

3.4 CULTURAL AND HISTORIC RESOURCES

3.4.1 Introduction

This section describes the cultural (historical, archaeological, and paleontological) resources present or potentially present on the project site and in the Central Arroyo and evaluates the potential effects on those resources as a result of implementation and operation of the proposed project. Significant cultural resources on the project site include the Rose Bowl, a National Register Historic Landmark, as well as other, associated structures that have been determined eligible or potentially eligible for the National Register of Historic Places or the California Register of Historical Resources. Landscape features of the project site are also discussed in Section 3.1 (Aesthetics) of this document.

Preparation of this section used data from various sources. The Historical Resources Technical Document: Rose Bowl Stadium Renovation Project, prepared in January 2005 and revised in October of 2007 by Myra L. Frank/Jones & Stokes, comprises the primary source of this analysis. The *Cultural Resources Technical Report* prepared by Historic Resources Group and dated February 26, 2004, *The Rose Bowl Historic Structure Report and Preservation Plan*, prepared by Historic Resources Group and dated October 1997, and a letter by the National Park Service dated September 8, 2003, were used to identify the character-defining features that convey the historic significance of the Rose Bowl. Other sources include the Central Arroyo Master Plan, the City of Pasadena General Plan, a cultural resources records search at the California Historic Resources Information System (CHRIS) South Central Coastal Information Center, and other data sources.

Comments made during the scoping session in July 2007 expressed concern over retention of the Rose Bowl as a National Historic Landmark. One comment letter, received from the West Pasadena Residents' Association, requested that the Rose Bowl's Historic Landmark status be considered in the development of the proposed revised project, particularly the horizon-level concourse option and the widening of tunnels option. Another comment letter from the Native American Heritage Commission requested that the California Historic Resources Information Center and the Native American Heritage Commission be contacted to determine the potential for presence of cultural or historic resources on the project site. A comment letter was received from Mic Hansen regarding the historical impacts of the tunnel widening and the development of the "skywalk and down-supports."

3.4.2 Environmental Setting

The historic resources in the project vicinity remain the same as described in the FEIR (pages 3.4-1 through 3.4-17) and are too lengthy to summarize in this Draft SEIR. Please refer to Section 3.4 of the FEIR for a complete description of both off-site and on-site historic resources.

3.4.3 Regulatory Framework

The regulatory framework for the revised project remains the same as that described in the FEIR (pages 3.4-17 through 3.4-20). The project as revised remains consistent with these regulations, and the discussion contained on pages 3.4-17 through 3.4-20 is incorporated by reference herein.

■ Character-Defining Features of the Rose Bowl

Historic Resources Group (HRG) previously completed for the City of Pasadena a Historic Structures Report (HSR), which contained a thorough analysis of character-defining features of the Rose Bowl, which is contained in the FEIR. Many of the features the National Park Service identified as “character defining” in its September 8, 2003 letter were not designed by Myron Hunt, and do not date to the historic period of significance of the Rose Bowl (1929–1950), except for those listed as follows:

- The National Historic Landmark boundary of the Rose Bowl is the perimeter fence, and this establishes the environment sensitive to direct effect
- Rock wall enclosures for the vegetation, giving a mounded or stepped appearance to the area
- Open underside of the bowl, and exposed unpainted concrete surface
- Vegetation pattern, especially roses and large palm trees
- “Open bowl of the stadium with tiered seating,” including, “open, unobstructed, gently-sloped tiers of seating punctuated by regularly spaced access tunnels with aisles that radiate straight downward to the field and upward above”
- Scoreboards (with red tile roofs)

Because the HSR is so thorough, and because it served as the basis for a prior review by NPS, the inventory of character-defining features used by HRG was used again in this document for consistency, amended as appropriate by features identified by NPS. Please refer to the FEIR for a complete description of all character-defining features of the Rose Bowl.

