



## PLANNING & COMMUNITY DEVELOPMENT DEPARTMENT

### STAFF REPORT

**DATE:** SEPTEMBER 27, 2012

**TO:** TRANSPORTATION ADVISORY COMMISSION

**FROM:** STEPHANIE DEWOLFE, AICP, DEPUTY DIRECTOR  
PLANNING & COMMUNITY DEVELOPMENT DEPARTMENT

**SUBJECT:** DRAFT ENVIRONMENTAL IMPACT REPORT (SCH# 2012031053)  
TEMPORARY USE OF THE ROSE BOWL STADIUM BY THE NATIONAL  
FOOTBALL LEAGUE (NFL)  
1001 ROSE BOWL DRIVE

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#### RECOMMENDATION:

It is recommended that the Transportation Advisory Commission: 1) receive the staff report; 2) open the public hearing and receive comments from the public; and 3) provide comments to staff on the Draft Environmental Impact Report (DEIR) prepared for the Temporary Use of the Rose Bowl Stadium by the National Football League (NFL).

#### EXECUTIVE SUMMARY:

The purpose of this meeting is to:

- Present an overview of the DEIR to the Commissioners and public;
- Receive comments on the adequacy of DEIR by the public; and
- Receive comments on the adequacy of the DEIR by the Commissioners.

All comments received from the public and Commissioners will be documented with responses and presented to the City Council for their consideration in the Final EIR.

The Commissioners will not be making a recommendation on the DEIR, the project, or the Statement of Overriding Considerations. These actions will be addressed by the City Council at the anticipated meeting of November 19, 2012.

The DEIR was prepared to analyze the potential environmental impacts of having up to 13 NFL games at the Rose Bowl. The final version of the EIR will be presented to the City Council in conjunction with a proposed amendment to the Arroyo Seco Public Lands Ordinance of the

City's Municipal Code to increase the allowed annual number of large events at the Rose Bowl from 12 to 25 to accommodate NFL games.

The DEIR analyzed the potential impacts to Air Quality, Greenhouse Gases, Land Use, Noise, Public Services, Recreation, and Transportation, Circulation, and Parking. Of these seven areas, the DEIR determined there would be significant impacts related to Air Quality, Noise, Recreation, and Transportation, Circulation, and Parking. All other impacts were found to be less than significant or less than significant with mitigation measures incorporated.

All of the impacts identified in the five topic areas result from vehicular and transit traffic the NFL games would generate. For example, it was found that while the NFL games themselves would not impact noise or air quality, each of these areas would be significantly impacted by vehicular traffic.

Finally, with the adoption of all of the recommended mitigation measures in the DEIR some of the impacts would be reduced, but many would remain significant and unavoidable. None of the mitigation measures would completely eliminate the significant impacts for any of the five topic areas.

#### **BACKGROUND:**

The potential exists for the National Football League (NFL) to relocate an existing team franchise to the Los Angeles area in the near future. Should this occur, there is a likelihood that the team would need to play in an existing stadium for an interim time period, possibly as soon as fall 2013, while a new stadium is constructed. Currently there are two proposed stadium projects in the greater Los Angeles Area; one in the City of Industry and other in the City of Los Angeles. Should either of these proposals move forward, it is likely that the Rose Bowl could be considered as an interim location.

To make the Rose Bowl available for consideration, the City Council would need to approve an amendment to the Arroyo Seco Public Lands Ordinance of the City's Municipal Code to increase the allowed annual number of large events at the Rose Bowl from 12 to 25 to accommodate NFL games. In order to properly inform the City Council of the potential environmental impacts the use of the Rose Bowl for NFL games could have, a Draft Environmental Impact Report (DEIR) has been prepared, the final version of which will be presented to the City Council along with the code amendment.

On March 12, 2012 the City Council authorized the City Manager to enter into a contract with an environmental consulting firm, Impact Sciences, to complete the EIR. The City Council also authorized the City Manager to contract with Fehr & Peers to complete the traffic study for the project.

A Notice of Preparation was released on March 16, 2012 to announce that the City was preparing the EIR and to solicit comments and input on what topics the EIR should analyze. The 30-day period to submit comments was from March 16 to April 18. During this time, three meetings were held. On April 3, the Rose Bowl Operating Company (RBOC) hosted an informational meeting where comments were taken and two "scoping sessions" were held at the Rose Bowl on April 12 and 14 to explain the project and obtain input from the public on what topic areas should be considered in the EIR.

