

**LINDA VISTA-ANNANDALE ASSOCIATION
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October 8, 2012

Mr. David Sinclair, Planner
Planning Department, 175 N. Garfield Avenue,
Pasadena, CA, 91109

Via email: dsinclair@cityofpasadena.net;
RoseBowlNFLComments@cityofpasadena.net

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

Dear Mr. Sinclair:

The Linda Vista-Annandale Association (LVAA) appreciates this opportunity to comment on the Draft Environmental Impact Report (DEIR) for the proposed Project entitled Temporary Use of the Rose Bowl Stadium by the National Football League (NFL).

Incorporated in 1930, LVAA is a California non-profit, mutual benefit corporation, tax exempt under IRC Section 50(c)(4), and corresponding California law. LVAA is dedicated to the preservation, protection, improvement and development of the Linda Vista~Annandale neighborhood area of Pasadena, and to the promotion of the general welfare of Linda Vista~Annandale residents.

The Linda Vista~Annandale area consists of roughly 2.5 square miles, extending from the west bank of the Arroyo Seco to the western City of Pasadena limits, and from the Devil's Gate Dam and the 210 Freeway on the north to the 134 Freeway on the south. The Linda Vista-Annandale area runs continuously along the Western edge of the Central Arroyo portion of the Central Arroyo, and is immediately adjacent to the Rose Bowl.

The neighborhood includes, and LVAA represents, approximately 1,350 single-family homes.

1. Project Description is Legally Inadequate. The DEIR Project Description is inaccurate and incomplete, and, therefore, legally Inadequate.

CEQA law is clear: The project description must be adequate, and as court cases have held, an accurate and adequate description of the project is necessary to correctly and fully describe the scope of environmental review. Further, the entire project being proposed for approval, and not some smaller or component part of it, must be described in the DEIR. As courts have held, a complete project description is necessary to ensure that all of the project's environmental impacts are considered and studied.

The "project" is more correctly described as the use of the Central Arroyo (all 470 acres), including, but not limited to, the Rose Bowl stadium and adjacent areas under the control of the Rose Bowl Operating Company (RBOC), by both the NFL as an entity, and an identified NFL team, for a "worse case" total of thirteen (13) NFL Displacement football games for five (5) continuous years, together with all the specific, detailed requirements of the NFL and the identified NFL team arising out of this use.

The City of Pasadena states on Page 2 of the Notice of Public Meetings to Provide Comments for the NFL Draft Environmental Impact Report that "The following Approvals would also be required by the Pasadena City Council":

NFL Agreement: Contracts with the NFL, including a lease, franchise commitment agreement and financing agreement(s) would be required in connection with the project.

Without a contract of any kind with the NFL or an identified NFL team, not even a "term sheet" or list of "deal points", how is it possible to know the legally Adequate scope of environmental review required to ensure that all of the project's NFL environmental impacts are fully considered and studied?

Without knowing the identify and reputation of the specific Rose Bowl NFL team, how is it possible for the DEIR to fully consider impacts and mitigations? It is LVAA's opinion that legally Adequate environmental review under CEQA for the Oakland Raiders playing thirteen (13) games in the Rose Bowl for five (5) continuous years would require a broader and more intense scope of analyses than practically any other NFL team.

The DEIR on Page 2.0-16 admits that the NFL will require significantly increased lighting and signage over that currently in place at the Rose Bowl. Would, for example, the NFL and the NFL team require additional changes or improvements to: the remodeled Rose Bowl; the Rose Bowl Area, including Area H and the adjacent or nearby paved parking areas; the Golf Courses, including the use of substantial portions of the Golf Courses for game parking; ingress and/or egress to and from the Rose Bowl Area, including public streets; security measures resulting in further Displacement of Recreational users and impacts on adjacent neighborhoods; installation and operation of commercial retail outlets, such as the "NFL Experience"; or, installations and operation of NFL commercial advertising and promotional banners and similar commercial, visual materials? Reference is made to the 2005/2006 list of "deal points" and proposed NFL Lease for the prior permanent NFL proposal for other examples of NFL required physical impacts on the Rose Bowl and RBOC controlled area, the Arroyo and other adjacent areas. None of these, or any similar NFL-specific impacts, are studied or analyzed in the DEIR.

For example, what exactly would be the specific impacts on neighborhoods adjacent to the Rose Bowl of the NFL Sports Lighting Design Criteria? The specific impacts are not studied in the DEIR. As to Rose Bowl NFL-specific impacts, what is the basis of the unsubstantiated assertion on Page 2.0-16 of the DEIR that the NFL required "illumination is focused on the field and does not spill light outside the seating bowl"?

To the extent that the DEIR does refer specifically to the NFL, a number of unsubstantiated "facts" are asserted and Inadequately considered.

The DEIR includes no description of exactly how long it would take to set-up for NFL games, how long it would take to break-down after NFL games, and how set-up and break-down would potentially impact UCLA football, the Tournament of Roses, and all recreational users of the Arroyo. Instead, the DEIR appears to assume that set-up and take-down will take no more than one day, which assertion is unsubstantiated. What is the basis for this unsubstantiated assertion?

The DEIR, on Page 3.1-19, asserts that “set up” for each NFL game requires deliveries by only thirty-five (35) trucks. What is the basis for this assertion which is unsubstantiated?

For example, the DEIR states that NFL “signage” would be temporary and in place for no more than 24 hours. What is the basis for this assertion, which is unsubstantiated?

