

CALIFORNIA INSTITUTE OF TECHNOLOGY

**Division of Chemistry and Chemical Engineering, 101-20
Pasadena, CA 91125**

**Jonas C. Peters
Bren Professor of Chemistry
Warren & Katharine Schlinger Laboratory
for Chemistry & Chemical Engineering**

**Phone (626) 395-4036
FAX # (626) 395-6948**

jpeters@caltech.edu

Dear Mr. Sinclair:

My name is Jonas Peters and I am a City of Pasadena resident and a Professor of Chemistry at the California Institute of Technology with expertise in chemicals of an organic and inorganic nature and how inorganic species interface with biological systems (bioinorganic chemistry), having relocated here in 1999 for work. I live, work, and am raising a family here in Pasadena. I am also a founding member of the newly formed community group that calls itself the "East Arroyo Neighborhood Preservation Committee", a group of local citizens collectively dedicated to the concept conveyed by this name.

Based on the DEIR, the information I learned from it, and also the severe gaps exposed in it as a result of my own reading, CEQA mandated standards that must be met, in addition to extensive comments and discussions at the Special Meetings I attended of the Planning Commission (Sept 19 2012), the Transportation Commission (Sept 27 2012), and the Recreation and Parks Commission (Oct 2 2012), I oppose renting the Rose Bowl to the NFL for any length of time, and any associated change thereby required of the Pasadena Municipal Code, as such a change would have a profoundly negative impact on the quality of life of Pasadena residents and neighboring communities, our health, and our happiness. My opposition additionally stems from what I learned by reading the thoughtful study compiled by the Urban Land Institute, dated Jan 30-Feb 2 of 2012, on the topic of the "Rose Bowl and the Central Arroyo Seco" by a Governors Advisory Panel, that explicitly states (page 21 of the report) that "Finally, the panel recommends that the city not be swayed by the offer to temporarily host the National Football League. It was the panel's opinion that such an effort would be detrimental to the ultimate goal of making the Central Arroyo Seco a sustainable part of the Pasadena community."

I have numerous concerns in regards to the DEIR that was made available to the public for comment, and address some of these concerns below. I urge City Council Members and the Mayor Bogaard not to approve this EIR. It is highly flawed on many fronts, and is in certain areas completely negligent. In areas where it might be somewhat accurate, such as informing us of traffic problems (detailed below), it is clear and unequivocal that we cannot mitigate and hence avoid significant problems. This is also true in terms of the effects of local air quality, where it is clear that we would exceed SCAQMD thresholds by nearly an order of magnitude (or worse in the vicinity of the Bowl itself) in various pollutants, including particulate matters (PMs), pollutants that are exceedingly well documented to be linked to severe human health problems. Moreover, most of the mitigation measures (MMs) detailed in the DEIR verge on triviality and do not do justice to the capacity of reasonable Pasadena citizens to carefully weigh and consider the validity of these stated MMs, nor do they meet CEQA standards in a great many instances.

Below I detail some of the problems associated with the DEIR and/or highlight some cautionary information we should note from it in thinking about the sanity of this project. I have put a substantial degree of thought into these issues, some of which I introduced in person at Special Meetings of the Planning Commission, the Transportation Commission, and the Parks and Recreation Commission these past few weeks. In addition to my many concerns as a citizen and resident of Pasadena, there are certain topics of the DEIR where my own professional background in the natural sciences causes me to raise substantial environmental concerns that are not given due study in the DEIR. I apologize in advance for the various typos, any inconsistencies, and possible redundancy that may remain in this letter. I will be happy to provide clarification on any topic that is herein covered, and would happily correct any information written here that is not factual and resubmit a corrected letter. It is being submitted in its current form to meet the City of Pasadena imposed deadline of October 8th 2012. Also, I note that I submitted some written text to accompany my spoken comments at the Special Transportation Commission Meeting (Sept 27th), and the text submitted here is inclusive of that text, and has been revised and expanded. This present text should be assumed to be a replacement for that previously submitted text, which was written in admitted haste on the day of that Special Transportation Commission Meeting.

DEIR TRAFFIC ANALYSIS SHOWS SIGNIFICANT IMPACT TO 85% OF INTERSECTION SITUATIONS ON WEEKDAYS AND 74% ON WEEKENDS – MITIGATION METHODS (MM's) MAKE NO CHANGE TO THESE TWO STATISTICS

There is frightening data contained within this DEIR report to heavily consider, despite its many failings. Traffic is one such area where the data is abundantly evident and weighs heavily against moving forward with this project.

Table 3.7-16 of the DEIR lists 66 intersections studied pre- and post-game (132 total intersection situations including all pre- and post-game situations) as part of this DEIR and estimates traffic impact LOS (level of service) grades for each of them, assuming a project goes forward: Summary of these scores are tabulated using LOS below:

Weekday Future w/ project LOS score:

38/132 score F: 29% have the worst score
possible 10/132 score E: 8% have the second worst score
22/132 score D: 17% have the third worst score

**Summary: 54% of intersections perform in the bottom half of scoring (F, D, or E)!
112/132 intersection situations would be "significantly" impacted!
This study represents 85% of the situations studied on a weekday game event! Statistics with "mitigation" are virtually identical. MMs are not shown to be effective.**

These data establish that, under no circumstances whatsoever, should the City of Pasadena proceed with weekday NFL games at the Rose Bowl. Traffic is predicted to become horrendous on such occasions.

