

**LINDA VISTA-ANNANDALE ASSOCIATION  
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April 18, 2012

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

Via email: [dsinclair@cityofpasadena.net](mailto:dsinclair@cityofpasadena.net)

Re: 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 Scoping of the Environmental Impact Report (EIR) for the 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, dedicated to the improvement and development of the Linda Vista~Annandale area of Pasadena, and 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 ridge of the Linda Vista Hills, and from the Devil's Gate Dam and the 210 Freeway on the north to the 134 Freeway on the south.

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

1. General Scoping Comment. LVAA objects to what appears to us to be a general “theme” running throughout the Project proposal and the Initial Study: all that is being proposed is just a few more football games for a short time, which will result in just a few more impacts, several of which obviously cannot be mitigated below thresholds of significance.

In our view, doubling the number of Rose Bowl Area Displacement Events to accommodate primarily the National Football League (NFL) for five (5) years will result in environmental effects, individually and cumulatively, at the highest levels of significance impacting the Central Arroyo, the balance of the Arroyo Seco, all the neighborhoods adjacent to the entire Arroyo Seco, and, the entire City of Pasadena and adjacent jurisdictions.

Describing the Project as continuing for “up to” five (5) years, and, therefore, continuing for merely a short time, is no help. The scope of the EIR must deal with the “worst case”: five (5) years. And, to us, five (5) years: worth of significant impacts might as well be permanent. Five (5) years is not transitory. The significant environmental effects of this proposed project may be permanent and irreversible, and highly destructive of the Arroyo environment, including surrounding and impacted neighborhoods.

Thus, we expect a full and adequate identification of all significant environmental impacts from the proposed project, and, a full and adequate analysis of mitigation measures to minimize the significant environmental effects identified in the EIR.

2. Project Description. LVAA objects to the Project Description as 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 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 EIR. 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 by both the NFL as an entity, and an NFL team, of the Rose Bowl Area for thirteen (13) NFL football games per year over five (5) years, together with all the detailed requirements of the NFL and the identified team arising out of this use.

Without a “term sheet” or list of “deal points” of NFL and NFL team requirements, how is it possible to know the scope of environmental review required to ensure that all of the project’s environmental impacts are considered and studied? Would, for example, the NFL and the NFL team require 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 portions of the Golf Courses used 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; location and/or installation of a practice field; installation of retail outlets; or, installations of NFL advertising and promotional banners and similar visual materials? Reference is made to the 2005/2006 list of “deal points” for the prior permanent NFL proposal for other examples of NFL required physical impacts on the Rose Bowl Area, the Arroyo and other adjacent areas.

Amendment of the Arroyo Seco Public Lands Ordinance to increase the number of Displacement events to 25 is just one portion of the project. Without detailed knowledge of what the NFL and an NFL team will require, the project description is incomplete, and, essentially, the project is speculative and the project description inadequate.

One portion of the Project Description does not pass the test of common sense, and that 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 attendance from all over Southern California, is held one 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 Swap Meet would be completely “Displaced” on NFL game Sundays.

3. Recreation. The Initial Study correctly recognizes that Displacement of active and passive recreational uses will be significant. In our view, Displacement will take place throughout the Arroyo, including on a cumulative basis. Further, 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.

It is LVAA’s opinion that 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 of all current actual, not estimated, Arroyo recreational users. The Baseline Study 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. Note: it appears that the entire very large attendance at this event would be Displaced by second Sunday of the month NFL game and related activities;
- 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;
- 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. .

4. 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 EIR study exactly what all the physical impacts of the significant Displacement of Recreation will be on all other City parkland, and include mitigation measures.

5. Cultural Resources. This section of the Initial Study, particularly Section 7.a. concerning historical resources, is in error in two respects: the factual discussion in Section 7.a., and, the conclusion that substantial adverse change to historic resources need not be studied and evaluated in the EIR..

In fact, 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 the written comments submitted by Pasadena Heritage for further information and discussion in this regard.

It is LVAA's opinion that 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 Conservation Plan should be required by the EIR 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.

