
VI. ENVIRONMENTAL IMPACT ANALYSIS

C. CULTURAL AND HISTORIC RESOURCES

2003 EIR Environmental Findings

The 2003 EIR identified the Coliseum as a designated National Historic Landmark, a State Historical Landmark, and is listed on the National Register of Historic Places (National Register). The Coliseum is listed as a National Historic Landmark because of the historic events that have occurred there and because the Coliseum itself has been a backdrop to these events. The 2003 EIR found that most of the alterations of the Original Proposed Project would preserve the historic character-defining features of the Coliseum, but that a few elements would be covered over by new construction, and some features would be removed.

The 2003 EIR concluded that because some of the original seating considered to be part of the historic fabric of the Coliseum would be removed, the Original Proposed Project would have a significant and unavoidable impact on historic resources. A Statement of Overriding Considerations was adopted by the Los Angeles Memorial Coliseum Commission for the Project's impacts upon historic resources.

Mitigation Measures

The 2003 EIR adopted the following mitigation measures designed to reduce the Project's impact on historic resources:

1. Recordation. Demolition of any historic fabric shall be documented in a report consistent with Historic American Buildings Survey (HABS) standards. The report shall document the significance and physical condition of the historic resources proposed for demolition, both historic and current, photographs, written data, and text. The documentation shall include:
 - a. A brief written historic and descriptive report shall be completed in narrative format, including an architectural data form.
 - b. A site plan on 8" x 11" paper showing the location of the buildings should be included. This site plan shall include a photo-key.
 - c. A sketch floor plan on 8" x 11" paper shall accompany each architectural data form.
 - d. Large format (4" x 5" or larger negative size) photographs in accordance with HABS guidelines. Views shall include several contextual views, all exterior elevations, detailed views of significant exterior architectural features, and interior views of significant historical architectural features or spaces.
 - e. Field photographs (35mm) based on HABS guidelines. Views as detailed in large format photographs.

- f. The report shall include copies or prints of any available original plans and historic photographs.
 - g. Archival stable reproductions of any available significant historic construction drawings and photographs.
 - h. Archival copies of the documentation shall be submitted to the Los Angeles Memorial Coliseum Commission.
2. In accordance with Standard 7 of the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings*, the surface cleaning of structures shall be undertaken with the gentlest means possible. Sandblasting and other cleaning materials that will damage the historic building materials shall not be undertaken.
 3. The Proposed Project shall be constructed in substantial compliance with the Conceptual Historic Fabric Retention Plan, as depicted in Figure III-3 of this EIR.

Environmental Impacts of the Revised Project

Introduction

In September 2003, Architectural Resources Group (ARG) completed a review of the proposed Los Angeles Memorial Coliseum project being developed as part of an effort to bring a NFL team to the Coliseum. This was done at the request of Christopher A. Joseph and Associates, the EIR consultant for the Lead Agency. ARG's review was based on the requirements of the California Environmental Quality Act (CEQA) to identify the impacts of proposed projects on potential historic and cultural resources. The historic resources were evaluated using the *Secretary of the Interiors Standards for the Treatment of Historic Properties* and the criteria of the National Historic Landmarks, Register of Historic Places (NRHP) and California Register of Historic Resources (CRHR) programs were considered. This report, completed in September 2003 became a technical appendix to the 2003 EIR for the Renovation Project.

The Los Angeles Memorial Coliseum Commission (LAMCC) certified the EIR for the project in September of 2003. Since then, the project design has continued to evolve with additional modifications to the architectural plans for the stadium structure as well as the site.

The following analysis reviews these modifications to the design and evaluates their potential impact to the historic characteristics of the Coliseum.