How about weekend games? The data from the DEIR is as follows:

Weekend Future w/ project LOS score:

19/132 scored F: 14% have the worst LOS score possible
24/132 scored an E or D.

32% of intersections are in the bottom half of LOS scoring (F, D, or E)!
98/132 intersection situations would be “significantly” impacted!
This represents 74% of the situations studied on a weekend!
Statistics with mitigation are again identical. MMs are not shown to be effective.

These data unequivocally establish that, under no circumstances whatsoever, should the City of Pasadena proceed with weekend NFL games at the Rose Bowl either.

The summary data tabulated above show that on both weekdays and weekends the traffic impacts to the City of Pasadena are enormous with mitigation not changing the situation much for the better. These data argue strongly against moving forward. Why change a good quality of life to our residents to a bad one? So NFL fans can watch a football game?

Summary statements from the DEIR establish the unequivocal nature of these projected traffic problems.

See 3.7-89 of the DEIR, where, consistent with my own math, it is shown that *“after applying the appropriate adjustments to the v/c and LOS calculation to account for MM 3.7-2, it was determined that the proposed mitigation will reduce the project related incremental v/c resulting in partial mitigation of the project’s traffic, however, the reduction in v/c will not be enough to reduce the impact to a less than significant level at any of significantly impacted intersections.”*

Again, the DEIR is clear. It states on 3.7-97: **“It is expected that impacts to the 20 CMP [Congestion Management Program] freeway-monitoring stations, though temporary, would remain significant and unavoidable.”**

Given anticipated traffic build-up, the possible impacts of local air quality, noise, and safety on parks, schools, and other points of congregation, especially by young children, near all significantly impacted intersections and arteries must be thoroughly studied.

Drunk Drivers: Given the obvious likelihood of a substantial increase of drivers in the Pasadena area that have consumed high levels of alcohol coming to and especially departing an NFL RB event, the DEIR should study the possible hazards that will be created. There will be more traffic accidents, and the likelihood of children and casual pedestrians being hit by cars will rise. The DEIR does not address this issue at all, and it’s such an obvious one. The only way to truly mitigate against drunk drivers is to do sobriety checks on drivers and remove them from vehicles when they fail such tests, or to not allow alcohol anywhere near the displacement event or in the tailgating hours preceding it. The former mitigation approach would be a nightmare from a traffic perspective as moving cars along is critical, and stopping cars to do sobriety checks would create total traffic havoc. The latter scenario would be highly effective, but will not likely be on the table for NFL events as the NFL would never agree to an alcohol-free displacement event. Indeed, alcohol will be a huge part of such events outside of the stadium (tailgaters and such), and perhaps in the stadium, too. The DEIR does not address these issues but they will greatly impact or local environment. These issues must be addressed, and mitigation measures must be advanced that ensure public safety in the face of knowledge about the likelihood of intoxicated drivers leaving the NFL game displacement events. This analysis should include displacement events where it rains and cars are allowed to park in local neighborhoods in lieu of the golf course (so as not to completely ruin the golf course), hence posing a huge safety hazard to local neighborhoods where alcohol consumption has occurred by departing drivers.

IMPACTS OF TRAFFIC/PARKING TO LOCAL NEIGHBORHOODS

The EIR does not make mention of the extraordinary inconvenience resulting from access/traffic/parking controls during games on adjacent neighborhoods. This is a serious and exceedingly well known problem for displacement events, and the DEIR needs to address this subject and provide very thoughtful mitigation measures to counter. The cumulative effects of up to an additional 13 such displacement events will begin to take their toll in a dramatic way on area residents. At present, we are often prohibited from parking on our own streets on game days up to 14 hours before the start of a UCLA game. Proof of this is provided by the photo below, taken on Sept 22nd on California Blvd West of Orange Grove Blvd. The UCLA game start time was 12:30 pm (UCLA vs Oregon St). As is obvious from the photo below, a resident with a home on that street would have been towed starting at 4am of that day. The attendance for this game was 54,636, far lower than the 80,000 seats the NFL would hope to fill as they build their fan base. In addition, the DEIR needs to specifically address whether cars will ever be allowed to park on the streets in local neighborhoods, as is typical on UCLA game days when it rains (a mitigation measure used to protect the golf course). If this is to be allowed, the environmental impact of this allowance needs to be studied, and specific MMs need to be provided to maintain the safe, peaceful quality of life in these neighborhoods. Also, if the terror alert level in the US is high for any reason, will additional measures be taken by police to further restrict traffic and parking in neighborhoods around the RB, to ensure a higher level of public safety? What would these measures be, and what additional nuisance for local residents would this create? The DEIR should address a variety of unexpected but reasonable scenarios in considering the full impact this project may have on local residents.



Parking is prohibited for long stretches (miles) of some residential streets throughout game days – this is not accurately evaluated in the DEIR but should be.

