

3.7 CULTURAL RESOURCES

1. The WPRA adopts and incorporates the comments submitted by both Pasadena Heritage and the National Trust for Historic Preservation (Attachments A & B).

2. The Draft EIR/EIS fails to acknowledge the City of Pasadena as a ‘site of cultural significance’; consequently, it does not comply with NEPA and Executive Order 11593 - Protection and enhancement of the cultural environment, or properly assess the environmental impacts for the tunnel alternative.

Pasadena’s identification as a National Treasure by the National Trust of Historic Preservation (see Historic Communities of the 710 http://www.preservationnation.org/assets/pdfs/saving-places/FINAL-20Historic-20Communities-20of-20710_NationalTreasure_Press-20Release_052715-2.pdf) recognizes Pasadena’s role as a unique cultural and social center in Southern California that has achieved international renown. In addition to its historical and cultural significance, Pasadena is a destination for tourists and national and international events, gatherings and meetings. The Pasadena community is dependent on these to sustain its character, its identity, its tourism, and its economic vitality. Pasadena is also known as a desirable place to live that can offer a superior quality of life to its residents and nearby neighbors. Pasadena’s unique attractions as a destination and as a place of residence are in turn dependent on the beauty of its physical setting, the charm of its historic buildings and neighborhoods, the attractiveness of its tree-lined streets and boulevards, and the active cultural life of the city. Pasadena residents volunteer for more than 1100 volunteer organizations, supporting cultural, educational, social and charitable activities. The cumulative and collective impacts on this special environment cannot be assessed by the physical impacts to any one historic building or structure; rather, Pasadena’s unique character and recognition as a ‘cultural treasure’ is sensitive to the collective impacts on the city as a whole.

The City of Pasadena is a cultural and historical site of significance internationally, nationally, regionally, and locally. We make this claim based on the following:

- a) Pasadena is a recognized as culturally significant by authors, historic organizations, etc.¹

¹ Notable **Books and Articles on Pasadena, California**

- Andersen, Tim, et al. *California Design 1910*, 1974
- Anderson, Carson, *Ethnic History Research Project*, 1995.
- Baur, John E., *Health-Seekers of Southern California*, 1959
- Buwalda, John, *The Geology of the Raymond Basin*, 1940
- Cartland, Earl F., *Study of Negroes Living in Pasadena*, 1948
- Cottrell, Edwin A., *Pasadena Social Agencies Survey*, 1940
- Conyers, Patrick, and Cedar Phillips, *Pasadena 1940-2008*, 2009
- Crocker, Donald W., *Within the Vale of Annandale*, 1968
- Delgado, Julianna and John Ripley, *Pasadena’s Bungalow Heaven*, 2012
- Dobyons, Winifred, *California Gardens*, 1931
- Dumke, Glenn, *The Boom of the Eighties in Southern California*, 1970
- Hulburd, David, *This Happened in Pasadena*, 1951
- James, G. W., *Pasadena and the Mt. Lowe Railway*, 1894

- b) Pasadena is a site of numerous historic and architecturally significant buildings and neighborhoods.²
- c) Pasadena is the site of the annual national New Year's Day ritual, the Tournament of Roses, a festival that includes the Rose Parade and the Rose Bowl Game played in the Rose Bowl Stadium, a National Historic Landmark.³
- d) Pasadena is a regionally, nationally and internationally recognized center for annual cultural events such as the Pasadena Music Festival, Pasadena LitFest, Pasadena Chalk Festival, the Pasadena Marathon, the biennial Arts and Science Festival (AxS Festival), ArtNight Pasadena, Old Pasadena Film Festival, LA Street Food Fest at the Rose Bowl, Craftsman Weekend, Pasadena Art Weekend, Pasadena Showcase House of Design, Bungalow Heaven Home Tour, Pasadena Black History Parade and Festival, Huntington

