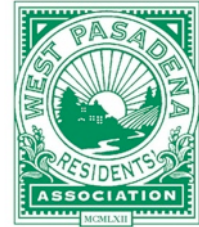


October 8, 2012



David Sinclair
Planning Department
175 N. Garfield Ave
Pasadena, CA 91109
email: dsinclair@cityofpasadena.net

Re: Draft Environmental Impact Report (*SCH# 2012031053*) Temporary Use of the Rose Bowl Stadium by the National Football League (NFL)

Dear David:

The Board of Directors of West Pasadena Residents' Association appreciates this opportunity to submit written comments on the scope and content of the draft environmental impact report (DEIR) on temporary use of the Rose Bowl by the National Football League (NFL).

WPRA stands with the Linda Vista-Annandale Association and other neighborhood groups in having grave concerns about the process and the DEIR itself. Our concerns fall in three general areas: (A) Transparency of the process for preparation and review of the DEIR, (B) Transparency of the process for reviewing and approving agreements with the NFL, and (C) Gross inadequacy of the DEIR itself.

First, we appreciate your extension of the comment period to October 8, 2012. The next step in the EIR process described in the Planning Commission meeting September 29 and other places is to produce a final EIR for review and approval by the City Council about November 19.

This plan is unreasonable. The DEIR has so many substantial errors and omissions that it must go back through public comment and City Commission review before being submitted to the City Council. Otherwise, the City Council will be provided with a proposed EIR and a huge number of comments, making it impossible for them to sift out the true decision before them in any reasonable way.

In addition, the City Council should not approve the DEIR until they have an NFL deal before them. How can the City Council decide whether the significant impacts that cannot be mitigated are worth enduring when they don't know what the offsetting benefits are? If staff outlines basic terms of a deal with the NFL, so that the City Commissions and City Council have offsetting benefits to evaluate, how anyone guarantee achieving the benefits?

A final point regarding the DEIR process, if a Statement of Overriding Considerations is proposed, it and all supporting documentation must be subject to a 90-day public review and comment before consideration by the City Council.

Regarding the process for reviewing and approving agreements with the NFL, as you know, this is an issue of great concern to residents in the large areas directly impacted. WPRAs surveyed its members on the issue of NFL use of the Rose Bowl, and the most frequently cited concerns were how the money from such an arrangement would be used and traffic impacts. All proposed NFL deal terms, especially memos of understanding, security agreements, and enforcement of the limits of the lease should be made available for public review and comment. This can be a constructive process. For example, the Rose Bowl and affected neighborhood organizations were able to negotiate a MOU that has served us well during the Rose Bowl renovation activities, once a very contentious issue.

Regarding the DEIR itself, it is almost as though there was a prejudice to minimize impacts. Attachment 1 lists specific comments; here are some areas of deficiency:

- 1. Complete lack of consideration of the historic nature of the impacted area.**
- 2. Impact on recreational users is dramatically underestimated,** partly because of incorrect assumptions.
- 3. Traffic affects also are hugely understated,** again partially because of incorrect and unclear assumptions.
- 4. Affects of pollution are understated,** and there is no consideration of the special demographics in the neighborhoods adjacent to the Rose Bowl.
- 5. Safety impacts are understated,** partly because there is no mention of the affects of closure of the San Rafael fire station.
- 6. There is no consideration of the fact that major construction is likely to be underway** as LA Metro implements its extension of SR-710.

In conclusion, the DEIR suffers major deficiencies, including those listed above and in Attachment 1, plus the rampant deficiencies enumerated by Linda Vista-Annandale Association, other neighborhood associations, and the City's own commissions.

Because of gross inadequacy of the DEIR, WPRAs respectfully requests that the City subject the DEIR to thorough revision and another round of review by the public and by the City's

Commissions. This is essential to allow the City Council to see clearly the effects of temporary use of the Rose Bowl by the NFL so they can make an informed decision.

Very truly yours,



Bill Urban
WPRA President

/S/

Fred Zepeda
WPRA Board Member

cc: City Manager Michael Beck
Mayor Bill Bogaard
Councilman Steve Madison
WPRA Board Members

Attachment 1
West Pasadena Residents' Association
DIER Comments Regarding
Temporary Use of the Rose Bowl Stadium by the National Football League (NFL)
SCH # 2012031053

1. PROCESS ISSUES

- 1.1. The DEIR and any proposed Statement of Overriding Considerations (SOC), together with proposed factual findings and all underlying economic impact studies, must be made available for public review and comment for 90 days, and the City Council should not vote to certify the EIR until after public comment and review by the relevant City Commissions.
- 1.2. We understand that City staff provided Planning Commission review of the DEIR even though they thought it was not required. We disagree. Use of the Rose Bowl by the NFL is a land use issue, and as such the final EIR and any proposed SOC should be reviewed by the Planning Commission before City Council review.
- 1.3. The City Council should not fully approve the EIR until they have an NFL deal before them. How can the City Council decide whether the significant impacts that cannot be mitigated are worth enduring when they don't know what the offsetting benefits are?