Highly restricted access to residential neighborhoods on displacement event days occurs for residents *and* their visitors dramatically impacting their normal weekend activities (shopping, play dates, family gatherings, etc). This is not accurately evaluated in the DEIR but should be.

One-way traffic for hours on game days on certain residential streets that are the only ingress and egress to some residents needs to be studied in the DEIR.

THE DEIR DOES NOT STUDY IMPACTS TO BUS SERVICE IN PASADENA AND THE IMPACT ON COMMUTERS THAT USE IT DURING DISPLACEMENT EVENTS – SOCIOECONOMIC AND RACIAL BIAS OF THE STUDY, ALTHOUGH PRESUMABLY INADVERTENT, APPEARS TO BE PROBLEMATIC IN THIS REGARD

The DEIR is sorely lacking with respect to impacts to local Pasadena bus service on both weekdays and weekends. This is highly problematic because the user community of local bus lines leans towards socioeconomically disadvantaged citizens whose work and livelihoods depend on reliable operation of such bus services. These include comparatively low-wage workers that need to get to a job, or to get home in time to meet their children getting out of an after school program. When we speak of economic benefit, do we anticipate benefits to landscapers in Pasadena, people that clean homes, people that need to get to a restaurant to work a shift? What about painters, contractors, and home care services? The list goes on. The DEIR must address traffic implications on all transportation lines, buses included, and estimate the true impact on people's lives. On a weekday it's clearly a disaster and a no go. But many low-wage workers need to travel to a job on either a Saturday or a Sunday, or both. What is their fate when a UCLA and an NFL game happen to clog the traffic arteries on both Saturday and Sunday? The DEIR seems in some regards socioeconomically and racially biased in the chosen areas of its focus. There are certain racial and socioeconomic demographics that might be more heavily punished if this project moves forward.

DEIR STUDY MAY BE PROBLEMATIC BY NOT BEING APPROPRIATELY SENSITIVE TO THE GREAT SOCIOECONOMIC AND RACIAL DIVERSITY OF THE POPULATION USING THE ROSE BOWL, BROOKSIDE, AND ALL ASSOCIATED RECREATIONAL FACILITIES ON WEEKENDS AND WEEKDAY EVENINGS – CERTAIN SOCIOECONOMIC AND RACIAL DEMOGRAPHICS MAY SUFFER DISPROPORTINATELY FROM THIS PROJECT AND THE DEIR SHOULD STUDY THIS

The Rose Bowl and Brookside recreation areas are wildly successful in drawing socioeconomically disadvantaged people, and many people from under-represented minority (URM) groups, to engage in healthful exercise of all sorts - running, soccer, baseball, aerobics, walking, playgrounds, etc. These are demographics where routine fitness is often hard to sustain for a host of reasons, and where obesity is known to be problematic among the broader population. A casual walk around the 3-mile loop, gazing at the grass fields of the Rose Bowl and Brookside filled with Latinos and other racial groups playing soccer, women of all races (and some men) doing aerobics, watching softball and baseball and kickball games filled with all types of people, not to mention the playgrounds within Brookside filled with joyful children of all creeds and colors, and many from URM groups, is wonderful to witness and is a great success of the RB recreational area. These various groups make the effort to come to the RB area, often driving, because it is safe and beautiful, and because there is benefit in 'shared community'. Users from socioeconomically disadvantaged and/or URM groups, which likely number in the thousands per week, would be displaced on the weekends and weekday evenings of NFL games in the Fall by a different demographic, presumably one that can afford and would want to attend NFL games. The other parks in Pasadena will not fill the void created, nor provide a similar level of experience. The DEIR casually but incorrectly states that Pasadena's other parks will fill the void created without any real impact to those other parks or areas. How can this be so casually stated? Which parks? What if lots of people decide that Victory Park is the only other reasonable option? Are there services in that park to accommodate perhaps thousands of additional people seeking recreation per week? What will happen to parking in that area? What if it's another park? One reason folks come to the RB area for recreation is the feeling of shared community. People like to jog where they see other people jogging, especially people that want to feel safe while doing so. We're not likely to disperse

equally into the rest of Pasadena's parks. Where is the pressure going to build up, and how will this be dealt with and mitigated? This is a huge environmental impact and has not been addressed in any way close to satisfactorily in the DEIR. For people that live in comparatively higher crime areas of Pasadena, where else will they go and still know that they will be safe? That is another HUGE advantage of the large numbers of people at the Arroyo/RB area. Where else will women during the dusk hours go for their 3-mile walk, and feel they are in the company of other people in an area so well lit? There is no other option for so many of these women.