6. Hydrology and Water Quality; Aesthetics: Trash. Large events, such as NFL games, and the tailgating that comes with them. Result, literally, in tons of trash, discarded food, paper, cans, bottles, and discarded plastic, and so on. Much of it ends up in the Arroyo flood control channel. In addition, it is common for tailgaters on the Golf Courses to toss their BBQ coals into the flood control channel.

There are two (2) environmentally sensitive natural stream areas south of the Rose Bowl stadium that must be considered for downstream impacts and mitigations:

- The area under the Colorado St. Bridge, which has always been a natural stream, recently was restored to: remove old trash / debris (some left over from bridge rehabilitation activities); remove non-native plant species; improve stream flow; and, promote native vegetation. This area starts under the Holly street bridge and meanders south to the south side of the Colorado St bridge where it is reintroduced to channel.
- Water is siphoned out of the natural stream area discussed above and used to irrigate man-made stream beds in the Lower Arroyo. The man-made streams (an extensive City managed project, funded by BFI) support many mature trees and are gathering and breeding areas for water fowl, particularly ducks.

Anything, including all forms of trash, that ends up in the flood control channel will be deposited in the natural stream areas and contaminate them. Further, ultimate downstream impacts should be considered in that the subject flows ultimately join the Los Angeles River. All Impacts of trash on the natural stream areas must be evaluated and mitigation measures adopted.

As to Aesthetics, 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 EIR.

7. Land Use and Planning. The Initial Study is in error 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. All of the following policy documents must be analyzed for 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 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, will the NFL require use of any part 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? Any such impacts must be studied and mitigated.

At the City’s own web site, we find the following summary of recent Urban Land Institute (ULI) activities in Pasadena:

***The Urban Land Institute (ULI) visited Pasadena in January 2012 to conduct a Governors Advisory Panel for the 254 acre Central Arroyo. The study area contained the Rose Bowl stadium, Brookside Golf Course and Clubhouse, Brookside Park, Rose Bowl Aquatics Center, Kidspace Museum, surface parking***

***lots and the 3.3 mile recreational loop.***

***The panel included experts in the fields of planning, landscape architecture and development to study how Pasadena could enhance revenue from the Central Arroyo by creating additional amenities and services for existing users without creating negative impacts. During their visit, the panel toured the area and interviewed stakeholders before brainstorming ideas and developing recommendations. Stakeholders included representatives of adjacent neighborhood groups, a variety of Arroyo users, the business community, Rose Bowl Operating Company (RBOC) Board, city staff and City Council.***

The ULI is generally regarded as a development and business oriented group of planning experts. While its final written report is not yet available, the ULI analyses, conclusions and recommendations are highly instructive, and, are summarized in the Power Point presentation available online and from the City's Planning Department which was presented and discussed at a public meeting.

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 EIR.

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. The EIR, in our opinion, must include, as a mitigation, 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 EIR should analyze the increase in numbers of permanent or temporary City staff will be required by the NFL presence in the Rose Bowl, including a mitigation staffing Plan.

The general position of the Initial Study appears to be 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. It is LVAA's position that the EIR 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.

8. Traffic and Transportation; Public Safety -- Emergency Planning and Management. Obviously, traffic and transportation are matters of the highest concern to the neighborhoods surrounding and impacted by Rose Bowl events.

In connection with determining the baseline, analyzing the impacts, including cumulative impacts, and arriving at mitigations, LVAA does not accept what appears to be the pre-determined view of the City: mitigation below thresholds of significance is not possible. We expect that every effort in this EIR will be made to analyze all impacts, including cumulative ones, and to propose all feasible mitigations. Further, we expect a series of feasible mitigation measures carefully crafted in detail to protect all neighborhoods surrounding the Arroyo, but particularly the Linda Vista-Annandale neighborhood, from the impacts of the traffic generated by the NFL project.

