



BROOKSIDE GOLF COURSE IMPROVEMENTS PROJECT

INITIAL STUDY/MITIGATED NEGATIVE DECLARATION RESPONSE TO COMMENTS

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BROOKSIDE GOLF COURSE IMPROVEMENTS PROJECT

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1. Introduction

1.1 BROOKSIDE GOLF COURSE IMPROVEMENTS PROJECT

The Rose Bowl Operating Company (RBOC) proposes the implementation of the Brookside Golf Course Improvements Project (Project) to reorient, expand the existing driving range, and construct a new miniature golf facility within the existing driving range area at the Brookside Golf Course (or golf course). Project improvements would occur on approximately 16 acres within the existing driving range, Hole 10 of the C.W. Koiner Course, and Holes 6 and 7 of the E.O. Nay Course (Project Site). The Project consists of two main components within the 16-acre Project Site: (1) reorient and expand the existing driving range toward the north; and (2) develop a new miniature golf course adjacent and west of the expanded driving range.

1.2 INITIAL STUDY/MITIGATE NEGATIVE DECLARATION

An Initial Study (IS) was prepared for the Project and concluded that there will be less than significant impacts on the environment with the incorporation of mitigation measures; therefore, a mitigated negative declaration (MND) was prepared. Possible impacts on Aesthetics (Lighting), Biological Resources, Cultural Resources, Tribal Cultural Resources, and Mandatory Findings of Significance were identified in the IS and mitigated to a less than significant level. This document includes the public comments received on the IS/MND as well as the RBOC's responses to those comments.

Under the California Environmental Quality Act (CEQA) (Public Resources Code, Division 13, Sections 21000 et seq.) and the CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000 et seq.), a lead agency has no affirmative duty to prepare formal responses to comments on an MND. The lead agency, however, should have adequate information on the record explaining why the comments do not affect the conclusion of the MND. In the spirit of public disclosure and engagement, the RBOC—as the lead agency for the Project—has responded to all written and verbal comments submitted during the public review period.

1.3 RESPONSE TO COMMENTS DOCUMENT FORMAT

This document is organized as follows:

Section 1, *Introduction*. This section describes CEQA requirements and content of this document. Additionally, this section describes the public engagement and community outreach that was conducted for the Project.

Section 2, *Response to Comments*. This section provides a list of organizations and interested persons commenting on the Initial Study/Mitigated Negative Declaration (IS/MND); copies of comment letters received during the public review period; summary of verbal comments; and topical and individual responses

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to written and verbal comments. References to “Comment letters” or “written comments” as used herein refers to any written communication, including emails, letters, and comment cards. References to “Verbal comments” as used herein refers to verbal comments provided at the community informational meeting on February 13, 2023, and the RBOC board meeting on March 2, 2023. To facilitate review, each comment letter has been reproduced and assigned a number—R-1 through R-48 for comment letters *and* verbal comments received from residents and interested parties, and O-1 through O-14 for comment letters received from local organizations. Individual comments have been numbered for each letter, and the letter is followed by responses with references to the corresponding comment number.

Section 3, *Revisions to the IS/MND*. This section contains revisions to the IS/MND text and figures as a result of the comments received by organizations and interested persons as described in Section 2, and/or to correct any minor errors and omissions discovered subsequent to release of the IS/MND for public review.

- **Attachment A, *Informational Community Meeting Presentation*.** This appendix contains the presentation materials from the Informational Community Meeting on February 13, 2023.
- **Attachment B, *Historic Photographs of Brookside Golf Course*.** This appendix contains photographs of the existing conditions on the Brookside Golf Course from previous decades.
- **Attachment C, *Existing Light at Brookside Golf Course*.** This appendix contains photographs of existing lighting conditions at the Project Site and Brookside Golf Course parking lots.
- **Attachment D, *Potential Location of Trees to Be Removed*.** This appendix contains the anticipated locations of trees that would be removed for the Project.
- **Attachment E, *Parking Lot Locations and Improvements*.** This appendix contains an illustration of proposed parking improvements as a result of the Project.