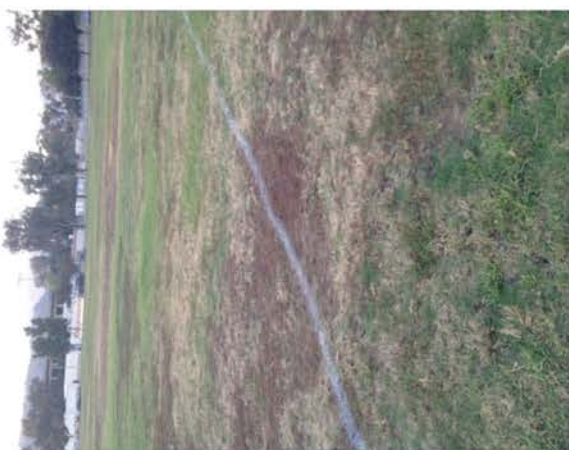
This DEIR needs to establish what demographic of people is displaced and what the specific numbers are, and what demographic replaces it in an NFL displacement event. Are NFL games attended by a higher percentage of men than women? What is the actual percentage? On a typical Sunday in the RB/Arroyo area, what are the relative percentages (NFL games are typically 60% male according to my research)? One could imagine that women will shoulder more of the burden of recreational displacement if they represent more than 40% of the RB area for recreation. These data are available (at least for NFL games) but are not mentioned anywhere. The DEIR should also establish what are the comparative health benefits to the respective groups of people engaging in the two very different types of activity, the present regular users being people obviously engaged in healthful fun and recreation, the NFL fans being engaged in, for the most part, fun entertainment, with food and alcohol consumption being a large part of that entertainment.

As a simple graphic that illustrates how severe the impact of NFL/UCLA games on all weekend recreation in the Rose Bowl/Arroyo Seco area, see the calendar below, which uses current year UCLA games as a baseline with estimated additional NFL events. Essentially every weekend becomes a displacement event weekend from the months between August and January.

	Mon	Tues	Wed	Thurs	Fri	Sat (UCLA)	Sun (NFL)
August	12	13	14	15	16	17	18
	19	20	21	22	23	24	25
	26	27	28	29	30	31	1
September	2	3	4	5	6	7	8
	9	10	11	12	13	14	15
	16	17	18	19	20	21	22
	23	24	25	26	27	28	29
October	30	1	2	3	4	5	6
	7	8	9	10	11	12	13
	14	15	16	17	18	19	20
	21	22	23	24	25	26	27
November	28	29	30	31	1	2	3
	4	5	6	7	8	9	10
	11	12	13	14	15	16	17
	18	19	20	21	22	23	24
December	25	26	27	28	29	30	1
	2	3	4	5	6	7	8
	9	10	11	12	13	14	15
	16	17	18	19	20	21	22
	23	24	25	26	27	28	29

Game Days 

A picture is often worth a thousand words. On the evening of the Recreation and Parks Commission Special Meeting on October 2nd I walked across Lot H to the Media Room where the meeting was being held. Below are a few photos I spontaneously took of a group of young people engaged in a fun touch-football game, in addition to some photos of the grassy lot H field itself, which is showing severe deterioration as a result of the UCLA game season and many other events that require the pitching of tents on it in addition to parked cars. These photos show just some of the types of people that will be displaced, and the type of grass they currently play on in the middle of the week during the Autumn. This grass obviously cannot be repaired in a single day and has taken a beating this season already.





DEIR IS INADEQUATE IN ECOLOGICAL STUDIES OF THE ROSE BOWL AND ARROYO SECO AREA, PARTICULARLY WITH REGARD TO CUMULATIVE EFFECTS OF CHEMICAL WASTE RESULTING FROM TRAFFIC AND OTHER SOURCES AS A RESULT OF USE OF THE AREA FOR DISPLACEMENT EVENTS WITH NEW FREQUENCY OVER A SUSTAINED PERIOD OF TIME

The DEIR fails to address possibly cumulative impacts of great environmental concern resulting from cumulative organic and inorganic chemical waste that is potentially hazardous and even toxic to the environment, as a result of this City proposal to rent the RB to the NFL for up to 5 years and increase the number of allowable displacement events from 12 to 25. CEQA is clear these impacts must be addressed. What are the chemical waste implications related to vehicles and possibly oil and gas leakage/spillage, cooking equipment in tailgating venues and associated disposal of various forms of trash items, cooking within the Rose Bowl, huge amounts of spillage of liquids including beer and high in sugar juices and sodas? How do these cumulative effect change when a single UCLA-type college game is played less than a dozen times per season, virtually never more than one such event in a single 7-day period, to a schedule wherein both a UCLA game and an NFL game would be played in a single week, for example on a Saturday and a Sunday, or a Thurs/Mon and a Saturday. Will these chemical and food-derived wastes products stimulate (or attenuate) the rate of metabolism of microorganisms essential to the ground soils of the Arroyo Seco, or microorganisms possibly harmful to the area? If such metabolisms are changed, what are the cumulative ecological chain effects that might be envisioned? Microbial metabolism is well established to be capable of mobilizing pollutants into ground waters, and the Arroyo Seco carries these pollutants and distributes them to downstream locations. What are these downstream locations? What is the anticipated impact? What is the anticipated environmental impact on various plant species and local Arroyo Seco wildlife? As rainwater washes airborne pollutants that arise from the increased pollution, clearly documented in the DEIR due to vehicle emissions but not including emissions of other sources like outdoor cooking, into the ground soil of the Arroyo, what cumulative change to that natural soil occurs over the time of the project? As living organisms drink that water to sustain life, including microorganisms, insects, and so on up the animal kingdom chain, what impact will there be to the local ecology of the Rose Bowl and Arroyo Seco area? CEQA demands we study these impacts. As particulate matters (PMs) and volatile organic compounds (VOCs) rise nearly an order of magnitude above SCAQMD threshold values with a new frequency due to the scope of this project, what environmental impact to we expect to local residential (and non-residential) gardens, including food-producing gardens? As these pollutants exceed threshold values and thereby increase their rate of dissolution in local residential (and non-residential) swimming pools, including the Aquatic Center, what cumulative effect can we expect? Our children swim in and sometimes accidentally swallow

