

Date: February 19, 2016

*Via E-Mail and hand delivery*

To: David Sanchez, Senior Planner

Subject: **WPRA Comments on Arroyo Seco Music and Arts Festival DEIR**

The West Pasadena Residents' Association supports the City's interest in seeing the Arroyo Seco Music & Arts Festival develop into an event which showcases Pasadena as a cultural nexus for art, music and dining, and features the natural beauty of the Arroyo Seco. We understand this major event will also provide a sound revenue stream for the Rose Bowl.

However, the impacts of such a large event on the surrounding neighborhoods-- as well as neighborhoods along the traffic corridors serving the Rose Bowl--must be fully considered and offset with vigorous and effective measures to avert and minimize the impacts.

**The DEIR is deficient because it does not provide for monitored and enforced mitigation.**

The DEIR refers to a number of actions that will be taken to mitigate impacts of the Festival, however it lacks required details about how the proposed mitigation actions will be monitored and enforced.

The DEIR relies heavily on the content of annually revised Festival Operations Plans and on the contracts between the City and the Festival operator to evaluate impacts of the project and to implement the promised mitigation. However, neither the plans nor contracts are included in the DEIR.

The project description, impacts analysis and proposed mitigation are accordingly deficient. To remedy this, we believe that direct, enhanced and ongoing community engagement is required, and the City must, at a minimum, adopt the following:

1. Public disclosure of any proposed Statement of Overriding Considerations at least 60 days before a final City Council vote on the Festival.
2. A formal program involving major stakeholders (RBOC, other Arroyo facilities, Festival operator, City departments, neighborhood organizations) to continuously monitor and mitigate the impact of Rose Bowl and other Arroyo Seco events on the City and surrounding neighborhoods. This program should be adopted after public comment and rigorously pursued, fully funded, and transparent.
3. A 45-day review and comment period to allow public comment before approving agreements, leases or licenses concerning the Festival and mitigation actions described in the DEIR.

**There are several individual deficiencies in the DEIR.**

Our major concerns are summarized below, by DEIR section number. A more complete list with detailed explanations is contained in the attached document.

**Section 3.2 Air Quality.**

The DEIR provides insufficient and unenforceable mitigation. Although promising "good-faith" efforts to limit air quality impacts and comply with air quality standards, there is no commitment to ensure that proposed air quality improvements will be adopted or that air quality will be monitored.

**Section 3.7 Noise.**

- The DEIR is inconsistent and possibly misleading about potential noise impacts. Despite extensive analysis and repeated assurances in the project description and impact analysis sections that the Festival will not exceed regulatory noise levels, the DEIR states that the Festival will require an exception from the City's noise regulations.
- Although there are no legally-mandated low-frequency standards, the DEIR should analyze the effects of the low-frequency sounds produced by the Festival. Low-frequency sounds can have a more adverse effect on the neighborhood during Festival operations than the higher-frequency sounds analyzed by the DEIR.

**Section 3.8 Public Services.**

The DEIR states that impacts on police and fire protection would be less than significant based on experience with one-day displacement events coupled with the Festival operator's experience. This assumption is not justified. One cannot use direct extrapolation from operating a 1-day event to operating a 3-day event.

**Section 3.10 Traffic and Circulation.**

- The DEIR frequently uses inappropriate traffic measurements to analyze traffic impacts.
- The DEIR declares that traffic impacts are "significant and unavoidable," but does not commit to implement or enforce proposed mitigation actions, nor analyze their effects on traffic impacts. These actions need to be described fully for proper analysis of the DEIR and consideration of overriding benefits.

We look forward to reviewing the City's response to these comments and participating in the public review and consideration of the proposed festival.

Sincerely,

WEST PASADENA RESIDENTS' ASSOCIATION



Geoffrey Baum, President

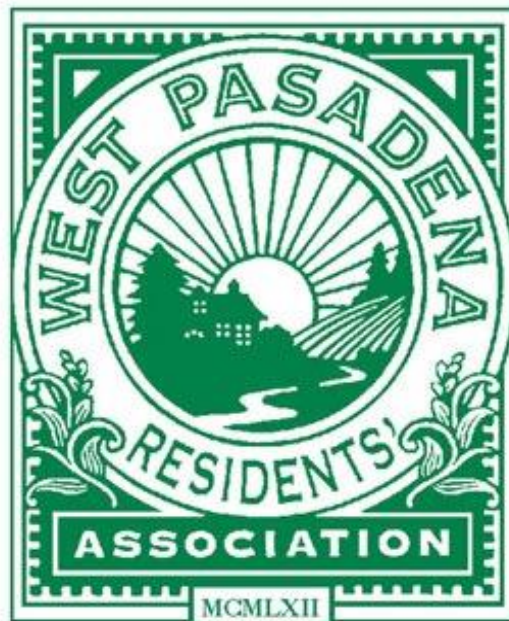
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# **WEST PASADENA RESIDENTS' ASSOCIATION**