CEQA requires a minimum 45-day review period for a DEIR once it is prepared. For this project a 60-day public review period is provided. The DEIR was released for review on August 9, 2012

and comments will be accepted until October 8, 2012. In addition to the Transportation Advisory Commission, staff presented the DEIR to the Planning Commission on September 19 and will go before the Recreation and Parks Commission on October 2 to obtain their comments on the DEIR. This meeting will be held in the Rose Bowl Media Center at 6:30 p.m.

## **PROJECT:**

The Rose Bowl is currently limited by the Arroyo Seco Public Lands Ordinance of the City's Municipal Code to no more than 12 displacement events (attendance exceeding 20,000) per year. Such events occur primarily on the weekends, although concerts, football championship (BCS) games, and soccer events are often held during the week. The proposed project would amend the Ordinance to allow an additional 13 displacement events to occur annually at the Rose Bowl Stadium for a total of 25 displacement events. Approximately seven events would continue to be reserved for UCLA football games and up to two post-season collegiate games, including the Rose Bowl Game. Up to 13 events would be reserved for the NFL with up to two games held on weeknights.

The amendment of the Arroyo Seco Public Lands Ordinance is specifically aimed at allowing the NFL to use the Rose Bowl for a period of no more than five years beginning no sooner than the 2013-2014 season. The use of the Rose Bowl by the NFL would be temporary until a new NFL stadium is selected and built in the Los Angeles area, or until the completion of a five-year lease term, whichever comes first.

In addition to the displacement events, the monthly swap meet and flea market would continue to be held, as would soccer and other recreational activities held in Lot H, outside the stadium to the southeast. There would be no change in the number of minor events (attendance between 2,000 and 20,000) that could be held each year, which are approximately 30 events.

The project does not include any physical changes to the Rose Bowl Stadium or any of the surrounding features. It would not increase or decrease the seating available at the stadium, or associated parking. It does not include any ground disturbing or excavation activities, any interior or exterior renovation to the Rose Bowl, or any new structures on the project site.

### Project Objectives

One component of any EIR is to identify the objectives for the project as a basis for determining whether the project and/or alternatives would satisfy the same needs or goals. The objectives for this project are:

- Generate revenue to fund City services and offset the costs associated with the Rose Bowl renovation project.
- Promote economic development in the project area and greater Pasadena through increased event activity and tourism.
- Conserve resources and avoid environmental impacts by utilizing existing infrastructure and parking facilities.
- Utilize the existing parking supply and establish a parking management plan to distribute parking consistent with arrival and departure directions to efficiently disperse project traffic, facilitate access to and from the site, and reduce traffic in the immediate vicinity to minimize potential pedestrian/vehicular conflicts.

## **DRAFT ENVIRONMENTAL IMPACT REPORT:**

The DEIR analyzes potential impacts in the following areas: Air Quality, Greenhouse Gases, Land Use, Noise, Public Services, Recreation, and Transportation, Circulation, and Parking. Of these areas, the Draft EIR analysis determined the project would result in significant impacts related to Air Quality, Noise, Recreation, and Transportation, Circulation, and Parking. Impacts to Greenhouse Gases, Land Use, and Public Services were found to be less than significant or less than significant with mitigation measures incorporated. The DEIR Executive Summary (Attachment A) contains Table ES-1 that summarizes the potential impacts and recommended mitigation measures.

### Air Quality: Significant and Unavoidable Impacts

The Air Quality analysis in the DEIR found that while the project would not conflict with an applicable air quality plan or expose sensitive receptors to substantial concentrations of pollutants or objectionable odors, the project would still have significant impacts. Specifically, these impacts are the generation of pollutants in excess of the South Coast Air Quality Management District's (SCAQMD) significance thresholds and cumulatively considerable effect on air quality. Both of these impacts result from vehicle emissions and the number of vehicle trips associated with the project. With the adoption of Mitigation Measures 3.7-1 and 3.7-2 and Additional Measure 3.7-2.1 (DEIR, p. ES-9-16), the impacts to air quality would be reduced, but would remain significant and unavoidable.