some water from these pools. *Pollution and water are everywhere, and like the air we breathe, tie all residents and wildlife of the area together regardless of what street or hole we live in.* CEQA is clear that the Arroyo Seco ecology must be studied carefully to establish the impacts that the scope of this project could have. This parkway accounts for a large percentage of Pasadena's public park lands and must be considered precious and be well looked after. Such questions need answers as is clear from CEQA.

PEST CONTROL AND HUMAN HEALTH RISKS THAT COULD RESULT

The current use of the Rose Bowl/Brookside/and associated Arroyo Seco areas and facilities attracts some 10,000-12,000 recreational users on a typical Summer/Autumn Sunday, as was calculated and presented by a member of the Parks and Recreation Commission at the special meeting held on Oct 2, 2012. This number of people, or whatever the true number is (which should be clearly established in the DEIR by sampling actual numbers on numerous Sundays in the months Aug-Jan, looking at the mean average and also the standard deviation), has a large impact on the area already. One of these impacts concerns a vast amount of detritus including waste paper goods, cans, bottles, BBQ waste products, and food. The accumulation of such detritus, or its steady state presence even when removed to the extent possible on a regular basis, attracts a large degree of wildlife looking for food, much of which falls into the Pest category, a category that can be a spreader of numerous diseases including rabies. What is the current Pest population in the area under consideration by this DEIR including the RB and its surrounding Arroyo Seco areas and facilities? What impact would the increase from 12 to 25 displacement events have on the Pest population, over a period of up to 5 years? With the amount of food present at NFL events via tailgating and related activities, much of which is not easily cleaned up and hence is discarded or falls into the grassy fields out of the containers that originally housed it, one can easily and should imagine that local Pest populations would increase, as then would the possibility of Pest-related spreading of diseases to humans and domestic animals. Even with efforts to clean detritus of various types at NFL events, there will be cumulative effects. What if it rains shortly after such an event, spreading all of the waste products quickly into the soils and making it impossible to clean? The DEIR should address how weather might play a role in clean-up, and again provide mitigation measures that are effective.

Also, as the Pest population grows, assuming it would, these Pests can and will then migrate to the surrounding residential areas, especially as the winter chill and rains come and they look for safe shelter. This possibility is not studied in the DEIR and clearly must be – it is a serious possible environmental impact. What mitigation procedures need to be developed to prevent a rise in Pest populations, and what measures need to be put in place to protect local neighborhoods from such increases?

There is also the unpleasant truth that as these pests live in the RB/Arroyo Seco/Brookside area they will continuously defecate, leaving such waste in the surrounding fields, including the golf course, the grassy field called lot H, and all of the Brookside Park grassy areas, and elsewhere. They will also carry and spread fleas. Children and adults numbering in the thousands play in these fields each week. What are the possible health risks to these people as this type of rodent/Pest waste builds up in the grasses and the soils as a result of an increasing Pest population – sustained by waste food sources that result directly from 13 additional NFL events – along with the associated microbial pathogens that might develop as a result? We all know when we go to the beach that washing hands after playing in the sand is important. We also know that we must protect our children from rat feces on occasions when we find it in our homes our yards. In a beautiful outdoor oasis like the Arroyo Seco area, this DEIR should consider the cumulative effects of waste of all types, what the current baseline levels are for

such waste, what the periodicity is for cleansing the waste that cannot be readily removed by human hands from the area, and what adding another 13 NFL events to the area per year – with all of the waste produced and discarded of various types. A large number of displacement events would be compressed into a 5-month period. What might this change do to the balance, and will it move us into a greater imbalance and possibly environmental hazards. It seems to my scientific eyes likely that it could, but regardless, this needs to be addressed in the DEIR specifically, and substantial mitigation measures must be outlined, as we really cannot tolerate “significant and unavoidable” changes for the worse in this category. Human health risks are too much to risk. It saddens me that the DEIR is so limited in where it is willing to place its focus, especially given CAMP and other visionary structures in place to preserve the Arroyo Seco. CEQA calls for a much higher standard.