## **Response to the Arroyo Seco Music and Arts Festival Draft Environmental Impact Report**



**February 19, 2016**

[WPRA.net](http://WPRA.net)

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## **DEIR Section 2.6 Description of Project Characteristics**

### **A. The DEIR description of the Festival Operations Plan has only a general description of the components and no provision for community input.**

The DEIR relies heavily on annually revised Festival Operations Plans and on the contracts between the City and the Festival operator to implement mitigation promised throughout the document. However, neither the plans nor the contracts are included in the DEIR.

This leaves important aspects of the CEQA "project" undefined, and perhaps more importantly, open to significant change from year to year, apparently without further EIR analysis or public opportunity for comment. The Festival Operations Plans are only very generally described, and the DEIR does not include the initial proposed contract between the City and the Festival operator. Thus, contrary to established law that requires a complete and stable project description, neither the terms of the initial contract nor the results of the annual revisions of the Festival Operation Plans will be subject to CEQA review.

To remedy these defects, The DEIR must disclose and analyze the impacts of how the City and Festival operator will attain each of the objectives mentioned in the description of the individual plans that comprise the Festival Operations Plan.

In addition, a direct, enhanced and ongoing community involvement is required to fill the obvious analytical gap in the project description; thus, the City must at a minimum adopt the following:

1. Public disclosure of any proposed Statement of Overriding Considerations at least 60 days before a final City Council vote on the Festival.
2. A formal program involving major stakeholders (RBOC, other Arroyo facilities, Festival operator, City departments, neighborhood organizations) to continuously monitor and mitigate the impact of Rose Bowl and other Arroyo Seco events on the City and surrounding neighborhoods. This program should be adopted after public comment and rigorously pursued, fully funded, and transparent.
3. A 45-day public review and comment period to allow public comment before approving any agreements, leases or licenses concerning the Festival plans or mitigation actions described in the DEIR.

## **DEIR Section 3.4 Cultural Resources**

### **A. The DEIR does not conform to CEQA requirements for cultural resources mitigation.**

The DEIR notes that no cultural resources will be altered or demolished as part of proposed event; thus, a significant determination of "Less than Significant" was made. However, the requirements for restoration in the event that historic or cultural resources are inadvertently damaged refer to the Secretary of Interior's Standards (on *page 3.4-16*). These standards are vague. All repairs and restoration should be done under the supervision of a qualified preservation architect.

## **DEIR Section 3.6 Land Use and Planning**

### **A. The DEIR inadequately evaluates the effects of the existing NFL agreement.**

The Arroyo Seco Public Lands Ordinance was amended in 2012 to allow 13 additional displacement events per year to allow an NFL team to temporarily use the Rose Bowl for five years from the first event. That ordinance is currently in effect. If, as we believe, the Festival will eliminate the possibility of NFL team use, the DEIR should clearly state that the Rose Bowl will not host an NFL team, or the effects of dual use should be thoroughly evaluated.

## **DEIR Section 3.7 Noise**

### **A. The DEIR is inconsistent in describing potential noise impacts. Despite extensive analysis and repeated assurances that the Festival will not exceed regulatory noise levels, the DEIR unaccountably states that the Festival will require an exception from the City's noise regulations.**

The Music Festival scoping sessions revealed that concert noise was a major concern for Pasadena residents. The DEIR Executive Summary, section *ES.8 Areas of Interest Identified During the Scoping Period - Page ES-9*, states:

*The comment letters received during the scoping process identified a range of issues that were recommended for consideration in this EIR. ... Concern was expressed regarding the potentially disturbing noise sourced from the music, crowds, fireworks, helicopters, police sirens, etc. In addition, comments urged that compliance with existing noise ordinance and potential noise mitigation be considered.*

Despite the importance of this issue, the DEIR's noise analysis is inconsistent: despite extensive analysis and repeated assurances that the Festival sound will be within limits proscribed by the City noise ordinances and General Plan, the DEIR notes that the Festival will require and seek a variance from noise ordinances.

