Measure **MM 3.6-5** related to maintenance and repair of Pasadena parks.

Response 14-24

The comment relates Brookside Golf Course. Based on information provided by RBOC, and the Golf Course Operations staff, both fairways and the rough are parked (greens are not parked). Of the golf course's approximately 180 acres, typically less than 0.5 acre are damaged from parking. Current practice after an event (UCLA, Rose Bowl Game, etc.) is to clean up any trash or debris on the golf course immediately following the game, address any damaged areas with sand and seed and return the golf course to a playable condition by the following day (the day after the event).