Revisions to the Project

The Proposed Project to alter the Coliseum is only the latest in an ongoing series of alterations and expansions. Completed in 1923, the Coliseum had wood seats on three tiers of risers, the first being within the excavated bowl and the other two above grade on wood structural supports. Almost immediately after completion, an additional level of wood seats was added. In 1931 the Coliseum was greatly altered by adding another tier of seats with all the seating above the bowl now supported by

concrete construction. There were now 25 rows of additional seating totaling 79 rows. The last four rows were cantilevered above the support structure and a series of concrete bracket pilasters and panels supported them, giving the Coliseum its unique form that is familiar today. Frequent alterations to the Coliseum have continued to the present day with major changes occurring for the 1932 and 1984 Olympics as well as numerous modifications before and after these events, most recently with the modifications following the 1994 Northridge earthquake.

As proposed, this project is one more alteration and expansion that will allow the Coliseum to continue to be economically viable and preserved for the future.

In addition, most of the proposed alterations preserve the historic character-defining features of the Coliseum intact. Wherever possible, new construction has been added to cover over historic features, such as the seating, rather than remove it. Much of the new construction could also be removed at some time in the future, leaving these features again exposed and intact.

Since completion of the earlier report, effort has been made to not only meet the requirements of the NFL but to reduce the impacts of the design on the historic character defining features where possible. As noted in the earlier report, NHL nomination describes three areas of architectural significance that contribute to the importance of the Coliseum. These are the Peristyle, the exterior Coliseum form and walls, and the bowl configuration.

The following sections describe the changes to the design made since the EIR was certified and the impact of these changes on the historic character of the Coliseum.

Modifications to Historic Features

The Peristyle

The recent modifications to the design have had no negative impacts on the Peristyle or the adjacent plaza. A larger percentage of the historic seating directly in front of the plaza remains, although covered over. The EIR design proposed a canopy structure on the plaza that was on axis with the Peristyle. Because it blocked the central view down to and from the field it has been removed from the design.

Exterior Coliseum Form and Walls

Exit Stairs, Tunnels and Berms

The existing stairways to the exterior of the structure do not meet current exiting code requirements due to their steepness and lack of intermediate landings. Most will be retained but not used as exit stairs. The ground level tunnels also do not meet current design requirements to serve as exits. The tunnels will also be retained but not used as exits.

The berms were added to the Coliseum in the 1940s and ring the entire structure except for the Peristyle area. The berms were partially removed and rebuilt during the 1994-95 seismic bracing construction.

After discussions with the Department of Building and Safety and the Los Angeles Fire Department, additional exiting needed to be provided at the sides of the Coliseum. A substantial amount of exit width will be required to be opened at the base of the structure to provide for this exiting. As a result, the berms in these two areas will be removed. The portals for the tunnels in these areas will remain in place.

The effect will be to retain large portions of the berms, the exterior stairs and the tunnel portals. Table VI.C-1, below, describes the amounts to be retained under the most recently drawn conceptual documents. The quantities indicated are provided only as an order of magnitude, and are not a precise representation of the design of the final configuration.

**Table VI.C-1
Comparison of Architectural Modifications Exterior Forms**

Area	EIR	Revised Design
Berm to Remain	100%	67%
Exterior Wall to Remain	100%	100%
Exterior Stairs to Remain	100%	74%
Portals to Remain	100%	93%
Source: ARCHITECTURAL RESOURCES GROUP, Architects, Planners & Conservators, Inc., April 28, 2006.		

The result of all of these changes to the design is that less of the non-historic berm and the exterior stairs will remain in place. The entire exterior bowl walls and the rim form will be retained.

Perimeter Wall Openings

To create a climate-controlled environment along the sidelines, new infill glass walls may be installed just inside the large openings along the exterior walls at the sidelines. These glass walls will have thin metal frames and the intent is to have the windows recede into the form of the bowl. See Figure II-4 Conceptual Plan, North and South Elevations.

Seating Canopy

While not directly impacting the Coliseum form and walls, the new structural canopy above the rim of the Coliseum has been reduced in size and the structural members that support it have been reduced in size and their visual form reduced. See Figure III-12 Conceptual Plan – Roof Plan and Seating Bowl.