1.4 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines Section 15204(b) outlines parameters for submitting comments on MNDs and reminds persons and public agencies that the focus of review and comment should be “on the proposed finding that the project will not have a significant effect on the environment.” If the commenter believes that the project may have a significant effect, it should: (1) Identify the specific effect, (2) Explain why they believe the effect would occur, and (3) Explain why they believe the effect would be significant.

Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate potentially significant environmental effects. At the same time, reviewers should be aware that the adequacy of an MND is determined in terms of what is reasonably feasible.

Section 15204(d) also states, “Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency’s statutory responsibility.” Section 15204(e) states, “This

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section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.”

Finally, CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. Written responses to comments are not required for MNDs; however, the RBOC understands the importance of this Project to the community and therefore is choosing to respond in writing to received comments. When responding to comments, lead agencies need only respond to potentially significant environmental issues; they do not need to provide all information requested by reviewers or respond to nonenvironmental comments as long as a good-faith effort at full disclosure is made in the environmental document.

1.5 PUBLIC ENGAGEMENT

Notice of Intent to Adopt a Mitigated Negative Declaration. Per CEQA Guidelines Sections 15072 and 15073, after preparation of an IS, the RBOC determined that an MND would be appropriate for the Project and circulated a Notice of Intent (NOI) to Adopt a Mitigated Negative Declaration. The public review period for the IS/MND was from January 13, 2023, to March 3, 2023. This was a 45-day public comment period which exceeds the 30-day minimum review for projects submitted to State Clearinghouse set forth in CEQA Guidelines Section 15073(b). Public notification of the IS/MND included the following methods.

- NOI sent to addresses within 500 feet of the Brookside Golf Course — 531 owner/occupant mailings.
- NOI sent to 74 state and local agencies and 2 Native American tribes.
- Emailed notification to the RBOC interested parties distribution list, consisting of over 1,200 recipients.

1.5.1 Document Availability

The NOI and IS/MND were available for review at the following locations:

- Rose Bowl Administration Office, 1001 Rose Bowl Drive, Pasadena, CA 91103
- RBOC’s webpage at <https://rosebowlstadium.com/public-notices>
- CEQAnet Web Portal: <https://ceqanet.opr.ca.gov/2023010324>

1.5.2 Community Outreach

During preparation of the IS/MND, the RBOC led 11 community informational meetings (see Attachment A for more details). In addition, over 42,000 emails were sent to golfers and residents in the Rose Bowl campus databases. An informational community meeting to take comments on the IS/MND was held on February 13, 2023, at the Brookside Golf Course, Mediterranean Room, 1133 Rosemont Avenue, Pasadena, CA 91103, at 5:00 pm and was noticed in the NOI as distributed above. The meeting included an overview of the IS/MND and gave agencies, organizations, and residents the opportunity to make verbal and written comments on the Project and the IS/MND. Approximately 71 people attended, 17 individuals made verbal comments, and

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2 submitted comments cards during the meeting. Attachment A to this document includes the presentation materials that were shared during that meeting. On March 2, 2023 (and also during the public comment period), the Project was presented as an informational item at the publicly noticed RBOC board meeting. Four individuals provided verbal comments during this meeting.

During the public review period, 41 letters and emails were received from local residents and organizations providing comments on the Project and the IS/MND (see Table 1, *Written Comments Submitted*, and Table 2, *Verbal Comments Submitted*). Summaries and responses to the written and verbal comments can be found in Section 2.2, *Responses to Written and Verbal Comments*, below.

1.6 NEED FOR RECIRCULATION OF AN MND PRIOR TO ADOPTION

Section 15073.5(a) of the CEQA Guidelines states that a lead agency is required to recirculate an IS/MND when the document must be substantially revised after public notice of its availability has previously been given pursuant to Section 15072, but prior to its adoption. Notice of recirculation shall comply with Sections 15072 and 15073. A “substantial revision” of the IS/MND refers to the following:

1. A new, avoidable significant effect is identified and mitigation measures or project revisions must be added in order to reduce the effect to insignificance, or
2. The lead agency determines that the proposed mitigation measures or project revisions will not reduce potential effects to less than significance and new measures or revisions must be required.