Why would the City require a variance unless it plans to exceed the noise ordinance limits? Planning to exceed the limits patently invalidates the analyses and conclusions in Section 3.7.

The Final EIR should require full compliance with all noise guidelines and thresholds without exceptions or exemptions. If the Festival will exceed regulatory noise levels, the EIR must fully analyze the effects of those violations and require full mitigation to avoid adverse effects.

### **1. The DEIR has repeated analyses and assurances that sound levels would be within the regulatory noise limits.**

In Section 3.7.4, the DEIR analyses each noise source and concludes that, individually or cumulatively, noise levels would not exceed the City's noise regulations, and therefore have less than significant impacts. Therefore, no

exemption from the City's noise limits should be required. If an exemption is allowed, the analysis is clearly invalid.

The DEIR defines the conditions that would result in a finding of significant impact for noise as follows:

*For the purpose of determining whether the Project's operations would result in the exposure of persons to, or generate, noise levels that would exceed established noise standards, the Project's forecasted stationary operational noise levels are compared to the operational noise regulations of the City. As indicated in Section 9.36.170 (Exemptions) of the City's Noise Ordinance, the Rose Bowl operation is permitted to generate noise levels up to the limits specified in the Noise Element of the City's General Plan. The City's General Plan Noise Element indicates that 75 dBA is normally acceptable and 85 dBA is conditionally acceptable for sport arenas (see Table 3.7-9 above), which is applicable to the proposed Project. Although the 85 dBA noise level provided by the City's General Plan is based on a 24-hour averaged sound level (Ldn/CNEL), for the purposes of conducting a conservative analysis (as Project operation would be less than 24 hours), the threshold for the Festival's concert events is based on a one-hour Leq noise level. Therefore, the Project's operational noise levels generated onsite would have a significant noise impact if the following were to occur: [emphasis added]*

- *Project-related on-site operational noise sources (i.e., non-roadway), such as outdoor concert-related noise sources (including crowd noise and amplified sound system), outdoor mechanical/ electrical equipment, and on-site parking facilities, would exceed 85 dBA (hourly Leq) at the Project's outer limits of the property line. (page 3.7-33 and 34)*

Immediately following this definition, under the subheading *IMPACT EVALUATION*, the DEIR concludes that noise from *all* Festival operations would be less than those limits, and therefore less than significant and require no mitigation, specifically:

*On-Site Setup and Breakdown Noise* – page 3.7-36

*...noise impacts associated with the Project's site preparation and breakdown would be less than significant.*

*Outdoor Stage Sound Systems* – page 3.7-38

*...noise impacts associated with the Project's music concert events would be less than significant.*

*Attendance (Crowd) Noise* – page 3.7-40

*...noise impacts associated with the Project's concert crowd noise would be less than significant.*

*Mechanical/Electrical Equipment* – page 3.7-41

*...noise impacts associated with the Project's mechanical/electrical operations would be less than significant.*



Parking – page 3.7-42

...noise impacts associated with the Project's on-site parking operations would be less than significant.

On-Site Composite Noise Levels – page 3.7-45

...noise impacts resulting from the Project's composite noise levels with the Main Stage A within the Rose Bowl Stadium would be less than significant.

Mitigation Measures – page 3.7-48

Impacts would be less than significant and no mitigation measures are required. Significance Determination: Less than significant.

In addition, The DEIR's Project Description, Section 2, defines the Sound Management Plan as follows:

*The Sound Management Plan would be prepared by the Festival operator on an annual basis, and would serve several key functions. It would document final stage layout speaker systems and supporting quantified noise analyses that confirm the sound levels associated with each stage (and comprehensively over the entire Festival) would be within the allowable noise limits as defined by the PMC and Noise Element of the General Plan (85 dBA at the property line of the Rose Bowl). The Sound Management Plan would also identify all the standard enforcement measures that would be in place during each Festival in order to ensure that, in real time, sound restrictions are adhered to. This would include but not be limited to noise monitors at the property line of the Rose Bowl Stadium and in surrounding neighborhood locations, a "three strikes" policy for noise violations, and a defined mechanism for gathering and responding to public complaints during the Festival. Signage would be placed throughout the surrounding neighborhoods requesting that concert patrons be quiet and respectful of surrounding neighborhoods, and the Sound Management Plan would identify those locations. [emphasis added]*