### Greenhouse Gases: Impacts Less than Significant

The DEIR found that the project would result in an increase of Greenhouse Gas (GHG) emissions associated with vehicular traffic from each of the 13 displacement events. Specifically, the increase would be up to 6,941 metric tons of carbon dioxide equivalents (MTCO<sub>2e</sub>) per year. Using the SCAQMD's draft threshold of significance of 4.8 MTCO<sub>2e</sub> per "service person" (employees and residents of the proposed project) and 4,000 employees at the Rose Bowl, the amount per service person is 1.7 MTCO<sub>2e</sub>, which is considered to be less than significant.

### Land Use: Impacts Less than Significant

In response to several comments received during the scoping sessions the DEIR analyzed the project's potential impact on Land Use, specifically whether it would physically divide a community or conflict with an applicable land use plan. It was found that in addition to not physically dividing a community, the project would not conflict with land use plans such as the Land Use and Green Space, Recreation, and Parks Elements of the City's General Plan, the Arroyo Seco Public Lands Ordinance, or the Arroyo Seco Master Plan. Impacts were found to be less than significant.

### Noise: Significant and Unavoidable Impacts

The Noise analysis in the DEIR found that while the project would not result in a permanent increase in ambient noise levels, the noise levels generated by the project would exceed the thresholds in the Noise Ordinance, even on a temporary or periodic basis. More specifically, the noise generated by the football games themselves would not exceed the noise thresholds but it would be the noise generated by vehicular traffic on some of the surrounding streets that would exceed the thresholds.

As with the Air Quality section of the DEIR, the Noise section also includes Mitigation Measures MM 3.7-1 and 3.7-2 and Additional Measure 3.7-2.1 (DEIR, p. ES-9-16). The impacts related to traffic noise would be reduced with the incorporation of these measures, but would remain significant and unavoidable.

#### Public Services: Impacts Less than Significant

The DEIR also analyzed the potential impact of the project on Public Services, specifically, fire and police protection. The DEIR concludes that while the 13 additional displacement events would increase the need for fire and police services, the project will not require new fire and/or police facilities, or the remodeling of existing facilities. Both the Pasadena Fire Department and the Pasadena Police Department have indicated that the project, in combination with foreseeable future development, can be served by existing facilities.

#### Recreation: Significant and Unavoidable Impacts

The "Rose Bowl Loop" and the fields and parks surrounding the Rose Bowl provide significant recreational opportunities for residents of Pasadena and surrounding communities. To analyze the potential impacts that the additional displacement events would have on these opportunities, the DEIR analyzed the potential physical deterioration of parks, the interference that the NFL games would have on recreational users, and the beneficial impact of NFL games as recreational opportunities.

The DEIR determined Brookside Golf Course could be damaged by vehicular parking, but with Mitigation Measure 3.6-1 (DEIR, p. 3.6-23) that the RBOC, or their designee, shall repair all damaged turf areas of Brookside Golf Course within one day, the impact would be less than significant.

The DEIR also found that even with mitigation measures, the additional displacement events would significantly interfere with recreational users of the Rose Bowl area as they would be displaced. These Mitigation Measures, 3.6-2, 3.6-3, and 3.6-4 (DEIR, p. 3.6-29-30) involve: 1) the RBOC maintaining access to the loop, trail, and other recreational uses during NFL games; 2) the RBOC notifying residents and neighborhood associations of upcoming NFL games; and 3) the City and the NFL shall, through the lease agreement, allow the Tournament of Roses and the Rose Bowl game activities to continue in their traditional manner.

In addition, the DEIR found that having up to 25 displacement events at the Rose Bowl would be a beneficial impact by making the Rose Bowl and associated facilities available to additional patrons.

#### Transportation, Circulation, and Parking: Significant and Unavoidable Impacts

The traffic study for the project was prepared by Fehr and Peers in the spring of 2012. The study analyzed 66 intersections and 27 street segments. The study found that of the 66 intersections, 60 would be significantly impacted during weekday events and 58 would be significantly impacted during weekend events. In addition, 20 of the 27 street segments would be significantly impacted during weekday events and 22 would be impacted during weekend events. All of these impacts are based on a threshold of increases in traffic volume of five percent or greater.

