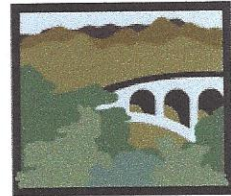


October 7, 2012



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**Re: San Rafael Neighborhoods Association (SRNA) Comments Regarding NFL DEIR**

The San Rafael Neighborhoods Association (SRNA) represents the interests of Pasadena residents who live west of the Arroyo Seco and south of the SR 134/Ventura Freeway. On behalf of those residents, we express grave concerns regarding the recently published NFL Draft EIR. We believe that the Draft EIR has serious, fatal flaws that do not adequately address issues of concern that affect residents of Pasadena in particular those who live within the boundaries of the San Rafael Neighborhoods Association and the Linda Vista Annandale Association.

The Draft EIR is flawed because of the following reasons:

- (1) It fails to consider the impacts of inadequate fire protection in West Pasadena and specifically the area within the boundaries of the San Rafael Neighborhoods Association and the Linda Vista Annandale Association;
- (2) It fails to address traffic impacts on the major point of access into West Pasadena along the arterial road Avenue 64;
- (3) It fails to address the Avenue 64/Marmion Way exit ramp from the Northbound Pasadena 110 Fwy as a major point of access into West Pasadena and the Rose Bowl;
- (4) It fails to address the East Bound off ramp of the 134 Freeway and Figueroa Street as a major point of access into West Pasadena and the Rose Bowl;
- (5) It inadequately addresses the traffic associated with the San Rafael Avenue & SR-134 Freeway EB Ramps and Colorado Blvd;
- (6) It fails to address the potential closure of the La Loma Bridge for seismic repair and the impact of that closure on traffic and the ability of Fire Engines to gain access to West Pasadena in the case of an emergency;

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**1. The Draft EIR/EIS Is Flawed Because It Fails To Adequately Consider Impacts of the Increased Need for Fire Services in West Pasadena**

The SRNA strongly opposes the purported plans for a temporary relocation of the NFL in the Rose Bowl in Pasadena. This position is consistent with the findings of the Urban Land Institute (ULI) who recommended AGAINST the temporary use of the Rose Bowl by the NFL. Notwithstanding that recommendation and the viewpoints of Pasadena residents, the City of Pasadena and the Rose Bowl Operating Company (RBOC) continue to study such a proposal. As long as that possibility is under consideration, any proposal to bring the NFL to the Rose Bowl has the potential of impacting Pasadena and neighboring communities significantly. The Draft EIR's failure to address the impact of up to 25 displacement events on the surrounding community's need for Fire protection services is entirely unacceptable.

History: In April 2011, Fire Station 39 in the San Rafael area of Pasadena was closed due to purported "structural instability" after successfully serving the citizens of West Pasadena for over 50 years. Fire Station 39 was the most western Fire Station within the city of Pasadena before its untimely closure. Since the closure in 2011, the people of West Pasadena in the San Rafael Neighborhoods boundaries have been without a Fire Engine and a fully operational Fire Station. Previously, Fire Station 39 served as a backup to neighboring Fire Station 38 in the Linda Vista section of Pasadena adjacent to the Rose Bowl. The DEIR states that Fire Station 38 would be involved as a first responder to any incident at the Rose Bowl. If Fire Engine 38 is called to the Rose Bowl, then the citizens of West Pasadena have no West Pasadena based Fire Engine available to them in their district.

In October of 2011 after the closure of Fire Station 39, a serious fire broke out on Sequoia Drive in the San Rafael section of West Pasadena. First response time to that incident was **8 minutes and 43 seconds**. Approximately \$750,000 in damage occurred to the burned home on Sequoia Drive and the home subsequently became uninhabitable. See report here: <http://www.pasadenanow.com/main/early-morning-fire-strikes-just-blocks-from-closed-fire-station> . This response time of 8 minutes 43 seconds was **OUTSIDE** the recommended range of the National Fire Prevention Association (NFPA) which recommends a first response time of 4-6 minutes. Most importantly, this response time was also outside the purported first response time that the Pasadena Fire Department claims to maintain of "less than 4 minutes with existing staff and equipment" in responding to fire instances as stated on page 3.5.1-2 of the NFL DEIR report.