■ Arroyo Seco Cultural Landscape

The Arroyo Seco Cultural Landscape is not currently designated under federal, state, or local criteria, but is in the process of being nominated by Pasadena Heritage for listing in the National Register of Historic Places (NRHP). This resource is extremely large, extending from Devil’s Gate Dam at the northern limits, to the intersection of San Rafael Avenue and Arroyo Boulevard at the southern limits, a distance of approximately 4 miles. The Lower Arroyo Seco was designated as a City of Pasadena Landmark in 1977. The National Register nomination for Arroyo Seco has identified the following character-defining features of the Arroyo Seco Cultural Landscape

- Devil’s Gate Dam, upper Arroyo (8,500 feet, or 1.62 miles, from Rose Bowl)
- Brookside Golf Club (golf courses, not the club house), 1133 Rosemont Avenue, opened 1928 (685 feet, or 0.13 miles, from Rose Bowl)

- The Rose Bowl
- Jackie Robinson Baseball Stadium, Brookside Park, 1930s, association with Chicago Cubs Spring training (1,530 feet, or 0.29 miles, from Rose Bowl)
- Fannie Morrison Horticultural Center Buildings (Kidspace), Brookside Park, collection of three buildings, built in 1938
- The Rockery, Brookside Park (3,100 feet, or 0.59 miles, from Rose Bowl)
- Brookside Park Amphitheater, Brookside Park (3,100 feet, or 0.59 miles, from Rose Bowl)
- La Casita del Arroyo, 173 S. Arroyo Boulevard, lower Arroyo, also individually designated as a City of Pasadena Landmark (6,300 feet, or 1.81 miles, from Rose Bowl)
- Stone retaining walls, throughout the Arroyo
- Original circulation elements, (roads and pathways throughout the Arroyo)
- All historic bridges over the Arroyo (throughout the Arroyo), including Colorado Street Bridge (5,755 feet, or 1.09 miles, from Rose Bowl), La Loma Bridge (9,500 feet, or 1.81 miles, from Rose Bowl), San Rafael Bridge, and Holly Street Bridge
- The view of the San Gabriel Mountains from inside the Rose Bowl.
- The aerial view of the Rose Bowl rim, a continuous and pure ellipse.

No new paleontological or archaeological resources have been identified since preparation of the FEIR for the original project.

3.4.4 Methodology

Significant effects on historical resources are evaluated by determining the historic status of the resource, the basis for its importance, and then determining the potential for development to affect the characteristics that convey its historic significance. Section 15064.5(b)(1) of the CEQA Guidelines defines a significant effect as one that would materially impair the significance of an historical resource. According to CEQA Guidelines Section 15064.5(b)(2), material impairment of a resource's historic significance could result if the project would do any of the following:

- Demolish or materially alter in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the CRHR
- Demolish or materially alter in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to local ordinance or resolution (PRC Section 5020.1(k)), or its identification in an historical resources survey meeting the requirements of PRC Section 5024.1(g) unless a preponderance of evidence establishes that the resource is not historically or culturally significant
- Demolish or materially alter in an adverse manner those physical characteristics of a resource that convey its historical significance and that justify its eligibility for its inclusion on the CRHR, as determined by the lead agency

New construction and modification of the Rose Bowl and its associated character defining features could affect this resource or its setting by demolishing or altering contributing features or by introducing incompatible elements. The changes to the Rose Bowl also have the potential to affect other historical resources within a reasonable proximity. The demolition or substantial material alteration of any feature that contributes to the historical significance of the Rose Bowl is evaluated to determine whether or not it constitutes a significant impact on the Rose Bowl as a whole. For the purposes of this analysis, the substantial adverse alteration or demolition of any contributing element is considered to be a significant impact.

3.4.5 Thresholds of Significance

For the purposes of this Draft SEIR, implementation of the proposed project may have a significant adverse impact on cultural resources if it would result in any of the following:

- Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the CEQA Guidelines
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature
- Disturb any human remains, including those interred outside of formal cemeteries

3.4.6 Revised Project Impacts and Mitigation Measures

Threshold	Would the revised project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines?
Threshold	Would the revised project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?
Threshold	Would the revised project disturb any human remains, including those interred outside of formal cemeteries?

Impact 3.4-1 **The revised project could cause a substantial adverse change in the significance of an archaeological resource, directly or indirectly destroy a unique paleontological resource or site or unique geologic feature, or disturb any human remains, including those interred outside of formal cemeteries. This is a potentially significant impact. Implementation of mitigation measures MM 3.4-1(a), MM 3.4-1(b), MM 3.4-2(a), and MM 3.4-2(b) would reduce this impact to *less than significant*.**

As discussed in the FEIR, construction activities associated with implementation of the proposed project would not cause adverse changes in the significance of archeological and paleontological resources and would not disturb human remains. Implementation of mitigation measures MM 3.4-1(a) and MM 3.4-1(b), MM 3.4-2(a) and MM 3.4-2(b) would require provisional measures in the event that

archeological and paleontological resources are identified. Provisional measures would be implemented upon discovery of a burial, human bone or human remains on the project site; the Los Angeles County Coroner must be immediately notified of the find and must comply with the provisions of the California *Public Resources Code* Section 5097 with respect to Native American involvement, burial treatment, and re-burial, if necessary. Therefore with the implementation of the aforementioned mitigation and provisional measures, the effects have been found to be *less than significant*.