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- James, Michael E., *The Conspiracy of the Good: Civil Rights and the Struggle for Community in Two American Cities, 1875-2000*, 2005
 - Lund, Ann Scheid, *Historic Pasadena*, 1999
 - McLaughlin, Dan, *Pasadena History Headline Quiz*, 2014
 - McLaughlin, Dan, *Pasadena: A Mystery and History You Can Explore*, 2015
 - Martinez, Roberta, *Latinos in Pasadena*, 2009
 - Nowlin, Stephen, "Pasadena, City of Art and Science," <http://www.pasadenaartscouncil.org/about/pasadena-city-of-art-and-science/> accessed 7/26/2015
 - *Picturesque Pasadena*, c. 1928
 - Phillips, Cedar, *Early Pasadena*, 2008
 - Michaelson, Maureen, *Pasadena 100 Years*, 1986
 - Page, Henry Markham, *Pasadena: Its Early Years*, 1964
 - Pinney, Joyce, *A Pasadena Chronology 1769 – 1977*, 1978
 - Pomeroy, Elizabeth, *Pasadena: A Natural History*, 2007
 - Reid, Hiram, *History of Pasadena*, Pasadena, 1895
 - Robinson, John, *The San Gabriels*, 1977
 - Scheid, Ann, *Pasadena: Crown of the Valley*, 1986
 - Scheid, Ann, *Early Pasadena's Downtown Architecture*, 2006
 - Scheid, Ann, *The Valley Hunt Club: 100 Years*, 1988
 - Seims, Charles, *Trolley Days in Pasadena*, 1982
 - Seims, Charles, *Mt. Lowe: The Railway in the Clouds*, 1976
 - Streatfield, David, *California Gardens: Creating a New Eden*, 1994
 - Thorndike, Ralph, 1994
 - Thorndike, Ralph, *Your City*, 1939
 - Wikipedia, "Pasadena, California" https://en.wikipedia.org/wiki/Pasadena,_California accessed 7/26/2015
 - Wright, Helen, *Explorer of the Universe*
 - Wood, J.W., *Pasadena: Historical and Personal*, 1917

² See **City of Pasadena's Historic Property and Historic Landmark Districts map:**

- <http://ww4.cityofpasadena.net/myneighborhood/> accessed 7/26/2015
- For a list National Register buildings and districts in Pasadena, see https://en.wikipedia.org/wiki/National_Register_of_Historic_Places_listings_in_Pasadena,_California accessed 7/26/2015

³ **Tournament of Roses and Rose Bowl:**

- "About the Rose Bowl Game," <http://www.tournamentofroses.com/rose-bowl> accessed 7/26/2015
- Hamlin, Rick, *Tournament of Roses: A 100-Year Celebration*, 1988.
- Muntz, Jan Furey, "The Rose Bowl," in *Myron Hunt, 1868-1952: The Search For a Regional Architecture*, 1984
- Wikipedia, "Pasadena Tournament of Roses" https://en.wikipedia.org/wiki/Pasadena_Tournament_of_Roses accessed 7/26/2015

Annual Camellia Show (and Orchid Show, Cactus and Succulent Show and more), The Original Doo Dah Parade, Americafest July 4th at the Rose Bowl, and many more.⁴

- e) Pasadena is an internationally recognized center for scientific research and technology as the site of the Carnegie Observatories, the California Institute of Technology, the NASA-Caltech administered Jet Propulsion Laboratory, the Mt. Wilson Observatory, and the Planetary Society. These institutions have spawned numerous local technology start-ups and established businesses that are essential to the economic vitality of the region.⁵
- f) Pasadena is an internationally recognized center for the visual arts, with major museums such as the Norton Simon Museum, the Pacific-Asia Museum, the Pasadena Museum of California Art, Armory Center for the Arts, and nearby, the Huntington Library, Art Galleries and Botanical Gardens. Pasadena is also the headquarters of the California Art Club and the home of the internationally recognized art school, Art Center College of Design, with its Williamson Art Gallery. *Sunset Magazine*'s June 2015 issue named Pasadena as the Best Arts Scene in the West (pp 82-83): "Pasadena has made an extraordinary commitment to the arts. From museums to performing arts, architecture to