The IS/MND would not be required to be recirculated under the following circumstances:

1. Mitigation measures are replaced with equal or more effective measures pursuant to Section 15074.1.
2. New project revisions are added in response to written or verbal comments on the project’s effects identified in the proposed negative declaration which are not new avoidable significant effects.
3. Measures or conditions of project approval are added after circulation of the negative declaration which are not required by CEQA, which do not create new significant environmental effects and are not necessary to mitigate an avoidable significant effect.
4. New information is added to the negative declaration which merely clarifies, amplifies, or makes insignificant modifications to the negative declaration.

As a result of the comments received and revisions made in this document, the RBOC has determined that the requirements in Section 15073.5 are not met and that recirculation of the IS/MND is not required. The analysis and conclusions in the IS/MND demonstrate substantial evidence in light of the whole record that the Project would not have a significant effect on the environment.

2. Response to Comments

As described above, an IS/MND analyzing and disclosing potential environmental effects resulting from the Project was prepared and circulated for public review from January 13, 2023, to March 3, 2023. The RBOC's responses to the comments on the IS/MND represent a good-faith, reasoned effort to address the environmental issues identified by the comments.

Table 1, *Written Comments Submitted*, and Table 2, *Verbal Comments Submitted*, list the individuals and organizations that provided written or verbal comments on the IS/MND during the 45-day public review period, and the dates that the comments were received. In total, 39 comment letters or emails and 2 comment cards were received; 17 individuals provided verbal comments during the public informational meeting on February 13, 2023; and 4 individuals provided verbal comments at the RBOC board meeting on March 2, 2023.

Table 1 Written Comments Submitted

Comment #	Commenter	Date Received
Residents		
R1	Lawrence Deady	January 31, 2023
R2	John Landis	February 13, 2023
R3	John Landis	February 13, 2023
R4	Andrea Bland	February 13, 2023
R5	Megan Foke	February 14, 2023
R6	Brian Elerding	February 14, 2023
R7	John Callas	February 14, 2023
R8	Mary Bucci Bush	February 14, 2023
R9	Petrea Burchard	February 14, 2023
R10	William Morris	February 14, 2023
R11	William Morris	February 15, 2023
R12	Vicki Livingstone	February 15, 2023
R13	Susan Whichard	February 16, 2023
R14	Jill Sigler	February 16, 2023
R15	Patricia Crook	February 18, 2023
R16	James Treidler	February 18, 2023
R17	Jennifer Jacobs	February 18, 2023
R18	Ellen G. Strauss	February 26, 2023
R19	Maureen Hosp	March 1, 2023
R20	Frank Clem	March 1, 2023
R21	Nancy Gadel	March 1, 2023

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Table 1 Written Comments Submitted

Comment #	Commenter	Date Received
R22	Patty Montbriand	March 1, 2023
R23	Patrick Feely	March 2, 2023
R24	Geoff Bland	March 2, 2023
R25	Irena Petrack	March 2, 2023
R26	Susan Burns	March 2, 2023
R27	Michael Clayton	March 2, 2023
R28	Carlos Chacon	March 2, 2023
R29	Allen Gharapetian	March 2, 2023
R30	Laura Burke	March 3, 2023
R31	Marcus Renner	March 3, 2023
R32	Marie Levine	March 3, 2023
R33	Arnold Siegel	March 3, 2023
R34	Adry Furchtgott	March 3, 2023
Organizations		
O1	Evan Davis (West Pasadena Residents Association)	February 23, 2023
O2	Geoffrey Baum (West Pasadena Residents Association)	February 23, 2023
O3	Robert Baderian (First Tee)	March 2, 2023
O4	Greg King (Pasadena Beautiful)	March 3, 2023
O5	Nina Chomsky (LVAA)	March 3, 2023
O6	Tim Martinez (Arroyo & Foothills Conservancy)	March 3, 2023
O7	Tim Brick (Arroyo Seco Foundation)	March 3, 2023

Table 2 Verbal Comments Submitted

Comment #	Commenter	Date Received
Residents		
R35	Nina Chomsky	February 13, 2023
R36	Bill Fennessy	February 13, 2023
R37	Doug Philbin	February 13, 2023
R38	Craig Kessler	February 13, 2023
R39	Dianne Philibosian	February 13, 2023
R40	Alan Behr	February 13, 2023
R41	Betsy Nathane	February 13, 2023
R42	Mark Whichard	February 13, 2023
R43	Jamie Scott	February 13, 2023
R44	Felix Breden	February 13, 2023

