

Summary of DSEIR Response for City of Industry/Majestic Realty NFL Stadium Based Development Project

The following is a summary of the City's 102 page response to the City of Industry regarding the City of Industry/Majestic Realty Draft SEIR for the proposed NFL Stadium development project. To view the response in its entirety, visit www.cityofdiamondbar.com or contact the City of Diamond Bar at 909.839.7010.

Background

- In 2004 the City of Industry approved the Industry Business Center (IBC) development plan, which included 4.78 million square feet of development (4.15 million square feet of commercial, retail and office uses and 633,000 square feet of industrial uses). The IBC project is situated in the City of Industry, along Grand Avenue on the north side of the Pomona (SR-60) Freeway and the Orange (SR-57) Freeway, and south of Valley Boulevard. Diamond Bar borders the eastern and western property line and extends the length of the property on the south side of the SR-60 Freeway. Project construction never commenced on site.
- In October 2007 Majestic Realty announced its plans to develop a professional football stadium based entertainment, retail and office development upon the 600+ acre IBC site.

The City of Diamond Bar immediately began working with environmental and traffic experts to assist the City in the review of the proposed project.

The proposed NFL stadium based development will anchor nearly 3 million square feet of mixed-use (entertainment, retail, commercial, office) development. Also planned for the project site are up to four NFL practice fields, an NFL training facility, and sports medical clinic.

The proposed NFL stadium based plan description does not indicate the size of the stadium. The developer has publicly estimated the stadium size at 1.9 million square feet. The additional stadium square footage increases the overall development plan to 4.89 million square foot development, larger than the originally approved 2004 IBC project.

- In April 2008 the City of Industry issued a Notice of Preparation (NOP) seeking governmental agency and general public comments upon the proposed Supplemental Environmental Impact Report (SEIR). The SEIR is intended by the City of Industry to address the differences between the previously approved project for the property and the proposed NFL stadium based project. Upon receipt the City of Diamond Bar immediately posted the NOP on the City's website (www.cityofdiamondbar.com) and made copies available at City Hall and at Library.
- In May 2008 the City submitted a 14-page response letter to the NOP. The letter outlined several areas of concern and asked Industry to address our issues in the upcoming environmental impact report. The primary concern is the impact to Diamond Bar as a result of the increased daily traffic trips related to the proposed land uses and specifically any stadium based activities.
- On September 3, 2008 the City of Industry issued the Draft Supplemental Environmental Impact Report (DSEIR) for public review. On September 4, 2008, Diamond Bar staff posted the entire contents of the 800+ page Draft SEIR and the 5,000+ page technical appendix on the City's

website (www.cityofdiamondbar.com). Information was also provided where to locate additional copies (City Hall and six local libraries) and information regarding how to comment upon the documents. Deadline for submission of comments was October 17, 2008.

- On September 18, 2008 the City requested additional time to review the Draft SEIR. The Lead Agency responsible for decision making of a project of this scale and complexity would often permit reviewers additional time beyond the State minimum of 45-days. On October 14, 2008 the City received correspondence from the City of Industry denying the request for an extension of the public review period.
- On October 17, 2008 the City submitted a 102-page response letter to the Draft SEIR. The response detailed Diamond Bar's concerns regarding the significant impacts and inadequate mitigation measures proposed for the project.

Project Description

In 2004 the City of Industry approved the Industry Business Center (IBC) development plan that included 4.78 million square feet of development (4.15 million square feet of commercial retail and office uses and 633,000 square feet of industrial uses). The 2008 "revised" IBC Plan (NFL Stadium based plan) is described by the City of Industry as 2.99 million square feet, a reduction of 1.79 million square feet from the previous proposal. However, the NFL Stadium based plan description fails to indicate the actual size of the stadium. Announced as a 75,000 (expandable to 80,000) seat facility, the developer, Majestic Realty presentations to the public indicate the size of the stadium at 1.9 million square feet. Therefore, the project is more realistically described as a 4.89 million square foot development and as a result, is larger than the approved 2004 IBC project. A total of 45 stadium events per year are anticipated (30 major stadium "sell out events" and an additional 15 "minor events" with an anticipated attendance of 25,000 or less).

Project Schedule

The City of Industry and Majestic Realty have indicated a desire to obtain project approvals in December 2008 or January 2009. Majestic Realty has indicated that construction would commence immediately after the announcement of the purchase and relocation of an existing NFL franchise. The DSEIR outlines the following schedule and project components:

Phase 1 – Open for business in Fall 2011

- 75,000 seat NFL stadium (1.9 million square feet) consisting of 280,000 square feet of related uses such as concessions, food services, retail facilities, four NFL practice fields, team offices, sports clinic, an NFL attraction, a team store, restaurants and banquet facilities open daily on a year round basis.
- 100,000 square feet medical center (outpatient).
- 25,000 surface level parking spaces.

Phase 2 – Open for business in 2015

- 995,000 square feet of retail shops and restaurants (some stadium related retail / restaurant development in Phase 1).
- 120,000 square feet dedicated to a 5,000-seat live theater and 1,000-seat movie theater.
- 1.49 million square feet of office uses.
- 1.39 million square foot parking structure(s).

