

RoseBowlNFLComments@cityofpasadena.net.

Written comments on the Draft EIR must be submitted to the City by close of business Monday, October 8, 2012.

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RE: Public Comment for Draft EIR on Rose Bowl - Temporary Use by NFL

Day One is a Pasadena-based non-profit organization with over two decades of experience in the realm of public health education, policy and environmental prevention. As such, Day One is actively interested in planning and land-use decisions that affects the health and well-being of residents of the City of Pasadena and greater San Gabriel Valley.

3.6 Recreation

The Central Arroyo is Pasadena's preeminent recreational facility. Thanks to its pedestrian-friendly infrastructure, low volume of automobile traffic, and heavy usage by pedestrians, soccer players, swimmers, cyclists, joggers, runners, model aircraft enthusiasts and other users, the area has become increasingly popular as a safe space to recreate at all hours. Recent improvements to the "Rose Bowl Loop" have further increased use in the past few years, yet an accurate accounting of current users does not exist.

Given the singular nature of this city resource, any uses that limit public access to the Central Arroyo, particularly ones that impose additional health burdens on our community, should be avoided or minimized to the greatest extent possible. Indeed, with 19% of adults and 21% of children in Pasadena currently obese, resources like the the Central Arroyo are of critical importance insofar as they provide first-rate recreational space where City residents can safely exercise with others.

Due to the unique characteristics of the Central Arroyo's facilities, the DEIR's references to "alternatives" such as La Pintoresca park, the Gamble House, and Wrigley Gardens are misleading. Members of the public feel safe using the Rose Bowl Loop at all hours of the day. This is of particular importance to working families and individuals who cannot recreate during daylight hours and live in adjoining areas such as northwest Pasadena, where City parks are not considered safe after nightfall. The "loop" also offers users 3.3 miles of dedicated space to walk, jog, run or skate without interruption - a recreation opportunity unavailable at any of the listed alternatives. Finally, and of equal importance, the Central Arroyo grants users the opportunity to recreate in the company of hundreds and sometimes thousands of other users, a motivating factor in of itself. The listed alternatives are therefore either ill-suited or unavailable for many recreational uses, and should not be considered genuine alternatives to the Central Arroyo's recreational opportunities. As such they should be removed from DEIR.

The DEIR also fails to recognize that the intensification of use associated with an enormous increase in annual users would have deleterious impacts on the Central Arroyo's recreational facilities. Five years of NFL football at the Rose Bowl would generate an estimated 4-5 million game day users, and result in the loss of approximately 125 days - as opposed to the current 60 - of recreational use by the public. Yet no mitigation efforts to rehabilitate and restore the resulting damage has been proposed.

The DEIR seeks to mitigate the loss in recreational space by recommending that the Rose Bowl Operating Committee (RBOC) maintain access to the Central Arroyo for all recreational users during NFL and "other" displacement events. Unfortunately this mitigation is completely unrealistic, and should be removed from the DEIR. For UCLA and other displacement events, the Central Arroyo is closed for all recreational users 6 hours before the event, and does not reopen for 2 hours after the event. Yet these hours do not accurately reflect the impact of game days, which generate higher than average volumes of traffic, restrict parking, and produce other disturbances that impede recreational use of the loop and other facilities outside of this window of time. Indeed, event setup, breakdown, and cleanup all limit opportunities to safely recreate in the Central Arroyo before and after large events.

Recommendations - While no level of mitigation will offset the loss of the Central Arroyo's unique recreational opportunities, the DEIR should propose more robust mitigation steps, including:

- Improve lighting and security at adjacent parks to enhance safety on game days.
- Remove delineators along the Rose Bowl loop on game day (as opposed to a day prior as is now the case) and replace them within 4 hours of the conclusion of the game. These reflective pylons enhance the safety of loop users from automobile traffic and should not be removed longer than absolutely necessary.
- Rehabilitate/repair trails and other infrastructure resulting from increase in large event users.
- Improve lighting around Rose Bowl Loop to enhance safety of pedestrians during displacement events.