Due to public outcry, community activism and organizing, and mass news coverage, the City of Pasadena implemented an interim 2 person rescue ambulance in a residential home on Glen Summer Rd to ease the fears of citizens and restore paramedic coverage, but still has done nothing to replace the Fire Engine or provide Fire Fighting equipment to the area previously served by Engine 39. The interim rescue ambulance solution provides NO FIRE PROTECTION coverage and will expire in December 2013 based on Conditional Use Permit #5837 when the property at 159 Glen Summer Rd reverts back to its original purpose as a private home. Even with a Rescue Ambulance temporarily located in a residential home, NO FIRE ENGINE, exists in the San Rafael –West Pasadena service area and residents remain exposed to a high degree of fire danger due to hillside nature of the community. The NFL DEIR fails to adequately address the impacts of up to 25 displacement events with attendance figures estimated at upwards of 70,000 people on an area already underserved by Fire and Paramedic services.

If the fire engine from Station 38 is called to the Rose Bowl for EMS services, then NO PASADENDA FIRE ENGINE is based in all of West Pasadena. This is totally unacceptable and in no manner is this issue addressed in the NFL DEIR. Instead, the DEIR appears to rely solely on unproven assumptions of the Pasadena Fire Dept to address the issue of Fire and EMS services and the negative impact the relocation of the NFL would have on these services.

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Section Impact 3.5.1-1 states that the “...*proposed project could increase the demands for fire protection services, but would not require the construction of new or physically altered governmental facilities to accommodate the increased demand and maintain acceptable fire flows.*” *Mitigation Measures are listed as “No Mitigation is required” and Residual Impact is noted as “Less than Significant”.* This finding is wholly inadequate and does not adequately address the true nature of the decreased Fire protection services in west Pasadena. In fact, the staff report from the Pasadena Planning and Community Development Department dated September 19, 2012 states that DEIR **WOULD** (emphasis added) increase the need for fire and police services.

Furthermore, Section 3.5.1 Fire Protection states that Station 39 would be included with two other stations as “...the most probable backup to Station 38 response at the project site”. Since Fire Station 39 is now closed, if Fire Engine 38 is deployed to the Rose Bowl for an NFL game, the entire area of Linda Vista and San Rafael sections of west Pasadena are left without a West-Pasadena based Fire Engine. Based on the delayed response to the fire on Sequoia Drive, it is evident even to the casual observer that there is inadequate Fire Protection in West Pasadena and that adding 70,000 people for 25 weekend displacement events is a recipe for human and property disaster.

Additionally, section 3.5.1 Fire Protection of the DEIR states that Fire Station 39 is “...scheduled to reopen in August of 2013 and would therefore be utilized as backup during the five-year time frame of the proposed project”. This proposed opening date does not coincide with other information provided by the City of Pasadena that Fire Station 39 may not reopen until December 2013. The discrepancy in opening dates between Fire Station 39 reopening in December 2013 and the start of an NFL Football season in August 2013 is not addressed. Also, the information provided on a reopening date in the DEIR does not appear congruent with the information provided by other resources and publications of the City of Pasadena.

The methodology used to assess Fire Protection in the event of an NFL relocation appears to be drawn on interviews with fire personnel. No rigorous study evaluating response times was done in this DEIR. Statements that “...the PFD has stated that ...response times are acceptable, that existing fire protection services in the area appear adequate, and that the proposed project would not by itself require new, expanded, or altered fire protection services or facilities to maintain the current level of service” appear unreliable as evidenced by the impacts of the closure of Fire Station 39 and the subsequent delayed first response to the fire on Sequoia Dr. If not for public outcry and intense news coverage and local community activism, Fire Station 39 would not be undergoing a planned renovation.

In summary, the San Rafael Neighborhoods Association (SRNA) finds the entire section of the DEIR on Fire Protection to be wholly inadequate. Inadequate studies were performed and the current state of inadequate fire protection in west Pasadena was entirely ignored. We dispute the DEIR findings on Fire Protection that “No mitigation measures are required for the proposed project and we demand a rigorous and scientific evaluation of Fire Protection in west Pasadena be examined before certification of this Draft EIR.

