

September 14, 2012

Mr. David Sinclair, Planner
Planning Department
175 North Garfield Avenue
Pasadena, CA 91109

**RE: Draft Environmental Impact Report for Temporary Use of the
Rose Bowl Stadium by the National Football League**

Dear Mr. Sinclair,

Pasadena Heritage continues to monitor the proposed temporary use of the Rose Bowl Stadium by the National Football League for potential adverse impacts on historic resources. Our organization submitted a letter (dated April 18, 2012) in response to the Notice of Preparation of a Draft Environmental Impact Report (dated April 4, 2012) that included comments with regard to the Initial Study prepared for the project (dated March 13, 2012) and the scope of the Draft Environmental Impact Report. After reviewing the DEIR (dated August 2012), Pasadena Heritage is concerned that our comments were not fully represented and not at all responded to in the DEIR document.

Appendix 1.0 of the DEIR includes Table 1, which summarizes comments received and indicates the appropriate section of the DEIR where the comments are addressed. The summary of Pasadena Heritage comments located on page 1.0-26 of Appendix 1.0 includes just one of our several comments and indicates the comment is addressed in "Section 6.0 Effects Found Not to Be Significant" of the DEIR. Unfortunately, there is no such section in the DEIR.

There is a "Section 6.0 References" beginning on Page 7.0-1 that is mislabeled in the header and footer as Section 7.0, but this section does not provide the relevant information. There is a single paragraph on page 5.0-5 in "Section 5.0 Other CEQA Considerations" that is labeled "Effects Not Found to be Significant." However, this paragraph simply refers the reader back to the explanations found in the Initial Study. Our comments were written in response to the Initial Study and cited several errors and omissions in that document. How then can that same document be cited in the DEIR as a response to our comments?

As an example, the description of nearby historical resources in "7. Cultural Resources" of the Initial Study states that just five historical resources are currently listed on the California Register in the Arroyo Seco area (Page 13). This is simply not true. First, the Rose Bowl itself is a contributing resource to the Pasadena Arroyo Parks and Recreation District (bounded roughly by the Foothill Freeway on the north, the Pasadena city limits on the south, Arroyo Boulevard on the east, and San Rafael and Linda Vista Avenues on the east), which is listed in the National Register of Historic Places and includes 23 contributing resources in total. The Initial Study made no mention of this fact. There are also three additional National Register



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Historic Districts in the adjacent residential neighborhoods, including the Prospect District, Arroyo Terrace District, and the Lower Arroyo District. The Initial Study cited only the Prospect District. These districts include dozens of contributing resources, some of which are also listed individually on the National Register or as Pasadena Landmarks.

In addition, the Initial Study indicates “No Impact” in response to the question “Would the project...[c]ause a substantial adverse change in the significance of a historical resource...?” (page 13). The reason given for this response is “There are no physical changes to the stadium or surrounding area proposed as part of this project. The only change is the number of displacement events permitted to occur annually” (page 13). If a CEQA project includes known historic resources, simply stating in the Initial Study that there will be “No Effect” is insufficient. By nature of their involvement, there is the potential for impacts to these resources. The appropriate course of action would be to include a Cultural Resources section in the EIR that fully identifies the historic resources involved and analyzes the potential for impacts.

While the City does not propose to actively implement any physical changes, it is plausible that allowing the increased number of displacement events to take place will result in indirect impacts to the Rose Bowl Stadium and the surrounding area to be utilized for automobile access, parking, and tailgating. The proposed project will more than double the number of displacement events. The wear and tear on the stadium, which is a historical resource, will no doubt increase. In addition, parking and tailgating will take place in the historic Brookside Golf Club and Brookside Park (Page 2.0-8), so there will likely be additional deterioration of these facilities as well.

The Rose Bowl Stadium is a National Historic Landmark and a contributing structure to the National Register-listed Pasadena Arroyo Parks and Recreation District. The Brookside Golf Club includes 1 contributing site (golf courses one and two) and 1 contributing building (restrooms with arroyo stone base at north end of course two) to the District. In addition, Brookside Park contains 3 contributing structures (rockery, bandstand, and pergola) and 4 contributing sites (picnic area, two baseball diamonds, and tennis courts) to the District. Abutting Brookside Park are Brookside Theater, Jackie Robinson Memorial Field, and the Fannie Morrison Horticultural Center (now Kidspace Children’s Museum), which contain contributing sites, structures, and buildings as well.

The increased frequency and intensity of use of these historical resources for NFL events, automobile access, parking, and tailgating, could result in a greater degree of indirect impacts than might otherwise take place under current conditions. Depending on which areas will be accessible to event attendees, some impacts might include deterioration of sites (such as the golf course and other landscaped areas) due to driving and parking automobiles and allowing fan tailgating on them, and deterioration or possibly vandalism of structures and buildings. There may be mitigation measures that could be incorporated into the project to reduce or avoid such impacts.

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We were disappointed to find that the Draft EIR oversimplified and dismissed our comments regarding potential impacts to cultural resources that were echoed by others in the community (including the Linda Vista-Annandale Association and West Pasadena Residents Association). **Cultural Resources should have been identified as one of the Areas of Known Controversy recommended by City residents for analysis in the DEIR (Page ES-5). The Final EIR should correct this omission, and add a Cultural Resources subsection to "Section 3.0 Environmental Impact Analysis" that fully identifies all historic resources on the project site and vicinity, analyses the potential for impacts to these resources, and recommends mitigation measures to avoid these impacts, if any.**

Sincerely,



Jenna Kachour
Preservation Director