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Table 2 Verbal Comments Submitted

Comment #	Commenter	Date Received
R45	Philip Jespersen	February 13, 2023
R46	Mario	February 13, 2023
R47	Kelly Holmes	February 13, 2023
R48	Patty Brugman	February 13, 2023
Organizations		
O8	Nina Chomsky (Linda Vista-Annandale Association)	February 13, 2023
O9	Pete Ewing (West Pasadena Residents Association)	February 13, 2023
O10	Tim Brick (Arroyo Seco Foundation)	February 13, 2023
O11	Craig Kessler (Southern California Golf Association)	March 2, 2023
O12	Andy Gantner (Linda Vista-Annandale Association)	March 2, 2023
O13	Doug Philbin (Brookside Men’s Golf Club)	March 2, 2023
O14	Geoffrey Baum (West Pasadena Residents Association)	March 2, 2023

2.1 TOPICAL RESPONSES TO COMMENTS

To reduce repetitive responses, this document includes “Topical Responses to Comments” specifically focusing on the concerns raised throughout the IS/MND public review. The topical responses to comments address comments related to general issues that are common throughout several comment letters. The intent of a topical response is to provide a comprehensive response to an issue so that all aspects of the issue are addressed in a coordinated, organized manner in one location, reducing repetition of responses. Main environmental concerns that were raised during the public review period include:

- **Topical Response 1:** Unstable Project Description
- **Topical Response 2:** Impacts Related to Lighting
- **Topical Response 3:** Tree Removal and Wildlife
- **Topical Response 4:** Consistency with the Arroyo Seco Master Plan and Arroyo Seco Public Lands Ordinance
- **Topical Response 5:** Increased Noise
- **Topical Response 6:** Changes to the Brookside Golf Course

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- **Topical Response 7:** Traffic and Parking
- **Topical Response 8:** Alternative Project Design and Location

2.1.1 Topical Response 1: Unstable Project Description

2.1.1.1 SUMMARY OF COMMENTS RECEIVED

Comments received expressed concerns that the Project Description is considered unstable because there is not a final design in the IS/MND. Comments assert that the Project Description is too conceptual and contains insufficient detail from which to conduct an environmental analysis and inform the public. Comments further assert that the RBOC, in serving as the lead agency for its own project, does not meet the requirements in the CEQA Guidelines regarding the amount of information available in the Project Description.

2.1.1.2 RESPONSE TO COMMENTS

The analysis in the IS/MND is based on a comprehensive discussion of details of the Project in Section 1.5, *Description of Project*, of the IS/MND, which reflects the Project as proposed by the applicant, which in this case is the RBOC. Section 15124 of the CEQA Guidelines (specific to an EIR but directly relevant for this purpose) states that a description of the Project should contain the following information but should not supply extensive detail beyond what is needed for evaluation and review of environmental impacts.

- The precise location and boundaries of the proposed project.
- A clear statement of the project objectives.
- A general description of the project's technical, economic, and environmental characteristics.
- A statement briefly describing the intended uses of the environmental document.

As stated on page 1 of the IS/MND, the RBOC seeks to build bureaucratic, public, and financial momentum behind the Project at this time, and to ensure that all environmental concerns of the Project that can be reasonably foreseen and analyzed are properly studied and disclosed now. The Project Description in the IS/MND provides all the details necessary for a thorough and comprehensive environmental impact analysis that meets and exceeds the requirements of CEQA. The location of the Project and boundaries of the Project Site are in Section 1.2.1, *Project Location and Surrounding Uses*. The Project's objectives are stated in Section 1.5.1, *Purpose of Project*. All project components, including the proposed driving range and miniature golf course; Project Site boundaries; and operational details, as well as proposed construction activities, have been adequately described in Sections 1.5.2, *Project Description*; Section 1.5.3, *Project Design*; Section 1.5.4, *Operational Changes*; and Section 1.5.5, *Construction Activities*. And the intended uses of this environmental document are stated in Section 1.6, *Intended Use of the MND, Responsible Agencies, and Project Approvals*.