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**2. The NFL Draft EIR/EIS Is Flawed Because It Fails To Adequately Consider Effects on Transportation, Circulation, and Parking Specifically Traffic in These Areas:**

**A: Principal Arterial-Avenue 64**

**B: The off ramp of the Northbound 110 Pasadena Fwy and Avenue 64/Marmion Way exit**

**C: The off ramp of the 134 Freeway and Figueroa Street**

**D: San Rafael Avenue & SR-134 Freeway EB Ramps;**

**E: La Loma Bridge Retrofit;**

The Transportation, Circulation, and Parking section of the DEIR fails to include Avenue 64 as a Principal Arterial connecting the Northbound 110 Pasadena Fwy with Colorado Blvd as the westernmost entrance point into Pasadena. The recognition of Avenue 64 as a prime arterial road was recently demonstrated by the proposed H2 alternative to the 710 Fwy completion project. The DEIR fails to evaluate the traffic impacts of the NFL on Avenue 64 which constitutes gross oversight.

Furthermore, nowhere in the DEIR is the Avenue 64/Marmion Way off ramp from the 110 Pasadena Fwy evaluated. This freeway exit is a well known and heavily used arterial into Pasadena from those heading North on the 110 Fwy from Downtown Los Angeles and west side of Los Angeles into Pasadena and the Rose Bowl. Instead, the DEIR states that "...the (110) interchange near the proposed project is Fair Oaks Avenue". The DEIR fails to address traffic congestion from the 110 interchange at Avenue 64 which is known to be one of the tightest exit ramps off of the 110 Pasadena Fwy with a hairpin 180 degree turn.

The DEIR also fails to address the EB exit of the 134 Fwy at Figueroa Street which is a prime entrance point to Colorado Blvd in the neighborhood of the San Rafael Residents Association and a route directly into the Rose Bowl. Failure to identify this exit ramp and streets in the traffic section of the DEIR is again a gross oversight.

Furthermore, the DEIR does not offer adequate solutions for traffic mitigation at the EB 134 exit ramp at San Rafael. Placement of a traffic coordinator as a means to mitigate traffic congestion is wholly inadequate. This intersection is already severely hampered by significant traffic during rush hour. We dispute the findings that the existing LOS ranks as an A at this intersection. We advise reexamination of the data between the peak hours of 8-9AM weekdays to assess the backup of traffic from the Colorado Blvd/San Rafael traffic signal back to Annandale Road and the findings in the DEIR be re-examined by another entity.

Another glaring omission for the DEIR is an analysis of the impact of the proposed closure of the La Loma Bridge for seismic retrofit. The closure of the La Loma Bridge would have a significant negative impact on both ingress and egress from West Pasadena as well as a negative impact on the ability of Fire Engines and other Police and Safety personnel to gain access to the San Rafael area of West Pasadena. The City of Pasadena website states that an analysis of the La Loma Bridge concluded "...that the bridge is deficient in strength and is deteriorating." As a result the City has approved the retrofit and rehabilitation of the existing La Loma Bridge to meet current seismic standards."

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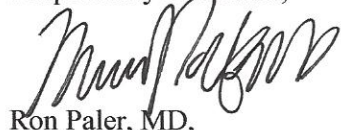


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The City of Pasadena website further states, "The scheduled start date for construction is Summer 2012 with project completion by Fall 2013." As of now (October 2012), no retrofit activity has started. Assuming the bridge retrofit starts in 2013, the impact of the La Loma Bridge closure during this time along with the potential arrival of the NFL is a recipe for traffic congestion and a public safety hazard. The Draft EIR does not address this issue.

For all of these foregoing reasons, the board of the San Rafael Neighborhoods Association (SRNA) believes that the NFL Draft EIR is fatally flawed. The City of Pasadena should reject the Draft EIR from a public fire safety, traffic impact, community, and sustainability perspective. Use of the Rose Bowl by the NFL is a hasty grab for an unproven revenue source with inadequate assessment of public safety and inadequate environmental impact studies. We concur with the findings of the Urban Land Institute (ULI) that the Rose Bowl not enter into an agreement with the NFL. We ask that the Draft EIR be REJECTED as inadequate in addressing the concerns of the residents within the boundaries of the San Rafael Neighborhoods Association and the Linda Vista Annandale Association and ask that Pasadena consider alternative solutions for revenue developed in conjunction with all of the affected communities.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ron Paler", written over the typed name.

Ron Paler, MD,

President

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