**2. Despite the extensive analysis and repeated assurances that the Festival will not exceed regulatory noise levels, the DEIR requires an exception from the City's noise regulations**

In section titled: *PROJECT DESCRIPTION*, on page 2-34. Item 2.7, the DEIR states:

*As required by Section 15124(d)(1)(B) of the CEQA Guidelines, the following permits and approvals from the City of Pasadena would be required for the proposed Project:*

...

**Municipal Code Exemption.** Permit to allow an exemption to PMC Chapter 9.36, "Noise Restrictions."

A second reference to this code exemption is in *APPENDIX A - Initial Study/Notice of Preparation and Comment Log*, under 8. *Description of Project*: page 7, within Item 10:

10. In addition, permits to operate the Festival would be issued by various City of Pasadena departments, including a permit to allow an exclusion to

*PMC Chapter 9.36 (Noise Restrictions); ...*

**3. The final EIR must disavow either its noise studies, analyses, and assurances or its requirement for a variance from noise regulations.**

Requiring a variance from the noise ordinance is more egregious than it sounds, since the conditions studied in the DEIR are, appropriately, more conservative than those specified in the Pasadena ordinance.

The DEIR analysis is based on sound levels averaged over an hour. The City's regulations are based on sound levels averaged over 24 hours (see the section of DEIR quoted under item 1 above). The 24-hour average would include substantial periods of time when the festival is not in operation, therefore it would require substantially louder and more sustained noise levels during the festival to exceed the 24-hour average in the noise ordinance compared with the 1-hour noise average studied.

In requiring an exemption from the noise ordinance, the DEIR is saying the Festival may go over 85 dbA averaged over 24 hours! There is no analysis in the DEIR of sound that contemplates noise from any source of over 85 dBA over 24 hours.

On a side note, requiring an exemption from the noise ordinance ignores recent advances in sound for outdoor venues. The noise ordinance was enacted in 1992 when the main stage speaker array generated most of the sound needed to reach the rear of the listening area. Since then, sound engineering technology has been improved with the use of focused repeater speaker columns, allowing all amplification sources to remain substantially lower in volume.

**B. Although the the City of Pasadena Noise Ordinance has no legally-mandated standards for low frequency noise, this noise is highly impactful to neighborhoods and should be included in the DEIR assessment.**

Both the City of Pasadena and the DEIR refer to sound measurements and sound limits measured in the dBA scale. This is appropriate for most purposes; however it is generally accepted that outdoor, amplified dance music is heavily enhanced by the utilization of high power, low frequency speakers, usually referred to as subwoofers. These speakers output a very low frequency sound at high amplitude which are not accurately measured by utilizing the dBA scale. The City of Pasadena ordinance makes no reference to low frequency noise nor does the DEIR; both reference the use of the dBA scale. Since the propagation of sound residing in the lower frequencies has remarkably differing characteristics than sound in frequencies above 200 hz, the measurement of these lower frequencies is critical to understanding the impacts on the neighborhoods surrounding the Rose Bowl during the proposed events. Per a conversation with Dave Revel of Technical Multimedia, the propagation of sound is dependent on frequency; the measurement of these lower frequencies is important to understanding the impacts on the neighborhoods surrounding the Rose Bowl during the proposed events."

The World Health Organization has studied the impacts of low frequency noise as it relates to Mental and Physical Health impacts due to the presence of periods of low frequency noise.<sup>1</sup> These studies should be referenced in the DEIR report.

In addition, the propagation of low frequency sounds should be studied as this sound is more likely to reach into the homes near the Arroyo. Low frequency propagation is very different from other sounds as it does not behave like sound traveling in air. The low frequency wave lengths tend to travel further and are not as affected by obstacles such as the terrain and vegetation.

It is not practical to assume that the low frequency sounds emanating from the Music Festival should be eliminated; however just as the dBA rated sound pressure is measured to a standard, a standard should be scientifically studied and established to include the dBC weighted lower frequencies which tend to have the most impact on the community.

