Topical Response 2 – Historic Resources

The Draft EIR addresses the temporary use of the Rose Bowl Stadium by the National Football League (NFL), which requires an amendment of the Arroyo Seco Public Lands Ordinance to allow an additional 13 annual displacement events at the Rose Bowl Stadium for a period of up to five years.

The Initial Study that was prepared prior to the Draft EIR found the additional events to have No Impact on the Rose Bowl Stadium or the surrounding area, including the Pasadena Arroyo Parks and Recreation District and adjacent residential neighborhoods that have been designated as historic districts. The Rose Bowl Stadium and its environs include a number of historic resources recognized at the national, state, and local levels. The Rose Bowl Stadium itself is a National Historic Landmark and a contributing structure to the Pasadena Arroyo Parks and Recreation District, which is listed in the National Register of Historic Places. The Pasadena Arroyo Parks and Recreation District is roughly bounded by the Foothill Freeway on the north, the City limits to the south, Arroyo Boulevard to the east and San Rafael Ave on the west. It contains 27 contributing buildings, structures, sites, and landscape features, including the Brookside Golf Club, Brookside Park, the Brookside Theater, Jackie Robinson Memorial Field and Stadium, the Fannie Morrison Horticultural Center, the Holly Street Bridge, the Colorado Street Bridge, the Mayberry and Parker Bridge, Lower Arroyo Seco Park and the Lower Arroyo Bird Sanctuary.

There are also three residential neighborhoods within the project vicinity that have been listed in the National Register of Historic Places as historic districts: Prospect Park located east of Brookside Park, Arroyo Terrace located south of Brookside Park, and the Lower Arroyo Seco located south of the 134 Freeway. Resources listed in the National Register of Historic Places are also listed in the California Register of Historical Resources. All of the resources mentioned above qualify as historic resources under CEQA.

CEQA states that a project would normally have a significant impact on historic resources if it would result in a substantial adverse change in the significance of a historic resource. According to *State CEQA Guidelines*, a substantial adverse change in the significance of a historic resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired. The *State CEQA Guidelines* go on to state that:

[t]he significance of an historic resource is materially impaired when a project... [d]emolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the

State CEQA Guidelines, section 15064.5(b) (1).

California Register of Historical Resources... local register of historic resources... or its identification in a historic resources survey.²

The temporary NFL project will not cause a substantial adverse change that would threaten the eligibility for historic designation of the Rose Bowl Stadium, the Pasadena Arroyo Parks and Recreation District, or the three adjacent residential historic districts, based on the following analysis:

1. Would the Project involve the demolition of a significant resource?

The proposed temporary use of the Rose Bowl by the NFL for a period up to five years would not involve any demolition either on the Rose Bowl site or within its vicinity. Therefore, the proposed project will not demolish any historically significant resources, either on the Rose Bowl site or within its vicinity.

2. Would the Project involve relocation that does not maintain the integrity of a significant resource?

The proposed temporary use of the Rose Bowl by the NFL for a period up to five years would not relocate any historically significant resources, either on the Rose Bowl site or within its vicinity.

3. Would the Project involve conversion, rehabilitation or alteration of a significant resource which does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings?

The proposed temporary use of the Rose Bowl by the NFL for a period up to five years would not convert, rehabilitate, or alter any historically significant resources, either on the Rose Bowl site or within its vicinity. The Rose Bowl stadium and its related ancillary buildings are currently being rehabilitated according to the Secretary of the Interior Standards, and no additional rehabilitation or alteration is proposed to accommodate the proposed temporary use by the NFL.

The Rose Bowl was constructed specifically to accommodate football games. The general wear and tear that results from the regular use of a resource is not considered a substantial adverse change under CEQA. The materials that could be impacted by football games are primarily reinforced concrete, arroyo stone retaining walls, stucco, and asphaltic concrete. These materials always have and will continue to be repaired and maintained as needed. An increase in the number of football games each year for a temporary period will not materially impact any of the significant character-defining features of the stadium.

Golf Courses 1 and 2 at Brookside Golf Club are currently used to accommodate parking for large events, including college football games and large-scale entertainment events. Although use of the golf courses as parking can damage fairways and landscaping, there are systems and procedures in place for

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State CEQA Guidelines, section 15064.5(b) (2).

maintaining and repairing the landscaping after such events that would remain in place for any NFL use. Moreover, the actual tees, bunkers, fairways and landscaping of the golf courses have been altered and changed numerous times during the Golf Club's history, and are not considered character-defining.³

4. Would the project involve construction that reduces the integrity or significance of important resources on the site or in the vicinity?

The proposed temporary use of the Rose Bowl by the NFL for a period up to five years would not include any new construction. Therefore, the proposed project would not involve any construction that reduces the integrity or significance of any historically significant resources, either on the Rose Bowl site or within its vicinity.

In conclusion, temporary use of the Rose Bowl by the NFL will increase the number of times the Rose Bowl is used as a football stadium per year. The proposed temporary use would result in a maximum of 65 additional events over the life of the stadium. The project will not introduce a new use for the Rose Bowl but will instead temporarily expand the number of times it is used for its historic purpose. The Rose Bowl is a reinforced concrete structure specifically designed and constructed as a football stadium. It has successfully hosted football games and capacity crowds since 1922. Moreover, the Rose Bowl is currently undergoing rehabilitation according to the Secretary of the Interior's Standards. There is no evidence to suggest that use of the Rose Bowl for 13 additional football games for a period of up to five years will cause any undue stress that might damage character-defining features such that the Rose Bowl would no longer be eligible for historic designation.

Use of the Rose Bowl by the NFL will not involve the demolition, relocation, conversion, rehabilitation, or alteration of any historically significant resource. Nor will it involve any construction that reduces the integrity or significance of any historic resources. Therefore, the proposed project will not result in significant impacts to historic resources.

³ Pasadena Arroyo Parks and Recreation District National Register of Historic Places Registration Form, prepared by Teresa Grimes for Pasadena Heritage, July 13, 2007. (7)