⁴ **Events:**

- For a current list of events in Pasadena, see Visit Pasadena www.visitpasadena.com accessed 7/26/15
- LitFest Pasadena <http://litfestpasadena.org> accessed 7/26/15
- Pasadena Music Festival <http://www.makemusicpasadena.org> accessed 7/26/15
- Pasadena Chalk Festival <http://www.pasadenachalkfestival.com> accessed 7/26/15
- Pasadena Arts and Science Festival <http://axsfestival.org> accessed 7/26/15
- ArtNight Pasadena <http://www.artnightpasadena.org> accessed 7/26/15
- Old Pasadena Film Festival <http://www.oldpasadena.org/filmfestival/>
- LA Street Food Fest at the Rose Bowl <http://lastreetfoodfest.com/summer-tasting-event-2015/> accessed 7/26/15
- Craftsman Weekend <http://www.pasadenaheritage.org/craftsmanweekend> accessed 7/26/15
- Pasadena Art Weekend <http://www.visitpasadena.com/events/pasadena-art-weekend/> accessed 7/26/15
- Pasadena Showcase House of Design <https://www.pasadenashowcase.org> accessed 7/26/15
- Bungalow Heaven Home Tour <http://www.bungalowheaven.org/annual-home-tour/general-information/> accessed 7/26/15
- Pasadena Black History Parade and Festival <http://www.visitpasadena.com/events/black-history-parade-festival/> accessed 7/26/15
- Huntington Annual Camellia Show and other events at the Huntington <http://www.huntington.org> accessed 7/26/15
- The Original Doo Dah Parade https://en.wikipedia.org/wiki/Doo_Dah_Parade accessed 7/26/15 ,
- America Fest July 4th at the Rose Bowl <http://www.rosebowlstadium.com/events/detail/americafest-1> accessed 7/26/15

⁵ **Science and Technology:**

- Carnegie Observatories <http://obs.carnegiescience.edu/about/history> accessed 7/26/15
- Caltech research: <http://www.caltech.edu/content/research> accessed 7/30/2015
- Caltech technology transfer: <http://innovation.caltech.edu> accessed 7/30/2015
- JPL history: <http://www.jpl.nasa.gov/about/history.php> accessed 7/30/2015
- JPL missions: <http://www.jpl.nasa.gov/missions/> accessed 7/30/2015
- JPL research: <http://scienceandtechnology.jpl.nasa.gov/research/> accessed 7/30/15
- Mt. Wilson: <http://www.mtwilson.edu> accessed 7/30/2015
- Planetary Society: <http://www.planetary.org> accessed 7/30/2015
- Planetary Society history: https://en.wikipedia.org/wiki/The_Planetary_Society accessed 7/30/2015
- Caltech contributions to industry, economy: <http://www.caltech.edu/content/industry-economy> accessed 7/30/2015
- Tech startups: http://www.idealab.com/about_idealab/ accessed 7/30/2015

events, including the Rose Bowl, nothing is lacking.” (Reference: www.visitpasadena.com)⁶

- g) Pasadena is a recognized center for the performing arts as the site of the Pasadena Playhouse (State Theater of California), The Noise Within, and Boston Court Theatre. It is also the home of the Pasadena Symphony, the Coleman Chamber Music Association (oldest chamber music association in the US), Levitt Pavilion Summer Concerts, MUSE/IQUE the Tuesday Musicale, the Pasadena Conservatory of Music, Pasadena Dance Theatre, the Ice House Comedy Club, and the Los Angeles College of Music.⁷
- h) Pasadena has a nationally recognized public library system, with seven branch libraries, bringing library services into every neighborhood. The first public building built in the village of Pasadena was a library, and Pasadena voters have continued to support the public library system since then.⁸
- i) Pasadena is an internationally recognized center for higher education and regionally recognized center for K-12 education. The California Institute of Technology enjoys worldwide renown in science and engineering education and research, boasting 34 Nobel Prizes (33 winners), more than any other institution. Other notable Pasadena educational institutions include Fuller Seminary, Pasadena City College (one of the leading community colleges in the region), and Cordon Bleu School of Culinary Arts. Pacific Oaks School and Pacific Oaks College are nationally recognized for excellence in pre-school education and training of pre-school teachers. Other highly regarded schools are Polytechnic School (K-12), Westridge School for Girls (4-12), Mayfield Junior and Senior School (K-12).⁹