MM 3.4-1(a) Prior to site preparation or grading activities, the Applicant shall retain a qualified (ROPA-listed) archaeologist to inform construction personnel of the potential for encountering unique archaeological resources and the regulatory framework of cultural resources protection. All construction personnel shall be instructed to stop work within 50 feet of a potential discovery until a qualified (ROPA-listed) archaeologist assesses the significance of the find and implements appropriate measures to protect or scientifically remove the find. Construction personnel shall also be informed that unauthorized collection of archaeological resources is prohibited.

MM 3.4-1(b) The Applicant shall retain a qualified archaeologist to provide spot-checks—on a schedule approved by the City—during grading and excavation activity and to be available on-call in the event of a discovery. In the event of a discovery, the archaeologist shall first determine whether an archaeological resource uncovered during construction is a “unique archaeological resource” under Public Resources Code Section 21083.2(g). If the archaeological resource is determined to be a “unique archaeological resource,” the archaeologist shall formulate a mitigation plan in consultation with the City that satisfies the requirements of Section 21083.2.

If the archaeologist determines that the archaeological resource is not a unique archaeological resource, the archaeologist shall record the site and submit the recordation form to the California Historic Resources Information System South Central Coastal Information Center, and no further investigation of the particular find would be required.

The archaeologist shall prepare a report of the results of any study prepared as part of a mitigation plan, following accepted professional practice. Copies of the report shall be submitted to the City and to the California Historic Resources Information System South Central Coastal Information Center.

MM 3.4-2(a) Prior to site preparation or grading activities, the Applicant shall retain a qualified paleontologist to inform construction personnel of the potential for encountering paleontological resources and the regulatory framework of cultural resources protection. All construction personnel shall be instructed to stop work within 50 feet of a potential discovery until a qualified paleontologist assesses the significance of the find and implements appropriate measures to protect or scientifically remove the find. Construction personnel shall also be informed that unauthorized collection of paleontological resources is prohibited.

MM 3.4-2(b) The Applicant shall retain a qualified paleontologist to provide spot-checks—on a schedule approved by the City—during grading and excavation activities and, in the event of a discovery, shall first determine whether a paleontological resource uncovered during construction meets the definition of a “unique archaeological resource” under Public Resources Code Section 21083.2(g). If the paleontological resource is determined to be a “unique archaeological resource,” the paleontologist shall formulate a mitigation plan in consultation with the campus that satisfies the requirements of Section 21083.2.

If the paleontologist determines that the paleontological resource is not a unique resource, the paleontologist shall record the site and submit the recordation form to the Natural History Museum of Los Angeles County, and no further investigation of the particular find would be required.

The paleontologist shall prepare a report of the results of any study prepared as part of a mitigation plan, following accepted professional practice. Copies of the report shall be submitted to the City and to the Natural History Museum of Los Angeles County.

With implementation of the mitigation and provisional measures, the effects would be *less than significant*.

Threshold	Would the revised project cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the CEQA Guidelines?
-----------	---

Impact 3.4-2 The revised project with Option B would not cause alteration of the resource or its immediate surroundings such that the significance of the historical resource would be materially impaired. This is a *less-than-significant* impact.

