COMMENT R28 - Carlos Chacon (1 page)

From: Carlos Chacon <carloslchacon@gmail.com>
Date: Thursday, March 2, 2023 at 8:35 PM
To: Public Comment <publiccomment@rosebowlstadium.com>
Cc: "president@lvaa.net" <president@lvaa.net>
Subject: Brookside Golf Course Improvements Project

We are writing to inform the Mayor and Pasadena City Council Members of our concerns over the proposed plan to expand the practice center and installing two miniature golf facilities. We have the following concerns with the proposal:

- Implementing changes to existing golf holes on both courses, including removal of trees and foliage: These courses have historical significance, and their current design should be respected. R28-1
- Proposed hours of operation include night lighting 7 days a week until 10PM is an intrusion to the neighborhood and risks drawing unwanted activity R28-2
- Tripling the practice facility is excessive, and will exacerbate current parking problems R28-3
- There has been no financial presentation of the project, including a cost-benefit analysis, or financing alternatives, to the public, creating the risk of requiring the City of Pasadena to support potential cashflow shortfalls R28-4

The Arroyo should be treated with care given its' historic value to the Pasadena community and should not be exploited by commercialization ventures to benefit the Rose Bowl Operating Company to the detriment of the residents. R28-5

Carlos and Debbie Chacon, Members of the Linda Vista Annandale Association

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2. Response to Comments

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R28. Response to Comments from Carlos Chacon, submitted via email March 2, 2023.

R28-1 This comment states that implementation of the Project would impact the historical significance of the E.O. Nay and C.W. Koiner golf course. As stated on page 27 of the IS/MND, to ensure that the ultimate Project design (including lighting components) is executed to achieve a maximum level of compatibility with the Pasadena Arroyo Park and Recreational District, Mitigation Measure CUL-1 requires the RBOC retain a qualified historic preservation professional to ensure that alterations to the driving range, design of the miniature golf course, and overall modifications to the Golf Course are compatible with the existing Brookside Golf Course landscape and the Pasadena Arroyo Park and Recreational District. Therefore, Mitigation Measure CUL-1 would ensure that design of the Project would avoid any impacts to the historical resource.

R28-2 This comment states that the proposed hours of operation would result in increased nighttime lighting, which would be an intrusion of the neighborhood and would draw unwanted activity to the Project Site. Please see Topical Response 2, *Lighting*, regarding the City's lighting regulations and how the Project complies with all policies regarding lighting, and requires additional mitigation measures to ensure impacts associated with lighting would be less-than-significant.

R28-3 This comment states that increasing the size of the existing facility would result in parking issues. Please see Topical Response 7, *Transportation and Parking*, which describes that IS/MND accurately assesses impacts related to transportation consistent with the CEQA Guidelines and the City's adopted methodology, and also addresses comments received regarding parking.

R28-4 This comment expresses concerns regarding financial analysis for the Project. The commenter's statements will be provided to the RBOC for its consideration as part of its decision-making for this project. This comment is not a direct comment on the content or adequacy of the IS/MND and does not raise a specific environmental issue. As directed by Section 15131(a) of the CEQA Guidelines, economic or social effects of a project shall not be treated as significant effects on the environment. Therefore, no further response is required.

R28-5 This comment states that the Arroyo Seco should be treated with historic value and should not be exploited by commercialization ventures. As stated in Section 3.5, *Cultural Resources*, of the IS/MND, the Historic Resources Technical Report completed for the Project (Appendix D to the IS/MND) ensured that alterations to the driving range, design of the miniature golf course, and overall modifications to the Golf Course are compatible with the existing Brookside Golf Complex landscape and the Pasadena Arroyo Park and Recreational District so that the historic integrity of the Pasadena Arroyo Park and Recreational District is maintained. The Historic Resources Technical Report determined that alterations included in the Project would be in areas that have previously been altered

and changed over time. Additionally, the Project would not destroy or alter the physical characteristics that make the Brookside Golf Course a historical listing as a contributing feature of the Pasadena Arroyo Park and Recreation District. Because the majority of the site elements that characterize the Brookside Golf Course would continue to retain their original location, general overall boundaries, and routing, the Brookside Golf Course would continue to convey its historic significance.

COMMENT R29 - Allen Gharapetian (1 page)

From: Allen Gharapetian <agharapetian@gmail.com>
Date: Thursday, March 2, 2023 at 8:39 PM
To: Public Comment <publiccomment@rosebowlstadium.com>
Cc: Tyron Hampton <Info@tyron.us>, Cushon Bell <cbell@cityofpasadena.net>, Victor Gordo <vgordo@cityofpasadena.net>
Subject: Re: Oppose the inappropriate addition proposed to Arroyo Seco

Ladies and Gentlemen,

I wanted to take a few minutes and echo the sentiments expressed by many residents during the February 13 meeting. I doubt there'll be a single resident or homeowner in the area who would support the proposed expansion of the Brookside golf course or the introduction of a "new attraction" (the miniature golf course) to Arroyo Seco. R29-1

A plan that advocates removing 45 mature trees, erecting multiple new stadium-style light poles that stay lit until 10 PM every single night, adding 2X as many hitting bays as current, and potentially tripling the daily traffic in an area that is not designed for commercial business, is just irresponsible, unethical, environmentally problematic, and completely unacceptable. R29-2

As is, the area is already overused and under supervised, especially after the pandemic and the shortage of labor. Orderly management of the traffic has become a nightmare. Parking overflow into the residential streets has become a norm rather than an exception, lack of proper barricading, excessive sound, and high level of ambient lighting at all times (eliminating the pleasure of gazing at the stars at night), have been issues that the Rose Bowl organization has failed to address consistently and remedy over years, despite complaints and comments from the residents. In this post-pandemic era, there is literally no reason to believe that the management company would be able to handle more or mitigatie any of the drawbacks even if those drawbacks were acceptable, which they clearly are not! R29-3

To simply summarize, this expansion and enhancement plan will quite notably and very negatively impact Arroyo Seco and create a nightmarish disaster for the area. R29-4

Thank you for your attention.

Allen H. Gharapetian
489 Prospect Terrace
Pasadena, CA 91103
agharapetian@gmail.com
(626) 765-9396

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2. Response to Comments

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R29. Response to Comments from Allen Gharapetian, submitted via email March 2, 2023.

R29-1 This comment expresses the commenter's opposition to the Project. The comment provides no specific issue regarding the detailed technical analyses contained within the IS/MND regarding these topics. The commenter's statements will be provided to the RBOC for its consideration as part of its decision-making for this project. This comment is not a direct comment on the content or adequacy of the IS/MND and does not raise a specific environmental issue; therefore, no further response is required.

R29-2 This comment states the at the removal of 45 trees, construction of new lighting, and expansion of the existing driving range, and increase in traffic within areas surround the Project Site, irresponsible, environmentally problematic, and unacceptable. The comment provides no specific comment regarding the environmental analysis contained in the IS/MND regarding these issues. Please see Topical Response 7, *Transportation and Parking*, Topical Response 2, *Lighting*, and Topical Response 3, *Tree Removal and Wildlife,* for more information.

R29-3 The comment states that traffic and parking issues in the areas surround the Brookside Golf Course have increased in recent years. Please see Topical Response 7, *Transportation and Parking*, which describes that IS/MND accurately assesses impacts related to transportation consistent with the CEQA Guidelines and the City's adopted methodology, and also addresses comments received regarding parking. Additionally, the commenter states that excessive sound and increased lighting are issues that the RBOC has failed to address or remedy, despite complaints from residents. Please see Topical Response 2, *Lighting*, and Topical Response 5, *Noise,* regarding the City's lighting and noise regulations and how the Project complies with all policies regarding noise and lighting, and requires additional mitigation measures for potential lighting impacts, to ensure impacts associated with noise and lighting would be less-than-significant.

R29-4 This comment states that implementation of the Project will negatively impact the Arroyo Seco. The comment provides no specific issue regarding the detailed technical analyses contained within the IS/MND regarding these topics. The commenter's statements will be provided to the RBOC for its consideration as part of its decision-making for this project. However; this comment is not a direct comment on the content or adequacy of the IS/MND and does not raise a specific environmental issue; therefore, no further response is required.

2. Response to Comments

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COMMENT R30 - Laura Burke (1 page)

From: Laura Burke <lauralei782@gmail.com>
Date: Friday, March 3, 2023 at 11:50 AM
To: Public Comment <publiccomment@rosebowlstadium.com>
Subject: Brookside Golf Course Improvements Project

Dear Rose Bowl Stadium,

I am a neighbor of the Rose Bowl and am very concerned that a miniature golf course will attract a constant stream of vehicular traffic that will make nonvehicular recreation unsafe. Walkers, runners, and cyclists will be in constant danger whenever the mini golf facility is open. The flow of the recreation loop does not lend itself well to this type of usage. R30-1

Thank you for your consideration,

Laura Burke
626-793-6504

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2. Response to Comments

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R30. Response to Comments from Laura Burke, submitted via email March 3, 2023.

R30-1 This comment states that the implementation of the Project would result in an increase of vehicular traffic in areas surrounding the Project Site, which would make nonvehicular recreational activities like walking, running, and cycling, unsafe. As described in Section 3.17, *Transportation*, of the IS/MND, the Project would be developed entirely within the Brookside Golf Course and would be accessed via existing adjacent parking lots and Brookside Golf Course pathways, similar to existing conditions. Operation of the Project would not require any changes to the existing circulation system, including the Rose Bowl Recreational Loop or equestrian trails. Additionally, the miniature golf course would serve existing users of the Brookside Golf Course and Central Arroyo recreational users, and the Project is not anticipated to increase attendance at the golf course, but rather to capture existing users. Existing driveways and parking areas are sufficient to serve both the project and the many user groups that access the Central Arroyo.

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COMMENT R31 - Marcus Renner (2 pages)

From: Marcus Renner <mvrenner@gmail.com>
Date: Friday, March 3, 2023 at 1:32 PM
To: Public Comment <publiccomment@rosebowlstadium.com>
Subject: Comment on Brookside Golf Course Improvement Project Initial Study/Mitigated Negative Declaration

Jenessa Castillo
Interim Chief Operations Officer
1001 Rose Bowl Drive
Pasadena, California, 91103

Dear Ms. Castillo,

Please register this as my comment on the Brookside Golf Course Improvement Project Initial Study/Mitigated Negative Declaration.

I do not feel putting a miniature golf course on the assigned acre next to the flood control channel is in the best interests of the city. While we've been inundated the last two weeks with rain, climate change is going to make water in high demand. Every inch of real estate will become valuable for its potential to capture water for the Raymond Basin. At the same time, the flood control channel as currently constructed will not, according to the Army Corps of Engineers, be able to handle storms of increasing intensity. For both these reasons, the need to change the configuration of the channel and the need to allow water to percolate into our aquifer, investing in additional infrastructure along the channel is not a wise move. R31-1

Reconfigurations of the golf course should account for a buffer along the channel that can in the future accommodate a more natural stream. There is great public interest in stream restoration, which can help with water conservation, flood control, and provide additional habitat for wildlife. Such restoration can be an amenity for a golf course if carried out in a thoughtful way with the input and collaboration of stakeholders.

