

**LINDA VISTA-ANNANDALE ASSOCIATION**

**THE NFL IN THE ROSE BOWL  
FINAL ENVIRONMENTAL IMPACT REPORT**

**SUGGESTED COMMENTS; BACKGROUND  
November 15, 2012**

1. Some suggested comment topics.

The City Council will consider Certifying the Final EIR this Monday, November 19, at a Hearing at 7:p.m. in the Council Chambers. Attend and speak out, and/or send written comments to the City Council by way of the City Clerk, [mjomsky@cityofpasadena.net](mailto:mjomsky@cityofpasadena.net), with copies to Mayor Bogaard, at [bbogaard@cityofpasadena.net](mailto:bbogaard@cityofpasadena.net), Council member Steve Madison, at [smadison@cityofpasadena.net](mailto:smadison@cityofpasadena.net), and, City Manager Michael Beck, at [mbeck@cityofpasadena.net](mailto:mbeck@cityofpasadena.net). Reference specifically the NFL in the Rose Bowl Hearing at the City Council meeting on November 19, 2012.

Consider reviewing the Final EIR (FEIR) which is available at the Central Library, the Linda Vista Branch Library, and, on the City's website at [www.cityofpasadena.net/Rose Bowl EIR](http://www.cityofpasadena.net/Rose_Bowl_EIR). Then, comment on the assertions and conclusions contained in the FEIR. Here are some suggested comment areas:

- **The vote of the City Council will be grounded in the FEIR Statement of Overriding Consideration because the FEIR alleges significant impacts in the areas of Traffic, Recreation, Air Quality and Noise that cannot be mitigated below legal thresholds of significance. In turn, the Statement is based on a highly speculative and questionable "Analysis" of NFL economic benefits to the Rose Bowl. But, what exactly is the net financial and economic result to the City of speculative NFL money for the Rose Bowl when measured against the enormous and probably permanent economic and financial impacts on all the impacted neighborhoods in West Pasadena and on the Arroyo of approving the NFL for five continuous years?**
- **The Statement of Overriding Considerations and the "Analysis" supporting it will be posted on the LVAA website, at [www.lvaa.net](http://www.lvaa.net). LVAA is preparing a detailed response to the Statement and the "Analysis" which will be posted to the website when finished and filed with the City.**
- **The "project" is incompletely and inadequately described.** The proposed amendment of the Arroyo Seco Public Lands Ordinance is just a phase of the entire, complete "project" which must include all the contracts and agreements with the NFL and the identified team in order to fully and completely analyze the significant impacts of the NFL in the Rose Bowl. So far, there are no commitments for the NFL to come to

Los Angeles, let alone any commitments or contracts for the NFL in the Rose Bowl. Without the NFL Pasadena “deal”, how can the City Council fully consider the NFL-specific significant impacts to neighborhoods and the Central Arroyo, and, NFL-specific economic “benefits” to the City when measured against economic impacts and harm to the City and West Pasadena?

- **Five years for an NFL team at the Rose Bowl is nearly “permanent.”** The significant impacts, on an individual and cumulative basis, will accumulate nearly to the same level as a “permanent:” team, previously rejected on a city-wide basis by the people of Pasadena. The Central Arroyo and West Pasadena neighborhoods more than likely will never be the same after 5 years. Consider the endless and intense traffic and air quality impacts, just for starters.
- **What is the “tipping point” from intensification of Central Arroyo use?** What are the significant impacts from the enormous intensification of use of the Central Arroyo proposed in the FEIR, including physical degradation of the Central Arroyo from 6-7 months each year of continuous Football, including NFL, games, and, also, impacts on the Historic Resources in the Central Arroyo? (Note: the FEIR fails to analyze Historic Resources in the Central and Lower Arroyo.) How about physical degradation of the trees, plants and wildlife in the entire Arroyo? How about the trails and similar assets? How about all the resources previously spent on improving and trying to restore the Central Arroyo? Who or what, will restore the Central Arroyo when the NFL leaves, and at what cost? Who or what will pay for restoration?
- **NFL “Fans” are different and worse than any other “fans” at the Rose Bowl and in the Central Arroyo.** Why doesn’t the FEIR just require that the Oakland Raiders will not be permitted as the NFL team for the Rose Bowl? The FEIR should limit alcohol consumption in the Central Arroyo and the Stadium with the same limits as UCLA. The FEIR should include a detailed written Police and Security Plan to control NFL fan behavior outside the stadium in connection with tailgating, and, inside the stadium. The FEIR should ban entry into the Central Arroyo on NFL game days for any NFL “fans” without game tickets.
- **The recreational asset that is the Central Arroyo is unique and distinctive and the loss of recreational opportunities in the Central Arroyo and the entire Arroyo cannot be “made up” or equaled elsewhere. Exactly where, and how, are all the Central Arroyo recreational users going to be relocated and their loss of use otherwise mitigated?** As identified and discussed in the Urban Land Institute (ULI) Report (available on LVAA’s website), the Central Arroyo is a recreational asset on the order of New York City’s Central Park, and it should be carefully managed and restored for the public benefit, not further degraded.