⁶ **Visual Arts:**

- Norton Simon Museum: <http://www.nortonsimon.org> accessed 7/30/2015
- Norton Simon Museum History: <http://www.nortonsimon.org/museum-history> accessed 7/30/2015
- Pacific-Asia Museum: <http://www.pacificasiamuseum.org> accessed 7/30/2015
- Pasadena Museum of California Art: <http://pmcaonline.org/about-us/> accessed 7/30/2015
- Armory Center for the Arts: <http://www.armoryarts.org/about-us/about-the-armory/> accessed 7/30/2015
- Huntington Library, Art Galleries and Botanical Gardens
<http://www.huntington.org/WebAssets/Templates/content.aspx?id=56> accessed 7/30/2015
- California Art Club: <http://www.californiaartclub.org/about/> accessed 7/30/2015
- Art Center College of Design: <http://www.artcenter.edu/accd/about.jsp> accessed 7/30/2015

⁷ **Performing Arts:**

- The Pasadena Playhouse: Alexander, Diane *Playhouse*, Los Angeles, 1984;
<http://www.pasadenaplayhouse.org/about-us/history.html> accessed 7/31/15
- The Noise Within: <http://www.anoisewithin.org/about-us/background/#tabs-1> accessed 7/31/15
- Boston Court Performing Arts Center: <http://www.bostoncourt.com> accessed 7/31/15 Pasadena Symphony:
<http://www.pasadenasympphony-pops.org/about/mission-and-history/>
- Coleman Chamber Music Association: <http://www.colemanchambermusic.org/about/> accessed 7/31/15
- Levitt's Pavilion Summer Concerts: <http://www.levittpavilionpasadena.org> accessed 7/31/15
- The Tuesday Musicale: <http://tuesdaymusicaleofpasadena.blogspot.com> accessed 7/31/15
- Pasadena Conservatory of Music: <http://pasadenaconservatory.org/about/history/> accessed 7/31/15,
- Pasadena Dance Theatre: <http://www.pasadenadance.org/about/> accessed 7/31/15
- Ice House Comedy Club: <http://icehousecomedy.com/About-Us> accessed 7/31/15
- Los Angeles College of Music: <http://www.lacm.edu/about-us/> accessed 7/31/15

⁸ **Pasadena Public Library:**

- http://cityofpasadena.net/library/about_the_library/ accessed 7/31/15

⁹ **Education:**

- j) Pasadena is a regional center for sports, besides the Rose Bowl Stadium and its UCLA and national football matches. Other important sports venues include an Olympic-size pool in the Rose Bowl Aquatics Center; the Pasadena Ice Skating Center which hosts hockey and figure skating, two 18-hole golf courses at Brookside (public) and Annandale (private); several AYSO soccer fields; Pasadena Lawn Bowling Club; and Robinson Stadium at Pasadena City College.¹⁰
- k) Pasadena is a regional center for the Southern California Public Radio Network, with Pasadena flagship station KPCC (founded 1924) and broadcast studios serving Los Angeles and Orange Counties, KUOR serving the Inland Empire, and KVLA in the Coachella Valley. SCPR also has affiliates in Palm Springs, Ventura County and Santa Barbara.¹¹
- l) Pasadena has a long tradition of fine printing and publishing. Notable local printers and publishers are Typecraft (noted for fine color printing of art and auction catalogues), Castle Press (founded 1931, originally specializing in fine printing, but now a printing company known for good design), Red Hen Press (founded 1994, one of the few literary publishers in the region) and Prospect Park Books (founded 2006, noted for beautiful publications with a California sensibility).¹²
- m) Pasadena has over 1100 non-profit volunteer organizations, attesting to the vibrancy of its social and cultural life and the dedication of its citizens to their community. Among the leading organizations are the American Red Cross San Gabriel Pomona Valley Chapter; the Pasadena Humane Society and SPCA; the Pasadena Ronald McDonald House; Gamble House Docents and Friends of the Gamble House; Tournament of Roses