Transforming an acre on the east side of the Rose Bowl campus, closer to the Brookside Clubhouse, would make miniature golf more accessible to existing parking and reduce impacts on wildlife. Better yet, an acre of the new 710 extension area could accommodate a miniature golf course as a recreational amenity that serves to introduce the sport to young people and families. This is a more appropriate location for such a facility and fit-in well with the mix of parks, housing, and commercial area that will likely comprise the new district. In terms of generating revenue, this area holds far more potential than the area along the channel and is a walkable attraction for people from surrounding neighborhoods and visitors to Old Pasadena. R31-2

Thank you and I look forward to your response.

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All the best,

Marcus Renner
970-426-8392

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Marcus Renner (he/him/his)
UC Davis Geography Graduate Group

"If the world were merely seductive, that would be easy. If it were merely challenging, that would be no problem. But I arise in the morning torn between a desire to improve the world and a desire to enjoy the world. This makes it hard to plan the day." -E.B. White, writer (1899-1985)

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R31. Response to Comments from Marcus Renner, submitted via email March 3, 2023.

R31-1 This comment states that the location of the proposed miniature golf course would not be appropriate because it would disrupt the flow of the flood control channel. As described on page 80 of the IS/MND, the Arroyo Seco channel, a subgrade concrete-lined feature, crosses the Brookside Golf Course and forms the western boundary of the reoriented driving range. However, the Project would not require any physical construction within the channel nor would it result in indirect impacts to the channel. The majority of the Project would result in similar amounts of impervious surfaces as the existing driving range (all natural turf). The Project is a continued use of golf activities that have occurred along the Arroyo Seco for decades. The recent storm events and water within the channel did not affect the adjacent golf course uses. No inhabitable structures are proposed within the golf course. As stated on page 80 of the IS/MND, the increase in bays within the proposed driving range, as well as limited new impervious features associated with the miniature golf course, would result in an increase of impervious surfaces and would be similar to current conditions. Thus, the Project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Additionally, as described on page 82 of the IS/MND, incorporation of landscaping and replacement of pervious surfaces would ensure that the Project would result in similar drainage patterns as the existing golf course and would not substantially increase the rate or amount of surface run-off in which would result in flooding on- or offsite. Therefore, no revisions to the IS/MND are necessary.

R31-2 This comment recommends an alternate location for the proposed miniature golf course. Please see Topical Response 8, *Project Alternatives*, regarding the alternatives and how the IS/MND is sufficient in not evaluating environmental impacts of other alternatives. The RBOC has no jurisdiction over lands associated with I-710 and this is not a viable alternative for consideration.

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COMMENT R32 - Marie Levine (2 pages)

From: Marie Levine <marielevine@aim.com>
Date: Friday, March 3, 2023 at 1:49 PM
To: Public Comment <publiccomment@rosebowlstadium.com>
Subject: Brookside Golf Course Improvements Project; CEQA Review and MND

To: The Rose Bowl Operating Company and the City of Pasadena.

I am a resident of the City of Pasadena and reside on Coniston Road on the East side of the Arroyo. I have lived in my house on Coniston for over 32 years. I highly value and appreciate the Arroyo Seco including the Central Arroyo. I believe that I am what CEQA refers to as a "Sensitive Receptor" in that I live adjacent to the Central Arroyo and the proposed Project site.

I have reviewed the Mitigated Negative Declaration (MND) and the Biological Resources Assessment as to an issue that is very important to me: the Project's potential significant impacts on Wildlife including Birds.

The primary suggested Mitigation, that is, focus all lighting downward, is unresponsive to the facts in the Central Arroyo; is incomplete; and will be ineffective. Further, the Biological Resources Assessment is minimal and incomplete, and is in error.

The Central Arroyo, including the Project site, is an essential part of a complex and widespread Wildlife Corridor and habitat system that is much larger than just the concrete channel and includes both adjacent Arroyo hillside areas, but particularly the Linda Vista area, and the entire Central Arroyo. The Wildlife Corridor system has been mapped and studied extensively by environmental organizations such as Pasadena's Arroyos and Foothills Conservancy and the Santa Monica Mountains Conservancy, as well as the State of California Agencies with jurisdiction. None of this detailed and important scientific data is included, analyzed and considered for required Mitigation. Further, important animals who use these various Wildlife Corridors are excluded and ignored in the analysis such as Bobcats which are continually using the Corridors. Also excluded and ignored is any analysis and discussion of project impacts on Central Arroyo wildlife habitat. R32-1

As to Birds, the entire Central Arroyo, including the Project Site, is home to many Bird species and is part of a significant Migratory Bird "Flyway." Neither of these facts is mentioned or analyzed at all in the MND. How exactly are the large Hawks, Owls and other large Birds that so many of us watch and enjoy regularly supposed to manage and survive all the new large netting proposed for the significantly expanded Driving Range? Why are "nesting" birds only important during construction? R32-2

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Shouldn't a Mitigation measure be included requiring that all healthy canopy Trees utilized by Birds in the Central Arroyo, including migrating ones, be preserved and maintained for the benefit of the Bird life in the Central Arroyo? R32-2

Most importantly, how will the proposed Project permanent nighttime lighting together with related nighttime noise and large numbers of people, impact the wildlife in the Wildlife Corridors discussed above and the Birds discussed above? The permanent night "glow" over such a large area of the Central Arroyo will disturb. disorient and undermine both the Wildlife Corridors, Wildlife habitat, and the existing and migrating Birds in the Central Arroyo. City policy for a long period of time has been to guarantee and preserve the natural area and aspects of the Arroyo with only one exception: the Rose Bowl itself. This proposed Project transforms the natural character of the Central Arroyo outside of the stadium into a permanent commercial operation that will result in significant and permanent impacts that were not studied and analyzed in the MND. R32-3

Considering that the MND fails to fully and properly study and analyze the potentially significant Project impacts in the Central Arroyo on Wildlife Corridors, Wildlife habitat and Birds, including the potentially significant impacts of permanent night lighting, the MND is legally Inadequate.

Thank you for considering my comments.

Sincerely,

Marie Levine, Ph.D.

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R32. Response to Comments from Marie Levine, submitted via email March 3, 2023.

R32-1 This comment states their concern regard the Project's potential impacts to wildlife including birds in the Arroyo Seco. The commenter states that the information provided in the IS/MND and Appendix C, *Biological Resources Assessment*, is minimal and incomplete. Additionally, the commenter states that the Central Arroyo Seco is part of a complex Wildlife Corridor and habitat system.

In addition to a field survey conducted by a qualified biologist for this project, the Biological Resources Assessment included a review of multiple biological diversity databases, including California Department of Fish and Wildlife's (CDFW) California Natural Diversity Data Base (CNDDB), California Native Plant Society's (CNPS) Inventory of Rare and Endangered Vascular Plants of California, U.S. Fish and Wildlife Service's (USFWS) Critical Habitat Portal, to determine the potential for special-status species and other sensitive biological resources to occur within the Project Site and survey area. While the databases identified species have been previously documented within or in close proximity to the survey area (most in the early- to mid-1900's), in its current state, suitable habitat within the Project Site is not present. As discussed on page 45 of the IS/MND, implementation of Measures MM-BIO-1 would ensure avoidance of impacts to nesting birds during construction as well as any potential indirect impacts that may be created by the Project. A qualified biologist will conduct a nesting bird survey within 3 days prior to the proposed start date, to identify any active nests within 500 feet of the Project Site. If an active nest is found, the nest shall be avoided, and a suitable buffer zone shall be delineated in the field such that no impacts shall occur until the chicks have fledged the nest as determined by a qualified biologist. Please see Topical Response 3, *Tree Removal and Wildlife*, regarding the procedures that would be taken by the RBOC to minimize potential impacts to wildlife within the Project Site.

R32-2 The comment states that Brookside Golf Course, including the Project Site, is home to many bird species and is a part of a significant Migratory Bird "flyaway". Implementation and operation of the Project would not be anticipated to negatively affect birds in the Project because conditions during operation of the Project would be essentially the same as existing conditions of the Brookside Golf Course. Thus, inclusion of the proposed netting surrounding the driving range would not negatively affect birds on the Project Site, including hawks and owls, since the Project Site currently contains netting within the existing driving range. There has never been a recorded incident of wildlife getting caught in the current netting.

Additionally, implementation of Mitigation Measure BIO-2 would minimize potential indirect impacts to nesting birds that may utilize ornamental/landscape vegetation onsite and/or wildlife movement along the Arroyo Seco, requiring nighttime lighting associated with the driving range and miniature golf course to be shielded downward to limit spillage. Construction associated with this Project is relatively low in scale, and especially in

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comparison to the large events held in the Arroyo Seco throughout the year. Even with those events, which include thousands of cars parking on the golf course, amplified sound, and significantly increased activity, birds still continue to utilize this area. Accordingly, there is no evidence that human activities in the Arroyo negatively impact the presence of birds. There has never been a recorded incident of wildlife getting caught in the current netting. There is no reason to believe that this Project would have a different result.

R32-3 This comment questions how lighting and noise from the Project will negatively impact wildlife within the Central Arroyo Seco, and the surrounding areas. As demonstrated in the IS/MND, the Project applies the appropriate threshold used for all projects in the City of Pasadena, including other projects in the Central Arroyo. In this case, the Project would have a significant impact on neighboring areas if the site lighting produces an illuminance of greater than 1.0 foot-candle on any residential property. The lighting assessment included in the IS/MND demonstrates that the light loss spill factor would be 0.95, less than the 1-foot candle threshold, at the property line. Given the precise lighting specifications are not known at this time (nor required to be known), the IS/MND requires a quantified, measurable mitigation measure with performance standards in place that must be met before lighting is installed (see mitigation measure AES-1). Please also see Topical Response 2, *Lighting*, regarding the City's lighting regulations and how the Project complies with all policies regarding lighting, and requires additional mitigation measures to ensure impacts associated with lighting would be less-than-significant. As such, the IS/MND includes a well-supported impact assessment (including appropriate performance-based mitigation) to ensure that impacts related to lighting would be less than significant. Additionally, there is a discussion regarding impacts to wildlife from lighting which is addressed beginning on page 45 of the IS/MND, and mitigation measure BIO-2 is required in order to reduce potential lighting impacts. The RBOC must, through adoption of this mitigation measure, enforce and demonstrate compliance and will do so as the Lead Agency for this project. Finally, the implication that the lighting will be on all night is not accurate.

