

CHAPTER 4

Other CEQA Considerations

4.1 Significant Unavoidable Impacts

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe any significant impacts which cannot be avoided. Specifically, Section 15126.2 (b) states:

Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.

As evaluated in Section 3.0, Environmental Impact Analysis, of this Draft EIR and summarized below, implementation of the proposed Project would result in significant and unavoidable impacts related to: air quality (project and cumulative), greenhouse gas emissions (project and cumulative), noise (project and cumulative), recreation (cumulative only), and traffic (project and cumulative). The following is a summary of the significant and unavoidable impacts for each topic area.

4.1.1 Air Quality

As discussed in Section 3.2, “Air Quality,” of this Draft EIR, setup and breakdown activities associated with the proposed Project would generate pollutant emissions from the following activities: (1) vendor trips; (2) employees traveling to and from the Project site; and (3) fuel combustion by on-site construction equipment. When analyzing the Project’s worst-case construction scenario, these activities have the potential to temporarily create emissions of fumes, equipment exhaust, dust, and other air contaminants that exceed South Coast Air Quality Management District’s (SCAQMD) recommended maximum daily significance threshold for oxides of nitrogen (NO_x) and carbon monoxide (CO), even after mitigation measures have been implemented.

During operations (the three days of the Festival), the proposed Project would result in short-term regional emissions of criteria air pollutants and ozone precursors associated with area sources and mobile emissions that could potentially exceed the SCAQMD’s applicable thresholds for ROG, NO_x, CO, particulate matter (PM₁₀, and PM_{2.5}) even after the implementation of mitigation measures. Vehicular travel by passenger vehicles,

shuttles, and vendor trips represents the majority of the emissions for all of the pollutant exceedances.

The proposed Project is located within the South Coast Air Basin (SCAB), which is considered the cumulative study area for air quality. Because the SCAB is currently classified as a state nonattainment area for ozone, PM₁₀, and PM_{2.5}, cumulative development consisting of the setup and breakdown activities generated by the proposed Project along with other reasonably foreseeable future projects in the SCAB as a whole would violate air quality standards for NO_x and CO even with the implementation of mitigation measures. Operational emissions (over the three days of the Festival) associated with the proposed Project, would also exceed the SCAQMD's thresholds of significance for ROG, NO_x, CO, PM₁₀, and PM_{2.5} even with the implementation of Mitigation Measures AIR-1 and AIR-2.

Although the SCAQMD's applicable thresholds would be exceeded, the exceedances would only be temporary as the Festival only occurs over 3 days during the year for up to 20 years. Additionally, as the year's progress, the vehicles will become cleaner and, therefore, mobile source emissions would be reduced consistent with the turn-over of the vehicle fleet. Nevertheless, given the worst case scenario analysis, air quality emissions for the proposed Project are potentially significant and unavoidable, even with the implementation of mitigation measures.

As described above, operational emissions (over the three days of the Festival) associated with the proposed Project would exceed the SCAQMD's thresholds of significance for ROG, NO_x, CO, PM₁₀, and PM_{2.5} even with the implementation of mitigation measures. The proposed Project could conflict with SCAQMD's air quality planning efforts for nonattainment pollutants and, thus, would result in a cumulatively considerable net increase in nonattainment pollutants during operations. Therefore, cumulative impacts associated with operational emissions would be significant and unavoidable.

4.1.2 Greenhouse Gas Emissions

As discussed in Section 3.5, "Greenhouse Gas Emissions," of this Draft EIR, implementation of the proposed Project would result in an increase in annual GHG emissions associated with vehicle traffic including worker and vendor vehicles during setup and breakdown, and patron and employee vehicles and shuttles during the 3-day Festival. The operational GHG emissions are projected to exceed the SCAQMD proposed annual threshold of 3,000 MT CO₂e at 7,695 MT CO₂e, thus resulting in significant impacts. While the proposed Project includes Mitigation Measure GHG-1 to reduce GHG emissions, it is not certain whether impacts would be reduced to below the level of significance and, thus, impacts are considered significant and unavoidable. Given this significant impact, the proposed Project-specific incremental impact

associated with GHG emissions would be cumulatively considerable and the cumulative impact would be significant.