In addition to making these measurements, both dBA and dBC weighted at the property line, measurements conducted at the rim of the Arroyo should be added to provide a better indicator of the effects of the noise entering the neighborhoods surrounding the Rose Bowl.

### **Definitions of Sound Pressure Scales<sup>2</sup>**

#### **DbA Weighting**

Follows the frequency sensitivity of the human ear at low levels. This is the most commonly used weighting scale, as it also predicts quite well the damage risk of the ear. Sound level meters set to the A-weighting scale will filter out much of the low-frequency noise they measure, similar to the response of the human ear. Noise measurements made with the A-weighting scale are designated dBA.

#### **dBB Weighting**

Follows the frequency sensitivity of the human ear at moderate levels, used in the past for predicting performance of loudspeakers and stereos, but not industrial noise.

#### **dBC Weighting**

Follows the frequency sensitivity of the human ear at very high noise levels. The C-weighting scale is quite flat, and therefore includes much more of the low-frequency range of sounds than the A and B scales.

## **DEIR Section 3.8 Public Services**

- A. The DEIR is deficient in detailing how the responsibility of police/fire protection and security will be coordinated between the City and the event coordinator, and**
- B. The DEIR fails to demonstrate and justify the claim that the scope of safety and security measures for a three-day displacement event would be the same as that for a one-day displacement event.**

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<sup>1</sup> [Guidelines for Community Noise](#), World Health Organization, available [here](#)

<sup>2</sup> American National Standards Institute

The EIR outlines the City's regulatory framework for public safety and describes extensive experience with prior one-day displacement events, however, but actual details and logistics for the implementing the proposed three-day Festival are vague or non-existent.

The DEIR claims that impacts to the police and fire protection infrastructure will be 'less than significant' and consequently provides no mitigation measures. The sole justification provided for this abbreviated impact analysis is that the Pasadena Police Department is experienced with one-day displacement events and the Festival operator is experienced with multi-day events. This conclusory justification is clearly inadequate. Significant differences between security and safety approaches as well as potential concerns and threats associated with a multi-day event versus a one-day event obviously exist and were not identified. Cumulative impacts for the extended event were also not assessed.

**C. The DEIR is deficient: it includes no provisions for enforcement or accountability on the part of the event operator with respect to traffic management or public safety plans.**

The EIR, citing the Arroyo Seco Public Lands Ordinance, states that a traffic management plan and public safety element must be developed by the event operator and the appropriate City departments. This element will vitally affect neighborhood impacts of the Festival. It is improperly left for future negotiation, with no apparent opportunity public notice or comment. CEQA requires that these important aspects, which significantly define the project's neighborhood impacts, not be left for future determination. The EIR must either be rewritten to include specific details of the traffic management and public safety plans—or, at a minimum, include procedures that assure public involvement including public notice and comment prior to their adoption.

## **DEIR Section 3.9 Recreation**

**A. The DEIR understates the impact of set-up and breakdown, particularly on the Brookside Golf Course.**

At least nine holes of the course will be used during the 3-week set-up and breakdown period, which will reduce availability of the 18-hole course. The DEIR does not estimate lost income caused by this closure.

**B. The DEIR fails to mention how the grass areas will be maintained during the 3-week set-up and breakdown periods and what remedial work will be required after the festival.**

The DEIR does not analyze how the sensitive grass areas of the golf course, particularly in this most historic part of the course, will be maintained during the 3-week period it is used by the festival. The DEIR also has no estimate of probable lost income as golfers will have found other courses to play and may not return, particularly if the course has incurred damage.

## **DEIR Section 3.10 Traffic and Circulation**

**A. The DEIR does not provide sufficient information to establish how the traffic and circulation elements of the Project will be managed. The DEIR must provide considerable additional information on how this unique event differs from one-day and limited-hour displacement events.**

The DEIR generally assumes that management, control and mitigation efforts for the Festival will be upwardly scalable from those utilized for the current displacement events held at the Rose Bowl and in the Arroyo Seco (*Sec. 3.10.1 and others, pp. 3.10-1 and others*). However, the event is significantly different from any previous displacement events in that it would be conducted over three consecutive days and will be operating for well over half a day each day, including arrivals and departures. The DEIR must establish specifically how the proposed Festival's impacts and management will differ from previous displacement events.