COMMENT R33 - Arnold Siegel (1 page)

From: Arnold Siegel <arnold.siegel@gmail.com>
Date: Friday, March 3, 2023 at 2:38 PM
To: Public Comment <publiccomment@rosebowlstadium.com>
Subject: Brookside Golf Course Improvement Project

I am writing to express my concerns about the above referenced project and the truncated public input and environmental documents. I have lived on Prospect Boulevard for 45 years and have witnessed the increasing commercialization of the Arroyo, the ever increasing number of events up and down the Arroyo, the increased traffic and noise, the damage to the tree canopy, and the negative impacts that these changes have on the surrounding neighbors. The RBOC and the city engage in piecemeal consideration of each new use and impact and fail to consider the cumulative impact as required by CEQA. See Section 15355 of the State CEQA Guidelines. It is well past time for a complete environmental review of all the projects in the Arroyo. R33-1

As recently reaffirmed by the California Court of Appeals decision in Make UC a Good Neighbor v. the Regents of the University of California, it is incumbent on the City and RBOC to consider alternatives and analyze noise and light impacts on the neighbors and wildlife. The RBOC and city made short shrift of these obligations and skipped ahead to the final certification without much citizen impact. R33-2

The project description is insufficient. How many trees will be taken down? The loss of any tree canopy is a disaster in light of the severe impacts the drought has had on all our trees. How much light will be generated? How much extra traffic will invade our streets? Without this thorough description, commenting is very difficult. Deferring this detail to the design commission is too late. R33-3

There is no analysis of alternatives. If the project is necessary to generate additional revenue, we are given no figures. What will all this cost? What other projects were considered, if any? The RBOC has indicated that UCLA football will attract bigger crowds and more money once the move to the Big 10 is consummated. If so, then why do we need these miniature golf courses and a greatly expanded driving range? R33-4

Please slow down and give the public the information it needs (and the law requires you to provide) and allow for intelligent and thorough public review.

–
Arnold Siegel
1030 Prospect Boulevard
Pasadena CA 91103
arnold.siegel@gmail.com
626-793-0508
626-419-2651 (cell)

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2. Response to Comments

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R33. Response to Comments from Arnold Siegel, submitted via email March 3, 2023.

R33-1 This comment states that the increased number of projects in the Arroyo Seco are commercializing the area and increasing traffic and noise, and reducing the number of trees in the area. Additionally, the commenter states that Project is being piecemealed, and the RBOC has failed to consider cumulative impacts. As described on page 118 of the IS/MND, the potential for cumulative impacts occurs when the independent impacts of a given project are combined with the impacts of related projects in proximity to the Project Site that would create impacts that are greater than those of the project alone. Related projects include past, current, and/or probable future projects whose development could contribute to potentially significant cumulative impacts in conjunction with a given project. The RBOC is undergoing a broad planning process to consider various improvements at the Rose Bowl and Brookside Golf Course to assist in meeting long-term revenue needs. While a variety of different options are under review, including operational changes and potentially other improvements, none of these changes are funded or considered reasonably foreseeable at this time. Therefore, there are no known reasonably foreseeable cumulative projects located in the immediate vicinity of the Project. As demonstrated in this analysis, there would be no long-term significant operational impacts that would result from the Project. As such, there is no contribution to cumulative impacts from the Project. Additionally, based on the relatively small and localized scale of this Project, and that no other cumulative projects are identified in the area, the Project would not result in impacts that are individually limited but cumulatively considerable.

R33-2 This comment states that it is the RBOC's responsibility to consider alternatives for the Project. However, as stated in Topical Response 8, *Alternatives*, the purpose of an alternatives analysis is to look at ways to avoid or reduce identified significant environmental impacts of a proposed project. An IS/MND is only prepared for projects that are demonstrated not to have any significant environmental impacts, or where mitigation can be adopted to reduce all significant impacts to a less-than-significant level. The case cited by the commenter is in relation to an EIR and is not relevant to this Project. Therefore, because the Project, which as supported throughout the IS/MND and corresponding detailed technical analyses, has been determined to have no significant environmental impacts, no analysis of alternatives is required. Therefore, no revisions are required.

R33-3 This comment states that the Project description is insufficient. Please see Topical Response 1, *Unstable Project Description*, regarding the required contents of the Project Description, which in this IS/MND, contains sufficient information to inform the public about all elements of the Project – from design, through construction, and long-term operation – and to adequately analyze environmental impacts of Project implementation and define appropriate mitigation. Additionally, the commenter poses questions regarding tree removal, increase of light, and additionally traffic impacts that would result from the

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Project. Please see Topical Response 3, *Tree Removal and Wildlife*, Topical Response 2, *Lighting*, and Topical Response 7, *Transportation and Parking,* for more information. All of the information requested by the commenter has been provided in the IS/MND and these responses. No further revisions are required.

R33-4 This comment expresses concerns regarding financial analysis for the Project. The comment provides no specific issue regarding the detailed technical analyses contained within the IS/MND regarding these topics. The commenter's statements will be provided to the RBOC for its consideration as part of its decision-making for this project. However; this comment is not a direct comment on the content or adequacy of the IS/MND and does not raise a specific environmental issue. As directed by Section 15131(a) of the CEQA Guidelines, economic or social effects of a project shall not be treated as significant effects on the environment. Therefore, no further response is required.

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COMMENT R34 - Adry Furchtgott (1 page)

On 3/3/23, 4:13 PM, "Adry Hezekiah" <adry.hezekiah@gmail.com <mailto:adry.hezekiah@gmail.com>> wrote:

Attn: Jenessa Castillo, Interim Chief Operations Officer

I'm writing to add my voice in saying NO! to miniature golf in the Arroyo. Adding a miniature golf course and/or expanding the golf greens will absolutely be to the detriment of the already sadly reduced natural habitat for our local wildlife.

We don't need more pesticide soaked monoculture non-native turf in the Arroyo Seco. We don't need more tourist attractions & activities - unless we're talking a nature center ala Eaton Canyon and guided (via marked trails or docents) & respectful nature hikes or walks. R34-1

Our natural habitats are worth protecting and we need to minimize the already excessive destruction of these lands.

So again I say NO to miniature golf in the Arroyo! R34-2

Sincerely,
Adry Furchtgott
(213) 290-8132
adry.hezekiah@gmail.com <mailto:adry.hezekiah@gmail.com>

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2. Response to Comments

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R34. Response to Comments from Adry Furchtgott, submitted via email March 3, 2023.

R34-1 This comment states the commenter's opposition to the implementation of the miniature golf course in the Project Site, because it will be detrimental to the natural habitat of local wildlife in the Arroyo Seco. Since the Brookside Golf Course includes landscaped vegetation, developed land uses, and unvegetated concrete-lined channel, the Project Site would not be considered a natural habitat. Please see Topical Response 3, *Tree Removal and Wildlife*, regarding the procedures that would be taken by the RBOC to minimize potential impacts to wildlife within the Project Site. Additionally, the commenter states that the Project would include unnecessary and harmful non-native turf to the Arroyo Seco. As stated on page 49 of the IS/MND, the Project would be consistent with Section 2.2, "Landscape Improvements" of the Arroyo Seco Design Guidelines, and would preserve the historical heritage of the City of Pasadena and the Arroyo Seco, preserve and protect natural resources, use California native/drought tolerant plant species, and use turf varieties that are water conserving, tolerant of heavy use, and not dependent on chemical fertilizers for their success.

R34-2 This comment expresses the commenter's opposition to the implementation of the miniature golf course. The comment provides no specific issue regarding the detailed technical analyses contained within the IS/MND regarding these topics. The commenter's statements will be provided to the RBOC for its consideration as part of its decision-making for this project. However; this comment is not a direct comment on the content or adequacy of the IS/MND and does not raise a specific environmental issue; therefore, no further response is required.

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COMMENT O1 - Evan Davis (West Pasadena Residents Association) (3 pages)

February 23, 2023

VIA EMAIL

Jens Weiden, Rose Bowl Operating Company @ jweiden@rosebowlstadium.com
Brandon Fox, Rose Bowl Operating Company @ bfox@rosebowlstadium.com
Councilmember Steve Madison @ smadison@cityofpasadena.net
publiccomment@rosebowlstadium.com

Re: Proposed mini golf course and expansion of driving range at Brookside Golf Course

Councilmember Madison and Messrs. Widen and Fox:

The Board of West Pasadena Residents' Association ("WPRA") thanks Messrs. Weiden and Fox for their presentation to the WPRA board meeting in October 2022 regarding the building of a proposed mini golf course and expansion of the driving range at Brookside Golf Course. Members of our organization also attended the recent public meeting regarding the CEQA report. Finally, on February 20, 2023, I spoke with RBOC President Steve Haderlein, who explained the RBOC's responses to our major concerns. O1-1

In sum, we applaud your efforts to achieve self-sufficiency through new revenue sources. We want the Rose Bowl to thrive and recognize that identifying new revenue streams is critical to its long-term success. However, we are writing to reiterate that we oppose the project at present.

The WPRA has identified two areas of the proposed project that are of major concern:

- The filing of the CEQA MND document that does not provide an accurate, stable and finite description of the proposed project, and
- The Project lacks specific financial and other details, as outlined below.

From our perspective, RBOC is marching down the CEQA path without having delineated the proposed changes to Brookside and without having demonstrated to the community – which will foot the bill if the projections are too rosy – that these changes are a good investment of public funds. The recent public meeting also highlighted that neighbors remain concerned about the collateral effects of any mini golf course or expansion of the driving range. We take note of Nina Chomsky's arguments concerning a variety of legal issues, which we would also like addressed before any decisions are made. O1-2

If this were a project by any private entity, then we would have seen plans at the same time as the CEQA review. Because the RBOC is a public-benefit corporation that's treated as part of the O1-3

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2. Response to Comments

city government, it exercised its power to make up different rules for its own project. My conversation with Steve Haderlein clarified why: if RBOC devoted the hundreds of thousands of dollars needed to draft detailed plans before obtaining CEQA approval, then RBOC would have been open to attack for squandering resources if it did not obtain CEQA approval. Further, the "CEQA first, plans later" approach was blessed by RBOC's lawyers, who presumably said that RBOC had legal authority to obtain CEQA approval before nailing down plans. From a pure "business" perspective, taking the smoothest route makes a lot of sense. However, RBOC isn't a regular business; it's a public benefit corporation with obligations that extend beyond balancing its budget. O1-3

As I noted to Mr. Haderlein, choosing to save money by pursuing CEQA approval first has a substantial non-economic cost: Brookside's neighbors understandably are concerned that they will have little impact on whether the project should be built and any design features once RBOC has cleared the CEQA hurdle. We recognize the need for fiscal restraint, but this approach certainly hasn't built any trust in RBOC in the eyes of its neighbors.

We think it's worthwhile highlighting an alert we recent sent to our members, which identified the following concerns that we continue to hold:

- Because the course is projected to operate 14 hours (6 a.m. through 10 p.m.) every day of the week, it will likely cause significant light pollution until 10:00 PM, along with traffic and possible amplified sound in the Arroyo. O1-4
- Creating the course will likely require removal of many (45) native and mature trees and contribute to the degradation of the adjacent animal habitat and the historic fabric of the Arroyo Seco. O1-5
- Initially, the RBOC estimated the cost to build the course at $2 million with no final design or specific components of the cost estimates. O1-6
- The financial projections offer little comparative analytic data of similar projects in cities like Pasadena.
- The project has yet to release a thorough "proof of concept." O1-7
- The Rose Bowl Stadium and Brookside Golf Club are on the National Register of Historic Places. O1-8
- The proposal may violate the Arroyo Seco Master Plan and/or the Arroyo Seco Public Lands Ordinance. O1-9

We invite you to reconsider your approach and invest in plans and financial analyses that will demonstrate to the community that these proposed changes will add to RBOC's bottom line without an undue impact on your neighbors.

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Thank you for your consideration of our points of view.

Respectfully,

/s/ Evan J. Davis

Evan Davis, President
West Pasadena Residents' Association

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2. Response to Comments

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O1. Response to Comments from Evan Davis of the West Pasadena Residents Association, submitted via email February 23, 2023.