2. What is an Environmental Impact Report (EIR) under the California Environmental Quality Act (CEQA)?

The purpose of an EIR is to inform governmental decision makers (i.e., the Pasadena City Council) **and the public** about the potentially significant environmental impacts of a proposed activity (the proposed “project”); identify ways that environmental damage as a result of the project can be avoided or significantly reduced; prevent significant avoidable environmental damage by requiring changes to a project through the use of alternatives or mitigation measures when the decision maker finds the changes to be feasible; and, disclose to the public why the decision maker went ahead and approved a project even if significant environmental effects will result.

An EIR is prepared by a lead agency which ultimately decides whether to approve, change or disapprove a proposed project. The lead agency for the proposed NFL in the Rose Bowl project is the City of Pasadena.

An EIR must be prepared with a sufficient degree of analysis to provide a decision maker with information enabling it to make a decision which intelligently takes account of environmental consequences. An EIR must be legally “Adequate”, which means that: information provided in an EIR must synthesize pertinent environmental and planning information; information provided must be factual, adequate and complete; and, rather than “perfection”, courts look for adequacy, completeness, and a good faith effort at full disclosure.

The environmental review process includes a Draft EIR, which is circulated for public comment, and, a Final EIR, which includes the Draft EIR, comments received during public review, and responses to comments.

In the case of the “NFL in the Rose Bowl” proposed project, the “project” is defined in the FEIR as follows: amending the Arroyo Seco Public Lands Ordinance to increase the number of “Displacement” or major events (defined in the FEIR as attendance over 20,000) from the current 12 annually to 25 annually. The Project Description also includes a general and minimum “Description” of “NFL events”, but there are NO existing contracts with the NFL, including a lease, a franchise commitment agreement, or financing agreement(s) from which to determine specific environmental impacts to the Central Arroyo or neighborhoods and, the net economic benefit, if any, to the City of Pasadena from NFL games at the Rose Bowl for 5 years or some other time period.

An EIR is required to describe a range of “reasonable Alternatives” to the proposed project that could feasibly avoid or lessen significant environmental impacts while meeting basic project objectives. In the case of the “NFL in the Rose Bowl”, the project objectives are: first, generate revenue to fund City “services” and offset the costs associated with the Rose Bowl renovation project; promote economic development in the project area and greater Pasadena through increased event activity and tourism; conserve resources and avoid environmental impacts by utilizing existing infrastructure and parking facilities; and, “utilize the existing parking supply and establish a parking management plan to distribute parking consistent with arrival and departure directions to efficiently disperse project traffic, facilitate access to and from the site, and reduce traffic in the immediate vicinity to minimize potential pedestrian/vehicular conflicts.”

The FEIR project Alternatives are: Alternative 1: the “No Project” Alternative, i.e., the number of Displacement Events remains 12; Alternative 2: the reduced attendance Alternative (maxing Displacement Event attendance at 50,000 versus 75,000, the maximum permitted in the FEIR for NFL events); Alternative 3: and, reduced non-NFL Displacement Events, which would not permit NFL events and would reduce the increase in Displacement Events to 9 for a total permitted Displacement Events of 21; As required by CEQA, the FEIR identifies the “Environmentally Superior” Alternative as Alternative 2.

If an EIR identifies significant environmental impacts which cannot be mitigated below thresholds of significance, the proposed project still can be approved if Statements of Overriding Consideration are adopted by the decision maker. These statement or statements, supported by detailed and specific Findings, indicate what the overriding considerations are that justify going forward with the project despite unavoidable significant environmental impacts.

The NFL in the Rose Bowl FEIR identifies the following areas where significant environmental impacts cannot be mitigated below significance: Air Quality; Noise; Recreation; and, Traffic, Parking and Circulation. The FEIR makes only a minimum effort to identify mitigations for significant impacts in these areas. The City is taking the position that the economic benefits of the “project” outweigh unavoidable significant environmental impacts, even though there is no “deal” with the NFL or any team. The claimed economic benefits are asserted on the basis of a speculative and deficient “Analysis” attached to the draft Statement of Overriding Consideration.

Note: other than statements of overriding consideration, EIRs are not about economic impacts, but rather EIRs consider and analyze physical impacts. However, now that the touchstone of the FEIR is the “Analysis” of alleged economic benefit from the NFL, **it is time to tell the City our concerns** about the decline in property values that may very well result from living adjacent to an NFL stadium, including required Real Estate Disclosures; the expected physical decline in all the neighborhoods surrounding or near the Rose Bowl; the expected physical decline of the Central and Lower Arroyo; and, the expected loss of recreation and enjoyment of the Central Arroyo, including the impacts on the Aquatic Center and Kidspace. **Bottom line: what exactly is the net financial and economic result to the City of speculative NFL money for the Rose Bowl when measured against the enormous and probably permanent economic and financial impacts on all the impacted neighborhoods in West Pasadena and on the Arroyo?**

**The Statement of Overriding Considerations and the “Analysis” supporting it are posted on the LVAA website, [www.lvaa.net](http://www.lvaa.net). LVAA is preparing a detailed response to the Statement and the “Analysis” which will be posted to the website when finished and filed with the City.**