Implementation of the proposed revised project with Option B would not result in significant adverse changes to the Rose Bowl under CEQA. This option includes two circulation towers on the west elevation, an area which was previously and substantially altered and analyzed in the FEIR. Additionally, included in Option B is an expansion of the existing tunnels within the structure. This expansion will require removal of existing landscaped berms and approximately 4,300 stadium seats. The removal of seats would change the existing conditions but would not adversely affect the historical integrity of the structure. The Secretary of the Interior’s Standards for Rehabilitation (Standards), has composed regulations (36 CFR Part 67, Historic Preservation Certifications) pertaining to historic buildings. These standards are to be applied to specific rehabilitation projects in a reasonable manner. ~~As proposed, the tunnel openings (exterior) would be the same shape and height as they are today, with their new concrete surrounds detailed as the existing concrete surrounds. Figure 2-7 of the Draft SEIR more clearly illustrates the visual effects of the widened tunnels. The tunnels would retain the identical shape and height as the original existing trapezoidal openings. Their new concrete surrounds would be detailed as the existing concrete surrounds. The vomitoria (the label used for tunnel openings on the interior of the Bowl) would double in height and change in appearance and per the Applicant as follows: the lower half of the reconfigured vomitoria, 8 feet wide, would be identical in location, shape, width, height, and detailing as the original trapezoid. Above that, the upper half of the revised vomitoria would be 16 feet wide, to accommodate new stair runs 4 feet wide flanking an 8-foot-wide landing permitting egress from seating above the vomitoria. This upper half of the reconfigured vomitoria, 16 feet wide and sharing the same center line as the bottom half of the vomitoria, would be the same height, trapezoidal shape and detailed as the existing concrete surrounds.~~ These changes follow the Standards with regard to rehabilitation of historic buildings, particularly given the need to meet safety and access requirements, and will be considered mitigated to having a less-than-significant impact on this historical resource and an acceptable alteration.

The aerial view of the rim would be somewhat changed by the larger press box (analyzed in the previous certified FEIR as an acceptable alteration, with no further analysis required) but substantially unchanged from what currently exists. The purity of the ellipse would remain, and therefore Option B in this regard is considered an acceptable alteration. The two vertical circulation towers on this side would be reduced in scale from those in Option A because their purpose would no longer be to function as emergency exits for the general public; rather, they would serve primarily as access for the more limited population of those using the press box and suite facilities. The aerial view of the rim, while somewhat diminished by the greater mass of the proposed press box and smaller circulation towers, would not be substantially altered. In addition, under this option, placing up to 50 percent of the restrooms and concession stands initially proposed for perimeter locations allows more of the Rose Bowl's character defining features on this east elevation to be visible to the public. As noted, this elevation is most easily seen and experienced by the public. This change in the size and shape of the vomitoria follows the Standards with regard to rehabilitation of historic buildings, particularly given the need to meet safety and access requirements, and will be considered mitigated to having a less-than-significant impact on this historical resource and an acceptable alteration.

Therefore, historical resource impacts associated with Option B would be *less than significant*.

Impact 3.4-3 **The revised project would not alter the significance of other historic resources in the project vicinity. This is a *less-than-significant* impact.**

■ Prospect Historic District

The Prospect Historic District, listed in the National Register on 02/02/1987, is located on the east rim of the Arroyo Seco, east of the Rose Bowl, and would not be directly affected by the proposed project. The closest part of Prospect District is over 720 feet from the Rose Bowl fence line. The ranges of street addresses that contribute to the district are:

- 480–1099 Prospect Boulevard
- 645–687 (odd only) Prospect Crescent
- 421–472 Prospect Square
- 470–535 Prospect Terrace
- 514–991 Rosemont Avenue
- 1010–1126 Armada Drive
- 535 Fremont Drive
- 50–550 La Mesa Place

Views of the Rose Bowl from the district are generally unaffected, although it is visible from specific properties along Armada Drive and Prospect Crescent. The residence at 1030 Armada Drive (top) is among the closest in the Prospect Historic District to the Rose Bowl, and it has views to the Rose Bowl across Armada Drive. The residence at 655 Prospect Crescent (top) is typical of houses along Prospect Crescent that have views to the Rose Bowl from their rear windows and yards.

The alterations to the Rose Bowl proposed by the project or the Alternate Design Alternative would be visible from specific points within the Prospect District, but would not be seen from the vast majority of

the district's contributors. These changes would not diminish the reasons the Prospect District was listed in the National Register and California Register, and would not alter "its immediate surroundings such that the significance of an historical resource would be materially impaired." Therefore, the proposed project or alternatives would not result in a significant effect on this historical resource.

■ Louise C. Bentz House

The Louise C. Bentz House was individually listed in the National Register on 12/02/1977, and was designed by Greene & Greene. It is located at 657 Prospect Boulevard, within the boundaries of the Prospect Historic District.

Any alterations that would occur to the Rose Bowl would not be visible from the Bentz House, therefore, the proposed project or alternatives would not result in a significant effect on this historical resource or its setting.

