Comments on Draft Environmental Impact Report Temporary Use of the Rose Bowl Stadium by the National Football League (NFL)

Submitted: 2 October 2012

From: Ann Scheid 500 South Arroyo Boulevard Pasadena, CA 91105 Commissioner, Parks and Recreation Commission

Notification: Notification of the EIR process was limited to within 500 feet of the Rose Bowl. Yet, this proposed land use change affects all properties surrounding the Arroyo, as well as the Old Pasadena and Central Business District of Pasadena, arguably the entire city. The process should be re-opened with wider notification to ensure an opportunity for everyone to be heard.

Historic Resources: The DEIR is silent on historic resources, despite the fact that historic resources will be impacted by the additional traffic, air pollution, and noise generated by the additional "displacement events" at the Rose Bowl.

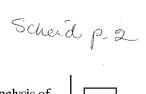
Historic resources that should be included: Prospect Park Historic District, Old Pasadena Historic District, Arroyo Terrace District, Markham Place and Bellefontaine Historic Districts, and the Lower Arroyo Seco Historic District. In addition, there is no analysis of impacts on the Arroyo Seco National Register Historic District within which the "displacement events" will take place, or adjacent historic buildings and Structures.

Traffic-Generated Air Pollution, Noise Pollution, especially in Lower Arroyo Seco: Most notable is the lack of analysis of the impacts of traffic, air pollution, and noise pollution on the Lower Arroyo Seco, which is designated as a "natural preservation area." There is no data on the current state of the natural habitat, flora and fauna of the Lower Arroyo, and what the impacts might be, considering that South Arroyo Boulevard is a major traffic route in and out of the Rose Bowl. No study of current habitat conditions or flora and fauna of the Lower Arroyo has been done since the changes brought about by the low-flow stream project begun over a decade ago.

Air pollution and noise pollution information in the DEIR concentrates exclusively on possible impacts on human beings, but fails to assess possible damage to animal and plant life. Additionally, the air pollution and noise measurements do not consider the topography of the Arroyo, which is depressed, generally windless, and in the case of the Lower Arroyo a deep and narrow ravine that traps air, from morning mists, to nighttime frost. These special conditions may cause impacts that differ in quantity and quality from those on the mesa on which most of Pasadena sits above the Arroyo.

Water Quality: Well over 30 storm drains drain into the Arroyo, some into the channel, but many directly into the soil. Nine of these storm drains drain from South

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Arroyo Boulevard directly into the Lower Arroyo, none into the channel. An analysis of the additional, cumulative impacts on water and soil quality generated by these additional "displacement events" is lacking in the DEIR.	$\boxed{4}$
Displacement of other recreational activities in the Arroyo: A recent article in the Pasadena Star-News informed the public that the Central Arroyo is closed to pedestrians, runners, hikers, etc., 8 hours before UCLA games, which occur on Saturdays. How will these additional displacement events affect the recreational users of the space? Will the space be unavailable for passive recreation for 8 hours before every NFL game as well? How many people now regularly use the space? Without adequate information on this, the impacts cannot be measured adequately. A recent survey published in Pasadena's Parks and Green Space Plan shows that well over 60% of Pasadenans surveyed wanted more opportunities to walk, hike and exercise in the City's parks. Is not the Central Arroyo the largest and most used space for these activities? This question requires further analysis.	5
Parking: Figures on parking vary depending on which section of the report they appear. See numbers on p. 2.0-16 and on p. 3.7-1 as well. The parking analysis depends on availability of the Parsons parking lot, which has recently been sold, as well as commercial structures in Old Pasadena, which cannot be counted on to be completely empty on Sundays during business hours. These figures need to be more accurately defined and represented to present a realistic picture.	6
Diesel bus pollution: Odors, health affects, noise. A byproduct of any major event at the Rose Bowl on surrounding streets, including South Arroyo Boulevard, is the idling of diesel busses in traffic, especially after the event. The street has been designated as a primary exit for busses. Two to three-hours of traffic congestion is the norm along South Arroyo Boulevard following the Fourth of July celebration, a foot ball game or a rock concert. Pre-concert traffic is spread out over several hours, but is not less. Information on the health effects, noise and odors associated with diesel-generated traffic needs to be considered, along with cumulative impacts to the natural preservation area of the Lower Arroyo.	7
Hahamongna and Lower Arroyo Master Plans: Analysis of the consistency of the proposed land use change in the Central Arroyo with the Master Plans of the adjacent Arroyo areas needs to be included in the DEIR. Potential impacts to both natural areas need to addressed and measured.	8

Letter No. 51 Ann Scheid

Ann Scheid 500 South Arroyo Boulevard Pasadena, CA Commissioner, Parks and Recreation Commission October 2, 2012

Response 51-1

Refer to **Response 12-8.**

Response 51-2

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

Response 51-3

Please see **Response 2-6** regarding localized air quality impacts. No guidelines or procedures are available for suitably analyzing air quality impacts on flora or fauna other than human beings. As stated in **Response 2-6**, the project does not exceed localized significance thresholds for impacts on human beings, and is therefore not expected to have an impact on flora of the Arroyo, as the flora and fauna are generally less sensitive to air pollution than humans. Similarly, the project is not expected to significantly impact local animal populations for the same reasons. Therefore, it is expected that emissions that would not present a localized health issue for humans would similarly not present a localized health risk for plants or animals that are successfully surviving in the urban environment of the area.

Response 51-4

Refer to **Response 11-19**.

Response 51-5

The comment relates to the displacement of recreational users in the Arroyo. Refer to **Response 8-10** and **Response 8-15**. Mitigation Measure MM 3.6-2 regarding maintaining access to the loop has been revised. Please see **Response 7-11**.

Response 51-6

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."

With respect to availability of parking at Parson's site and in Old Pasadena, the comment is noted and is hereby part of the Final EIR, and will be forwarded to the decision makers for their consideration prior to taking any action on the project. The study does not assume the use of commercial parking structures in Old Pasadena as part of the game day parking supply. The parking supply at the Rose Bowl and Parsons site will adequately address the demand for both a weekday and weekend game. See **Response 6-17** regarding impacts of potential redevelopment of Parson's site.

Response 51-7

See **Response 2-6** regarding localized air quality impacts. Buses were included as part of this analysis.

Response 51-8

The proposed project's consistency with applicable land use plans, including Arroyo Seco Master Plans, is discussed on pages 3.3-14 through 3.3-17 of the Draft EIR.