Summary of City DSEIR concerns

The Draft SEIR identified additional impacts as a result of the revised development plans and provided additional mitigations. The mitigations from the 2004 IBC EIR were included in the 2008 Draft SEIR. As with the 2004 IBC EIR, a number of impacts cannot be mitigated to “less than significant” and therefore, the City of Industry must adopt a “Statement of Overriding Consideration(s)”. As a result of a City staff review of the 2008 Draft SEIR, the following impacts and mitigations have been identified as significant to Diamond Bar:

Traffic Impacts

- The Draft SEIR Traffic and Parking Management Plan (TPMP) lists the primary access point to the venue as the Orange (SR-57) and Pomona (SR-60) freeway interchange, with attendees primarily utilizing the Grand Avenue project access points.
- According to the TPMP, nearly 82% of stadium traffic will approach and enter the project from Grand Avenue, with 18.1 % using Brea Canyon Road to access the Grand Crossing Boulevard entrance to the project. It is anticipated that 38.6 % of the traffic will approach from the east on the freeways, and merge with approximately 30.4% approaching from the west and from farther south on Grand Avenue. The remaining 12.9% will arrive from the north on Grand Avenue. It is anticipated that the completed project (2015) on stadium event days could generate approximately 62,837 average daily trips (ADT).
- The TPMP recommends modifications at 89 intersections and freeway ramps to mitigate the increased traffic impacts. Of these, 53 intersections and freeway ramps are within Diamond Bar city limits (10 on/off ramps from SR-60 and SR-57 and 43 intersections). The traffic mitigations proposed would require additional right-of-way changes, removal of landscaped medians, removing bike lanes, additional traffic signals, and/or re-striping for additional lanes.
- Identified in the TPMP are elements mentioned to address additional mitigation concerns that include parking and traffic management plans, shuttle bus system, pre-assigned travel routes, traffic and parking control personnel, special event temporary signage, marketing/public outreach, emergency routes, and offset/irreversible traffic flow at key intersections and police helicopter to assist traffic control. These elements are not addressed in detail and without sufficient information it is not clear if they would have any reduction on the traffic and parking impacts to the City. Furthermore, the specifics of the various elements in the TPMP were proposed to be prepared 6 months before the first scheduled event.
- Funding for traffic mitigation projects not in the City of Industry would be placed into an escrow account overseen and administered by the City of Industry. These funds would only be released to outside jurisdictions upon initiation of construction, causing these jurisdictions to bear upfront costs with no guarantee when or if costs would be reimbursed.

Public Safety Impacts

- The increase in population during major events in such close proximity to Diamond Bar will generate a public safety impact to the City. Mitigation measures do not include the provision of funding for additional public safety services.
- With no increase in personnel, public safety resources would also be diminished as a result of existing resources being reallocated to assist with altercations and/or additional traffic control that may be required as a result of stadium events.

- The Draft SEIR does not take into account the impact to fire and police services in Diamond Bar if the major access routes, Grand Avenue and Brea Canyon Road, were inaccessible or blocked as a result of stadium activities.
- Upon completion, an increase in approximately 62,837 traffic trips daily impacting the City of Diamond Bar.
- No traffic mitigation planned for local residential neighborhoods adjacent to stadium to control off-site parking or attendees seeking alternate routes to and from stadium.

Air Quality, Noise and Aesthetic Impacts

- The stadium project will generate long-term emissions that exceed the SCAQMD regional significance threshold. Diamond Bar will be exposed to pollutants from new daily traffic trips, grading and construction of the site.
- Adjacent areas will be exposed to increased noise from construction activities, traffic, large crowds, daily operations, aircraft flying overhead on game days and other significant events held at the facility. A mitigation plan to address the noise generated by the project must be fully identified, analyzed and mitigated.
- Although there are other project design features listed in the Draft SEIR to address aesthetic impacts, the features did not contain sufficient details to demonstrate that the visual character of the area and the buffering of the residential areas will be adequately addressed.
- There is insufficient information to determine if residential areas would be impacted by the light glare emanating from the stadium and parking lots. The Draft SEIR stated that the stadium would emit 300 to 350 foot candles of light. The closest example of this intensity of light is Anaheim Stadium. The Draft SEIR indicates that the residential area to the east would not be impacted by the stadium lights because it is 2,000 feet away. The Draft SEIR did not provide information as to the height of the light poles in the east parking areas, which are located approximately 150 feet from some nearby residences.

Additional Information

As always, City of Diamond Bar City Council and staff will continue to monitor the project details and work with City of Industry officials to identify what is best course of action for our community, and to mitigate immediate and long term impacts.

Learn more about the project...

Contact the City of Industry Planning Department at 626.333.2211
Visit project website at www.losangelesfootballstadium.com
Contact project developer, Majestic Realty at 562.692.9581

Industry NFL Stadium Project Information Meeting

Hosted by Majestic Realty

Thursday, October 30, 2008 @ 6:30pm

Diamond Bar Center
1600 Grand Avenue, Diamond Bar

For meeting information, contact Majestic Realty at 562.692.9581