■ Millard House/La Miniatura

The Millard House/La Miniatura was individually listed in the National Register on 12/12/1976, and was designed by Frank Lloyd Wright. It is located at 645 Prospect Crescent, within the boundaries of the Prospect Historic District.

The Millard House (top) is located on an interior street within the Prospect Historic District, and does not have views of the Arroyo Seco or Rose Bowl, as shown in this view (bottom) facing northwest, toward Prospect Crescent and the Rose Bowl.

■ Holly Street Livery Stable

The Holly Street Livery Stable was individually listed in the National Register on 10/25/1979. It is located at 110 East Holly Street, in Old Pasadena, and is not in geographic proximity to the Rose Bowl or the Arroyo Seco. It is included in the study area because of its historic association with events held during the Tournament of Roses.

Any changes in events that would occur at the Rose Bowl would not affect those Tournament of Roses events that may occur at the Holly Street Livery Stable, therefore, the proposed project or alternatives would not result in a significant effect on this historical resource.

■ Arroyo Terrace Historic District

The Arroyo Terrace Historic District is listed in the National Register listing. It is bounded by North Grand Avenue, Live Oaks Avenue, Arroyo Terrace, and North Orange Grove Boulevard. It is located on the east rim of the Arroyo Seco, southeast of the Rose Bowl and would not be directly affected by the proposed project. The closest part of Arroyo Terrace is over 3,500 feet from the Rose Bowl fence line. The addresses of houses that contribute to the district are:

- 200, 210, 230, and 240 North Grand Avenue

- 368, 370, 400, 406, and 440 Arroyo Terrace
- 239 North Orange Grove Boulevard

Views of the Rose Bowl from the district are generally unaffected, although it is visible across the street from specific properties, including 240 North Grand Avenue and 368 Arroyo Terrace.

The alterations to the Rose Bowl proposed by the revised project would be visible from specific points, but would not be seen from the vast majority of the district's contributors. These changes would not diminish the reasons Arroyo Terrace would be eligible for the National Register and California Register, and would not alter "its immediate surroundings such that the significance of an historical resource would be materially impaired." Therefore, the proposed project or alternatives would not result in a significant effect on this historical resource.

The alterations to the Rose Bowl proposed by the project or the Alternate Design Alternative would be visible from specific points within the Arroyo Terrace (proposed) Historic District, but would not be seen from the vast majority of the district's contributors. These changes would not diminish the reasons Arroyo Terrace would be eligible for the National Register and California Register, and would not alter "its immediate surroundings such that the significance of an historical resource would be materially impaired." Therefore, the proposed project or alternatives would not result in a significant effect on this historical resource.

Impacts on these historic resources would be *less than significant*.

Threshold	Would the revised project cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the CEQA Guidelines?
-----------	---

Impact 3.4-4 **The revised project with Options A or C would cause alteration of the resource or its immediate surroundings such that the significance of the historical resource would be materially impaired. This is a potentially significant impact. Implementation of mitigation measure MM 3.4-3(a) and MM 3.4-3(b) would reduce this impact, but not to a less-than-significant level. Therefore, the impact would be *significant and unavoidable*.**

Under Option A of the revised project, the Rose Bowl's appearance would be substantially altered at the rim, the base, and around the circumference by the combined intervention of the horizon-level concourse, four large circulation towers, and requisite supports. The horizon level concourse would be constructed along the entire rim of the stadium and extend around the interior of the stadium at the south and north ends. The horizon concourse would cause a substantial alteration to bowl reconstruction (elliptical curvature in plan and section) as well as the south-end bowl enlargement, both character defining features. Exterior support structures would allow the concourse to remain detached from the existing structure, but would require excavation along the sides of the stadium in four locations to accommodate the towers. Because of the presence of the concourse inside the rim, Option A would constitute a substantial alteration of the south-end bowl enlargement and substantially alter the Rose Bowl's curvature in section, which are two character defining features. The aerial view of the rim, now a

continuous and pure ellipse, would be replaced by a view of a staggered shape that would be fragmented in several locations along the entire ellipse, most noticeably on the east and west sides.

The administration building, woven wire fence and gates, ticket booths, parking lot toilet, and the woven and steel picket fences, all of which are considered character-defining features, would be removed and demolished. The proposed peripheral buildings could potentially create a new fortress-like or wagon-circle feeling to the visual experience of the Rose Bowl, in large part because the gate openings are small in comparison to the length and apparently solid mass of the peripheral buildings. Notably, the Rose Bowl has always been perceived as a free-standing single object rooted in a natural, landscaped setting.