Amendment of the Arroyo Seco Public Lands Ordinance to increase the number of Displacement events from twelve (12) to twenty-five (25) is just one portion of the project. Without detailed knowledge of what the NFL and an NFL team will require for the thirteen (13) NFL Displacement football games in the Rose Bowl, the project description is incomplete, and, essentially, the project is speculative and the project description is improperly phased and improperly segmented, and, therefore, is legally Inadequate.

2. Full and Effective Mitigation Measures Required. CEQA is clear: CEQA requires the City of Pasadena to make every good faith effort to fully and effectively mitigate all significant, negative environmental impacts before recommending the adoption of a Statement or Statements of Overriding Consideration.

The Sections of the DEIR which conclude that impacts cannot be mitigated below levels of significance, specifically Recreation; Transportation, Circulation and Parking; Air Quality; and Greenhouse Gases; all include minimal, ineffective suggested Mitigations, certain of which are in error.

The balance of the DEIR Sections also include a number of minimal, ineffective suggested Mitigations. The entire DEIR fails to include Mitigations to address known impacts. Further, the DEIR fails to include any analyses of Historic Resources or Aesthetics.

The DEIR is legally Inadequate in that it fails to include full and effective Mitigations, particularly as to those subject areas involving recommendations to adopt a Statement or Statements of Overriding Consideration.

3. Recreation. The Initial Study correctly recognizes that Displacement of active and passive and active recreational uses will be significant. However, the DEIR bases its conclusions on estimated data from secondary sources. Such estimated, secondary data results in minimal, legally Inadequate DEIR mitigations.

Further, in our view, Displacement will take place throughout the Arroyo, including on a cumulative basis. A number of recreational uses take place throughout the Arroyo without any “border” limitations, such as walking, hiking and equestrian activities. In fact, the entire Arroyo is recognized as one coordinated planning area and one environmentally sensitive area as reflected in the Arroyo Seco Master Plans, which were evaluated under a single Master Environmental Impact Report certified in February, 2003.

(a) Baseline Studies Required. Significant Arroyo Recreation impacts, including cumulative impacts, and, a full and adequate analysis of mitigations, cannot be adequately understood and studied without a Baseline Study or Studies of all current actual, not estimated, Arroyo recreational users. The Baseline Study or Studies should include, but not be limited to, the following:

- actual number (and not estimated numbers) of attendees at City Permitted/entitled events, determined from the City Master Calendar, and, including all charitable “Walks”, “Runs” and similar activities;
- Kidspace Museum attendance weekdays and weekends, including special events;

- Rose Bowl Aquatic Center attendance weekdays and weekends, including special events;
- RJ Canning Flea Market/Swap Meet attendance, particularly holiday November and December actual attendance numbers.
- Tournament of Roses December Float building and viewing activities actual attendance;
- Brookside Park use over and above City Permitted events, including all casual Park users;
- Oak Grove Park (Hahamongna) casual use;
- Children’s Playground use weekdays and weekends;
- Area H events and uses, including City Permitted use, organized Soccer (AYSO) and similar uses and events, and, casual users such as “pick-up” games and kite flyers; As to AYSO children’s Soccer, the games involve hundreds of kids on both Saturdays and Sundays, including parking in the Central Arroyo other than the Golf Courses.
- Numbers of casual walkers and joggers in and around the Central Arroyo “Loop” and adjacent areas;
- Numbers of Central Arroyo and Hahamongna bicyclists, including casual bicyclists and organized Peloton users;
- Numbers of equestrians throughout the entire Arroyo, including organized groups;
- Numbers of Trail walkers and hikers in, around and through Hahamongna, Central Arroyo and Lower Arroyo trails;
- Numbers of Bird Watchers throughout the Arroyo, including organized groups such as the Audubon Society;
- Analysis of Golf Course (both Golf Courses) users weekdays and weekends, including all special events such as organized Tournaments;
- Brookside Club House users, including organized events, casual diners and other social users, and, Pro Shop users;
- Baseball Field use, including organized events and casual use;

- Tennis Court use, including organized events and casual use;
- Upper Arroyo Disc/Frisbee Golf users;
- Lower Arroyo Casting Pond and Roving Archers use;
- Organized/Permitted use of La Casita del Arroyo (Lower Arroyo);
- Organized and casual recreational use of all other dedicated Park land in the Arroyo, including, but not limited to, an area referred to as “Rose Bowl Park” in the Initial Study;
- Displacement effects and impacts on all other City Parks and recreational facilities, taking into account that City policy for some time has been and is to direct recreational activities from smaller City Parks and facilities to the Central Arroyo;
- For all of the above and all other recreational activities in the Central Arroyo: current parking requirements and actual parking use, and, current requirements and actual use of access to recreational use of the Arroyo through public transport.

(b) Golf Courses and Other Turf Areas. One extremely important Recreational opportunity in the Central Arroyo, which will be significantly impacted by NFL football, is playing golf on the two Central Arroyo Golf Courses.

Mitigation Measure 3.6-1 on DEIR Page 3.6-23, states:

“The RBOC or their designees shall be responsible for timely repair (within one day) of damaged Brookside Golf Course turf areas as a result of parking during displacement events.”

This Mitigation should be removed. It is infeasible; undoable; false and misleading. Simply put, the turf areas on the Golf Courses cannot be repaired in one day – this is impossible. The Golf Courses are barely “repaired” currently over a long period of time after UCLA football season ends. Doubling parking, particularly with destructive NFL tailgating fans, requires: a full analyses and study of actual physical impacts on the Golf Courses of the proposed Project, including the “tipping point” beyond which the physical condition of the Golf Courses will be irreparable and irretrievable.