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- Caltech: Goodstein, Judith, *Millikan's School: A History of the California Institute of Technology*, 1991; https://en.wikipedia.org/wiki/California_Institute_of_Technology accessed 7/31/15
 - Fuller Theological Seminary: <http://fuller.edu/about/history-and-facts/our-history/> accessed 7/31/15
 - Pasadena City College: <http://www.pasadena.edu/about.html> accessed 7/31/15
 - Cordon Bleu School of Culinary Arts: <http://www.chefs.edu/los-angeles/about-california-school-of-culinary-arts> accessed 7/31/15
 - Pacific Oaks School and Pacific Oaks College: http://www.pacificoaks.edu/Why_Pacific_Oaks/About_Us ; http://www.pacificoaks.edu/Childrens_School accessed 7/31/15
 - Polytechnic School (K-12): https://en.wikipedia.org/wiki/Polytechnic_School accessed 7/31/15
 - Westridge School for Girls: [https://en.wikipedia.org/wiki/Westridge_School_\(Pasadena\)](https://en.wikipedia.org/wiki/Westridge_School_(Pasadena)) accessed 7/31/15
 - Mayfield Junior School: <http://www.mayfieldjs.org/podium/default.aspx?t=33922&rc=0>
 - Mayfield Senior School: https://en.wikipedia.org/wiki/Mayfield_Senior_School accessed 7/31/15

¹⁰ **Sports:**

- Rose Bowl Aquatics Center: http://www.rosebowlaquatics.org/about_us.php accessed 7/31/15
- Pasadena Ice Skating Center: <http://www.skatepasadena.com/info/about-us> accessed 7/31/15
- Brookside Golf Course: <http://brooksidegc.com> accessed 7/31/15
- AYSO Soccer: <http://ayso13.org> accessed 7/31/15
- Pasadena Lawn Bowling Club: <http://www.pasadenalawnbowlingclub.com> accessed 7/31/15
- Robinson Stadium at Pasadena City College: <http://www.pasadena.edu/foundation/FundedProjects/stadium.cfm> accessed 7/31/15

¹¹ **Communications/Broadcasting:**

- KPCC and SCPR: <http://www.scpr.org/about/> accessed 7/31/15

¹² **Printing/Publishing:**

- Typecraft: <http://www.typecraft.com/muse/home.html> accessed 7/25/15
- Castle Press: <https://castlepress.com/page/who-we-are> accessed 7/25/15
- Prospect Park Books: <http://www.prospectparkbooks.com/our-story/> accessed 7/25/15
- Red Hen Press: https://en.wikipedia.org/wiki/Red_Hen_Press accessed 7/25/15

Association; Union Station Homeless Services; Pasadena Museum of History; Pasadena Arts Council; Encompass (mission to reduce prejudice and intergroup conflict among California teenagers) Ability First (serving children and adults with special needs); Pasadena NAACP (one of the oldest chapters in Southern California, organized 1919); Pasadena Heritage (one of the oldest and second largest preservation organizations in the State of California, founded 1977).¹³

3. The Draft EIR/EIS has woefully failed to sufficiently address Pasadena's cultural assets.

Examples of key non-historic cultural, internationally-recognized Pasadena treasures within 1 mile of the north freeway tunnel portal and construction zone, that were not addressed in the Draft EIR/EIS include the following:

Impacts to the Rose Parade

Construction phase:

- Noise and air pollution impacts for many years on the staging area on Orange Grove Boulevard one block west of the proposed tunnel route and its daylighting between California and Del Mar Boulevards.
- Demolition of bridges over the 210 stub at Del Mar and Green Street will close access to streets required for the parade line-up for at least 5 years.
- Access to Parade formation area on South Orange Grove where floats, equestrians, bands, etc. line up may be restricted for many years due to tunnel boring and construction only one block to the east

Post-construction:

- Noise and air pollution as well as negative aesthetic impacts on the Parade route that crosses the freeway on Colorado Blvd. just north of the tunnel entrance/exit. Parade route also will suffer air pollution, sightline and aesthetic impacts from the proposed ventilation towers at the entrance to Old Pasadena.
- Annual ritual New Year's Day nation-wide broadcast of the Parade from Colorado and Orange Grove may be impacted by noise and air pollution from increased freeway traffic. Music by marching bands from high schools and colleges across the country will be negatively impacted by increased noise and air pollution.