O1-1 This comment summarizes West Pasadena Residents Association (WPRA) involvement and acknowledges the RBOC's efforts to achieve self-sufficiency but oppose the Project. The comment provides no specific issue regarding the detailed technical analyses contained within the IS/MND regarding these topics. This comment will be provided to the RBOC for its consideration as part of its decision-making for this Project.

O1-2 This comment states that the IS/MND does not provide an accurate, stable, and finite Project Description for the Project. Please see Topical Response 1, *Unstable Project Description*, regarding the required contents of the Project Description, which in this IS/MND, contains sufficient information to inform the public about all elements of the Project – from design, through construction, and long-term operation – and to adequately analyze environmental impacts of Project implementation and define appropriate mitigation.

O1-3 This comment expresses concerns regarding financial analysis for the Project. The commenter's statements will be provided to the RBOC for its consideration as part of its decision-making for this project. However; this comment is not a direct comment on the content or adequacy of the IS/MND and does not raise a specific environmental issue. As directed by Section 15131(a) of the CEQA Guidelines, economic or social effects of a project shall not be treated as significant effects on the environment. Therefore, no further response is required. The commenter also refers to a separate letter provided by Nina Chomsky. Please see responses to this letter O5 below.

O1-4 This comment states that implementation of the Project would result in increased levels of lighting and noise. Please see Topical Response 2, *Lighting*, regarding the City's lighting regulations and how the Project complies with all policies regarding lighting, and requires additional mitigation measures to ensure impacts associated with lighting would be less-than-significant. Additionally, please see Topical Response 5, *Noise*, regarding the City's noise regulations and how the Project complies with all policies regarding noise to ensure impacts associated with noise would be less-than-significant. No amplified noise is proposed. The commenter also states that the Project would result in increased traffic issues in areas surrounding the Brookside Golf Course. Please see Topical Response 7, *Transportation and Parking,* which describes that IS/MND accurately assesses impacts related to transportation consistent with the CEQA Guidelines and the City's adopted methodology, and also addresses comments received regarding parking.

O1-5 This comment expresses concern regarding tree removals and that the Project will negatively impact wildlife in the Brookside Golf Course. Please see Topical Response 3, *Tree Removal and Wildlife*, regarding the procedures that would be taken by the RBOC to minimize potential impacts to trees and wildlife within the Project Site. Additionally, the

comment states that implementation of the Project would impact the historical fabric of the Arroyo Seco. The IS/MND includes a comprehensive historical analysis and provides a well-supported conclusion that there would be no impact to the historical resource. The comment provides no specific issue or concern with the analysis provided.

O1-6 This comment expresses concerns regarding financial analysis for the Project. The commenter's statements will be provided to the RBOC for its consideration as part of its decision-making for this project. However; this comment is not a direct comment on the content or adequacy of the IS/MND and does not raise a specific environmental issue. As directed by Section 15131(a) of the CEQA Guidelines, economic or social effects of a project shall not be treated as significant effects on the environment. Therefore, no further response is required.

O1-7 This comment states that the Project has not released a thorough "proof of concept". Assuming the comment is regarding the amount of detail provided in the project description, please see Topical Response 1, *Project Description*. To the extent that this comment is not a direct comment on the content or adequacy of the IS/MND, it does not raise a specific environmental issue.

O1-8 This comment states that the Rose Bowl Stadium and the Brookside Golf Course are on the National Register of Historic Places. This is a correct statement and potential impacts to the historical resource are comprehensively addressed in the Historical Resources Technical Report found as Appendix D to the IS/MND, which was prepared by local experts at Historic Resources Group (HRG). As summarized on page 27 of the IS/MND, to ensure that the ultimate Project design (including lighting components) is executed to achieve a maximum level of compatibility with the Pasadena Arroyo Park and Recreational District, Mitigation Measure CUL-1 requires the RBOC retain a qualified historic preservation professional to ensure that alterations to the driving range, design of the miniature golf course, and overall modifications to the Golf Course are compatible with the existing Brookside Golf Course landscape and the Pasadena Arroyo Park and Recreational District. The RBOC would ensure that the design of the expanded and reoriented driving range and miniature golf course are compatible with existing design elements of the Brookside Golf Course Complex and are sensitive to the location within the Historic District, the Arroyo Seco, and the adjacent Rose Bowl. Additionally, the Project would be subject to the City's Design Review process as defined in the Pasadena Municipal Code. Therefore, Mitigation Measure CUL-1 would ensure that design of the Project would avoid any impacts to the historical resource.

O1-9 This comment states that the Project may be in violation of the Arroyo Seco Master Plan and/or the Arroyo Seco Public Lands Ordinance. Please see Topical Response 4, *Land Use and Planning*, regarding how implementation of the Project would comply with the Arroyo Seco Master Plan and the Arroyo Seco Public Lands Ordinance.

COMMENT O2 - Geoffrey Baum (West Pasadena Residents Association) (3 pages)

February 23, 2023

VIA EMAIL

Jens Weiden, Rose Bowl Operating Company @ jweiden@rosebowlstadium.com
Brandon Fox, Rose Bowl Operating Company @ bfox@rosebowlstadium.com
Councilmember Steve Madison @ smadison@cityofpasadena.net
publiccomment@rosebowlstadium.com

Re: Proposed mini golf course and expansion of driving range at Brookside Golf Course

Councilmember Madison and Messrs. Widen and Fox:

The Board of West Pasadena Residents' Association ("WPRA") thanks Messrs. Weiden and Fox for their presentation to the WPRA board meeting in October 2022 regarding the building of a proposed mini golf course and expansion of the driving range at Brookside Golf Course. Members of our organization also attended the recent public meeting regarding the CEQA report. Finally, on February 20, 2023, I spoke with RBOC President Steve Haderlein, who explained the RBOC's responses to our major concerns. O1-1

In sum, we applaud your efforts to achieve self-sufficiency through new revenue sources. We want the Rose Bowl to thrive and recognize that identifying new revenue streams is critical to its long-term success. However, we are writing to reiterate that we oppose the project at present.

The WPRA has identified two areas of the proposed project that are of major concern:

- The filing of the CEQA MND document that does not provide an accurate, stable and finite description of the proposed project, and
- The Project lacks specific financial and other details, as outlined below.

From our perspective, RBOC is marching down the CEQA path without having delineated the proposed changes to Brookside and without having demonstrated to the community – which will foot the bill if the projections are too rosy – that these changes are a good investment of public funds. The recent public meeting also highlighted that neighbors remain concerned about the collateral effects of any mini golf course or expansion of the driving range. We take note of Nina Chomsky's arguments concerning a variety of legal issues, which we would also like addressed before any decisions are made. O1-2

If this were a project by any private entity, then we would have seen plans at the same time as the CEQA review. Because the RBOC is a public-benefit corporation that's treated as part of the O1-3

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city government, it exercised its power to make up different rules for its own project. My conversation with Steve Haderlein clarified why: if RBOC devoted the hundreds of thousands of dollars needed to draft detailed plans before obtaining CEQA approval, then RBOC would have been open to attack for squandering resources if it did not obtain CEQA approval. Further, the "CEQA first, plans later" approach was blessed by RBOC's lawyers, who presumably said that RBOC had legal authority to obtain CEQA approval before nailing down plans. From a pure "business" perspective, taking the smoothest route makes a lot of sense. However, RBOC isn't a regular business; it's a public benefit corporation with obligations that extend beyond balancing its budget. O1-3

As I noted to Mr. Haderlein, choosing to save money by pursuing CEQA approval first has a substantial non-economic cost: Brookside's neighbors understandably are concerned that they will have little impact on whether the project should be built and any design features once RBOC has cleared the CEQA hurdle. We recognize the need for fiscal restraint, but this approach certainly hasn't built any trust in RBOC in the eyes of its neighbors.

We think it's worthwhile highlighting an alert we recent sent to our members, which identified the following concerns that we continue to hold:

- Because the course is projected to operate 14 hours (6 a.m. through 10 p.m.) every day of the week, it will likely cause significant light pollution until 10:00 PM, along with traffic and possible amplified sound in the Arroyo. O1-4
- Creating the course will likely require removal of many (45) native and mature trees and contribute to the degradation of the adjacent animal habitat and the historic fabric of the Arroyo Seco. O1-5
- Initially, the RBOC estimated the cost to build the course at $2 million with no final design or specific components of the cost estimates. O1-6
- The financial projections offer little comparative analytic data of similar projects in cities like Pasadena.
- The project has yet to release a thorough "proof of concept." O1-7
- The Rose Bowl Stadium and Brookside Golf Club are on the National Register of Historic Places. O1-8
- The proposal may violate the Arroyo Seco Master Plan and/or the Arroyo Seco Public Lands Ordinance. O1-9

We invite you to reconsider your approach and invest in plans and financial analyses that will demonstrate to the community that these proposed changes will add to RBOC's bottom line without an undue impact on your neighbors.

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3

Thank you for your consideration of our points of view.

Respectfully,

/s/ Evan J. Davis

Evan Davis, President
West Pasadena Residents' Association

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2. Response to Comments

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O2. Response to Comments from Geoffrey Baum of the West Pasadena Residents Association, submitted via email March 3, 2023. This is the same comment letter as O1 above.

Please see responses O1-1 through O1-9 for responses.

2. Response to Comments

COMMENT O3 - Greg King (Pasadena Beautiful) (2 pages)

From: "gregkingfour@aol.com" <gregkingfour@aol.com>
Reply-To: "gregkingfour@aol.com" <gregkingfour@aol.com>
Date: Friday, March 3, 2023 at 11:20 AM
To: Public Comment <publiccomment@rosebowlstadium.com>
Subject: Trees, trees, trees---proposed removal of 47 Mature trees at Brookside

To whom it may concern:

Pasadena Beautiful Foundation (PasadenaBeautiful.org) is proud of the work we have done since our founding in 1960. Our mission is the following: "Pasadena Beautiful Foundation works with individuals, community organizations and the City to restore, renew and protect Pasadena's parks, urban forests and public spaces." We do this by acknowledging our priceless and beautiful environmental assets throughout our beautiful city. The awarding of the Golden Arrow Awards to 27 worthy residential front gardens each year is but one example of what we do to help protect and beautify our lovely city. Have you seen the 28 new Ficus trees just recently planted on Green Street? Thank your hardworking PBF volunteers.

Our work also involves tireless efforts to ensure that our street and city canopies are well tended. Trees that have died or are diseased are removed and replaced. We do this work because we understand the value of the contributions these trees make to the overall health of our environment. Other cities in our area are learning from us the importance of this work. With the help of our City of Pasadena Partners, together we do this work better than most.

It now appears that Pasadena Beautiful will need to expand our protection to another group of trees in one of the most vulnerable and well-loved parts of the City---our Arroyo Seco.