Though there was not a "final approved design" at the time the IS/MND was prepared, CEQA does not require such, and 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 the maximum extent of physical impacts to the environment from Project implementation. Upon completion of the final Project design, as with any Project approval, the RBOC and the City of Pasadena, through future approval of a Conditional Use Permit

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(CUP), will ensure that the Project description remains within the parameters set in the IS/MND. As part of the City’s process to issue a future CUP, the Project would be subject to the City’s Design Review process, as defined in the Pasadena Municipal Code, to ensure that the findings of the IS/MND address the final design and that all impacts and mitigation measures are appropriate. All components of the Project must be consistent with the Pasadena Municipal Code, and this is discussed in the IS/MND in Section 1.5.3, *Project Design*. 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 of the City of Pasadena.

Specific comments regarding Project components and potential impacts regarding lighting, biological resources, land use consistency, noise, recreation, traffic and parking, and Project alternatives are discussed further in the topical responses below.

By approving the IS/MND now, the RBOC is consistent with CEQA Guidelines Section 15323, which defines “approval” of a project as occurring “upon the earliest commitment to issue or the issuance by the public agency of a discretionary contract, grant, subsidy, loan, or other form of financial assistance, lease, permit, license, certificate, or other entitlement for use of the project.” As stated in the IS/MND and above, the RBOC will commit substantial public funds to the pursuit of the Project now and will use that approval and adoption of the IS/MND to seek additional funds (public and private) necessary to finalize the design and begin construction of the Project. CEQA requires environmental review before a project’s approval, which is not necessarily its final approval, consistent with the definition of “approval” as occurring when the agency *first* exercises its discretion, not when the last discretionary decision is made. In acting now, the RBOC specifically seeks to avoid postponing environmental analysis until after bureaucratic and financial momentum build irresistibly behind the Project, and to complete CEQA early enough to allow for meaningful contribution to public decisions.

Therefore, the IS/MND contains sufficient information to inform the public about all elements of the Project—from design to construction and long-term operation—and to adequately analyze environmental impacts of Project implementation and define appropriate mitigation. Therefore, the Project Description is adequate and stable and meets the requirements of CEQA. No revisions to the IS/MND are necessary.

2.1.2 Topical Response 2: Lighting

2.1.2.1 SUMMARY OF COMMENTS RECEIVED

Comments expressed concerns with potential lighting impacts from the Project. Current operational hours of the existing driving range and golf course are from sunrise to sunset, seven days a week. As stated on page 15 of the IS/MND, the proposed driving range and miniature golf course would be open to the public between 6:00 am and 10:00 pm, seven days a week. Lighting could be on from dusk until closing (not during daytime hours), with lighting levels dimmed significantly (i.e., reduced to 75 percent illumination) to allow for limited cleaning/staff needs after closing. Comments assert that the proposed increase in hours of operation would result in excessive illumination on the Project Site that could potentially have a negative impact on residents and wildlife in the Arroyo Seco, and that there will be a permanent night glow resulting from the Project. Comments further assert that the proposed lighting for the Project was not adequately analyzed and that the

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mitigation measures provided in the IS/MND would not sufficiently mitigate potential lighting impacts of the Project.

Additionally, comments assert that with the implementation of new operational hours for the driving range and miniature golf course, Brookside Golf Course does not provide sufficient lighting to ensure pedestrian safety in areas surrounding the Project Site, including walkways and parking lots.

2.1.2.2 RESPONSE TO COMMENTS

As stated on page 9 of the IS/MND, an estimated 14 of the 56 poles would be light-mounted (at 60 feet in height and, importantly, not at the tops of the poles) on the perimeter of the driving range on the east and west sides and directed at the driving range with leading-edge, light-emitting diode (LED) technology. A detailed analysis of the proposed lighting is discussed beginning on page 26 of the IS/MND, and the analysis appropriately relies on the lighting threshold required by the City of Pasadena Zoning Code Section 17.40.080(a). As described in Section 3.1, *Aesthetics*, of the IS/MND, the Project would comply with Section 17.40.080, Outdoor Lighting, of the Pasadena Municipal Code. Section 17.40.080(a) states:

Lighting shall be energy-efficient, and shielded. Lighting shall be energy-efficient, and shielded or recessed so that direct glare and reflections are confined to the maximum extent feasible within the boundaries of the site, and shall be directed downward and away from adjoining properties and public rights-of-way. No lighting on private property shall produce an illumination level greater than one foot-candle on any property within a residential zoning district except on the site of the light source.