In terms of the proper approach to traffic and congestion analyses, we concur with and support all of the traffic and congestion comments made by the West Pasadena Residents Association (WPRA) on Pages 1 – 3, Section 2 (Game Day Conditions – Traffic and Congestion) in Exhibit 2 to the WPRA Scoping Letter dated April 12, 2012.

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.

Traffic mitigations must include, for 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.

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.

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 Initial Study and prior Environmental documents rely 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 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 EIR must include a Baseline Study of current catastrophic Emergency conditions, and, as a mitigation, 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.

Whether a catastrophic fire or other emergency, or, any type of fire in the Linda Vista hills, on a Red Flag day, the EIR 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.

The Traffic section of the EIR 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.

9. Aesthetics: NFL “Branding”. Will there be “NFL” signage, symbols, and commercial advertising in and around the Rose Bowl area as a result of the project? Such a foreseeable project impact will degrade 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.

Will NFL tailgating 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? If so, all such impacts must be evaluated and mitigated.

10. Public Services – Public Safety/Police. The Initial Study is in error in that it does not include the topic of Public Services (Public Safety/Police) for study.

LV AA's opinion is that a Baseline Study must be undertaken to determine current Public Safety conditions. The Study would enable the EIR to include the legally required analysis to address the kinds of criminal incidents, public safety concerns and emergency and disaster scenarios that could occur within the Project Site, 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 Department, and, that a detailed and comprehensive Public Safety Plan should be developed and implemented as a mitigation measure..

From LVAA's general knowledge of NFL events and venues, specific issues related to police protection that must be addressed in the EIR include crime, crowd management, communication and command operations, natural disasters, and the potential for terrorist attacks.

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 Project Site, it seems clear that these types of crimes could occur more frequently. This increased frequency has the potential to result in an impact on police protection services.

Tailgating (i.e., drinking (often alcohol) and eating in small groups within vehicle parking areas prior to an event), is an activity that is associated with sporting venues, including the Rose Bowl. Such activities can 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 may not be adequate for NFL tailgating. The EIR must fully consider all the significant impacts of tailgating including increased demand for police protection services.

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.

The current command and control operations at the Rose Bowl must be evaluated in light of the NFL proposal, and improved command and control of Police and Fire personnel and resources recommended and implemented as required.

LVAA understands that NFL venues constitute Mass Gathering Venues, also known as soft targets. Placing NFL games in the Rose Bowl will transform the Rose Bowl into a much more likely soft target. The soft target impacts on Police (and Fire) service protection from NFL games in the Rose Bowl must be considered in the EIR and mitigated.

Natural disasters are discussed above in terms of Traffic, but such disasters also must be fully analyzed in terms of emergency response personnel and capabilities.

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 EIR 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. The NFL would be expected to generate similar crowds on game days (Sundays, occasional Mondays and Thursdays). The impact on the "drain" on officers 3 nights in Old Pasadena while maintaining staffing levels for the event and the rest of the city needs to be evaluated.

11. Project Alternatives. The City, in the recent past, has encountered criticism of its efforts at legally adequate study of Project Alternatives. Here, the problem is exacerbated by the fact that the Project is being sponsored and promoted by the City itself, and this conflict may inhibit full and adequate consideration of a range of feasible Alternatives to the proposed project or its location which will reduce the project's significant environmental impacts while feasibly attaining most of the project's basic objectives. LVAA expects that the EIR Consultant will conduct a legally adequate study of Project Alternatives, including the Environmentally Superior Alternative, the No Project Alternative, and, a range of feasible Alternatives that would feasibly attain most of the project's basic objectives which appear to be rooted in raising funds to cover the \$21 million or so cost overrun on the Rose Bowl Renovation construction project.

12. Cumulative Effects. LVAA agrees with WPRA 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 EIR 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 EIR 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 our Scoping comments. If you have comments or questions, please contact current LVAA President, Lee Zanteson, at (626) 792-8909, or, LVAA President-Elect, Nina Chomsky, at (626) 795-1967

Sincerely,

*/s/ Lee Zanteson*

Lee Zanteson, President



Nina Chomsky, President-Elect

Linda Vista-Annandale Association

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