Apparently, due to financial pressures brought to bear on the Rose Bowl Operating Company (RBOC), management has explored many sources of new revenues trying to come up with ways to address the RBOC financial shortfalls. The notion that a vulnerable and venerable environmental asset like the Arroyo Seco needs to be horribly altered and disfigured to make way for a miniature golf course and an expanded driving range is unconscionable. The RBOC management has already spent thousands of dollars on consultants and advisors to create documents, studies and reports that only clarify the following: O3-1

1

2. Response to Comments

1 1) 47 mature trees will be destroyed. O3-2

2 2) There is no financial certainty that the $2 million investment (not counting thousands already spent) will actually be profitable. O3-3

3 3) No one has bothered to quantify the loss of 47 mature tree canopies that support a large and diverse wildlife and plant population. O3-4

4 4) There is no environmental assessment of the light pollution and harm to wildlife that may be caused by the new lighting and orientation of the proposed changes to the driving range which is slated to stay on until 10:00 pm every evening of the week. O3-5

5 5) What will the negative environmental impacts be due to the increased congestion? O3-6

It is most absurd that some project consultants actually suggested that each "hole" provide an interactive educational piece so that those playing miniature golf could actually learn about endangered species. Really?

In short, Pasadena Beautiful Foundation cannot support the concept that a beautiful array (47 in all) of mature trees in our beloved Arroyo Seco (which is also part of historic golf courses protected by Pasadena Heritage principles) be sacrificed. O3-7

It is time for our leaders to recognize the folly of expecting the RBOC to be financially self-supporting. Destroying 47 mature trees trying to chase uncertain revenues will have an incalculable negative impact on our local environment. We need to reclaim the heritage that our City was founded on---The City Beautiful Movement—and acknowledge that our local environment deserves as much protection and advocacy as our historic buildings now enjoy.

Greg King
President, Pasadena Beautiful Foundation

2

O3. Response to Comments from Greg King of Pasadena Beautiful, submitted via email March 3, 2023.

O3-1 This comment summarizes the role of Pasadena Beautiful as an organization, and expresses concerns regarding financial analysis for the Project. The commenter's statements will be provided to the RBOC for its consideration as part of its decision-making for this project. However; this comment is not a direct comment on the content or adequacy of the IS/MND and does not raise a specific environmental issue. As directed by Section 15131(a) of the CEQA Guidelines, economic or social effects of a project shall not be treated as significant effects on the environment. Therefore, no further response is required.

O3-2 This comment expresses opposition to the proposed tree removal. Please see Topical Response 3, *Tree Removal and Wildlife*, regarding the procedures that would be taken by the RBOC to minimize potential impacts to trees and wildlife within the Project Site.

O3-3 This comment expresses concerns regarding financial analysis for the Project. The commenter's statements will be provided to the RBOC for its consideration as part of its decision-making for this project. This comment is not a direct comment on the content or adequacy of the IS/MND and does not raise a specific environmental issue. As directed by Section 15131(a) of the CEQA Guidelines, economic or social effects of a project shall not be treated as significant effects on the environment. Therefore, no further response is required.

O3-4 Please see comment response O3-2 above. The potential loss of trees and tree canopies (as providing nesting habitat) on the entirely landscaped golf course is adequately addressed in the IS/MND and supporting technical analysis (see Appendix C, Biological Assessment).

O3-5 This comment states that there is no environmental assessment of light pollution to wildlife. However, there is a discussion regarding impacts to wildlife from lighting which is addressed beginning on page 45 of the IS/MND, and mitigation measure BIO-2 is required in order to reduce potential lighting impacts. Please also see Topical Response 2, *Lighting*, regarding the City's lighting regulations and how the Project complies with all policies regarding lighting, and requires additional mitigation measures to ensure impacts associated with lighting would be less-than-significant.

O3-6 The comment asks what the negative environmental impacts will be associated with increased congestion. Impacts associated with traffic, including air quality, greenhouse gas emissions, and noise, are addressed throughout the IS/MND. Please also see Topical Response 7, *Transportation and Parking*, which describes that IS/MND accurately assesses impacts related to transportation consistent with the CEQA Guidelines and the City's adopted methodology.

2. Response to Comments

O3-7 This comment summarizes previous comments provided by the commenter. Please comment responses O3-1 through O3-6 above.

COMMENT O4 - Robert Baderian (First Tee) (1 page)

first tee
greater pasadena

Brookside Golf Club
1133 Rosemont Ave.
Pasadena, CA 91103
(626) 543-4708 Office
www.firstteegreaterpasadena.org

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Executive Director

March 2, 2023

Mayor Victor Gordo and Pasadena City Council
Pasadena City Hall
100 North Garfield Avenue
Pasadena, CA 91109

Re: Family Golf at Brookside Golf Club

Dear Mayor Gordo and City Council Members,

First Tee - Greater Pasadena (FTGP) is celebrating its 17-year anniversary in 2023. We are proud to have served over 275,000 youth by instilling life skills through the game of golf. We program at 7 golf courses throughout the San Gabriel Valley, as well as in schools, parks and youth community centers. We are privileged that we can call Brookside our home.

FTGP wishes to express its support for the proposed Family Golf concept. Golf can be an intimidating sport to introduce to individuals. It can be difficult and have rules associated that take time to learn. TTGP has found success in being an introductory way to open people up to the game of golf that can last a lifetime. We believe that expanding the practice center and installing miniature golf will further allow our programs and Brookside to introduce the game to more people. These activities are geared toward the majority of people, both golfers and non-golfers. O4-1

FTGP supports and encourages the City and RBOC's responsibility to continue to improve and maintain not only the Rose Bowl, but the entire Arroyo. FTGP looks forward to continuing to work with the RBOC and Brookside staff regarding the facility for programming, fundraising and meetings.

Sincerely,

Mark Holdsworth
Chair
First Tee Greater Pasadena

2. Response to Comments

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O4. Response to Comments from Robert Baderian of First Tee Greater Pasadena, submitted via email March 2, 2023.

O4-1 This comment expresses support for the Project. The comment will be provided to the RBOC for its consideration as part of its decision-making for this Project. No further response is required.

2. Response to Comments

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COMMENT O5 - Nina Chomsky (LVAA) (7 pages)

Linda Vista-Annandale Association
P. O. Box 94364
Pasadena, CA 91109

March 2, 2023

Via Email To: publiccomment@rosebowlstadium.com.

Re: Brookside Golf Course Improvements Project; CEQA Review and MND

To: The Rose Bowl Operating Company (RBOC) and the City of Pasadena.

The Linda Vista-Annandale Association (LVAA) appreciates this opportunity to comment on the Mitigated Negative Declaration (MND) for the proposed Brookside Golf Course Improvements Project (the Project) prepared pursuant to the California Environmental Quality Act (CEQA).

Incorporated in 1930, LVAA is a California non-profit, mutual benefit corporation, tax exempt under IRC Section 501(c)(4), and corresponding California tax law, dedicated to the improvement and development of the Linda Vista-Annandale neighborhood area of Pasadena, and the promotion of the general welfare of Linda Vista-Annandale residents.

The Linda Vista-Annandale neighborhood area consists of roughly 2.5 square miles, extending from the west bank of the Arroyo Seco to the boundary with Glendale in the area of the Linda Vista portion of the San Rafael Hills, and below the Devil's Gate Dam at Hahamongna. O5-1

Our neighborhood includes, and LVAA represents, approximately 1,300 single-family homes located in the City of Pasadena. Our neighborhood also includes an important educational institution, the Art Center College of Design Hillside campus. To the east, north and south, our neighborhood, including the Art Center, is immediately adjacent to, and abuts, the Central Arroyo Seco including the site of the proposed Project.

The MND Project Description is Legally Inadequate.

Applicable CEQA law requires an unambiguous, accurate, stable and "finite" Project Description. A leading CEQA case law opinion in this area is Stopthemillenniumhollywood.com v. City of Los Angeles (2019) 39 Cal.App.5th 1, 16–20 [251 Cal.Rptr.3d 296, 307–310, 39 Cal.App.5th 1, 16–20]. As stated by the court in its opinion:

2. Response to Comments

The requirement of an accurate, stable, and finite project description as the sine qua non of an informative and legally sufficient EIR has been reiterated in a number of cases since County of Inyo. (See, e.g., Treasure Island, supra, 227 Cal.App.4th at p. 1052, 174 Cal.Rptr.3d 363 ["This court is among the many which have recognized that a project description that gives conflicting signals to decision makers and the public about the nature and scope of the project is fundamentally inadequate and misleading"]; Communities for a Better Environment v. City of Richmond (2010) 184 Cal.App.4th 70, 85–89, 108 Cal.Rptr.3d 478 [EIR failed as an informal document because the project description was inconsistent and obscure as to the true purpose and scope of the project]; San Joaquin Raptor Rescue Center v. County of Merced (2007) 149 Cal.App.4th 645, 653, 57 Cal.Rptr.3d 663 [an EIR must include detail sufficient to enable those who did not participate in its preparation to understand and to consider issues raised by the proposed project].)

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Here, the MND itself states that the Project is merely "conceptual" and that the proposed Project will be specifically determined when funding is secured. See the discussion at the top of Page 15 of the MND. Further, the Administrative Record is replete with oral comments on behalf of the Lead Agency, the RBOC, that the exact Project will be figured out "later". The most recent iteration of Project status and description is in the Staff Report for a meeting of the RBOC Board held on March 2, 2023, wherein it is stated: *This matter will then return to the Board soon for consideration of adoption of the MND, concurrent with a substantial allocation of public funds toward the Project, even though the RBOC is not yet ready to break ground. When the RBOC has completed preliminary design and engineering work, and has secured substantial funding toward the Project, the RBOC will then seek necessary City approvals, including a conditional use permit and design review.* 05-1
As to a very important issue to the public – the apparent removal of 47 generally healthy canopy Trees on the Project site – both the MND and the accompanying Tree Report indicate the number of removals in fact cannot be determined at this point in Project development.

The Project Description in the MND for this proposed Project is so minimal and misleading that it fails to include required detail sufficient to enable those in the public who did not participate in its preparation to understand and to consider issues raised by the proposed Project. Further, the public cannot determine the precise scope and purpose of the Project. Therefore, the MND is legally Inadequate.

Page **2** of **7**

MND Deferral of Mitigation is Legally Inadequate.

CEQA requires that the MND include all required and necessary detailed and enforceable Mitigations as to potentially significant impacts.

The MND and accompanying reports including the Tree Report and the Biological Resource Assessment, as well as other Studies and numerous oral comments included in the Administrative Record, repeatedly indicate that the City of Pasadena Design Commission, the RBOC, or the Urban Forestry Advisory Committee (UFAC) and/or the City Manager of Pasadena, at some unknown later time will determine the precise and finite Project including its scope and including, very importantly to the public, the exact number of public Canopy Trees on the Golf Course that will be cut down. At that point in the future, there will be no vehicle or method under CEQA to impose necessary and required detailed and enforceable Mitigations for significant environmental impacts. Such deferral of Mitigations renders the MND legally Inadequate. O5-2

The MND is Legally Inadequate in that the Document Fails to Fully Study and Analyze the Impacts of Project Permanent Night Lighting.

Both "parts" of the proposed Project include extensive light installations for the purpose of nighttime operations. Except for conflicts with Rose Bowl events, the Project proposes night hours of operation and night lighting seven (7) days a week all year round until 10:00 P.M., followed by less further lighting for such matters as cleaning. Currently and historically, the Golf Courses close at dusk and no later than 8:00 P.M. No part of the Arroyo Seco has ever been permanently subject to night lighting and all previous proposals to do so have been rejected by the City.