Suggested Mitigation: inclusion of, or provision for, a written Plan including methods and time tables, discussion and participation of the golfers themselves, and a full analysis of the requirements of repairing and preserving the Golf courses, as well as Central Arroyo turf areas in general.

Further, rainy days are not adequately considered by the DEIR. The suggested Mitigation Plan also must include specific mitigation measures to address rainy day parking limitations, i.e., the unavailability of golf course parking during and after rainy days, plus the degradation of the courses and all the other Central Arroyo turf areas from rain and additional measures required to restore the courses and other turf areas.

For example, when the Golf Courses are unavailable for parking due to rain, UCLA fans are parked in the neighborhoods per RBOC policy, particularly the Linda Vista-Annandale neighborhood.. The DEIR does not address this issue at all.

(c) Factual Errors and Minimal Mitigations. It is of great concern that the Recreation Mitigations are minimal and fail to accomplish anything. Such an approach to Mitigations is Inadequate. The most obvious failure, including clear error, is the inclusion in the DEIR of a “mitigation” (MM 3.6-2 on DEIR Page 3.6-29) that the RBOC will maintain all access to the Central Arroyo for all recreational users during NFL and “other” displacement events. This mitigation is false, misleading, an illusion, and, cannot be implemented. It should be removed from the DEIR. For UCLA and other current Displacement events, the Central Arroyo is closed for all recreational users 8 -9 hours before the event, and does not reopen for about 2 hours after the event.

Even more inadequate: “positive” Impact 3.6-3 on DEIR Page 3.6-30 as to “enhanced recreation” from NFL games. All references in the DEIR to “enhanced” recreation and beneficial impacts from NFL games should be removed from the DEIR. This provision appears to be an effort to “offset” significant impacts, but this alleged

recreational “enhancement” is not equivalent in any way to the recreational opportunities which will be lost in the Central Arroyo as a result of the proposed project.

There are missing Mitigations arising out of the fact that all forms of community-based recreation will be displaced for days at a time for half the year: where are all the recreational users going to be relocated? How will they get there? What will be the physical effects and impacts on other City parks and recreational areas of the forced relocation of thousands of people forced out of the Central Arroyo for approximately half the year? What is the Plan to provide substitute Central Arroyo recreational opportunities?

Suggested Mitigation: The DEIR should include or provide for a written Central Arroyo Recreational Displacement Plan which fully takes account of all lost recreation, relocation of lost recreation, and a full analyses of all measures required to fully mitigate the loss of recreation and the impacts on all Pasadena’s other recreational assets.

The “Off-Site Recreation” portion of the DEIR, beginning on Page 3.6-5 of the DEIR, is Inadequate in that it is generally in error in listing “Citywide Community and Neighborhood Parks.” While these assets provide certain recreational opportunities, the Central Arroyo is unique. The recreational experiences provided by the Central Arroyo cannot be duplicated by most of Pasadena’s developed community and neighborhood parks. Most of the listed parks, such as the Wrigley Gardens, are not equivalent or comparable to the Central Arroyo in any manner. As to Hahamongna Watershed Park and the Lower Arroyo, access, including ingress and egress, to these areas during Displacement events is severely limited.

As to the Angeles National Forest, which was severely compromised by the Station Fire, and the San Gabriel Wilderness Area, these assets are not comparable or equivalent to the Central Arroyo. For example, how would mothers with young children who walk the Central Arroyo Recreational Loop for exercise and enjoyment transfer this experience to the Angeles National Forest or the San Gabriel Wilderness Area?

The “Other Special Facilities” portion of the Recreation section of the DEIR, beginning on Page 3.6-12 of the DEIR, borders on the ludicrous. Such “opportunities” as the Gamble House, the Huntington Gardens, Descanso Gardens, and so on, again, are not comparable or equivalent to the Central Arroyo. The Altadena Golf Course and the Eaton Canyon Golf Course are not comparable to the Central Arroyo Golf Courses. These Golf Courses are both nine-hole courses, as opposed to the Central Arroyo courses which are both eighteen-hole courses with a much different and better Golf experience than Altadena or Eaton Canyon. The Eaton Canyon Park and McCurdy Nature Center are fully and, arguable, overused currently. Eaton Canyon cannot, as a practical matter and matter of fact, absorb any significant increases in use.

(d) Current Baseline: Degraded Condition of the Central Arroyo. Reference is made to the recent Urban Land Institute Report (ULI Report) on conditions in, and the future of, the Central Arroyo, specifically as: summarized in the Power Point “exit” public presentation.

As to general impressions: the ULI panel concluded as to the Central Arroyo:

- Incredible natural resource in a magnificent setting
- Facility is declining from overuse and lack of appropriate investment
- No comprehensive management plan for prioritizing the use of scarce resources in the Central Arroyo.

The ULI Report includes an analysis of current baseline conditions in the Central Arroyo which should be included in the Baseline and environmental “setting” portions of the DEIR. The ULI Report observes that the Central Arroyo is in decline NOW from overuse and lack of appropriate investment. In addition to the ULI Report findings, the Linda Vista-Annandale Association and the general public which enjoys the Central Arroyo know from our own observations and experiences that the Central Arroyo suffers from current intense Rose Bowl use. What will over five (5) continuous years of intense use from the NFL do to Pasadena’s “Central Park” as called out by the ULI Report?