2. DRAFT EIR ISSUES

2.1. Inconsistent and inadequate project description

- 2.1.1. Why are the project objectives in the DIER different from the project objectives in the DIER's Analysis of the Project Alternatives?
- 2.1.2. There is no description of the specific terms and conditions of the NFL's use of the Rose Bowl. The DEIR describes the project as an amendment to the Arroyo Seco Public Land Ordinance. An amendment is required, but that is not the project.
- 2.1.3. There is no description in the DEIR of ancillary activities for NFL games, including setup and removal of traffic barricades, setup and removal of tents and pavilions, and any pre-game expos or festivals. These activities have substantial impacts for UCLA games and should not be ignored.

2.2. Complete lack of consideration of historical resources

- 2.2.1. There is no mention of impact on historical resources. Others are providing more detailed analysis, but the DEIR must analyze potential impacts on historical resources and proposed mitigations.

2.3. Impact on recreational users dramatically underestimated

- 2.3.1. The DEIR does not include any baseline studies of actual recreational activities in the Arroyo. The omission of factual data and incorrect assumptions such as those listed below make the entire analysis suspect.
- 2.3.2. The DEIR says that the Rose Bowl loop will remain open during a game. Actually, the loop is closed for many hours before a game until well after the game for UCLA games and other large events. The closure is not arbitrary. Use of the Rose Bowl loop becomes very dangerous as workers set up and remove traffic barriers, etc. in addition to the traffic jams as people arrive and leave.
- 2.3.3. Affects on recreation in the rest of the arroyo are not included. For example, the casting pond, archery range, and hiking trails all would become virtually inaccessible from game traffic.

2.4. Traffic affects dramatically underestimated

- 2.4.1. Traffic estimates are based on study of traffic patterns from a poorly attended UCLA game with only 2/3 the attendance projected for NFL games (50,000 at the UCLA game vs 75,000 for NFL). The estimates are adjusted using standard traffic formulas. However, simply applying standard formulas and analogies is inadequate. The purpose of studies is to see if the situation is as predicted by standard formulas. Studying traffic around the November 17, 2012, game between UCLA and USC will provide much better information; the crowd should be larger, closer to 75,000, and the game will attract Southern California residents as an NFL game might.
- 2.4.2. The traffic study cites the 1994 General Plan Mobility Element rather than the 2004 revision.
- 2.4.3. The DEIR ignores the fact that Orange Grove Avenue is a “de-emphasized street” which is supposed to be protected from traffic.
- 2.4.4. The Traffic Study omits the following key intersections and segments:
 - 2.4.4.1. Arroyo Blvd intersections south of California
 - 2.4.4.2. Intersection of Arroyo and Seco Street (in the arroyo)
 - 2.4.4.3. Street segments on South Orange Grove, Fair Oaks and Arroyo Parkway south of Green Street and Pasadena Ave between California and Glenarm
 - 2.4.4.4. All streets east of Arroyo Parkway such as Marengo and Los Robles.
- 2.4.5. How were the public transportation “mode splits” assumptions determined? How do they compare with actual UCLA and NFL games? How do they compare to Farmers Field EIR assumptions?

2.5. Pollution affects understated

- 2.5.1. Significant pollution affects are noted by others. In addition,
- 2.5.2. The DEIR ignores the fact that population in the immediate vicinity of the Rose Bowl is disproportionately susceptible to the affects of pollutants. According to 2010 Census data, the two Census tracts adjacent to the Rose Bowl have over 2.5 times the number of elderly (65 and over) people as the average for Los Angeles County.

2.6. Safety impacts understated

- 2.6.1. Significant affects on public safety are noted by others, in addition,
- 2.6.2. There is no mention of the affects of closure of San Rafael fire station. This omission is worse because of the disproportionate portion of elderly people in the area, as mentioned above.

2.7. There is no consideration of the fact that major construction is likely to be underway in southern Pasadena

- 2.7.1. LA Metro will probably be implementing its selected alternative for the SR-710 extension. Although the exact alternative is unknown, it seems clear that people coming to Pasadena from the south are likely to encounter substantial construction during the period of proposed NFL use.