¹³ **Examples of Volunteer Organizations:**

- American Red Cross San Gabriel Pomona Valley Chapter: <http://www.redcross.org/ca/pasadena/about-us> accessed 7/31/15
- Pasadena Humane Society and SPCA: <http://www.pasadenahumane.org/site/PageServer?pagename=about> accessed 7/31/15
- Pasadena Ronald McDonald House: <http://rmhcsc.org/pasadena/mission> accessed 7/31/15
- Gamble House Docents and Friends of the Gamble House: <http://gamblehouse.org/docent-council/>; <http://gamblehouse.org/junior-docent-program/> accessed 7/31/15
- Tournament of Roses Association: <http://www.tournamentofroses.com/history/association> accessed 7/31/15
- Union Station Homeless Services: <http://unionstationhs.org/about/about-us/> accessed 7/31/15
- Pasadena Museum of History: <http://www.pasadenaheritage.org/content.php?pgID=4> accessed 7/31/15
- Pasadena Arts Council: <http://www.pasadenaartscouncil.org/about/mission-and-staff/> accessed 7/31/15
- Encompass: <http://www.encompass.org/aboutus.php> accessed 7/31/15
- Ability First: http://www.abilityfirst.org/about/about_intro.aspx accessed 7/31/15
- Pasadena Heritage: <http://www.pasadenaheritage.org/content.php?pgID=4> accessed 7/31/2015

- The visual integrity of the Parade will be negatively impacted by the intrusion of the garishly painted and oversized proposed ventilation towers flanking the Parade route, affecting sightlines, visibility, and context.

Impacts to the Norton Simon Museum:

Construction phase:

- Air pollution, dirt and ground vibration may affect paintings and other art objects inside the museum. The Museum's ventilation systems, key to protection of the art objects, may be negatively impacted, which would increase maintenance costs. The sculpture garden, part of the museum's exhibition space and used for outdoor dining, may be especially impacted by increased pollution (especially during five or more years of construction) and construction noise. Impacts of construction noise for years on visitor experience to the museum may result in reduced attendance and affect economic viability of the museum.

Post-construction:

- Permanent increase in air pollution from the exhaust towers proposed to be located nearby will negatively impact ventilation systems and therefore paintings and other art objects. Noise pollution will increase in the garden, which is even now subject to excessive noise from the adjacent freeway ramp on the north. The proposed reconstruction of the interchange north and northwest of the Museum will compound current impacts. Overall impacts may include increased maintenance costs and decreased attendance, resulting in the potential loss of revenues.
- Important to note: The Norton Simon owns the building but leases the grounds from the City of Pasadena. If negative impacts are too great, the Museum could decide to relocate its collection out of Pasadena to a more favorable site. The severity of this impact would be incalculable.
- The Museum building by architects Ladd & Kelsey (1969) with interiors redesigned by Frank Gehry & Associates, and gardens by prominent landscape architect Nancy Power (1990s) may qualify for listing in the National Register of Historic Places as a "property of exceptional importance" that is less than 50 years old.

Impacts to Ambassador Auditorium:

Construction phase:

- Vibration, dirt, noise and air pollution may negatively impact this historic building used for religious services and Pasadena Symphony concerts as well as concerts by well-known artists. The auditorium is immediately adjacent to the north portal construction site.

Post-construction:

- The estimated increase in noise, up to 11 decibels, probably cannot be mitigated because as a designated historic building, the glass curtain wall exterior cannot be altered nor the glazing changed. This may restrict the use of the building—known for its outstanding acoustics—and disrupt religious services, as well as discourage its use for concerts and other events, affecting its long-term economic viability and depriving the region of an important cultural venue.

Impacts on Old Pasadena

- This historic commercial center, revitalized into a thriving 22-block area of shops, residences and two parks, and listed in the National Register of Historic Places, will experience a significant increase in noise (large increases near freeway) and air pollution (especially near exhaust towers). These impacts will affect tourism; the weekly Farmer's Market; the Make Music Pasadena festival; park facilities and activities such as playgrounds, summer concerts, lawn bowling, and annual Earth Day events; outdoor dining in the parks and the district; and Old Pasadena's overall economic vitality, including the attractiveness of housing in Old Pasadena.
- New housing in the district, including a significant component of Section 8 housing, has been concentrated along the current 210 freeway stub. Increased traffic and noise will decrease the economic value and livability of these new units, some 800 built within the last 5 years. This may result in health problems for residents, especially children, and turn what is currently a thriving, inviting urban village into a blighted neighborhood.