As to cumulative intensification of use from the NFL proposal, what will be the actual physical results from further degradation? What is the “tipping point” when the Central Arroyo cannot be restored for its primary use, which is the recreational enjoyment of the Pasadena community and surrounding communities? The DEIR is Inadequate in that it fails to identify further and cumulative degradation of the Central Arroyo over current baseline degraded conditions.

Suggested Mitigation: The DEIR should include, or provide for, a comprehensive written Plan for Central Arroyo restoration, including consideration of specific recommendations included in the ULI Report, specific attention to the recreational use of the Central Arroyo, and, specific attention to Historic Resources.

(e) Direct Conflicts Caused by the Project. As part of LVAA’s concern about Recreation, we are concerned about conflicts with Recreational institutions in the Central Arroyo such as the Swap Meet, the Tournament of Roses, Kidspace Museum, and the Aquatics Center.

One statement in the DEIR that is clearly in error is the assertion that the RJ Canning Flea Market/Swap Meet and Area H activities would “continue to be held.” The Swap Meet, an extremely large event drawing very large attendance from all over Southern California, is held the second Sunday each month beginning (after a set-up period) at 7:00 A.M. in the morning and continuing until 3:00 P.M. in the afternoon (followed by a take-down period). The Swap Meet event takes place throughout the Rose Bowl Stadium Concourse and includes selling areas taking up all of Lots F and K. All of the remaining parking areas in the Central Arroyo (exclusive of the Golf Courses) are fully parked for Swap Meets, and parking typically spills into surrounding neighborhood areas. How could any NFL Sunday set-up, game, and take-down activities take place in competition with the Swap Meet? It is clear that the currently, regularly scheduled Second Sunday Swap Meets would be completely “Displaced” on NFL game Sundays.

As to the Tournament, all of its activities in December and January in the Central Arroyo will be impossible to carry on. The City states that the Agreements with the Tournament, which gives the Tournament control of large areas of the Central Arroyo for float activities, etc., MAY have to be renegotiated. The DEIR includes Mitigation Measure 3.6-4 on Page 3.6-30 which provides that the City and the NFL will “accommodate” the Tournament. In LVAA’s opinion, this Mitigation says nothing. The Agreements with the Tournament WILL be have to be fully renegotiated as NFL games will use Tournament space during all of December and probably January (assuming play-off games). To the extent the Tournament must be relocated, what will be the impacts on other Park or public recreational space, assuming that Central Arroyo Tournament activities must be relocated? As to Kidspace and the Aquatics Center, parking (weekends and some weekdays) will not be available for weeks and months on end beginning in August and continuing the rest of the year and possibly into January.

The DEIR is Inadequate in that it fails to provide specific, detailed Plans for relocating and otherwise mitigating the NFL impacts on Tournament Central Arroyo activities, and plans for mitigating impacts on the Swap Meet, Kidspace and Aquatics Center operations.

4. **Cultural Resources.** The DEIR fails to include a Historic Resources section. The fact is that the entire Central Arroyo is a National Register Historic District, including numerous contributing features such as the Golf Courses and the rock walls. Reference is made to all written comments submitted by Pasadena Heritage for further information and discussion in this regard.

As described and discussed by Pasadena Heritage and the Pasadena Planning Commission, it is clear that the project will result in significant cumulative impacts on Historic Resources from continuing intensification of use in the Central Arroyo. What is the “tipping point” beyond which Central Arroyo Historic Resources cannot be restored? The failure of the DEIR to include a Historic Resources section is a gross Inadequacy.

Significant Central Arroyo Cultural Resources impacts, including cumulative impacts, and, a full and adequate analysis of mitigations, cannot be adequately understood and studied without a Baseline Study of all current National Historic District conditions. As to mitigations, a written Conservation Plan should be provided for or required by the DEIR to establish procedures and techniques to protect the historic status of the District, including all contributing features, in light of potential NFL use and the significant increase in Displacement events. This Conservation Plan should also establish methods for review and approval of all NFL and NFL team required changes or improvements to District features, including, without limitation, mandatory Certificates of Appropriateness as part of any discretionary review approval process.

5. Public Services – Parks. The Initial Study correctly identifies the potential impact of the project on Parks as a potentially significant impact. In this connection, it is essential that the DEIR study exactly what all the physical impacts of the significant Displacement of Recreation will be on all other City parkland and recreational assets, and include mitigation measures.

6. Hydrology and Water Quality; Trash. The DEIR is Inadequate because it does not adequately study the impact of NFL related plastic pollution and other trash on the Central Arroyo, the Lower Arroyo and the Arroyo Stream. . The Report states that the RBOC has a standard trash plan that would apply to NFL games. However, the DEIR fails to recognize that the current trash removal plan is inadequate, and forms an unsatisfactory baseline.

Presently, after any major event at the Rose Bowl, and particularly after a football game, the trails and the grassy areas are covered in plastic zip ties (used to connect temporary fencing), plastic bottles, plastic bottle tops, plastic grocery bags, cans, bottles, paper waste, food waste, and charcoal (including live coals) from barbeques. This pollution remains for days after an event. If one drives around the Recreational Loop, the clean-up looks fairly acceptable, But for those who walk the trails or the

grassy areas, as so many do with pets or children, all the waste is apparent and easily visible.