New Exterior Stairs

As a result of meetings with the Department of Building and Safety and the Los Angeles Fire Department regarding exiting from the Coliseum, additional exit stairs may be necessary to meet the required exiting needs. These are shown at four equidistant locations around the perimeter of the stadium. (See the Revised Conceptual Plans in Sections II and III of this Addendum). They are also shown on the Revised Conceptual Plans Perimeter Elevations. These are large open stairs rising from grade to above the rim of the Coliseum. They would not physically attach to the historic exterior walls, however, as a result of the size and location of these new elements, they create an unavoidable impact on the exterior coliseum form and walls.

Bowl Configuration

The greatest impact of the revised design is to the bowl configuration. After completion of the EIR, more detailed measurements were made of the Coliseum and it was found that the bowl was actually slightly narrower and steeper than originally estimated. To maintain sightlines and seating counts, more historic fabric needed to be removed to accomplish this. Portions of the existing lower bowl that were to be retained, but covered, have been removed along the sidelines. See Figure III-3 Proposed Conceptual Historic Fabric Retention Plan.

Studies were made to see if the entire seating bowl could be raised to avoid this condition, but the resulting removal of more historic fabric to the upper areas and rim of the Coliseum caused this to be abandoned. See Figure II-2 50 Yard Line Section.

The design team was able to find ways to retain more of the historic seating at the West End Zone seating area and to either side of the Peristyle. See Figure III-13 Conceptual Plan – West End Zone Section (NFL Configuration).

Table VI.C-2, below, indicates changes to the bowl area (as percentages) as shown in the EIR design and the Revised Design. See Figure III-3 Proposed Conceptual Historic Fabric Retention Plan and Figure III-4 Approved Conceptual Historic Fabric Retention Plan (Per Certified EIR) for a graphic comparison of the percentages given. The table is provided only as an order of magnitude, and is not a precise representation of the design of the final configuration.

**Table VI.C-2
Comparison of Architectural Modifications Exterior Forms**

Area	EIR	Revised Design
Original Seating Bowl Remains	16%	22%
Original Seating Bowl Remains, Covered	29%	8%
Existing Fabric Removed and Rebuilt	7%	1%
Original Seating Bowl Removed	38%	59%
Historic Fabric Removed and Rebuilt, 1983	10%	10%
<i>Source: ARCHITECTURAL RESOURCES GROUP, Architects, Planners & Conservators, Inc., April 28, 2006.</i>		

Analysis of Project Impacts

Threshold of Significance – From Earlier EIR Report

Section 15065 of the CEQA Guidelines mandates a finding of significance if a project would eliminate important examples of major periods of California history or prehistory. In addition, pursuant to Section 15064.5 of the CEQA Guidelines, a project could have a significant effect on the environment if it “may cause a substantial adverse change in the significance of an historical resource.” A “substantial adverse change” means “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource is impaired.” Material impairment means altering “in an adverse manner those characteristics of an historical resource that convey its historical significance and its eligibility for inclusion in the California Register of Historical Resources.”

Impacts to historical resources not determined to be significant according to any of the significance criteria described above are not considered significant for the purposes of CEQA. Generally, under CEQA, a project that follows *The Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* or *The Secretary of Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Structures (The Standards)* is considered to have mitigated impacts to an historical resource to a less-than-significant level (CEQA Guidelines 15064.5). Section 15126.4 (b)(2) of the CEQA Guidelines notes that in some circumstances, documentation of an historical resource may not mitigate the effects to a less-than-significant level.

"Rehabilitation" is defined in the *Standards* as “the process of returning a property to a state of utility, through the repair or alteration, which makes possible an efficient contemporary use while preserving those portions or features of the property which are significant to its historic, architectural or cultural values.”

Effect on Historic Designations– From Earlier EIR Report

Because the Coliseum has been designated as an NHL, is listed on National Register of Historic Places, and is a California Historic Landmark based on the events and people associated with the facility, physical alteration to the Coliseum would need to be so severe that the original intent and association with the events and people were completely eradicated, in order to create a significant impact. Total demolition or severe changes to the form of the Coliseum would be required to remove these historic designations. The alteration will update the Coliseum and make it economically viable while keeping its use as a sports facility consistent, thus there will be no impact on its historic designations.