The Secretary of the Interior's Standards for Rehabilitation (Standards), has composed regulations (36 CFR Part 67, Historic Preservation Certifications) pertaining to historic buildings. These standards are to be applied to specific rehabilitation projects in a reasonable manner. New additions, exterior alterations, or related new construction shall not destroy historic materials. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect historic integrity of the property and its environment. The proposed concession buildings located at the perimeter of the south end would visually obscure views of the lower portion of the south entry from the Arroyo Seco and decrease the Bowl's visual prominence and public presence; this impact is discussed in more depth in Section 3.1 (Aesthetics). The greater density of surrounding peripheral buildings compared to existing conditions would visually obstruct existing views of the Bowl, and there would be a loss of the historic fabric of the Arroyo stone walls and berms resulting from these renovations. The revised project under Options A or C would materially impair the Rose Bowl's ability to convey its historic significance and could jeopardize its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA and its status as a National Historic Landmark.

Option C combines parts of Option A and Option B; therefore, if it is determined that either Option A or B results in a significant and unavoidable impact, Option C would also incur a significant and unavoidable impact. As stated, above, Option A would visually obscure some character-defining features and substantially alters others, and while Option C would lessen the magnitude of these impacts, these impacts would still occur, which would result in a substantial adverse change to the resource and constitute a significant effect on the environment.

Mitigation measures MM 3.4-3(a) and MM 3.4-3(b) would reduce this impact, but not to a *less-than-significant* impact. The alteration imposed on the preexisting structure has been determined to be *significant and unavoidable*.

MM 3.4-3(a) ***Compliance with the Secretary of the Interior's Standards for Treatment of Historic Properties.*** *The scope of work is currently schematic and will be defined further as the project progresses. All work on elements of the Rose Bowl to be retained shall be designed for maximum possible compliance with the Secretary of the Interior's Standards for Treatment of Historic Properties. This shall be accomplished through the oversight of an independent historic preservation consultant and City staff, as described below.*

- ***Historic Preservation Consultant.*** *The City shall retain the services of a qualified historic preservation consultant with experience in architectural preservation. The role of the*

historic preservation consultant shall be to review structural designs and construction activities that could potentially affect character-defining features as identified in this EIR and the Historic Structure Report. All reviews by the historic preservation consultant shall be carried out by a person or persons meeting the Secretary of the Interior's Professional Qualification Standards. Knowledge of historic architecture, materials, surface finishes, and historic restoration techniques is required. This consultant shall have a structural engineer and conservator available for consultation. The consultant's main responsibility shall be to monitor and advise the City regarding compliance with the Secretary of Interior's Standards with respect to elements of the Rose Bowl that would be retained, as well as approved design criteria. Through a series of development, design, and specification review meetings, as well as construction monitoring, the historic preservation consultant shall work in conjunction with City and with the Applicant's project and construction management teams. In addition, the consultant shall review the historic record and photo documentation, protection of historic fabric, mock-ups, and test panels of treatments to historic fabric. In consultation with other experts, the consultant shall approve the materials and replica designs used in the restoration, rehabilitation and new construction related to the historic resources.

- **Construction Monitoring.** *On-site construction monitoring by a historic preservation consultant shall be undertaken throughout the construction phase to ensure protection of historic fabric and compliance with the Standards and approved design and construction documents. Monitoring will be scheduled based on potential construction impacts and specific scope of work and will vary between daily and weekly visits upon approval by the City. In addition, all submittals, mock-ups, and change orders that affect historic fabric shall be reviewed by the consultant. On-site changes that might affect historic fabric shall be undertaken in consultation with the historic consultant. If the historic preservation consultant determines that construction does not substantially conform to the approved criteria, the historic preservation consultant will immediately notify the City. The City will require any contractors, vendors etc. to take all reasonable measures to avoid or minimize harm to the property until the issue is resolved. The historic preservation consultant, design team, and construction management will work cooperatively and diligently to resolve issues in a timely manner.*

MM 3.4-3(b)

Documentation. *A Historical Resource Documentation Report shall be prepared for the Rose Bowl. The resources shall be described photographed in a manner that conforms to Historic American Buildings Survey/Historic American Engineering Record (HABS/HAER) Level I documentation standards, as well as the HABS/HAER Guidelines for HABS Historical Reports. The documentation shall amend the existing HABS report for the Rose Bowl in the Library of Congress collection, focusing on those areas that would be directly affected by the proposed project. The documentation shall be donated to suitable repositories selected by the City, one of which shall include the main branch of the Pasadena Library.*

Implementation of Options A or C would result in a **significant and unavoidable** impact due to the alterations to the visual character of the defining aspects of the stadium and surroundings.