This pollution is unsightly. It degrades the Central Arroyo as a recreation area, and it degrades it as open space. But worst of all, much of this pollution finds its way into the Arroyo Stream, which feeds into the LA River and ultimately into the Ocean. The Arroyo Stream flows through two wonderful, but environmentally sensitive, naturalized stream areas—the area under the Colorado Street Bridge, and the area in the Lower Arroyo above the archery fields. The City of Pasadena and Non-profit organizations have spent thousands of dollars removing invasive plants, restoring native plants, and creating habitat for birds, ducks and the Arroyo Chub. These restored areas are being choked by pollution, most of which is plastic pollution. To give an example of how bad the current situation is, reference is made to the recent Coastal Clean Up Day. According to the Arroyo Seco Foundation, 110 volunteers filled 60-70 large bags of plastic pollution and other trash, removing approximately one ton of waste from the area under the Colorado Street Bridge. Where did this waste come from? This is the current base line that the DEIR asserts is acceptable.

How much more plastic pollution and other trash will 13 NFL games produce, with 75,000 fans in attendance, and with thousands of additional ticketless fans? How much more plastic pollution and other trash will find its way into the Arroyo Stream after 13 more NFL games? We do not know because the DEIR has not studied these matters.

What mitigations might be proposed to deal with all this plastic pollution and trash, and how many man-hours might be required to clean up all this additional trash? We do not know because the DEIR has not studied the issues or provided any mitigations.

Before it can be considered legally Adequate, the Draft EIR must analyze the additional impact on the Central Arroyo, the Lower Arroyo and the Arroyo Stream of the

plastic pollution and trash that 13 NFL games will generate, and the DEIR must identify all possible, feasible mitigations.

7. Aesthetics. The DEIR is Inadequate in that it does not include an Aesthetics section.

The tons of trash which result and will result from doubling the number of Displacement events for the NFL in fact do degrade the Arroyo, including its existing visual character and quality, and the existing visual character and quality of all the neighborhoods surrounding the Arroyo. All Aesthetic impacts of the significant increase in trash over the current baseline must be evaluated and mitigated in the DEIR.

NFL Branding: The DEIR indicates that there be “NFL” signage, symbols, and commercial advertising outside the Rose Bowl and in the Rose Bowl area as a result of the project. Such a foreseeable project impact will degrade further the Central Arroyo, including its existing visual character and quality, and the existing visual character and quality of all the neighborhoods surrounding the Arroyo. Such Aesthetic impacts must be evaluated and mitigated.

NFL tailgating will involve impacts over and above the current UCLA activities, including banners, special lights, souvenir retail installations, tourism installations, and such. As is typical of NFL fans, will the use of large intrusive Recreational Vehicles be accommodated in the Central Arroyo? All such impacts must be evaluated as Aesthetic impacts, and mitigated.

8. Land Use and Planning. The DEIR is in error and Inadequate in that it does not take account all of the layers of adopted Land Use and Planning public policy supporting recreation and open space as the primary uses of the Arroyo, including the Central Arroyo, and it asserts that the project does not conflict with Land Use and Planning policies and documents. All of the following policy documents must be analyzed for clear conflicts with the proposed project:

- The Arroyo Seco Public Lands Ordinance. This Ordinance focuses on Displacement of recreation, not numbers of event attendees. It also extols the environmental sensitivity of Arroyo areas within its jurisdiction, and, except for the Rose Bowl itself, bans commercial activity in the Arroyo.
- The Arroyo Seco Master Plans, composed of the following four documents: the Hahamongna (Upper Arroyo) Master Plan; the Central Arroyo Master Plan, the Lower Arroyo Master Plan, and Design Guidelines.
- The Green Space, Parks and Recreation Element of Pasadena’s General Plan, together with its implementation policy document, the Green Space, Parks, and Recreation Master Plan.
- The recently adopted Open Space and Conservation Element of Pasadena’s General Plan.

All of these policy documents recognize the following policy considerations: Pasadena is “under-parked”, and parks and open space for active and passive recreation are high priorities for Pasadena’s decision makers; the Arroyo Seco including the Central Arroyo, is Pasadena’s largest open space, and represents a very high percentage of the City’s parkland and open space; and, the City is committed to preserving and expanding parks and open space opportunities.

As to NFL commercial activities that normally accompany NFL games, it appears that the NFL will require use of many parts of the Central Arroyo or Arroyo outside of the Rose Bowl Area on game and non-game days for souvenir retail, tourism, or, other commercial activities. The conflicts of all such commercial activities with adopted Pasadena recreational and open space policies must be studied and mitigated.

The ULI Report also includes analyses of failed, fractured management practices in the Central Arroyo which have resulted in the current degraded physical environmental setting. Further, ULI concludes that the entire Central Arroyo should be analogized to Central Park in New York City, and placed into a new Central Arroyo Conservancy, similar to the current Central Park Conservancy.

While the Central Arroyo Conservancy proposal has not received formal review and discussion, LVAA has advocated for some time that City management of events

and uses in the Central Arroyo is fractured, chaotic and out of control, and, that this current situation is exacerbated by the confusing, overlapping and gerrymandered jurisdictional Central Arroyo, and Arroyo in general, boundaries.

Suggested Mitigation: The DEIR should include, or provide for, a Central Arroyo Management Plan that is transparent and provides a significant role for all stakeholders in the Centra Arroyo, including all the surrounding Arroyo neighborhoods.

As a matter of Planning, it clear to LVAA that doubling the number of Displacement Events by bringing in the NFL will put enormous pressure and stress on the Administrative capabilities of the City, including Police and Fire personnel, Public Works, Rose Bowl personnel and City Administration in general. The DEIR should analyze the increase in numbers of permanent or temporary City staff that will be required by the NFL presence in the Rose Bowl, including a mitigation staffing Plan.