Effect on Historic Fabric

As noted above, under CEQA, the level of compliance with the *Standards* is used to determine the level of environmental impact on historic resources. The following paragraphs first describe each of the ten standards and then describe the level of compliance of the proposed project using that standard.

STANDARD 1 “Every reasonable effort shall be made to provide a compatible use for a property which requires minimal alteration of the building, structure, or site and its environment, or to use a property for its originally intended purpose.”

The revised design has not changed the proposed use, thus this Standard will be met while bringing the facility up to current functional requirements for maintaining its continued historic use.

STANDARD 2 “The distinguishing original qualities or character of a building, structure, or site and its environment shall not be destroyed. The removal or alteration of any historic material or distinctive architectural features should be avoided when possible.”

As noted above, the Coliseum has three primary character-defining features and many details that contribute to its significance. These include: the overall bowl shape that is perceived from inside the Coliseum; the exterior form of the Bowl with the concrete pilasters, panels and stepped seats at the rim; and the Peristyle which is the major architectural feature of the Coliseum.

The overall bowl form of the Coliseum as seen from the inside of the Coliseum will be retained and clearly evident. The revised design calls for removal of a larger percentage of the historic concrete seating leaving only 22 percent remaining exposed and another 8 percent covered over. See Figure III-3 Proposed Conceptual Historic Fabric Retention Plan. The bowl form will remain but with new material and in a slightly different configuration. This is a major impact to this character-defining feature.

The exterior form of the Coliseum with the walls, structural elements, stairways and entry tunnels, pilasters and cantilevered seating has also been impacted with the revised design but to a lesser extent. The majority of the stairways, tunnels and portals will be retained but not used.

The Peristyle is architecturally the most significant element of the Coliseum and will be restored and enhanced.

With the revised design this Standard is met regarding the exterior form of the building and treatment of the Peristyle. Consistent with the EIR design, removal of the majority of the seating and changing the form does not meet the Standard.

STANDARD 3 “All buildings, structures, and sites shall be recognized as products of their own time. Alterations that have no historical basis and which seek to create an earlier appearance shall be discouraged.”

This standard does not apply to the proposed project as no effort is being made to replicate an earlier appearance. All restoration work is being done using original historic drawings, photographs, and physical evidence found at the Coliseum.

None of the proposed changes will give a false sense of history or seem to create an earlier appearance. New construction is clearly not historic in appearance and has carefully been designed to blend with the historic character-defining features of the Coliseum.

STANDARD 4 “Changes which may have taken place in the course of time are evidence of the history and development of a building, structure, or site and its environment. These changes may have acquired significance in their own right, and this significance shall be recognized and respected.”

Removing 33 percent of the berms reduces their contribution to the overall character of the exterior of the Coliseum but enough remain in place to convey the feeling and sense they impart to the facility. Further, the removed berms could be restored at some time in the future, following the termination of the planned use.

Generally the changes to the Coliseum that have gained importance over time are being respected and enhanced.

STANDARD 5 “Distinctive stylistic features or examples of skilled craftsmanship which characterize a building, structure, or site shall be treated with sensitivity.”

Restoration of the Peristyle, the seating at the rim of the bowl and the exterior wall elements all contribute to compliance with this standard.

Removal of much of the seating detracts from meeting this Standard, consistent with impact of the EIR design.

STANDARD 6 “Deteriorated architectural features shall be repaired rather than replaced, wherever possible. In the event replacement is necessary, the new material should match the material being replaced in composition, design, color, texture, and other visual qualities. Repair or replacement of missing architectural features should be based on accurate

duplication of features, substantiated by historic, physical, or pictorial evidence rather than on conjectural designs or the availability of different architectural elements from other buildings or structures.”

The proposed design will retain architectural features and wherever possible restore or maintain them. In some instances recreations of elements may be necessary due to deterioration or damage. This may include some elements of the rim seating and the exterior wall elements.

This Standard is being met as deteriorated features of the Coliseum will be repaired when possible and only replaced if repair is not possible. This includes restoration of the Peristyle, the concrete elements of the exterior, the pilasters and the rim and concrete beams and columns.