Public Safety

Game days constitute a unique public safety and public health challenge for the host community. According to researchers such as Virginia J. Dodd and Tavis Glassman from the University of Florida, sports-connected drinking commonly results in binge drinking. With an estimated 90% of large event attendees depending on automobiles to access the Rose Bowl, alcohol-use norms associated with college and NFL football games increase the numbers of impaired motorists on city streets.

The impact of an increase in motorists traversing City streets under the influence of alcohol has not been adequately examined by the DEIR. As a result steps to mitigate this impact of an increase in displacement events to host the NFL have not been proposed by the consulting team. This oversight should be addressed in the final EIR, including recommendations.

The RBOC's current policies around alcohol use should also be strengthened if additional displacement events are permitted. Although recent changes to the stadium's tailgating policy were a step in the right direction, there is substantial room for improvement. For example, the Rose Bowl website's "[Vehicle Tailgating Policy](#)" page prompts members of the public to call or email if they witness unruly behavior, yet does not list an actual number or email account.

"If you see rivalries or other incidents where there is a threat of violence or other conduct getting out of hand, please email [a special email account will be established] or call [a special number will be established] to report the location and to describe the incident."

While the efficacy of email on event days is questionable, at the very least an emergency number to call should be prominently displayed on the website. Displacement event signage urging members of the public to call/text a designated number(s) should also be created and displayed at all large events.

To mitigate the effects of event-day binge drinking, researchers recommend that organizers provide more alcohol-free game day alternatives, and that areas for tailgating parties be designated, and the number of tailgating hours permitted limited.

Especially when considering the different fan bases of UCLA and NFL football, stronger, across-the-board standards that incorporate evidence-based strategies should be adopted for all major displacement events at the Rose Bowl to mitigate the deleterious impacts associated with tailgating, alcohol use and alcohol-impaired driving.

Recommendations - Further mitigation needs to mitigate the impact to public safety and emergency services on event days. The following recommendations include evidence-based methods to reduce the negative impacts to public safety on game days.

- **Reducing Drunk Driving**
 - **Institutionalize DUI checkpoints** - at least two DUI checkpoints should be set up along ingress/egress routes on all Game Days.
 - **Increase visibility of DUI enforcement** - enforcement activities should be made highly visible on to amplify their preventative impact as much as possible. Possible strategies include:
 - Placement of the City's DUI enforcement trailer prominently at venue entrances;
 - Posting of DUI Enforcement signage/notices on other venue vehicles;
 - Announcement of enforcement efforts on stadium PA every game and on containers (e.g., beverage, concessions) served inside of stadium.
- **Promoting Public Transportation** - Additional incentives to encourage the use of public transit should be added, including:

- Inclusion of a Metro pass/discount with purchase of every game day ticket;
 - Regular shuttles from Memorial Park Gold Line station to stadium (fans should not have to walk to Parsons lot);
 - Bike valet at stadium and Parsons.
- **Improving Tailgating** - In addition to the existing rules, the following tailgating “best practices” from other stadiums around the country should be employed to mitigate the increased risk to public safety and recreational facilities.
 - Tailgating areas should:
 - Be restricted to ticket holders only;
 - Be limited to 4 hours prior to kickoff (no alcohol after kickoff);
 - Be limited to beer and wine;
 - Include a designated alcohol-free tailgating area for families;
 - Include alcohol-free alternative activities for participants.
- **Supporting Responsible Fan Behavior** - The Rose Bowl’s website urges members of the public to call if they experience any problems, yet fails to publish an actual number. The RBOC should urge event attendees to assist law enforcement and public safety by reporting all unruly fan behavior. To facilitate this effort, the following mitigation steps should be adopted:
 - Establish an easy-to-remember number to report problems by phone;
 - Establish a Text Messaging system for fans to report unruly behavior;
 - Publicize both numbers and tailgating policies on website, and printed materials (e.g., pamphlets handed out to attendees as they enter tailgating areas).

Conclusion

As a whole, the Draft Environmental Impact Report (DEIR) understates the detrimental impacts to public safety and recreation that the proposed use would entail, and fails to adequately quantify and identify the Central Arroyo’s growing role in improving the health of both City residents and visitors. The final EIR should address these issues and incorporate meaningful, robust steps to mitigate their detrimental impact on the community.

Best regards,

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