The general position of the DEIR is that the NFL project will not result in physical changes in the Arroyo, particularly the Central Arroyo, because no physical changes are proposed in the Project description. The question is asked again: what will the NFL and the NFL team propose in terms of physical changes or improvements to the Rose Bowl and/or the Central Arroyo? Apparently, the City's answer is "nothing" because no such changes can occur without some sort of Permit (and, apparently, additional Environmental review.). It is LVAA's position that the DEIR should fully study the entitlement processes that would apply to any physical changes proposed for any reason anywhere in the Arroyo, including the Central Arroyo and the Rose Bowl itself, by the NFL or an NFL team, including requiring that all such entitlement processes occur in a transparent setting with full public review.

9. Traffic, Circulation and Parking: Obviously, Traffic, Circulation and Parking are matters of the highest concern to the neighborhoods surrounding and impacted by Rose Bowl events.

Complete Streets: The Traffic Study and the Traffic, Circulation and Parking section of the DEIR are Inadequate in that they both fail to take into account the state-mandated Complete Streets approach and methodology to traffic study, analyses and mitigations. “Complete Streets” is not discretionary – it is mandatory. The DEIR must utilize a Complete Streets approach in analyzing transportation and circulation impacts for the project. All of the traffic and transportation impacts and proposed mitigations must be revised to reflect Complete Streets.

The DEIR on Page 3.7-38 speculates as to the percentage of NFL fans who will arrive in the hour immediately prior to the event and leave the hour immediately after the event without any substantiation. The DEIR is “clueless” as to the fact that the Rose Bowl encourages fans to arrive mainly by car six (6) hours before each football game, and that driving out of the Central Arroyo through the neighborhoods continues for as long as two (2) or more hours after a game.

The DEIR completely ignores the problem of ticketless NFL tailgaters in the Central Arroyo and in the neighborhoods. As is typical with NFL games, it is commonly known that thousands of ticketless NFL fans congregate as close as possible to the stadium to tailgate and otherwise enjoy the NFL atmosphere and experience, including the commercial activities outside the stadium.

Suggested Mitigation(s): The DEIR should include a specific Mitigation prohibiting entry into the Central Arroyo and the neighborhoods by car or shuttle of any NFL fan without a ticket to the NFL game. This Mitigation should include, or provide for, a shuttle and traffic control written Plan to keep ticketless NFL fans out of the Central Arroyo and the neighborhoods to the greatest extent feasible.

As to cars entering the Central Arroyo for an NFL game: how was the 2.5 vehicle occupancy number determined? This speculative estimate is not substantiated.

As to the estimates of the number of shuttle trips in the hour before and after an NFL event, the DEIR estimates are not substantiated. No mention is made of the time required for each trip. If an average round trip shuttle ride takes 20 minutes, then 211 shuttle trips in one hour would require over 70 shuttles. (See DEIR page 3.7-41).

The Traffic section of the DEIR must fully analyze the impacts, including cumulative impacts, of the Lincoln Properties Project (Parsons site) which will be one of the largest mixed use projects in Pasadena history (nearly 1 million square feet phased over time), and will, in addition to introducing enormous numbers of vehicles and trips onto the streets of West Pasadena, have the potential to completely eliminate, particularly during construction, the current Rose Bowl shuttle system taking Rose Bowl attendees, who park at Parsons and reduce traffic in the Central Arroyo, to and from the Rose Bowl, particularly during construction.

Suggested Mitigation: The DEIR should include, or provide for, a specific written Plan for Parsons shuttle alternative operations if the Lincoln Properties Project at the Parsons site goes forward, which is probable. This Plan should include detailed alternative shuttle plans for relocated and adjusted operations in the event that the Parsons shuttle site, including on-site parking, is no longer available for an extended period of time during the Lincoln Properties project construction period.

The DEIR assumes that NFL fans will be content to park away from the stadium and shuttle into the Rose Bowl, but tailgating, including continuous alcohol consumption, is an integral part of the game day experience, and depends on on-site parking around the stadium. The DEIR does not adequately explore and analyze specific incentives (such as reduced ticket prices) to encourage use of shuttles and other public transportation. The DEIR fails to take account of the fact that current public transportation in the Central Arroyo, the ARTS Bus, is blocked from providing service on Displacement event days.

Why isn't "Park and Ride" from sites outside Pasadena considered and studied in the DEIR? Significant numbers of cars trips could be reduced and kept out of Pasadena and the Central Arroyo if Park and Ride to NFL games (or all Displacement Events) was implemented following the model of the Hollywood Bowl.

Suggested Mitigation: The DEIR should include, or provide for, a Plan to establish and implement a "Park and Ride" program to NFL and other Displacement events in the Rose Bowl.

Rainy day parking limitations (unavailability of golf course parking) are not adequately considered by the DEIR. On rainy days, UCLA fans are parked as a matter of policy in the neighborhoods. How will NFL fan parking be kept out of all the neighborhoods surrounding the Central Arroyo in general, but particularly on rainy days? The DEIR does not address this issue at all. NFL fans cannot be parked in the neighborhoods on rainy days or after heavy rains as a matter of public safety as NFL fans, unlike UCLA fans, will be permitted to consume alcohol continuously before and during the game for hours. Drunken and DUI driving, and drunken or drug influenced behavior by NFL fans cannot be tolerated in any neighborhood around the Rose Bowl, including the LVAA neighborhood.

As to excessive NFL alcohol consumption, and drunken or DUI driving in and around the neighborhoods, what is the specific Police Plan for control of such behavior, including the additional administrative burden of the required additional traffic officers and required additional policing?