WOULD LOCAL REAL ESTATE DISCLOSURES NEED TO BE MADE TO PROSPECTIVE HOME BUYERS IN AREAS OF PASADENA IF THIS PROJECT IS NOT IMMEDIATELY SHELVED? MAJOR SIGNIFICANT IMPACTS TO LOCAL TRAFFIC, NOISE, SAFETY, AND POLLUTION ARE ABUNDANTLY CLEAR FROM THE DEIR, AND THIS WILL IMPACT QUALITY OF LIFE THAT CANNOT BE PERCEIVED BY AN UNINFORMED PROSPECTIVE NEW RESIDENT

Given the rather dire and well-documented traffic and associated noise, safety, and local air quality situation raised by Professor Dianne Newman (Caltech) with independent input from Professor John Seinfeld also of Caltech, would the City of Pasadena need to immediately direct local real estate agents presenting Pasadena properties in the vicinity of any of the 66 intersections studies, in addition to the arteries both minor and major studied, to present such information to prospective home buyers as a formal disclosure? Such a disclosure would need to be well-documented, disclosing DEIR predicted changes to health and quality of life issues likely to occur in the future, much in the same way a lead paint or known disturbance disclosure is supposed to be made. Because buyers purchasing Pasadena homes in advance of a possible NFL arrival would have no way of knowing what they were getting into, City officials in such a scenario would need to make immediate efforts to educate all local real estate agents on this topic.

ROSE BOWL JOGGING-WALKING LOOP

DEIR (3.7-15) states “The Rose Bowl loop consists of an approximately 5-kilometer loop and is currently utilized for recreational activities including walking, running, and cycling. The loop consists of Seco Street (between Rosemont Avenue and West Drive), West Drive (between Seco Street and Washington Boulevard), Washington Boulevard (between West drive and Rosemont Avenue), and Rosemont Avenue (between Washington Boulevard and Seco Street). During large-scale special events at the Rose Bowl, it is noted that the potential for conflicts between trail/loop users and special event vehicular traffic and pedestrians is higher than on non-event days.”

The DEIR is completely incorrect on this topic. In advance of displacement events police exclude casual recreation users from using the Rose Bowl 3-mile loop, and post signs to this effect. I have personally tested these waters, trying to jog during a displacement event around the loop. A Pasadena Police officer on a motorcycle ran me down, and told me I needed to immediately evacuate the error, and that I was not allowed to be using the loop. Others have spoken at the Special Meetings held in the past few weeks on this topic, and a Parks and Recreation Commission member described an analogous experience where a Police Officer instructed her to leave the area. Hence when the DEIR states: “MM 3.6-2 The RBOC shall

maintain access to the loop, trails, and other recreational uses during NFL and other displacement events” it loses much credibility.

BROOKSIDE GOLF COURSE

3.6-4 “The club attracts 800,000 visitors each year, making it one of the busiest golf facilities in the country. These golf courses provide approximately 9,085 additional parking spaces for Rose Bowl displacement events, as needed, on the turf areas.”

Why on earth would we close one of the most successful public golf courses in the country on 25 Saturdays or Sundays per year? Isn't 12 times per year enough? What cumulative damage to the course is anticipated to the course with such an increase and its use as a parking lot instead? How will weather impact this analysis? What if we have an unusually rainy season? The DEIR loses credibility when it states that damage to the golf course will be repaired within one day. Many individuals spoke at the Special Meetings held in the past few weeks, including members of the Parks and Recreation Commission with expertise at Brookside Golf Course, saying this mitigation measure was essentially ridiculous and not workable. The DEIR must account for real, workable mitigation measures. Also, it needs to consider weather effects. Sometimes it rains a lot in December. Will cars still be allowed to park at Brookside Golf Course. Will they be allowed to park on the other area grassy fields (Lot H, Brookside fields, baseball/softball diamonds)? What effects will this have? If we have some rainy weekends, what mitigation measures will be adapted? Will cars be flowed into the surrounding neighborhoods instead? What effect would this have on the neighborhoods? The DEIR should examine this in detail.

AQUATIC CENTER

3.6-4 “The Center offers year round programming for all ages and abilities including swimming and diving, water polo, pool therapy, summer camp, and water aerobics. The facility has two Olympic-size (50-meter x 25-yard) pools, one 55,000-gallon warm water pool, diving platforms, two hydro spas, a 3.6 Recreation Impact Sciences, Inc. 3.6-5 Temporary Use of the Rose Bowl Stadium by the NFL 1136.01 August 2012 weight and exercise room, two large conference rooms, and a clubhouse building with locker rooms, showers, pro shop and administrative offices. The facility draws 16,800 swimmers and up to 250,000 visitors per year.”

The Aquatic Center also has a café that now serves a vital function to user of the Brookside Park area beyond the Aquatic Center itself. Moreover, it is a vital training facility for various aged swimmers engaged in competitive swimming, water polo, etc. This is “the” place to train. Training schedules should not be subjected to fitting around NFL games, which will make this facility inaccessible. 25 weekend days compressed into the Aug-Jan months would have a major environmental impact on those training at the RB for competitive sports, and for health reasons, in addition to the casual recreation users, a great many of whom come to the Aquatic Center from socioeconomically disadvantaged community groups and are racially diverse, including a large percentage from under-represented minority groups.