STANDARD 7 “The surface cleaning of structures shall be undertaken with the gentlest means possible. Sandblasting and other cleaning materials that will damage the historic building materials shall not be undertaken.”

Methods and the extent of cleaning have not been determined at this time. All cleaning and repairs will undertaken to meet this Standard.

STANDARD 8 “Every reasonable effort shall be made to protect and preserve archeological resources affected by, or adjacent to any project.”

No archaeological resources have been identified on the site therefore this Standard does not apply to the project.

STANDARD 9 “Contemporary design for alterations and additions to existing properties shall not be discouraged when such alterations and additions do not destroy significant historical, architectural or cultural material, and such design is compatible with the size, scale, color, material, and character of the property, neighborhood or environment.”

The new roof canopies, new seating areas and structural supports, suites and other new elements that are part of the proposed project are clearly different, yet compatible with, the historic character-defining features.

The new glazed windows inside the sideline openings have been designed to reduce their impact and to differentiate them from the original structure.

The four new freestanding exterior stair towers will be designed and detailed in a manner to differentiate them from the historic Coliseum exterior materials and detailing.

STANDARD 10 “Whenever possible, new additions or alterations to structures shall be done in such a manner that if such additions or alterations were to be removed in the future, the essential form and integrity of the structure would be unimpaired.”

The greatest change to the design and in meeting this Standard is in removing the historic seating from the bowl. Once removed these elements cannot be returned and the current design will cover up most of the locations where the historic seating existed.

If removed, the historic form of the bowl would continue to be seen from inside the Coliseum, the exterior form of the bowl would also be intact with the cantilevered rim seating in place. Finally, the Peristyle would remain in place in its restored setting.

While difficult to accomplish, the four new exterior freestanding stair towers will be designed in such a way that they could be removed at some time in the future with little impact on the historic exterior of the Coliseum.

Impact Summary

A determined effort has been made by the entire design team to respect the history and importance of the Coliseum and recognize the many changes that have occurred to the facility during the course of its 80-year history. The design has gone through a number of revisions since the EIR was certified in an effort to reduce the impact on the historic character of the Coliseum.

It has not been possible to retain all elements of the Coliseum in the process of bringing the stadium up to today's requirements for maintaining its historic use as a venue for sporting events, but the few that have been sacrificed have been done so reluctantly.

The proposed rehabilitation meets all of the Standards except for the removal of much of the historic seating. Just as was the case with the EIR design, this removal is a significant impact on the character of the facility and cannot be feasibly mitigated. Some of the seating, as well as the form of the bowl, will remain and be clearly visible around the entire Coliseum for the interior. The exterior of the Coliseum will be returned to its former appearance, with the exception of the four new stair towers, and the Peristyle will be restored and enhanced with the removal of the large electronic scoreboards.

It should also be noted that the Coliseum is listed as a National Historic Landmark because of the events that have occurred there and that the stadium itself has been a backdrop to these events. Its historic use is largely why it has been designated a National and State landmark, and this rehabilitation will guarantee that historic use can continue into the future by making the Coliseum an economically viable facility for sporting events.

As a result of the proposed project, there is no specific mitigation for the loss of historic materials, primarily the removal of portions of the seating. Other alterations to the Coliseum either improve the character-defining features or could be reversed in the future. An unavoidable adverse impact is created, similar to the level of impact which was created by the EIR design.

Conclusion

With regard to the criteria set forth in CEQA Section 15162 (a), the changes proposed by the 2006 Revisions would not result in any new significant cultural and historic resources impacts or result in a

substantial increase in the severity of those effects previously identified. Therefore, the preparation of a subsequent environmental analysis is not warranted.

Mitigation Measures

The 2003 EIR included several mitigation measures designed to reduce the Project's impact on historic resources. All of the prior mitigation measures shall apply to the Revised Project, with the exception of Mitigation Measure No. 3, which shall be revised as follows to refer to the revised Historic Retention Plan:

3. The Proposed Project shall be constructed in substantial compliance with the Conceptual Historic Fabric Retention Plan, as depicted in Figure III-3 of this Addendum.