Currently, traffic management, including ingress and egress through the neighborhoods and throughout the Central Arroyo, is under the control of the Pasadena Police Department. Over many years, certain effective policies and practices have been developed which the Police follow on an ad hoc and sometimes haphazard basis. We are not aware of any publicly available written reference manual of these policies and practices. Each time there is a change-over of Police personnel in charge of Rose

Bowl event traffic management, LVAA often is faced with “starting over” to be sure that the policies and practices previously agreed to and tested are implemented.

Suggested Mitigation: Traffic mitigations should include, for purposes of consistency and reliability, a written, publicly accessible, Manual of all applicable Rose Bowl event traffic/parking management policies and practices, including staffing and back-up planning which is binding on the City.

Currently, if the Police are distracted during a Displacement Event day by, for example, some activity such as the “Occupy the Rose Parade” effort this year, the Police reserve the right to divert resources from Event/neighborhood traffic management to the higher priority perceived need. The written Manual must include plans for backing up Police traffic management of Rose Bowl events if the Police are diverted.

10. Public Services – Public Safety/Police/Emergency Planning and

Management. LVAA observes that NFL crowds pose different risks than do the typical crowds attending events at the Rose Bowl and in the Central Arroyo. The Public Safety section of the DEIR is Inadequate in that it does not fully study or mitigate Public Safety impacts of the project.

LVAA’s opinion is that a Baseline Study must be undertaken to determine current Public Safety conditions. The Study would enable the DEIR to include the legally required analysis to address the kinds of criminal incidents, public safety concerns, traffic control matters discussed above, and emergency and disaster scenarios that could occur within the Central Arroyo from the project, and evaluate whether the level of resources needed to provide effective security oversight and emergency response would and could be provided, including on a cumulative basis. In studying and analyzing Public Safety issues, LVAA believes that close consultation should take place with the Pasadena Police and Fire Departments.

From LVAA's general knowledge of NFL events and venues, specific issues related to police protection that must be addressed in the DEIR include crime, impacts from unlimited alcohol consumption, crowd management, communication and command operations, and natural disasters.

As to crime, it appears to LVAA that certain types of crimes associated with large crowds at NFL venues will increase with NFL games, including ticket scalping, fraud, pick pocketing, theft of property and merchandise, and other civil and criminal violations. With the increases in the number and size of events that would occur within the Central Arroyo and project site from NFL games, it is clear that these types of crimes could occur more frequently. This increased frequency has the potential to result in an impact on levels police protection services, including staffing.

Tailgating is an activity that is associated with sporting venues, including the Rose Bowl. Such activities can and will lead to drunk and disorderly conduct in the parking lots and in the stadium. In this connection, LVAA has observed that NFL tailgating operates on a much larger and more intense level than UCLA tailgating. The current Rose Bowl alcohol policy will not be applied for NFL tailgating. The DEIR must fully consider all the significant impacts of tailgating including increased demand for police protection services, including staffing.

In fact, LVAA understands that the City and the RBOC plan to impose NO limits of any kind on alcohol consumption by NFL fans at NFL games in the Rose Bowl, which means that NFL fans will be able to consume all forms of alcohol during tailgating prior to each game (up to six (6) hours), during the game itself, and, after the game.

Suggested Mitigation: LVAA suggests imposing the same limitations on NFL game alcohol consumption as is currently imposed on UCLA and other College Rose Bowl games.

Of most concern is the general result of all this drinking before, during and after NFL games in the Rose Bowl: drunk driving in the Central Arroyo and in and around surrounding neighborhoods, including the LVAA neighborhood, and, drunken and disorderly NFL fan behavior in and around the Central Arroyo, particularly in the neighborhoods.

LVAA observes that motor officers are crucial to managing Displacement Event traffic flow and parking areas as well as protecting the surrounding neighborhoods from intrusion. The DEIR must study whether there are enough motor officers to provide these services if UCLA plays on Saturday and NFL on Sunday, especially if UCLA is scheduled for an evening game and the NFL is early the following day.

Old Pasadena's weekend activity requires a special deployment of officers due to the alcohol consumption and large crowds in Old Pasadena. The NFL would be expected to generate similar crowds on game days (Sundays, occasional Mondays and Thursdays). The impact on the "drain" on officers three (3) nights in Old Pasadena while maintaining staffing levels for the event and the rest of the city needs to be evaluated.

The proposed project would result in an increase in the number and frequency of Displacement events within the Project Site, doubling the number of large crowd events when compared with existing conditions. Crowd management and control must be addressed, particularly since typical NFL crowds will be involved. Crowd management and crowd control will also be extremely important in protecting neighborhoods adjacent to the Arroyo. In studying this topic, control of persons entering or attempting to enter the Arroyo without an event and/or parking ticket must be addressed and mitigated. This is a particularly important effort with respect to NFL games where large numbers of persons without tickets are known to come to the venue to enjoy the experience outside the venue.

Suggested Mitigation: a detailed and comprehensive Public Safety/Police and Security Plan should be developed and implemented as a mitigation measure, including

full evaluation of the current Police command and control capabilities and NFL game staffing needs. ..

Alcohol, crime and crowd control impacts will be influenced to a great extent by the identity and reputation of the identified NFL Rose Bowl team. The Oakland Raiders are well-known to bring impacts of this sort at a much higher level than other NFL teams.

Suggested Mitigation: The DEIR should include a Mitigation measure providing that the City of Pasadena and the RBOC will not contract for or permit the Oakland Raiders as the Temporary NFL team.