**B. The DEIR does not provide sufficient data for transportation analysis of the DEIR in a number of areas.**

- *Intersection Impacts* - Pasadena no longer develops Level of Service (LOS) analysis of project impacts on local intersections, and does not make decisions based on LOS analysis. Only city-wide per-capita Vehicle Miles Traveled and Vehicle Trip data are developed, which tend to minimize any local impacts by averaging them across the entire city. Therefore, the DEIR does not contain or analyze local intersection impact information. LOS analysis was performed in the DEIR for other affected jurisdictions, including Los Angeles City and County and several nearby cities. Residents and businesses in those less proximate jurisdictions can get information on projected local traffic impacts, but those of the "ground zero" city, Pasadena, cannot. The DEIR must provide a means for Pasadenans to review and understand the projected local impacts of Festival traffic (*Sec. 3.10, various references*). The raw data exists to do LOS analyses for Pasadena locations. CEQA requires that the analysis use the best available scientific and technical information, and the EIR is therefore inadequate in not providing adequate analyses of traffic impacts on the City.
- *Performance Measures* - The DEIR only uses the City's VMT/C and VT/C performance measures (see above) to assess the impact of the Project within the City. It does not use the City's adopted bicycle, pedestrian and transit performance measures to assess Project impact, because "...the Project is not land use-related and is temporary in nature." (*Sec. 3.10.4, p. 3.10-31*) The DEIR should explain why the project is not land-use related, and why one set of performance measures is appropriate to utilize and one is not. It would seem that bicycle, pedestrian and transit access are important to the Festival, and, indeed, should be required and the implementation of that requirement analyzed.
- *Light Rail Estimates* - The DEIR uses Metro ridership data from a 2014 music festival at Whittier Narrows to estimate light rail transit use for the Project (*Sec. 3.10.4, p. 3.10-35*) Whittier Narrows is almost seven miles from the nearest light rail station (Gold Line Atlantic) which is clearly not comparable to the nearby light rail access to the Project. The DEIR should justify why this data is

considered relevant for estimating light rail use at the Project, and should reanalyze the possibility of greater reliance on transit access. .

- *Adequacy of Remote Parking* - The DEIR assumes that adequate parking spaces will be available at remote parking locations for Friday and weekend use (Sec. 3.10.4, page 2.10-82 and Appendix Table 20). However, it does not specify how that supply will be assured and how it will not be impacted by competing demands for that parking, or what other measures may be taken if the parking supply is inadequate. Both the Friday and weekend parking availability estimates are the same, which is improbable given varying weekday and weekend business and school parking demands. There are also no alternative locations indicated in case of special events at those locations. This key aspect of accommodating Festival attendance requires more specific analysis to assure that adequate remote parking will be available.
- *Adequacy of Alternatives Analysis* - The "Reduced Capacity Festival" alternative assumes that less Bowl-area parking will be required (ES.7.3), however the same parking space allocation methodology seems to be assumed. How is this outcome possible if Bowl-area parking is fully allocated to the first ticket purchasers?

**C. The DEIR provides insufficient information as to how neighborhoods will be protected and access assured for local residents and businesses. This is a crucial issue for residents of the affected areas.**

- *No Review of Setup/Breakdown Traffic* - The DEIR states that "transportation review of setup and breakdown is not necessary..." because setup and breakdown trips would be under 300 Passenger Car Equivalent (PCE) trips per day, the threshold for any City transportation review (Sec. 3.10.4, p.3.10-33). This appears to minimize the impact of two weeks of setup and one week of breakdown traffic through neighborhoods. How can setup and breakdown trips be enforced to total fewer than 300 per day? How many will be heavy trucks and what will be their impact? Trucks are assumed as two PCE's – are heavy trucks appropriately classified as having only twice the impact of passenger cars?
- *Misleading Mode Split Information* – The DEIR implies that the Festival will shift some trips from "auto" to some other kind of arrival, when in fact all but 1% of arrivals will involve a motorized trip. This makes a substantial difference in impact to the neighborhoods.

The distribution of person trips across different travel modes presented in Table 3.10-5 (p. 3.10-34) estimates that 84% of attendee trips will be by "Auto", 10% by taxi and Transportation Network Companies (such as Uber) and 5% by transit. However, taxi/TNC trips to the facility are also "auto" (e.g. motorized) trips, without parking but with two round trips to the facility (dropoff and pickup) per the attendee(s) served. Light rail and most other transit stops are beyond walking distance and assume the use of shuttles; again, two round trips. The only non-motorized trips by Festival attendees are bike/walk trips, estimated at 1%. The 99% motorized trips will heavily impact neighborhoods.