The Project would have a significant impact on neighboring areas if the Project Site lighting produces an illuminance greater than 1 foot-candle on any residential property. However, lighting assessments of a conceptual lighting layout for the driving range, the most substantial element of proposed lighting, indicate that the light loss spill factor would be 0.95, less than the 1 foot-candle threshold, at the property line. Although the proposed driving range poles would have an average pole height of 90.67 feet, lighting on the proposed poles would not be fixed at the top of the poles, but at approximately 60 feet in height. As detailed in the IS/MND, the lighting to be installed would be a leading-edge LED technology with wireless remote-control capability and directionality focused downward to the driving range. The lighting technology would include spill and glare control, high-definition, and precise light targeting capabilities, and all LED lighting would be individually adjustable to ensure proper direction and avoidance of light spill into surrounding neighborhoods.

Lighting on the Project Site, which as part of the existing golf course would continue to be fenced in and actively used for recreational purposes thereby deterring wildlife movement in its current condition, would not further impact the movement of wildlife. The impact of the additional lighting during the limited hours from dusk until the lights are turned off is not expected to significantly impact birds or other wildlife that may occur in this high-use area any more than existing lighting in the activated Central Arroyo or from residential lighting in the adjacent neighborhoods. Additionally, implementation of Mitigation Measure BIO-2 would minimize potential indirect impacts to nesting birds that may utilize ornamental/landscape vegetation on-site and/or wildlife movement along the Arroyo Seco, by requiring nighttime lighting associated with the driving range and miniature golf course to be shielded downward to limit spillage.

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Additionally, with 1 foot-candle or less of lighting, the Project would not result in a permanent glow in the Arroyo Seco. Currently, there is lighting throughout the Central Arroyo associated with the Rose Bowl Stadium, the Rose Bowl Loop, parking lots, the Rose Bowl Aquatic Center, numerous Jackie Robinson sports fields, and other uses. It is the most highly activated recreational area in Pasadena and is illuminated in its current condition. There are a multitude of events that occur throughout the year at the Rose Bowl Stadium and Brookside Golf Course itself that include substantial event lighting. Additionally, though the driving range currently has no lighting, lighting was used on a nightly basis at the driving range from approximately 1968 to 1974. Lighting at the driving range is not a new concept but a return to prior conditions (only with a much more advanced-control lighting system as proposed). The Project would continue golf activities that have occurred along the Arroyo Seco for decades, as shown in Attachment B; therefore, implementation of the proposed lighting at the driving range would not substantially differ from current (or historical) conditions on the Project Site.

Lighting for the Project would be screened from off-site residential receptors by the existing topography, mature vegetation, and the Brookside Clubhouse. The quantified lighting analysis in the IS/MND concludes that the proposed lighting would not exceed the established 1 foot-candle threshold. However, Mitigation Measure AES-1 is required to further ensure the requirements are met. The Brookside Golf Course has a land use and zoning designation of Open Space (OS); thus, the Project would comply with Section 17.40.070, Limited Hours of Operation, of the Pasadena Municipal Code, which allows limited hours of operation for specified land uses, including OS. Section 17.40.070(2) states:

...identified uses may only operate between the hours of 7:00 a.m. and 10:00 p.m. by right; and between the hours of 10:00 p.m. and 7:00 a.m. subject to the issuance of a Conditional Use Permit.

Therefore, implementation of the Project, including the proposed hours of operation of the driving range and lights until 10:00 p.m., would be consistent with the Pasadena Municipal Code.

With respect to public safety in the Project Site and the surrounding areas, Attachment C shows that walkways and parking lots leading to and from the existing driving range provide sufficient lighting to ensure the safety of visitors and staff that exit the Brookside Golf Course after sunset, in current conditions.