4.1.3 Noise

As discussed in Section 3.7, “Noise,” of this Draft EIR, impacts associated with the Festival-related noise at the Project site (including amplified concert noise) would be less than significant. However, during the three-day Festival, off-site noise sources would include mainly traffic on various roadways leading to the Project site and five off-site parking areas by patrons and employees of the Festival. Significant traffic noise impacts would occur during both the weekday (Friday) and weekend days (Saturday and Sunday) at most of the analyzed roadway segments in the Project vicinity with the exception of the following roadway segments: Mountain Street (between Raymond Avenue and Summit Avenue); Del Mar Boulevard (east of Hill Avenue); Baldwin Avenue (between Huntington Drive and Hugo Reid Drive); and Huntington Drive (between Baldwin Avenue and Holly Avenue. The maximum noise increase (relative to the existing conditions) due to the Festival-related off-site traffic during the weekday (Friday event) would be up to 10 dBA Leq (along Washington Boulevard between Arroyo Boulevard and Rosemont Avenue) during the peak arrival hour and up to 33 dBA Leq (along Salvia Canyon Road between West Drive and Afton Street) during the peak departure hour. During the weekend day (Saturday and Sunday events), the maximum noise increase due to the Festival-related off-site traffic would be 11.2 dBA Leq during the peak arrival hour and 28.2 dBA Leq during the peak departure hour (along Salvia Canyon Road between West Drive and Afton Street). Therefore, as a majority of the analyzed roadway segments in the Project vicinity, including roadway segments surrounding four of the five off-site parking lots would experience an increase in noise levels over their existing ambient conditions by 5 dBA or more as a result of the Project’s traffic, traffic noise impacts associated with Project operations would be significant. While this increase would be very limited in duration (during specific timeframes over a 3 day period, and not over the entirety of the three days), noise impacts associated with the off-site traffic would exceed thresholds and are considered significant.

The Project and other cumulative projects would produce traffic volumes (off-site mobile sources) that would contribute to cumulative roadway noise. The primary roadways to the Project parking lots would be limited to ticketed patrons and, thus, the cumulative off-site traffic noise impacts would be controlled mostly by the Project-related traffic. Given that noise impacts due to the Project-related traffic would result in significant impacts, the Project’s off-site roadway noise impacts could incrementally contribute to a cumulatively considerable noise impact.

4.1.4 Recreation

As discussed in Section 3.9, “Recreation,” of this Draft EIR, the proposed Project would result in a temporary increase in visitors in the Central Arroyo Seco due to the influx of

Festival attendees during the 3-day Festival. During the Festival event, programmed and passive recreational users would be displaced during the setup, breakdown, and 3-day Festival. The proposed Project would increase the number of displacement events allowed without further City Council approval from 12 to 15 annual events for a period of up to 20 years, and particularly would require a prolonged setup and breakdown period of over nearly four weeks for the Festival, which is much longer than traditional displacement events. Combined with the existing 12 displacement events, the current use of recreational facilities within the City of Pasadena, and the projected increase in recreational patrons due to the 79 related projects, the Project's impact of the two weeks of setup and one week of breakdown for the Festival has the potential to cumulatively increase the use of parks and recreational facilities within Pasadena, such that physical deterioration would occur. Thus, the Project's contribution to cumulative impacts is considered potentially significant.

City departments (i.e., Department of Human Services and Recreation or Public Works) have developed ways to respond to increased demand on City recreational facilities during existing displacement events and other high use periods, particularly in instances, such as this, when they can be planned for in advance. Given that the Festival would occur during the same timeframe each year, there would be substantial lead time for the appropriate City departments to ensure that sufficient resources are available to adequately maintain additional service population (should it occur) at the various recreational facilities Citywide. Nonetheless, as noted above, the Project would displace recreational uses in the Arroyo Seco for a period of nearly four weeks, and the use and potential deterioration of citywide parks and recreational facilities by displaced patrons would contribute to an overall increase in citywide recreation impacts. Thus, the Project's incremental contribution to the recreation impacts described herein is considered cumulatively considerable. The City is responsible for maintaining its parks and recreational facilities and would determine the level of effort needed to maintain such facilities with the increase in displacement period associated with the Festival.

4.1.5 Traffic and Circulation

As discussed in Section 3.10, "Traffic and Circulation," of this Draft EIR, the proposed Project would generate additional traffic by adding three displacement events at the Rose Bowl Stadium. The proposed Project would anticipate approximately 69,028 daily attendee vehicle trips generated each day of the Festival, of which an estimated 6,903 trips (6,239 inbound/664 outbound) would be generated during the arrival peak hour and 20,707 trips (1,991 inbound/18,716 outbound) would be generated during the departure peak hour on both a weekday and weekend day.