Impact 3.4-5 **The revised project could alter the significance of the Arroyo Seco Cultural Landscape. This is a potentially significant impact. Implementation of mitigation measure MM 3.4-3(b) would reduce this impact, but not to a level of less than significant. Therefore, this impact would remain *significant and unavoidable*.**

The Arroyo Seco Cultural Landscape is not currently designated under federal, state, or local criteria, but is in the process of being nominated for listing in the National Register of Historic Places. This resource is extremely large, extending from Devil's Gate Dam at the northern limits, to the intersection of San Rafael Avenue and Arroyo Boulevard at the southern limits, a distance of approximately 4 miles. The Lower Arroyo Seco was designated as a City of Pasadena Landmark in 1977. The following character-defining features of the Arroyo Seco Cultural Landscape have been identified:

- **Devil's Gate Dam**, upper Arroyo (8,500 feet, or 1.62 miles, from Rose Bowl).
- **Brookside Golf Club (golf courses, not the club house)**, 1133 Rosemont Avenue, opened 1928 (685 feet, or 0.13 mile, from Rose Bowl).
- **Rose Bowl**.
- **Jackie Robinson Baseball Stadium**, Brookside Park, 1930s, association with Chicago Cubs Spring training (1,530 feet, or 0.29 mile, from Rose Bowl).
- **Fannie Morrison Horticultural Center Buildings (Kidspace)**, Brookside Park, collection of three buildings, built in 1938.
- **The Rockery**, Brookside Park (3,100 feet, or 0.59 mile, from Rose Bowl).
- **Brookside Park Amphitheater**, Brookside Park (3,100 feet, or 0.59 mile, from Rose Bowl).
- **La Casita del Arroyo**, 173 S. Arroyo Boulevard, lower Arroyo, also individually designated as a City of Pasadena Landmark (6,300 feet, or 1.3 mile, from Rose Bowl).
- **Stone retaining walls**, throughout the Arroyo.
- **Original circulation elements**, (roads and pathways throughout the Arroyo).
- **All historic bridges over the Arroyo** (throughout the Arroyo), including Colorado Street Bridge (5,755 feet, or 1.09 mile, from Rose Bowl), La Loma Bridge (9,500 feet, or 1.81 mile, from Rose Bowl), San Rafael Bridge, and Holly Street Bridge.

The views to the Rose Bowl from the vast majority of the contributing features of the Arroyo Seco (proposed) Cultural Landscape are so distant or obstructed that they are unaffected. For this reason, alterations to the Rose Bowl would have no effect on the Lower Arroyo Seco or the La Casita Del Arroyo or their setting. Where views to the Rose Bowl do exist, for example, from the Brookside Golf Course and Jackie Robinson Stadium, the alterations to the Rose Bowl proposed by the project or the Alternate Design Alternative would not diminish the reasons those features were found to contribute to the Cultural Landscape. There would also be no direct effect on ancillary elements such as Arroyo stone walls, paths or circulation elements, outside the fence line of the Rose Bowl itself. Of course, the Rose Bowl itself is a contributing feature of the Arroyo Seco Cultural Landscape, and significant effects on the Rose Bowl would result in significant effects on the Arroyo Seco Cultural Landscape. Therefore, in cases

where the proposed project or alternatives would result in a significant effect on the Rose Bowl, they would also result in a significant effect on the Arroyo Seco Cultural Landscape.

A Historical Resource Documentation Report shall be prepared for the Rose Bowl pursuant to mitigation measure MM 3.4-3(b). The resources shall be archivally photographed in a manner similar to Historic American Buildings Survey (“HABS”) standards, and the documentation shall be donated to a suitable repository, such as the Pasadena Library. The documentation shall amend the existing HABS report for the Rose Bowl in the Library of Congress collection, focusing on those areas that would be directly affected by the proposed project. However, there would still be a significant effect after mitigation because archival documentation would not mitigate demolition of the historical resource to a level less than significant. This impact would remain *significant and unavoidable*.