Impacts on Schools

- Several important private schools known as centers for quality education are in close proximity to the freeway route. These include Maranatha School, Sequoyah School, Waverly School, Westridge School, and Mayfield Senior School. These schools include K-12, K-8, 9-12, etc. There are also pre-schools located in the area, including Pacific Oaks, Cottage Co-op, New Horizon School, Pasadena Montessori School, and International Montessori Academy. Depending on their exact location they may experience negative impacts during construction from vibration, dirt and diesel exhaust (during the hauling of dirt out of the tunnels), noise and air pollution.
- Long-term impacts may include excessive noise and air pollution that could cause some or all of the schools to close down or relocate for health and safety reasons.

Because the Draft EIR/EIS does not recognize Pasadena as a 'site of cultural significance' it makes no attempt to comply with the following NEPA regulations and executive orders, including Executive Order 11593, which calls for the preservation and enhancement of non-federally owned sites, structures and objects of historical, architectural or archaeological significance.

Executive Order 11593, Protection and Enhancement of the Cultural Environment, Section 1. Policy. *The Federal Government shall provide leadership in preserving, restoring and maintaining the historic and cultural environment of the Nation. Agencies of the executive branch of the Government (hereinafter referred to as "Federal agencies") shall (1) administer the cultural properties under their control in a spirit of stewardship and trusteeship for future generations, (2) initiate measures necessary to direct their policies, plans and programs in such a way that federally owned sites, structures, and objects of historical, architectural or archaeological significance are preserved, restored, and maintained for the inspiration and benefit of the people, and (3), in consultation with the Advisory Council on Historic Preservation (16 U.S.C. 470i), institute procedures to assure that Federal plans and programs contribute to the preservation and enhancement of non-federally owned sites.*

NEPA Desk Guide (1999), Section 9.3.1 Legal Requirements: *"A social impact assessment (SIA) is a fundamental part of NEPA analysis, which calls for the integrated use of the social sciences in assessing impacts "on the human environment." SIAs are also an important way of addressing the requirements of EO 12898 and sometimes other statutes, such as the CERCLA, aspects of the NHPA, and the American Indian Religious Freedom Act. An SIA is often characterized as "socioeconomic impact analysis," and*

major emphasis is placed on such economic variables as job creation and loss, strains on city services, and impacts on the local tax base.”

NEPA Desk Guide (1999), Section 9.3.2 Data Requirements: *The Interorganizational Committee on Guidelines and Principles for Social Impact Assessment defines "social impacts" as "consequences to human populations of any public or private actions that alter the ways in which people live, work, play, relate to one another, organize to meet their needs and generally cope as members of society." The term also includes cultural impacts involving changes to the norms, values, and beliefs that guide and rationalize their cognition of themselves and their society.*

The report fails to provide a social impact assessment and a socioeconomic analysis, including cultural impacts involving changes to the norms, values and beliefs that guide and rationalize Pasadenans' cognition of themselves and their society. The tunnel alternative construction phase and post-construction will negatively impact Pasadena's desirability as a cultural center, a tourist destination, and as a place to live. This will fundamentally transform how Pasadenans will perceive both themselves and their community.

Moreover, the report fails to address the economic and social effects on the community, particularly with respect to housing, schools and playgrounds, businesses, and non-historic cultural and economic assets. This is appropriate and recommended in CEQA 15131.

CEQA 15131. ECONOMIC AND SOCIAL EFFECTS: *“(b) Economic or social effects of a project may be used to determine the significance of physical changes caused by the project. For example, if the construction of a new freeway or rail line divides an existing community, the construction would be the physical change, but the social effect on the community would be the basis for determining that the effect would be significant. As an additional example, if the construction of a road and the resulting increase in noise in an area disturbed existing religious practices in the area, the disturbance of the religious practices could be used to determine that the construction and use of the road and the resulting noise would be significant effects on the environment. The religious practices would need to be analyzed only to the extent to show that the increase in traffic and noise would conflict with the religious practices. Where an EIR uses economic or social effects to determine that a physical change is significant, the EIR shall explain the reason for determining that the effect is significant. (c) Economic, social, and particularly housing factors shall be considered by public agencies together with technological and environmental factors in deciding whether changes in a project are feasible to reduce or avoid the significant effects on the environment identified in the EIR. If information on these factors is not contained in the EIR, the information must be added to the record in some other manner to allow the agency to consider the factors in reaching a decision on the project.*