- *Inadequate description and analysis of neighborhood protection areas.* The DEIR seems to anticipate a boundary or cordon to protect neighborhoods from vehicle intrusion, similar to those implemented for the Rose Parade and Rose Bowl game (Sec. 3.10.4, p.3.10-40), but provides an inadequate level of detail to analyze if

this mitigation measure will be effective. A number of issues must be addressed, including but not limited to:

- What are the approximate neighborhood boundaries?
  - Would the cordon also prevent walk-in traffic, including those without tickets wishing to listen in areas around the Bowl?
  - What level of staffing would assure the proper operation of the cordon (by comparison, the Tournament of Roses depends on hundreds of volunteers to enforce its boundaries for a much shorter time)?
  - How would that staffing be provided, funded and assured?
  - What authority would that staff have to enforce restrictions on unauthorized drive-in and walk-in traffic?
- *Effectiveness of Advance Parking Purchase Requirement* - The requirement for advance parking purchase and remote parking facilities is assumed to prevent drive-in traffic and help mitigate neighborhood traffic (*Sec. 3.10.4, p. 3.10-35*). This would seem to be an effective technique, but the DEIR needs to further analyze the specific impacts on diverting drive-up traffic seeking parking without advance parking purchase.
  - *Appropriateness of Remote Parking Facilities* - The two closest parking facilities (Rose Bowl adjacent and Parsons Site) would be fully utilized, which will create severe local traffic impacts. The remaining traffic intercept/remote parking facilities are to the south and east of the Rose Bowl (*Sec. 3.10.4 and ES 6.2; pp 3.10-75 and ES-6*). Access to the two Pasadena City College facilities and Santa Anita race track may require traffic from the west and northwest to travel through the severe impact areas near the Project (which includes the intersection of I-210 and SR 134, less than a mile from the Rose Bowl). Should another remote parking site (such as the Griffith Park/LA Zoo facility successfully utilized for remote parking and shuttle by the Hollywood Bowl) be sought?
  - *Inadequacy of Neighborhood Protection Efforts* - The terms "neighborhood protection plan", "extensive local outreach program", "community liaison" and "resident access program" are used without definition or implementation details. These are crucial concepts for neighborhoods and must be fully defined and their proposed outcomes described in the DEIR.

**D. The DEIR concludes that traffic impacts are "significant and unavoidable" but does not provide adequate mitigation or sufficient information on proposed mitigation actions. The results of the proposed mitigation actions are not adequately detailed or quantified.**

- *Inadequate Mitigation "Plan"* - Mitigation Measure TRA-1 describes the development of a plan, not the plan itself, and provides little detail or expected outcomes other than reference to mitigation used in previous and only partially comparable displacement events (*Sec. 3.10.4 and ES-10; p. 3.10-79*). The DEIR must provide sufficient details about proposed mitigation efforts and outcomes to permit analysis. In effect, affected neighborhoods are asked to accept a "plan to plan" as effective mitigation of severe impacts. This is inappropriate and does not comply with the CEQA requirement that a stable and complete project description be included and analyzed.

- *The Proposed "Report Card" Does Not Qualify as Mitigation* - Mitigation Measure TRA-2 proposes but does not quantify or estimate the effectiveness of an "after the fact" report card to be used in planning the following year's event. As such it is certainly not mitigation for the initial event and cannot constitute mitigation for subsequent year's events since how the 'report card' will be graded and used is vague and undefined. Equally important, key elements of the "report card" will be available in real time during the Festival operation and should be applied to the current year event to inform the public and ameliorate impacts. For example, real-time noise measurements are already made available to Rose Bowl management, and Festival noise measurements should similarly be made available to neighborhoods on an internet site.
- *Permanent physical improvements* - The DEIR concludes that permanent physical improvements (which could mitigate impacts) are not recommended due to the temporary nature of the Project. Such an argument could be used for any temporary event, but with this Project the displacement events could total as many as 15 per year. The DEIR should assess the *cumulative impacts* of the Festival and the other annual displacement events and assess what permanent physical improvements to reduce traffic, air quality, noise and other Project impacts can be made.