3.4.7 Cumulative Impacts

A cumulative impact analysis is only provided for those thresholds that result in a less-than-significant or significant and unavoidable impact. A cumulative impact analysis is not provided for those thresholds where there are no project-related impacts.

The geographic context for the discussion of cumulative impacts includes the City of Pasadena, which keeps an inventory of historic resources, and, in a larger context, the nation. Because it is impossible to quantify the projects nationwide that could affect historic resources, this analysis is based primarily on the cumulative projects list in Table 2-2 of Chapter 2 (Description of the Revised Project).

Elected and appointed officials often face difficult and controversial decisions that affect the character of their communities, and these decisions often relate to older and historic buildings. Examples include

- Demolishing an old building or group of buildings for redevelopment
- Constructing additions to existing buildings
- Constructing new buildings in an older neighborhood
- Replacing historic building elements such as windows, doors, porches, roofs, or original siding materials

When making these decisions, elected and appointed officials look to their communities’ plans, zoning ordinances, and related land use regulations. Often, however, these documents provide little guidance in terms of historic preservation, and in the absence of mandatory ordinances, economic pressures often favor the demolition of historic structures. Though buildings may be listed in the NRHP or state or local registers, the listing itself often confers little or no inherent protection (Facca 2003). Even in the case of CEQA, full mitigation of impacts to historical resources can be considered infeasible and the impact overridden to allow for project approval. A local example of this includes the significant and unavoidable historical resources impacts associated with the seismic retrofit of Pasadena City Hall.

It is, therefore, possible that cumulative development, not only in the City of Pasadena, but also throughout the country, could result in the adverse modification or destruction of historic buildings, which could contribute to the erosion of the historic and architectural fabric of the City and country.

Although it is anticipated that future development that could potentially affect historic resources or structures will be subject to the requirements of some historic resource protection ordinances or regulations, these resources are scarce, and cumulative impacts on historic resources as a result of future development are expected to be significant. As an example, the EIR for the City of Los Angeles General Plan Framework regards the “loss of known and unknown historic structures and/or sites” to be cumulatively significant, despite the existence of historic preservation ordinances.

As described above, under Options A or C, modification of the Rose Bowl, a National Historic Landmark associated with the history of Pasadena and with sports facilities in the United States, as evidenced by the retirement of some historic professional ballparks and stadiums, would substantially reduce the historic qualities of the bowl and the potential cultural landscape with which it is associated and would threaten the landmark status of the structure. No mitigation is available to reduce this impact to a less-than-significant level. Therefore, the potential impacts of development under the proposed project if Options A or C is chosen, when considered in conjunction with the cumulative impact on historical resources in the City, as well as the loss of historical resources with national historical significance, would be cumulatively considerable with respect to potential impacts to historic structures. Consequently, this would be considered a significant impact. With selection of Option B, which would not jeopardize the status of the Rose Bowl as a National Historic Landmark, the revised project’s contribution to the cumulative impact would not be cumulatively considerable, and the cumulative impact would be less than significant.

Development in the City of Pasadena would also require grading and excavation that could potentially affect archaeological or paleontological resources or human remains. The cumulative effect of these projects would contribute to the continued loss of subsurface cultural resources, if these resources are not protected upon discovery. CEQA requirements for protecting archaeological and paleontological resources and human remains are applicable to development in the City of Pasadena. If subsurface cultural resources are protected upon discovery as required by law, impacts to those resources would be less than significant. As indicated above, given the mitigation measures that would be imposed and enforced throughout construction, the contribution of potential impacts from the proposed project to the cumulative destruction of subsurface cultural resources throughout Pasadena would not be cumulatively considerable and would, therefore, be less than significant.

3.4.8 Conclusion

The revised project would not result in new significant impacts or a substantial increase in the severity of previously identified significant impacts in relation to archaeological and paleontological resources. Additionally, the revised project would not disturb any human remains. Mitigation measures MM 3.4-1(a)-(b) and MM 3.4-2(a)-(b) would ensure impacts related to these resources would be less than significant. Option B of the revised project would have a less-than-significant impact to historic resources. Options A and C, however, would significantly impact the historic character of the Rose Bowl, resulting in a significant and unavoidable impact.