The entire Arroyo Seco, including the Central Arroyo, currently and historically, is regarded as an irreplaceable natural, environmentally sensitive recreational area, subject to Rose Bowl Stadium events and activities. The Central Arroyo is part of an extensive Wildlife Corridor system, including Wildlife habitats and environmentally important habitat linkages, is home to many Bird species as well as being a "Flyway" for migrating and local Birds, and is part of a number of Trail systems. O5-3

This status of the Central Arroyo is recognized in long-standing City policies and rules, beginning with the Land Use Element of Pasadena's General Plan which provides as a matter of adopted policy:

10.11 **Eaton Canyon Corridor and the Arroyo Seco.** Preserve and maintain the natural character of the Eaton Canyon Corridor and the Arroyo Seco as self-sustaining healthy

2. Response to Comments

ecosystems of plants and animals, in balance with the integration of recreational facilities and flood control improvements.
10.15 **Open Space Connectivity.** Maintain and, where possible, restore wildlife corridors and habitat linkages.

One of the foundational documents of the City as to the natural character of the Central and Lower Arroyo areas is the Arroyo Seco Public Lands Ordinance which the MND ignores. See the discussion of this Ordinance below. The purpose of the Arroyo Seco Public Lands Ordinance is as follows:

The purpose of this chapter is to establish regulations for preservation, enhancement and enjoyment of the Arroyo Seco as a unique environmental, recreational and cultural resource of the city surrounded by residential neighborhoods. Such resource and the neighborhoods must be preserved, protected and properly maintained. These regulations are designed to identify uses, activities, facilities and structures as well as their limitations.

The Central Arroyo also is part of an extensive hiking and trail system, as discussed in the Central Arroyo Master Plan:

The recreation trails in the Central Arroyo are part of a regional hiking and equestrian trail system. There is also a network of local pedestrian pathways connecting to adjacent neighborhoods. O5-3

The primary suggested Mitigation for the proposed permanent night lighting is to focus all lighting downward. This suggested Mitigation is unresponsive to the facts in the Central Arroyo, is incomplete, will be ineffective, and ignores the unique environmental status of the Central Arroyo. The proposed permanent night lighting will create a permanent night "glow" in the Central Arroyo plus add permanent night time noise, traffic, and people to the Central Arroyo. The night lighting will impact all the surrounding and adjacent neighbors and neighborhoods by altering the way neighbors and neighborhoods, who and which are Sensitive Receptors under CEQA, experience the Central Arroyo – that is, permanently changing the physical and visual relationships between the Central Arroyo and the surrounding and adjacent neighbors and neighborhoods. The permanent night lighting will permanently change the character of the Central Arroyo and may undermine the National Register status of the Golf Course areas by permanently changing the historic "setting".

The proposed night lighting will result in significant environmental impacts which require full study and analysis under CEQA including required detailed and enforceable Mitigations. Failure to fully study and analyze these significant environmental impacts

Page **4** of **7**

resulting from the Project's imposition of permanent night lighting renders the MND legally Inadequate.

The MND is legally Inadequate in that the Noise and Lighting Studies are Incomplete.

The Lighting Study informs the public of literally nothing as to potential impacts on the environment with the exception of indicating where lights will be located – although the one page "Study" is almost impossible to decipher as a member of the public. Missing is a full study and analysis, including any Mitigation that may be required, of the full amount of permanent "glow" and spillage in the Central Arroyo, including sight line studies of the night lighting impacts on surrounding and adjacent neighbors and neighborhoods as well as impacts on users at night of the Recreational Loop and the Brookside Clubhouse.

As to the Noise Study, the Noise Ordinance and rules in Pasadena are known to be out of date from a public health and environmental perspective, and, therefore, any study and analysis of Noise impacts from the Project, particularly at night, must include analysis outside of the current City Noise Ordinance as to current, up to date scientific measurements and information. Further, Noise from activities and events in the Central Arroyo is especially impacted by changing air, wind, cloud, and weather circumstances, and must be studied analyzed based on variable models of such circumstances, particularly when a new, permanent change to the environment is proposed as is the situation with the proposed Project. O5-4

In that the Noise and Light Studies are Incomplete, the MND is legally Inadequate.

The Land Use and Planning Section of the MND is Legally Inadequate in that the Section Fails to Consider and Apply the Arroyo Seco Public Lands Ordinance to the Proposed Project.

The Arroyo Seco Public Lands Ordinance is one of the foundational legal and policy Ordinances of the City that applies to the Central Arroyo. See the Purpose of the Arroyo Seco Public Lands Ordinance set out above. This is the law that divides the Central Arroyo into four distinct areas including the Golf Courses. The Arroyo Seco Public Lands Ordinance is completely ignored and overlooked by the MND. The MND does not address the Ordinance and includes no study and analysis of it in the Land Use and Planning Section of the MND. O5-5

The General Regulations of the Ordinance, Section C., ban commercial uses in the Central Arroyo except for Rose Bowl Stadium Displacement Events and ancillary

2. Response to Comments

activities, and Music and Arts Festivals, both of which are temporary uses. The permanent commercial use of the Golf Courses pursuant to this proposed Project for the admitted purpose of maximizing RBOC net profit may violate this provision against commercial uses. This matter requires further CEQA study and analysis, particularly since the City proposes that a Conditional Use Permit must be obtained for the proposed Project which would not be appropriate or if the proposed Use(s) is/are not legally permitted.

Further, the Golf Course section of the Ordinance provides that: *Any new permanent structure or alteration of existing structures shall be subject to the hearing procedures of Section 3.32.180.* The required Hearing is before the Parks and Recreation Commission of the City of Pasadena, with a recommendation required to be forwarded to the Pasadena City Council. All construction plans and landscaping plans are required to be reviewed by the City's Design Commission. O5-5

In that the MND and supporting Reports and Studies omit any reference to and any study and analysis of the Arroyo Seco Public Lands Ordinance, the MND is legally Inadequate.

<u>Use of a "Mitigated Negative Declaration" as the Method of CEQA Study and Analysis for the Proposed Project is legally Inadequate. Since it is Apparent that the Proposed Project Will Result in a Number of Significant Environmental Impacts, a Focused, Project-Level Environmental Impact Report (EIR) Should Have Been Prepared and Circulated.</u>

The MND utilized for the proposed Project is minimal, in error, and incomplete, and fails to legally Adequately mitigate obvious potential significant environmental impacts of the proposed Project as discussed above.

In addition, and most importantly, an MND does not enable and allow for essential study and review of matters requiring public review as to the proposed Project including: Alternatives to the proposed Project including the Environmentally Superior Alternative, full consideration of impacts to Sensitive Receptors, and Cumulative Impacts. For example, it is suggested that the Miniature Golf part of the proposed Project be relocated to an area adjacent to Kidspace and that the activity be a joint project of both the RBOC and Kidspace. This Alternative should receive full study and review under CEQA in LVAA's opinion. Another example of Alternatives that should receive full study and review under CEQA is to require that the hours of operation of the proposed Project coincide with the Golf Course hours of operation, or close earlier than 10::00 P.M. O5-6

Page **6** of **7**

The MND for this proposed Project should be withdrawn, and a focused, project-level EIR prepared with a full analysis of the proposed Project that fully and Adequately informs the public of all potential significant environmental impacts. As part of this revised CEQA process, broad and robust public participation should be encouraged and engaged in, including holding several CEQA Scoping meetings. Scoping was completely overlooked as part of the proposed Project MND process. O5-6

Thank you for your attention to our comments and concerns.

Sincerely,

/s/ Nina Chomsky

Nina Chomsky,
LVAA President,
nrchomsky@aol.com
president@lvaa.net
(626) 795-1967

cc: LVAA Board of Directors

Page **7** of **7**

2. Response to Comments

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O5. Response to Comments from Nina Chomsky of Linda Vista-Annandale Association, submitted via email March 3, 2023.

O5-1 This comment states that the IS/MND does not provide a stable and "finite" description of the Project and cites case law for the stopthemillenniumhollywood.com v City of Los Angeles. Comparison of the Project analyzed in the IS/MND to the case law cited is not comparable here, where that project included a land use equivalency review in a project description with multiple scenarios. That is not applicable here. While the commenter asserts there is misleading and insufficient information, they provide no specific detail or information that is lacking or is contradictory in nature. The Project evaluates a conceptual site plan, a project site for which all potential activities would occur, operational details, and construction information. While there is not a "final approved design" available at the time the IS/MND was prepared, nor does CEQA require such, all components of the Project have been adequately disclosed and properly evaluated. In lieu of having a "final approved design," the IS/MND appropriately analyzes what the maximum extent of physical impacts to the environment would be from Project implementation. The scope and details of the Project are clearly detailed and sufficient for which to inform the public, conduct a comprehensive analysis, and impose mitigation measures where necessary.

Regarding tree removals, the IS/MND appropriately determines a maximum extent of physical impacts associated with the Project. The IS/MND also details the process for future implementation of the Project, which includes City issuance of a Conditional Use Permit (CUP). As part of the City's process to issue a future CUP, the City will be required to review the IS/MND and make findings that the CEQA review addresses the final design and that all impacts and mitigation measures are appropriate. Approval of this CEQA document does not replace the need for the RBOC to comply with mitigation measures and comply with the various policies and regulatory requirements set forth by the City of Pasadena.

Please also see Topical Response 1, *Unstable Project Description*, regarding the required contents of the Project Description, which in this IS/MND, contains sufficient information to inform the public about all elements of the Project – from design, through construction, and long-term operation – and to adequately analyze environmental impacts of Project implementation and define appropriate mitigation.

O5-2 This comment states that the IS/MND defers mitigation measures and states that the regulatory processes in place that assure City policies and objectives are met, is deferral of mitigation. This is not the case. The processes set forth by the Urban Forestry Advisory Commission (UFAC), City of Pasadena Design Commission, and City Manager are regulatory requirements imposed on this and all projects. Reliance on these requirements, and applying mitigation measures where needed in the event of significant impacts, is appropriate and adequate.

2. Response to Comments

O5-3 This comment states that the IS/MND does not fully study and analyze lighting impacts of the Project as it relates to wildlife, and cites the Central Arroyo Seco as an environmentally sensitive recreational area subject to Rose Bowl Stadium events and activities, and cites the City of Land Use Element goal 10.11 around the balance of land uses and activities. The comment assumes, without basis, there will be a permanent night glow resulting from the Project, and implies that this is a natural area that is devoid of lighting in the existing condition. On the contrary, there is lighting throughout the Central Arroyo, associated with the Rose Bowl Stadium, the Rose Bowl Loop, the parking lots, the Rose Bowl Aquatic Center, the numerous Jackie Robinson sports fields, and other uses. It is the most highly activated recreational area in Pasadena, including for evening events. Additionally, there are a multitude of events that occur throughout the year at the Rose Bowl Stadium and Brookside Golf Course itself, which include substantial event lighting.