Pursuant to the City of Pasadena's Transportation Impact Analysis Guidelines, the project would result in significant and unavoidable impacts related to vehicle miles traveled (VMT) per capita and vehicle trips (VT) per capita. The Project's incremental change of VMT per capita using a service population of 3,400 persons (consistent with

the City of Pasadena analysis methodology requirements) was calculated to be 450.3 VMT per capita. The Project's incremental change of VMT per capita using a service population of 93,000 persons was calculated to be 16.5 VMT per capita. Because the Project's increment of VMT per capita would be greater than the Pasadena citywide average of 22.6 VMT per capita, the Project's impact is considered to be significant.

The Project's incremental change of VT per capita using a service population of 3,400 persons (consistent with the City of Pasadena analysis methodology requirements) was calculated to be 11.6 VT per capita. The Project's incremental change of VT per capita using a service population of 93,000 persons was calculated to be 0.4 VT per capita. Because the Project increment of VT per capita would be greater than the Pasadena citywide average of 2.8 VT per capita, the Project's impact is considered to be significant.

Four scenarios (Existing Plus Project, Future (2016) Plus Project, Future (2026) Plus Project, and Future (2035) Plus Project), were analyzed to determine the potential effects of the proposed project under both weekday and weekend conditions. Under the Existing plus Project scenario, 18 of 43 study intersections would be significantly impacted under both weekday and weekend conditions (over a three-day period). Under the Future (2016) Plus Project scenario, 13 of 43 study intersections would be significantly impacted under weekend conditions. Under the Future (2026) Plus Project scenario, 21 of 43 study intersections would be significantly impacted under weekday and 15 intersections would be significantly impacted under weekend conditions (over a three-day period). Lastly, under Future (2035) Plus Project conditions, 21 study intersections would significantly impacted under weekday and 16 intersections would be significantly impacted under weekend conditions (over a three-day period). Mitigation measures and traffic management strategies were included in the Project to reduce potential impacts; however, even with implementation, impacts would remain significant and unavoidable.

Implementation of the proposed Project would result in temporary impacts to CMP arterial intersections. The LOS analysis for the future (2026) Plus Project scenario determined that the Festival would significantly impact one intersection. The LOS analysis for the future (2035) Plus Project scenario for determined that the Festival would significantly impact two intersections. Mitigation measure TRA-1 would be implemented, which would help improve overall circulation issues in surrounding jurisdictions resulting from the proposed Project. However, even with implementation of this measure, the traffic impacts would remain significant and unavoidable.

Altogether, the proposed Project would increase the number of displacement events from 12 to 15 per year. When combined with current, future, and foreseeable projects, the proposed Project would have significant impacts on area intersections, freeways, and transit, over the three-day period when the Festival would be held under present

and future (2035) conditions. The Project impacts, though temporary and reduced by implementation of Project mitigation measures, are considered significant and unavoidable.

4.2 Growth Inducing Impacts

Section 15126(d) of CEQA Guidelines requires that this section discuss the ways in which the proposed Project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Projects that are traditionally or most commonly considered growth inducing are those that would remove obstacles to population growth (for example, a major expansion or a wastewater treatment plant may allow for more construction in its service area, or a new freeway may allow growth at freeway exits). A project could also induce growth by creating an amenity that attracts new population or economic activity. The *CEQA Guidelines* also require a discussion of the characteristics of projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Finally, the CEQA Guidelines also state that it must not be assumed that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment.

Implementation of the proposed Project would represent an increase in the number of displacement events allowed at the Rose Bowl Stadium facilities and would expand the uses that could occur within the Brookside Golf Course on a temporary use basis. The increase in displacement events would be in the form of an annual two- or three-day Festival. The proposed Project would not result in the construction of any residential uses (or any other types of uses) that could directly induce population growth in the City of Pasadena or the surrounding vicinity. Additionally, the Project site is currently located in a highly urbanized area that is already developed with infrastructure and, thus, no expansion of municipal infrastructure or public services would be required to accommodate the Project.

The proposed Project would result in a temporary employment and economic generator for the City of Pasadena. Approximately 3,400 temporary jobs would be provided that would largely come from the existing service and entertainment industry present in the greater Los Angeles area. Given the temporary nature of the event and the abundance of jobs in this sector, the proposed Project would not create permanent jobs that would induce in growth in the Project area.