EFFECTS ON AYSO (American Youth Soccer Organization)

The DEIR falsely states that there would be no impact to AYSO because NFL games are on Sundays and AYSO is on Saturdays in the RB area (Table 3.6-1). This is false. As an example, the AYSO held its grand season opening celebration in the Brookside Park area on Sunday Sept 23rd. Also, Jackie Robinson Field is sometimes used for AYSO practices on Sundays in the Fall. Moreover, there are a huge number of AYSO participants using Jackie Robinson and Brookside fields on Tues and Thurs nights, and these participants would be displaced by a Thurs night

game, along with all the other folks (softball and dog training, for example). If NFL displacement events occur on Sundays throughout the Fall, how will people transport their children to other venues for their matches. For example, AYSO13 hosts U5 soccer (and other age groups) at John Muir North Field on Sunday afternoons. Many of the roadways that lead to this field will be blocked-off or difficult to negotiate due to traffic. Will it still be feasible for people to get to the John Muir North Field from various locations? There are downstream effects traffic havoc will have on recreation beyond the RB/Brookside areas themselves.

Impact 3.6-3 – This section is highly speculative, not based on any factual data, and should be stricken from the DEIR in my view. If it is not the place of the DEIR to assess true financial benefits and consequences to the city of this project, which it does not do, then casual mention of the items in 3.6-3 are misplaced and may indeed be misguided. In particular, I suggest the following be stricken:

“The proposed project would expand recreational use at the Rose Bowl by adding additional events, including NFL games. By increasing to 25 the number of events with 20,000 or more patrons, the Rose Bowl stadium and associated facilities will be available to additional patrons. The City of Pasadena actively continues to maintain and enhance park and recreational facilities throughout the City, and the RBOC strives to promote Pasadena and Los Angeles County as a sports destination for local, regional, state, national, and international sports events. Therefore, each event that occurs at the stadium will enhance the area’s image, provide entertainment and participatory opportunities, further one of the City’s guiding principles of promoting Pasadena as a corporate, entertainment, and educational center of the region, and contribute to quality of life in the City of Pasadena, and, thus, would constitute a beneficial impact.”

One could easily argue that NFL events in Pasadena will have huge negative consequences regarding image of the City. Also, since Pasadena and area citizens could easily hop on the Gold Line and go and watch an NFL game elsewhere (for example Farmer’s Field or the Coliseum) it is not at all clear that we gain recreation from this project. We lost what recreation we have and replace it with entertainment, being spun in this DEIR as recreation. Regardless of the semantics, just like we can go and see a Dodgers game we can easily see an NFL game elsewhere if in LA. But we cannot do this as part of our daily life routines. Exercise and healthful recreation are, on the other hand, essential and must be preserved and easily accessible in close proximity to where we live.

Actual numbers of users on Sundays in the Autumn/Winter months

To accurately determine the number of people that will be displaced from normal recreational activity in the Rose Bowl and Arroyo Seco areas on Sundays during the months of Aug-Jan, it is important to measure true data during those months, and take the average over a sufficient number of Sundays such that a meaningful statistical deviation is also estimable. Because it gets dark earlier and earlier as Summer transitions to Fall and ultimately Winter, many people that use this area on weeknights when more daylight is still available likely transition to heavier daytime use on the weekends to ensure sufficient exercise and recreational activity each week. Hence, it may be particularly problematic to displace these people during the months between Oct-Jan due to scheduled games on Sundays. An in depth analysis of accurately estimated numbers of displaced people at displacement events is key, and requires broader considerations in the DEIR than are currently included.

NFL Fan Violence compared to UCLA Fan Violence

The DEIR, and the FAQ sheet posted on the City of Pasadena website on the topic of the proposed NFL/Rose Bowl project, attempt to lead us to presume that our current baseline knowledge of fans at UCLA Bruins games at the RB provides a sufficient estimate of how NFL fans might behave, should this project go forward. Easily researched data leads to a far different conclusion, and the DEIR should do a much more accurate job of documenting well established NFL fan violence as a possibility, and mitigation measures to deal with such violence. A good start would be to use Google to search “NFL Fan Violence Statistics” and the to do the same for “UCLA Football Game Fan Violence”, and to determine how the information gleaned from each of these searches compares. I have done this, and one gets a very different picture, with NFL fan violence being an incredibly serious issue, whereas UCLA Bruin RB games presenting comparatively little problem from the perspective of fan violence within the stadium and outside of it on Bruin game days.

The DEIR should use WEB sites such as the following to consider mitigation measures and the possibly impacts to the environment in terms of safety, both to fans and citizens in the surrounding neighborhoods, or casual users of the RB area on game days (if there is any access whatsoever to such people).

As a vivid example of such NFL fan violence, I have copied some text from a relatively recently published article that appeared in the Washington Post:

By Tracee Hamilton, Published: August 24, 2011

“We’ve all seen the horrible videos from Saturday night’s Raiders-Niners game at Candlestick Park, and although there were fights throughout the stadium during the game, the worst action was happening away from the ubiquitous cameras. Two men were shot and another seriously beaten...Do we really have to risk our lives to have it, though? The league has already acknowledged that large, flat-screen HD televisions make staying home a sound financial choice in these dire economic times. Throw in safety issues, and even more fans may decide to remain in their man- and woman-caves, saving the cost of concessions, parking, tickets and possible visits to the emergency rooms...It could be argued that there have always been fights in the stands at football games — I’ve witnessed them on occasion at FedEx — and that the combination of YouTube and the plethora of video-capable cellphones merely give the appearance of more violence...But beatings and shootings in parking lots?”