As demonstrated in the IS/MND, the Project applies the appropriate threshold used for all projects in the City of Pasadena, including other projects in the Central Arroyo. In this case, the Project would have a significant impact on neighboring areas if the site lighting produces an illuminance of greater than 1.0 foot-candle on any residential property. The lighting assessment included in the IS/MND demonstrates that the light loss spill factor would be 0.95, less than the 1-foot candle threshold, at the property line – and will not be lit all night, as implied by the comment. Given the precise lighting specifications are not known at this time (nor required to be known), the IS/MND requires a quantified, measurable mitigation measure with performance standards in place that must be met *before* lighting is installed (see mitigation measure AES-1). Additionally, there is a discussion regarding impacts to wildlife from lighting which is addressed beginning on page 45 of the IS/MND, and mitigation measure BIO-2 is required in order to reduce potential lighting impacts. The RBOC must, through adoption of this mitigation measure, enforce and demonstrate compliance and will do so as the Lead Agency for this project. The commenter has no basis to assume that the RBOC will not enforce the mitigation measures it adopts. Please also see Topical Response 2, *Lighting*, regarding the City's lighting regulations and how the Project complies with all policies regarding lighting, and requires additional mitigation measures to ensure impacts associated with lighting would be less-than-significant. As such, the IS/MND includes a well-supported impact assessment (including appropriate performance-based mitigation) to ensure that impacts related to lighting would be less than significant.

In addition, please see Topical Response 4, *Land Use and Planning*, regarding how implementation of the Project would comply with the Arroyo Seco Master Plan and the Arroyo Seco Public Lands Ordinance.

O5-4 This comment states that the project does not adequately analyze noise and lighting impacts that could result from the Project. Please see response to comment O5-3 above, Topical Response 2, *Lighting*, and Topical Response 5, *Noise,* regarding the City's lighting and noise regulations and how the Project complies with required policies and regulations

and sets forth appropriate enforceable mitigation measures where appropriate. With respect to noise, it is worth noting that Project involves a continuation of the same golf uses that have occurred on the site for decades – there is no change in use. It is a golf project on an existing golf course.

O5-5 This comment states that the Project fails to consider and apply the Arroyo Seco Public Lands Ordinance. Please see Topical Response 4, *Land Use and Planning*, regarding how implementation of the Project would comply with the Arroyo Seco Master Plan and the Arroyo Seco Public Lands Ordinance.

O5-6 This comment states that the use of a MND for the Project is inadequate, and instead the RBOC should prepare and Environmental Impact Report (EIR). All issues raised by the commenter have been thoroughly addressed in the responses herein and there remains no credible evidence that the Project, which includes improvements to the existing driving range serving an existing golf demand, and a miniature golf course entirely within the limits of the existing golf course on one acre, would result in significant unavoidable impacts. In accordance with CEQA Guidelines Section 15070, a mitigated negative declaration can be prepared when a lead agency, the RBOC in this case, has identified potentially significant effects on the environment, but (1) revisions in the project plans or proposals made by, or agreed to by, the applicant before the proposed negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur, and (2) there is no substantial evidence in light of the whole record before the public agency that the project, as revised, may have a significant effect on the environment.

All potentially significant impacts have been adequately disclosed, addressed and mitigated. Therefore, the IS/MND remains the appropriate level of environmental documentation for the Project.

2. Response to Comments

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COMMENT O6 - Tim Martinez (Arroyo & Foothills Conservancy) (6 pages)

Arroyos & Foothills
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Jenessa Castillo, Interim Chief Operations Officer
1001 Rose Bowl Drive
Pasadena, CA 91103
March 3, 2023

Re: Comments to Brookside Golf Course Improvements Project

The Brookside Golf Course Improvement Project proposes to reorient and expand the existing driving range and construct a new miniature golf facility within the existing driving range area at the Brookside Golf Course. The Initial Study/Mitigated Negative Declaration, released in January 2023, does not adequately consider impacts on wildlife that will result from the construction and establishment of these further developments in the Arroyo.

The Arroyos & Foothills Conservancy (AFC) is a non-profit organization dedicated to preserving undeveloped areas of the western San Gabriel Valley, and Crescenta Valley, and eastern San Fernando Valley to support long-term wildlife population connectivity. AFC recognizes the desire for the RBOC to increase revenue. However, the Brookside Golf Course Improvement Project will cause further disruption to wildlife movement in the Arroyo Seco, already impacted by the development in the area.

Effects of Lighting on Wildlife O6-1

The Initial Study MND states that "LED lighting would be individually adjustable to ensure proper direction and avoidance of light spill into surrounding neighborhoods."

"The driving range and miniature golf course would be open to the public between 6:00 a.m. and 10:00p.m. seven days a week (no change to golf course operation). Lighting could be on from dusk until closing, with lighting levels dimmed significantly (i.e., reduced to 75 percent illumination) to allow for limited cleaning/staff needs after closing."

The effects of outdoor lighting and LED lighting on wildlife species, habitats and biodiversity should be further evaluated. We recommend that mitigation measures to reduce the environmental effects of lighting on species and habitats consider four major attributes that have been identified by Travis Longcore, Assistant Professor at the USC School of Architecture, as important to reducing environmental effects of lighting on species and habitats: direction, duration, intensity, and spectrum.[1]

Effects of Noise on Wildlife

[1]Longcore, Travis. (2018). Hazard or Hope? LEDs and Wildlife. LED Professional Review. 70. 52-57. 06-2

2. Response to Comments

Section 3.13 of the DEIR states that "Noise associated with these additions would be similar to existing noise sources (e.g., voices, club to ball impact noise, and maintenance noise associated with the driving range). The nearest receptors to the site are single-family homes approximately 440 to 900 feet to the east and west, respectively, from the edge of the Project Site. Lastly, the Project would not include any sound amplification. At that distance, noise levels from unamplified noise sources would substantially attenuate and would not significantly increase noise levels above existing conditions. Therefore, impacts would be less than significant." O6-2

Environmental noise and vibrations are critical to the development and behaviors of many species (Hill 2001). The project should consider the impacts of noise on wildlife passing through the Brookside Golf Course and the Arroyo Seco Channel during operational hours, and along or below the Arroyo slopes, which, according to the Overriding Design Principles of the Arroyo Seco Design Guidelines, should be maintained as "continuous transitions of natural habitat as a wildlife corridor that connects Pasadena's Arroyo Seco to the larger Arroyo Seco Watershed and the San Gabriel foothills."

The Arroyo Seco Is a Wildlife Corridor

The "Surrounding Land Uses and Setting" section on page 19 should include description of the Arroyo Seco as a wildlife corridor. (See map of wildlife corridor from the Arroyo to Cottonwood Canyon[2] on the last page of these comments). O6-3

Biological Resources

Section 3.4, Biological Resources, states that "The golf course vegetation is highly landscaped and regularly maintained and does not support sensitive species."

Does this statement take into consideration the hundreds of beneficial insect and bird species[3] supported by the 81 trees surveyed in the Brookside Golf Course Improvement project Tree Report, including the impacts of removing up to forty-seven (47) of the protected trees and the sixteen (16) trees that could be encroached upon according to the current project description to accommodate project construction?

Mitigation Measures MM-BIO-1 and MM-BIO-2 only describe conducting a nesting bird survey by a qualified biologist prior to construction activities, but do not address the impact of habitat loss that would occur from up to 47 tree removals and impacts to 16 other trees. These measures also do not describe any mitigation for lost habitat. The replacement ratio for trees removed must be identified and be robust enough to truly mitigate the impact of removing mature trees currently providing habitat. O6-4

Page 48 states that "…the ultimate design of the Project would be developed at a later date depending on timing of funding. Therefore, the final number of trees that would require removal or relocation is dependent on the final boundaries of the Project."

How can the project be exempt from CEQA and the impacts be considered less than

[2] https://arroyosfoothills.org/land/pasadena/cottonwood-canyon/

[3] https://www.pasadenaaudubon.org/?q=street-tree-plan

significant with mitigation if the ultimate project design and mitigation measures have not been developed yet? The project's CEQA exemption is irresponsible given that the full scope of impact has not been truly assessed and will not be able to be identified until a later date. O6-4

Central Arroyo Master Plan

Section 4.5 LANDSCAPE AND AESTHETIC IMPROVEMENTS of the Central Arroyo Master Plan recommends:
- Identifying areas for native plant restoration including the Brookside Golf Course.
- Developing a tree-planting program and plant up to 100 trees native to the Arroyo Seco in the Central Arroyo area including stream course restoration areas.

The removal and disturbance of up to 63 protected trees and the installation of additional hardscape and artificial turf, as described on page 10 of the Initial Study MND seem to conflict with the above goals in the Central Arroyo Master Plan. O6-5

Section 4.7 FLOOD PROTECTION recommends that the City of Pasadena "Work with the County to complete a plan that will (naturalize) stream courses where feasible" including consideration of a low-flow stream through the golf course.

The proposed miniature golf course project would be directly adjacent to the Arroyo Seco Channel, seemingly precluding future possibility of Arroyo Seco stream restoration through the area. This conflicts with the above recommendations and directives in the Central Arroyo Seco Master Plan and should be considered.

Arroyo Seco Design Guidelines

Section 1.5.3 Project Design, on page 15 of the Initial Study MND states that: "The process would also specifically ensure that the policies and objectives of the Arroyo Seco Design Guidelines (City of Pasadena, 2003) are reflected in the design."

The above claims that the project will follow the Arroyo Seco Design Guidelines seems to conflict with the goal of "Restoration of the Arroyo Seco Stream Course and Environment" on page 1-1 of the Design Guidelines by the placement of the miniature golf course directly adjacent to the Arroyo Seco Channel. As already stated, this would seem to preclude restoration of the Arroyo Seco Stream and should be considered. O6-6

The project also seems to conflict with the following general guiding principles are at the core of each of the specific guidelines developed for the Arroyo Seco and its environment:
- Limit the creation of man-made objects and minimize any impact to the natural environment.
- Restore the Arroyo Seco stream course and its environment; Avoid use of colors that distract from the natural environment;
- Use natural materials O6-7

The hardscape, structures, tree removals, and installation of artificial turf would increase man-made objects within the Arroyo Seco, impact the natural environment, introduce synthetic materials and preclude restoration of this section of the Arroyo stream course. All of this should be considered.