The proposed Project also has the potential to foster indirect economic growth. The Festival would introduce a yearly event that would bring in a crowd up to 93,000 people daily, including attendees and employees. A daily increase of this size would result in a general increase in patronage of local businesses and services. Given the number of displacement events that currently occur at the Rose Bowl, businesses in Pasadena, such as restaurants, hotels, and retail stores, are able to cater to the temporary increase

in business. Thus, this demand would be met by existing commercial businesses that cater to these services and would not induce growth. While the proposed Project could be considered an amenity that attracts new population or economic activity, the temporary nature of the Festival (a maximum of three days each year, plus three weeks of setup and teardown activities are included) would not be expected to increase the intensity of, or change the future pattern of, growth in Pasadena. Therefore, there would be no direct or indirect environmental impacts related to growth inducement.

4.3 Significant Irreversible Environmental Changes

In accordance with Section 15126.2(c) of the CEQA Guidelines, an EIR is required to evaluate significant irreversible environmental changes that would be caused by implementation of the proposed Project. As stated in CEQA Guidelines Section 15126.2(c), “[u]ses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.”

The proposed Project is a temporary event, and no development activities or permanent change to the Project site or surrounding area would occur. No irreversible commitment of land or other resources would occur. In addition, this Project does not involve construction of any permanent facilities that would require the commitment of construction materials, electricity, water, or natural gas. However, the Festival setup and breakdown process would generate a minimal amount of solid waste. This includes, but is not limited to, the disposal of packing materials, waste generated by onsite staff, and any other waste generated as a result of setting up a Festival. While the Project would not involve the construction of any permanent facilities, temporary structures would be constructed out of existing and new construction materials. However, it is not anticipated the Project would require a great deal of new construction material given that the temporary stages are portable and reused for multiple concert events. As discussed on page 50 of the Initial Study that was circulated for this EIR (see Appendix A), the Festival operator is committed to recycling and waste reduction practices and there is sufficient capacity in local landfills to serve the proposed Project.

During Project setup, energy would be consumed mostly in the form of petroleum-based fuels used for transport, lighting, staff vehicles, and equipment used for setup on the Project Site, as well as staff travel to and from the Project site. Festival operations that could increase the use of energy during the music festival displacement event include, but are not limited to, lighting, sound systems, concession stands, and general entertainment operations. Vehicle trips associated with employees and attendees would

also use oil-based energy. Energy needed to operate the event would be provided primarily through generators and supplemented with electric supply provided by the Rose Bowl (via Pasadena Water and Power) for needs within the Rose Bowl (lighting, concessions, restrooms, etc.), as for all current events, and also by mobile generators that would be located throughout the project site as needed. While the annual addition of three displacement events (which are proposed to consist of a single, three-day music festival) above the existing 12 displacement events would increase the demands for energy on the City's utility infrastructure, this increase in demand would be short term given the temporary nature of displacement events. Additionally, the Rose Bowl Stadium is currently undergoing a comprehensive renovation that will upgrade the existing infrastructure and improve water conservation and energy efficiency during all events at the stadium (RBOC, 2015). Thus, while there would be a temporary increase in energy use with implementation of the proposed project, this use would be offset by generators brought onsite by the project operator. Furthermore, energy use would be further supplemented by the energy savings that would occur as a result of the infrastructure renovations that would increase energy efficiency at the project site.

Energy consumption would also occur from increased vehicular traffic and usage of a limited water supply. Impacts from the incremental increase in vehicular traffic, and the associated air pollution include the emissions from haul trucks transporting supplies throughout the set up and breakdown of the proposed project and motor vehicle travel of festival attendees and staff, which would rely heavily on carpool and shuttle services.

In summary, Project setup, breakdown, and operation would require the irretrievable commitment of limited, slowly renewable, and non-renewable resources, which would limit the availability of these resources for future generations or for other uses during the life of the proposed Project. However, this commitment would not be a long-term obligation as the increase in displacement events would occur for a temporary duration for a period of up to 20 years and the use of such resources would be on a small scale considering the commitment to recycling and waste reduction and energy efficiency measures. Given the Project's limited use of non-renewable resources and the limited nature of the Festival, the Project would not result in significant irreversible changes to the environment.