Another randomly chosen example from Yahoo Sports:
Brutal fan violence breaks out in New Jersey and Miami
By Kristian Dyer

http://sports.yahoo.com/nfl/blog/shutdown_corner/post/more-fan-violence-dots-week-14?urn=nfl,wp13907

FLORHAM PARK, N.J. — It's becoming an epidemic around the NFL as fan violence becomes a growing concern. This past weekend in both Miami and East Rutherford, N.J., fans were beaten badly at NFL venues.
New York Jets fan James Mohr, 28, was hospitalized and had to undergo surgery following a brutal beating by several Kansas City Chiefs fans who

attended the game at MetLife Stadium. The assault on Mohr, a physical education teacher in New York City, came after the Jets' 37-10 win...Mohr was responding to a group of Chiefs fans telling him that "You all deserved what happened on 9/11," and screaming obscenities about New York in general. Mohr's sister Anna said that her brother was compelled to respond because "our other brother is a fireman, and my father is retired FDNY, so you can understand why a 9/11 comment would especially irk him. He was shocked anyone would actually say something like that." Mohr's response that the comments were "disrespectful" apparently triggered the beating. He suffered a fractured jaw, cheekbone and eye socket, as well as bleeding on the brain.

Another randomly chosen example from an article in the Huffington Post entitled **"Fan Shot Near University of Phoenix Stadium During Cardinals-Raiders NFL Preseason Game"**

http://www.huffingtonpost.com/2012/08/18/cardinals-fan-shooting-glendale-parking-lot_n_1803281.html

"The preseason football game between the Arizona Cardinals and the Oakland Raiders on Friday night was marred by a frightening act of violence. A man was shot in the face not far from University of Phoenix Stadium, according to ABC 15 in Glendale and various other reports.

The Arizona Republic reports that the shooting occurred during an altercation in a parking lot near the stadium during the third quarter of the preseason contest won by the Cardinals, 31-27.... Unfortunately, there is ample precedent for such violence amongst fans, even at preseason NFL games. Last year, two men were shot and wounded outside of a preseason game at Candlestick Park between the Raiders and the San Francisco 49ers."

YouTube provides many highly graphic examples of recent NFL fan violence within the state of California. Samples with graphic video footage and language are provided via the following three WEB links:

http://www.huffingtonpost.com/2012/09/25/nfl-fans-fight-browns-bill-redskins-brawl_n_1910567.html?utm_hp_ref=email_share

http://blogs.sfweekly.com/thesnitch/2011/08/witnesses_sought_in_49ers_shoo.php

http://blogs.sfweekly.com/thesnitch/2011/08/49ers_raiders_jed_york_nortenos_surenos

Why is the DEIR so silent on the well-known and well-documented topic of NFL fan violence, and what the environmental impacts to Pasadena might be from having a subset of such fans here in our Rose Bowl and surrounding neighborhoods. The DEIR is grossly negligent on this topic, and this oversight needs to be remedied. A Google search on "NFL Fan Violence" today (Oct 7 2012) shows **9,200,000** hits. Similar searches on "UCLA Bruin Football fan violence" and related topics to find instances of serious violence at Rose Bowl UCLA games comes up with rather little for concern. The DEIR needs to substantively analyze the difference in these two fan bases (UCLA fans vs NFL fans), based on available data, and consider impacts and mitigation measures. At present, the way this topic is treated is laughable, as is the FAQ sheet on the City of Pasadena WEB site that states (pic below is copied directly from the pdf FAQ sheet posted by the City of Pasadena):

Q. Won't a NFL team attract a rowdy crowd?

- A. Not any more than any other sporting event. The Rose Bowl is accustomed to playing host to some of the most significant events viewed throughout the world. The stadium is well known for safety and security management.

I refer to the above examples to show the baseless and empty nature of the answer the City of Pasadena gives to their question. Unless of course Pasadena City Officials are misleading the public, and when they say "not any more than any other sporting event" they do so knowing full well of major sporting event disasters, some as extreme as the Hillsborough disaster that occurred in Liverpool England in 1989 where 96 fans died as they were crushed to death. When officials post on the City of Pasadena website "not any more than any other sporting event", are we to infer they have such little concern for public safety that events like the Hillsborough disaster, and so many other sporting event disasters, would be included within their ever so casual response? I hope not. But the answer given by them, and the examples I provide here and the numerous instances of NFL fan violence plaguing stadiums across the country, shows how little concern Pasadena officials are willing to admit, and how little this DEIR is willing to study, as such concerns of fan violence weigh heavily against the sensibility of pursuing this project within a lovely Pasadena residential and recreational area.

To close, I sincerely this letter and the issues it raises is helpful in your further consideration of this DEIR, and the sensibility of moving forward with this project. A Rose Bowl Renovation Project is not an end that justifies the means in this case. This risks to our beautiful city and its citizens are far too great to proceed. I implore your better judgment and ask that you do not approve the DEIR and that this project be permanently shelved. I am available for any questions on this matter.

Sincerely,



Jonas C. Peters