To mitigate some of the impacts on affected intersections, the DEIR includes two aforementioned mitigation measures, Mitigation Measures 3.7-1 and 3.7-2 (DEIR, p. ES-9-16), to have a traffic control officer or optimized traffic signal timing and intersection-specific measures. As a result of these mitigation measures, the impacts to street intersections and street segments would be reduced but would remain significant and unavoidable.

In addition to the mitigation measures described above, the DEIR also identifies Additional Measure (AM) 3.7-2.1, in the form of a transportation demand management program. This measure includes programs such as incentivized carpooling, pre-paid parking, bicycle valet at Parsons, charter buses for groups, temporary changeable message signs for directing traffic, and use of social media. However, it is acknowledged that the effectiveness of these programs to reduce related impacts cannot be quantified, nor can their success be guaranteed. Therefore, no credit for reducing impacts was given in the DEIR and it cannot be considered a mitigation measure for CEQA.

An additional impact that was identified in the DEIR is significant impacts on the transit system on event days. Mitigation Measure 3.7-3 (DEIR p. ES-16), which calls for Metro to increase transit service to meet both the demand of commuter transit demand and event day demand, was identified, but even while acknowledging that this mitigation measure is the responsibility of another agency, the impacts would still be significant and unavoidable.

In addition to analyzing street segments in the vicinity of the Rose Bowl, the traffic study also analyzed the potential impact the project could have on freeway segments in the Los Angeles region. The impacts are based on a Demand to Capacity (D/C) criteria and use a significance threshold of an increase in the D/C ratio of 0.02 or greater. As a result of this measurement threshold, the project would have a significant impact on 20 freeway segments. To reduce these impacts, Mitigation Measure 3.7-4 (DEIR p. ES-16) calls for the placement of two changeable copy message signs on the I-210 freeway and/or SR-134 to help facilitate traffic arriving and leaving the Rose Bowl on event days. However, given the volume of traffic that would use the freeway system on event days, it is acknowledged that there is no feasible way to mitigate these impacts to a less than significant level. Therefore, this impact would remain significant and avoidable.

Finally, the DEIR identifies the potentially significant impact the project could have on parking resources given the high demand for parking on event days. However, unlike the prior impacts identified, the implementation of two mitigation measures would reduce the impacts to a less than significant level. These actions, Mitigation Measure 3.7-5 and 3.7-6 (DEIR p. ES-17) call for the use of stacked parking in specific lots on high demand days and the implementation of all traffic and parking control plans on NFL game days that are currently implemented for events at the Rose Bowl, respectively.

#### **ALTERNATIVES:**

The DEIR analyzed three project alternatives that would avoid or lessen significant environmental impacts, while still meeting the basic objectives of the project:

##### 1) No Project Alternative

This alternative assumes there would no change in the number or type of allowed displacement events at the Rose Bowl Stadium and there would continue to be 12 events held annually.

2) Reduced Attendance Alternative

This alternative would still permit the additional displacement events for NFL games, but would reduce attendance per event to a maximum of 50,000 attendees; a reduction of approximately one-third. This alternative would reduce significant impacts related to Air Quality (specifically, particulate matter 10 microns or less in diameter (PM10)), Greenhouse Gases, Land Use, as well as Transportation, Circulation, and Parking (specifically, intersections and street segments). When compared to Alternative 3, Alternative 2 is the environmentally superior alternative.

3) Reduced Non-NFL Displacement Event Alternative

This alternative would still permit additional displacement events, would reduce the additional number of events from 13 to 9, and would restrict the types of events to non-NFL events, such as other sports, concerts, or other activities that have a maximum attendance of 75,000 patrons. Similar to Alternative 2, this alternative would result in reduced significant impacts related to Greenhouse Gases and Land Use, but would not reduce impacts related to Air Quality and Transportation, Circulation, and Parking.

**CONCLUSION:**

It is requested that the Commission review and comment on the DEIR for the Temporary Use of the Rose Bowl Stadium by the National Football League (NFL). The public review period for the draft EIR began on August 9, 2012, and will conclude on October 8, 2012.

After the comment period ends, responses will be prepared for inclusion in the Final Environmental Impact Report (FEIR) which will be presented to the City Council for review and certification of the FEIR and consideration of the Municipal Code Amendment to the Arroyo Seco Public Lands Ordinance.

Respectfully Submitted,



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Attachments:

Attachment A – Draft Environmental Impact Report, Executive Summary