There were no specific comments attesting that the threshold employed, the lighting analysis conducted, or the mitigation measures are insufficient. The IS/MND provides a supported analysis of potential lighting impacts and appropriate mitigation. Therefore, the information provided regarding lighting, and the resulting impacts and mitigation, are appropriate and meet the requirements of CEQA. No further analysis or changes to the IS/MND are necessary.

2.1.3 Topical Response 3: Tree Removal and Wildlife

2.1.3.1 SUMMARY OF COMMENTS RECEIVED

Comments expressed concerns with potential impacts to the trees and wildlife as a result of the Project. Comments assert that the removal of several mature trees from the Project Site for the expansion of the driving range and implementation of the miniature golf course would be excessive and unnecessary, because it would

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negatively alter the natural landscape of the Central Arroyo Seco and potentially result in negative effects to birds and other wildlife in the Arroyo Seco.

2.1.3.2 RESPONSE TO COMMENTS

Trees

As previously described, the IS/MND appropriately analyzes the maximum extent of physical impacts to the environment from Project implementation, including when evaluating the number of trees that could potentially be removed or relocated. As described in Section 3.4, *Biological Resources*, of the IS/MND, implementation of the Project could potentially require the removal of up to 47 trees from the Project Site. Because these trees are on City-owned property, they fall under the City's Trees and Tree Protection Ordinance (Title 8, Chapter 8.52), which defines a protected tree as a native, specimen, landmark, landmark-eligible, mature (except for the trees in RS or RM-12 Zones), or public tree. That does not imply that all trees to be removed are *native* trees.

The golf course area is not a wild and natural space, nor has it been for nearly 100 years. As stewards of the Brookside Golf Course and the over 1,400 trees that have been planted, relocated, or removed since 1967, the RBOC, as a matter of practice, works in close cooperation with the City's Urban Forestry Advisory Committee (UFAC), and the City Manager, who has ultimate approval authority for removal of any trees, including those that display health and public safety concerns. 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.

Upon further review by RBOC, it is estimated that the number of trees that could be removed or relocated (resulting from improvements to the driving range only, as the proposed miniature golf does not necessitate tree removals) may be reduced to 27 trees—25 pepper trees (nonnative), one ash tree (nonnative), and one pine tree (nonnative), as shown in Attachment D. No native trees are anticipated to be removed. However, as discussed in the IS/MND, the final number of trees that would require removal or relocation is dependent on the final design of the Project and on consideration of the health and/or safety condition of the trees at that time.

Upon completion of the final Project design, all construction activities, including potential removal of trees, will be analyzed in accordance with the City's Tree Ordinance, including the identification and protection of specimen trees within the Project Site. Additionally, consistent with previous efforts at Brookside, RBOC is committed to replanting replacement trees for all trees removed, at appropriate ratios determined in consultation with UFAC, and at locations that ensure no implications to RBOC operations.

When the Project goes through the design development, as stated on page 48 of the IS/MND, the RBOC will ensure that tree removals are limited and that as many trees are retained as public safety and feasibility regarding Project design allow. The RBOC would coordinate with the City's UFAC and Planning and Community Development Department, and all tree removals as well as construction activities in proximity to trees that would be retained would be required to follow the City's Tree Protection Guidelines (City of Pasadena 2019). Additionally, as described in the IS/MND, the Project would be required to go through the City's Design Review

2. Response to Comments

process, which ensures the protection and retention of landmark, native, and specimen trees and other significant landscaping of aesthetic and environmental value to the extent feasible. Overall, compliance with the City's Design Review process and Tree Ordinance, including preparation of the required Tree Protection Plan and identification of a tree replacement ratio, would ensure that impacts related to the protection of biological resources, such as a tree preservation policy or ordinance, would be less than significant.

Wildlife

Comments were received regarding effects to wildlife in the Arroyo Seco as a result of the Project, to birds that nest in the trees within the Project Site, and to animals that use the Central Arroyo Seco as a wildlife corridor.