2. Response to Comments

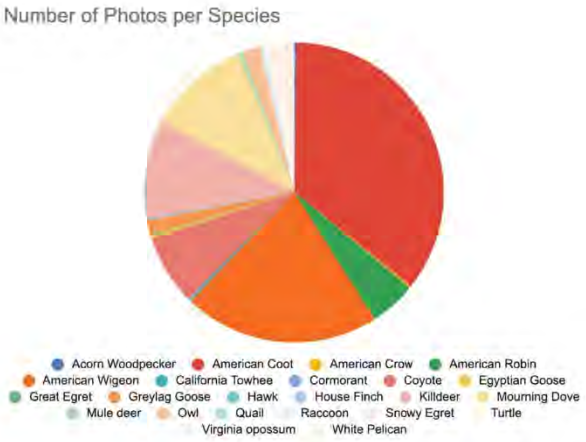
Conclusions:

The Brookside Golf Course Improvements Project should take into consideration the cumulative effects of LED lighting, noise, and duration of operating hours on wildlife utilizing the Arroyo Seco as a wildlife corridor. The project does not adequately consider the impacts of tree removals to wildlife, including beneficial insects, pollinators, and birds. It should outline mitigation measures for any tree removals, including the ratio of tree replacement. Finally, the project should seek to reconcile its apparent conflicts with the stated goals and recommendations of the Central Arroyo Seco Master Plan and the Arroyo Seco Design Guidelines to *increase* the number of trees in the Central Arroyo, and to restore a natural stream course prior to moving forward with project design and approval. O6-8

Respectfully submitted,

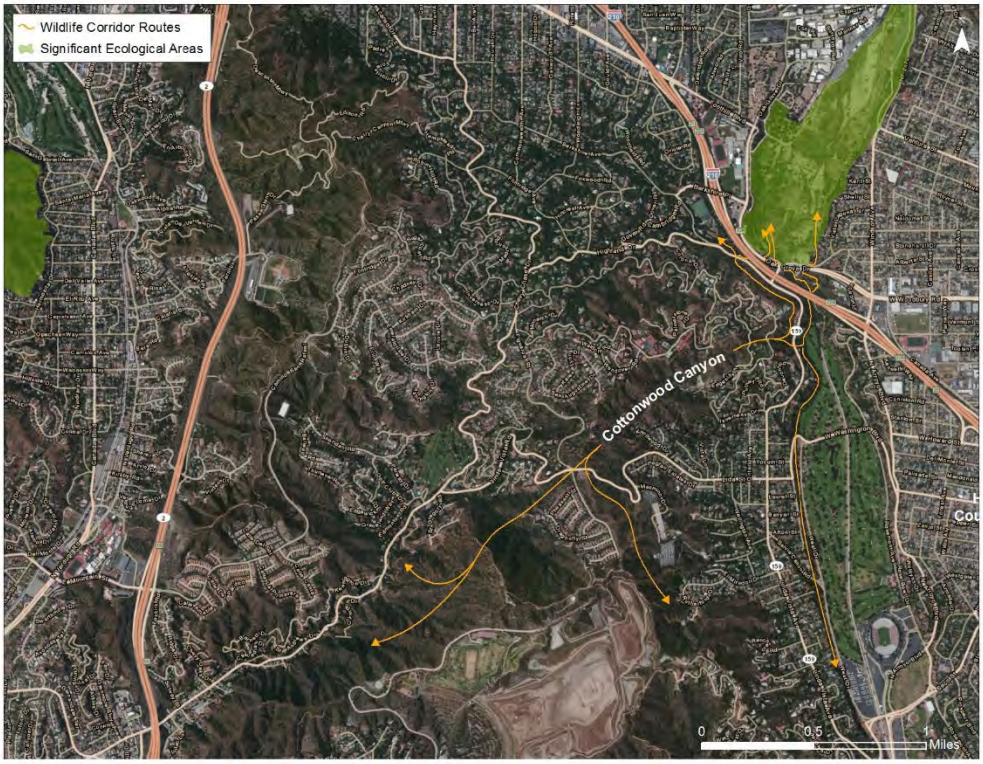
Tim Martinez, Land Manager and Community Liaison
Auxenia Grace Privett-Mendoza, Program Director
Arroyos & Foothills Conservancy

Graph Depicting Number of Identifications from 2020-2022 at Brookside Golf Course; Canada Geese excluded because it obscures the data.



Species	SUM of Count
Acorn Woodpecker	2
American Coot	334
American Crow	2
American Robin	47
American Wigeon	198
Bird	5900
California Towhee	2
Canada Goose	8699
Cormorant	1
Coyote	71
Domestic dog	1
Egyptian Goose	3
Empty	0
FIX	1
Great Egret	1
Greylag Goose	15
Hawk	1
House Finch	1
Human	426
Killdeer	99
Mourning Dove	105
Mule deer	4
Owl	18
Quail	1
Raccoon	5
Snowy Egret	2
Turtle	1
Unknown	31
Virginia opossum	1
White Pelican	25

2. Response to Comments



O6. Response to Comments from Tim Martinez of the Arroyo & Foothills Conservancy, submitted via email March 3, 2023.

O6-1 This comment states that that the IS/MND does not adequately consider impacts to wildlife in the Arroyo Seco. The commenter states that the proposed outdoor lighting and LED lighting will have a negative effect on wildlife species and habitats. The commenter recommends that additional mitigation measures should be considered for the Project, and should consider direction, duration, intensity, and spectrum of the proposed lighting to reduce impacts on wildlife. As demonstrated in the IS/MND, the Project applies the appropriate threshold used for all projects in the City of Pasadena, including other projects in the Central Arroyo. In this case, the Project would have a significant impact on neighboring areas if the site lighting produces an illuminance of greater than 1.0 foot-candle on any residential property. The lighting assessment included in the IS/MND demonstrates that the light loss spill factor would be 0.95, less than the 1-foot candle threshold, at the property line. Given the precise lighting specifications are not known at this time (nor required to be known), the IS/MND requires a quantified, measurable mitigation measure with performance standards in place that must be met before lighting is installed (see mitigation measure AES-1). As described in mitigation measure AES-1, upon design of the Project, including both miniature golf and the driving range, RBOC will prepare a quantified lighting study, which would consider the four lighting attributes described in "Hazard or Hope? LEDs and Wildlife" by Travis Longcore, including direction, duration, intensity, and spectrum, to ensure that the Project would not result in additional environmental impacts. Additionally, there is a discussion regarding impacts to wildlife from lighting which is addressed beginning on page 45 of the IS/MND, and mitigation measure BIO-2 is required in order to reduce potential lighting impacts. The RBOC must, through adoption of this mitigation measure, enforce and demonstrate compliance and will do so as the Lead Agency for this project. Please also see Topical Response 2, *Lighting*, regarding the City's lighting regulations and how the Project complies with all policies regarding lighting, and requires additional mitigation measures to ensure impacts associated with lighting would be less-than-significant. As such, the IS/MND includes a well-supported impact assessment (including appropriate performance-based mitigation) to ensure that impacts related to lighting would be less than significant .

O6-2 This comment states that the Project should consider noise impacts to wildlife that pass through the Arroyo Seco and Brookside Golf Course during operation of the driving range and miniature golf course. Please Topical Response 5, *Noise,* regarding the City's noise regulations and how the Project complies with required policies and regulations. No amplified sound is proposed for the Project. The Project involves a continuation of the same golf uses that currently occur on the Project Site. Therefore, operational noise and vibration levels would be similar to existing conditions.

O6-3 The commenter states that the "Surrounding Land Uses and Setting" section should include a description of the Arroyo Seco Wildlife Corridor. This description is included

in Section 3.4, Biological Resources, of the IS/MND. As stated on page 46, the Arroyo Seco channel, which would be located along the western edge of the Project Site, could serve as a suitable corridor for native resident wildlife to move through the area, particularly medium to large mammals such as coyote, bear, deer, and mountain lion. Therefore, no revisions to the IS/MND are necessary.

O6-4 This comment states that this comment does not adequately address impacts of habitat loss that would occur from the removal of trees within the Project Site. Additionally, the commenter questions how Project impacts can be considered less than significant if the ultimate Project design has not been fully developed yet. As discussed in Appendix C, Biological Resources Assessment, while the databases identified species have been previously documented within or in close proximity to the survey area (most in the early- to mid-1900's), in its current state, suitable habitat within the Project Site is not present. As such, since the Brookside Golf Course includes landscaped vegetation, developed land uses, and unvegetated concrete-lined channel, the Project Site would not be considered a natural habitat. Additionally, as discussed on page 45 of the IS/MND, implementation of Measures MM-BIO-1 would ensure avoidance of impacts to nesting birds during construction as well as any potential indirect impacts that may be created by the Project. A qualified biologist will conduct a nesting bird survey within 3 days prior to the proposed start date, to identify any active nests within 500 feet of the Project Site. If an active nest is found, the nest shall be avoided, and a suitable buffer zone shall be delineated in the field such that no impacts shall occur until the chicks have fledged the nest as determined by a qualified biologist. Please see Topical Response 3, *Tree Removal and Wildlife*, regarding the procedures that would be taken by the RBOC to minimize potential impacts to wildlife within the Project Site.

In regards to the commenter's question about the ultimate design of the Project, the Project evaluates a conceptual site plan, a project site for which all potential activities would occur, operational details, and construction information. While there is not a "final approved design" available at the time the IS/MND was prepared, nor does CEQA require such, all components of the Project have been adequately disclosed and properly evaluated. In lieu of having a "final approved design," the IS/MND appropriately analyzes what the maximum extent of physical impacts to the environment would be from Project implementation. The scope and details of the Project are clearly detailed and sufficient for which to inform the public, conduct a comprehensive analysis, and impose mitigation measures where necessary.

Regarding tree removals, the IS/MND appropriately determines a maximum extent of physical impacts associated with the Project. The IS/MND also details the process for future implementation of the Project, which includes City issuance of a Conditional Use Permit (CUP). As part of the City's process to issue a future CUP, the City will be required to review the IS/MND and make findings that the CEQA review addresses the final design and that all impacts and mitigation measures are appropriate. Approval of this

CEQA document does not replace the need for the RBOC to comply with mitigation measures and comply with the various policies and regulatory requirements set forth by the City of Pasadena.

Please also see Topical Response 1, *Unstable Project Description*, regarding the required contents of the Project Description, which in this IS/MND, contains sufficient information to inform the public about all elements of the Project – from design, through construction, and long-term operation – and to adequately analyze environmental impacts of Project implementation and define appropriate mitigation.

O6-5 This comment states that the removal of trees within the Project Site and implementation of hardscape and artificial turf conflict with the Central Arroyo Master Plan. As stewards of the Brookside Golf Course and the over 1,400 trees that have been planted, relocated, or removed; the RBOC as a matter of practice, works in close cooperation with the City's Urban Forestry Advisory Committee (UFAC), Planning and Community Development Department, and City Manager, who has ultimate approval authority for removal of any trees. The RBOC must and will continue in that management role, particularly to protect public safety regarding unsafe or dying trees, regardless of whether the Project is ultimately approved. Please see Topical Response 3, *Tree Removal and Wildlife*, regarding the procedures that would be taken by the RBOC to minimize potential impacts to trees within the Project Site.

O6-6 This comment states that implementation of the miniature golf course adjacent to the Arroyo Seco Channel would impede future Arroyo Seco stream restoration through the area, which would conflict with the Arroyo Seco Master Plan and the Arroyo Seco Design Guidelines. As described on page 80 of the IS/MND, the Arroyo Seco channel, a subgrade concrete-lined feature, crosses the Brookside Golf Course and forms the western boundary of the reoriented driving range. However, the Project would not require any construction within the channel, and would not result in indirect impacts to the channel. The increase in bays within the proposed driving range, as well as limited new impervious features associated with the miniature golf course, would result in an increase of impervious surfaces and would be similar to current conditions. Implementation of the Project, include the miniature golf course, would not impede any future restoration within the Arroyo Seco channel. Therefore, no revisions to the IS/MND are necessary.

O6-7 This comment states that the Project would conflict with the Arroyo Seco Design Guidelines of limiting construction of man-made objects, through the implementation of hardscape, structures, tree removal, and installation of artificial turf. The golf course area is not a wild and natural space, nor has it been for nearly 100 years. Implementation of the Project involves a continuation of the same golf uses that have occurred on the site for decades – there is no change in use; therefore, implementation of the Project would result in similar structures and objects that are currently located on the Project Site.

2. Response to Comments

O6-8 This comment summarizes the concerns raised in the previous comments. Please see responses O6-1 through O6-7.