Natural disasters are of great concern to LVAA. The DEIR is Inadequate in that it does not fully analyze emergency response personnel and capabilities in the context of NFL games and doubling of Displacement events in the Rose Bowl. For example, regular dumping of live coals in and around the Central Arroyo from tailgating is a constant fire threat to the LVAA neighborhood.

The ultimate challenge to Traffic and Congestion management and Public Safety in connection with NFL and all other Displacement events is Emergency/Natural Disaster planning management. The DEIR is silent or relies on the City's current disaster preparedness planning. LVAA disagrees with this assessment of preparedness. Doubling the number of Displacement events, including bringing NFL patrons into the Arroyo who, unlike UCLA fans who have attended football games in the Rose Bowl for years, have little experience with exiting the Central Arroyo, brings the risk of significant failure to respond to Emergencies and Disasters to a very high degree.

It should be noted that very few of the Linda Vista-Annandale neighbors have a secondary exit route in the event of a major disaster such as a major Earthquake and/or a fast-moving fire. (Note further: large areas of dry brush are "behind", to the West of, the LVAA neighborhood and these areas have not burned for many years; and, Linda

Vista-Annandale includes a large number of narrow, winding hillside roads.) A very large number of cars and residents will exit onto Linda Vista Avenue at the same time as thousands of Rose Bowl attendees attempt to exit up and out of the Central Arroyo using, essentially, the same routes, causing chaos and gridlock, and, potentially enormous loss of property and life similar to the Oakland Fire result some years ago.

The DEIR must include a Baseline Study of current catastrophic Emergency conditions,

Suggested Mitigation: The DEIR should include an LVAA Area Emergency Preparedness and Response Plan that covers exactly how during an NFL or other Displacement Event all residents and event attendees will be protected and evacuated, and, how Police and Fire personnel, augmented by from other jurisdictions as required, will adequately respond to such an Emergency. Further, the DEIR must consider the implications of Red Flag Day policies put in place by the Pasadena Fire Department against NFL and other Displacement events. These implications include special requirements to clear and divert traffic entering or exiting the Linda Vista-Annandale neighborhood, including Linda Vista Ave., to enable Fire equipment from Pasadena Fire or other jurisdictions access on an expedited basis to the Linda Vista hills.

11. Air Quality. The DEIR is Inadequate, first, because the Air Quality monitoring stations for the project are located miles from the Central Arroyo: 752 S. Wilson Ave., a station in the City of Azusa, and, a station in the City of Burbank. The various “Regional” results from these stations for all purposes do not reflect factual conditions in the Central Arroyo for current Displacement events or for projected NFL football games.

Second, the DEIR fails to take account of the particular topography in the Central Arroyo. The Arroyo, including the Central Arroyo is a depressed, deeply cut canyon area surrounded by higher land forms. The result is that the Arroyo, including the Central Arroyo, concentrates poor air quality, particularly during the hot climate periods which will occur during a major portion of the NFL football season.

12. Greenhouse Gases. The DEIR is Inadequate because it fails to include any baseline study for local, Pasadena Greenhouse Gases. Apparently, the DEIR relies only on estimates.

Months ago, the City's Planning Department prepared and submitted to the Planning Commission a draft methodology for determining baseline Greenhouse Gases and analyzing Greenhouse Gas impacts under CEQA. The draft document, apparently required by applicable state law, was rejected by the Planning Commission. A revised plan has not been resubmitted to the Planning Commission. What is the effect on the DEIR of Pasadena failing to complete and adopt such a Pasadena Greenhouse Gas Plan?

13. Cumulative Impacts. The DEIR is Inadequate in that it fails to fully analyze and mitigate Cumulative Impacts.

LVAA agrees that Cumulative Impacts must be evaluated on a consecutive basis, year-by-year, and, on a cumulative basis over the entire five (5) year period on a year-by-year basis. See Page 5 of Exhibit 2 to the WPRA Scoping Letter dated April 12, 2012.

Most importantly, the DEIR must analyze and mitigate the cumulative impacts of all current and foreseeable projects in Pasadena. These projects include, but are not limited to, the Art Center College of Design Master Plan, the La Loma Bridge Restoration Project, the Marriott Residence Hotel Project, all ongoing Projects in Hahamongna, the Central Arroyo and the Lower Arroyo arising out of the Arroyo Master Plans, and, two of the largest projects in Pasadena history: the Los Angeles County Sediment Removal Project in Hahamongna discussed in detail at the Scoping Meetings, and, the Lincoln Properties Project (Parsons site) which will be one of the largest mixed use projects in Pasadena history (nearly 1 million square feet phased over time), and

which will add enormous numbers of vehicles and trips onto the already overburdened streets of West Pasadena

In particular, the DEIR must fully analyze and consider mitigations, all on a cumulative basis, of the two enormous "bookend" projects to the North and South of the Central Arroyo (the Los Angeles County Sediment Removal project and the Lincoln Properties Project, in terms of all applicable topics, including, but not limited to, Traffic/Transportation, Air Quality and Green House Gas Emissions.

Thank you for the opportunity to submit LVAA's DEIR comments. If you have comments or questions, please contact LVAA President Nina Chomsky, at (626) 795-1967, nrchomsky@aol.com.

Sincerely,



Nina Chomsky, President
Linda Vista-Annandale Association

cc: City Manager Michael Beck
Mayor Bill Bogaard
Council Member Steve Madison
LVAA Board of Directors