The Arroyo-Seco Brookside wildlife corridor runs north-south adjacent to the Project Site and generally outside of the fenced and netted golf course that contains the Project site. As described in Section 3.4, *Biological Resources*, of the IS/MND, the miniature golf course and driving range would be adjacent to the Arroyo Seco channel, which provides connectivity to the Upper Arroyo/Hahamonga Watershed Park to the north of the Project Site. This segment of the Arroyo Seco is concrete lined with no vegetation and does not support sensitive species. The Project Site is in the Central Arroyo subarea, which is a highly activated and landscaped area used as a recreational resource. As discussed in Appendix C, *Biological Resources Assessment*, to the IS/MND, though databases identified species that were previously documented within or in close proximity to the survey area (most in the early- to mid-1900s), in the current state of the Project Site, suitable habitat is not present. Therefore, since the Brookside Golf Course includes landscaped vegetation, developed land uses, and unvegetated concrete-lined channel, the Project Site is not considered a natural habitat. Implementation of the Project involves the continuation of the same golf uses that have occurred on the site for decades, as shown in Attachment B—there is no change in use.

The IS/MND describes that mature trees that occur on and adjacent to the Project Site, including within the surrounding area, provide foraging and breeding opportunities for common wildlife. Additionally, the Central Arroyo Seco, outside of the fenced golf course that contains the Project Site, could serve as a suitable corridor for native resident wildlife to move through the area, particularly small to medium mammals such as coyote, opossum, and raccoon, which may forage in the landscaped vegetation of the golf course during nighttime hours when it is closed. It is possible that larger mammals such as deer or mountain lion could pass through the Arroyo outside of the larger fenced area of the golf course. The landscaping and mature trees on and surrounding the Project Site could provide suitable nesting habitat for avian species protected under the Migratory Bird Treaty Act (MBTA), particularly during the nesting season that generally occurs from February through August.

The IS/MND acknowledges on page 46 that disturbing or destroying active nests is a violation of the MBTA (16 U.S.C. 703 et seq.) and that active nests and eggs are protected in accordance with Fish and Game Code Section 3503. However, as described in the IS/MND, avian species that could establish nests on the Project Site are species that would typically occur in urban environments and already occur on the golf course, and they would be accustomed to a high level of human presence and noise and light disturbance, consistent with the residentially developed areas surrounding the golf course. It is important to note that the golf course and driving range have included safety netting for decades and there has not been an observed bird mortality due to the netting; therefore there is no reason to assume that birds would be affected by replacement of netting.

2. Response to Comments

The Project requires the implementation of Mitigation Measures MM-BIO-1, which would require a qualified biologist to 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 any construction activities occur within the bird nesting season (generally defined as February 15 through September 15). If an active nest is found, the nest will be avoided, and a suitable buffer zone (300 feet for passerines and up to 500 feet for any raptor species) will be delineated in the field so that no impacts will occur until the chicks have fledged, as determined by a qualified biologist. Additionally, implementation of Mitigation Measure MM-BIO-2 would require nighttime lighting associated with the driving range and miniature golf course to be shielded downward to limit spillage onto nesting birds that may utilize ornamental/landscape vegetation on-site and/or wildlife movement along the Arroyo Seco.

Therefore, impacts to wildlife in the Project Site would be less than significant with mitigation incorporated. The IS/MND adequately analyzes all impacts of the Project to wildlife, and no revisions are necessary.

2.1.4 Topical Response 4: Land Use and Planning

2.1.4.1 SUMMARY OF COMMENTS RECEIVED

Comments received expressed concerns regarding the Project's consistency with the Arroyo Seco Master Plan and the Arroyo Seco Public Lands Ordinance. Comments assert that the IS/MND fails to consider the Project's consistency with the Arroyo Seco Public Lands Ordinance, and the Project could potentially be in violation of this policy.

2.1.4.2 RESPONSE TO COMMENTS

Comments were received regarding Project consistency with adopted land use plans, policies, or regulations, specifically the Arroyo Seco Master Plan or the Arroyo Seco Public Lands Ordinance. The Project consists of two main components within the approximately 16-acre Project Site: (1) reorient and expand the existing driving range toward the north; and (2) develop a new miniature golf course adjacent to the west of the proposed driving range. Consistent with Chapter 3.32, Arroyo Seco Public Lands, of the Pasadena Municipal Code, the golf uses, which would not change as a result of the Project, are permitted within the Brookside Golf Course (see Section 3.32.460, Brookside Golf Course Area—Permitted Uses). Comments on the IS/MND assert that the Project would be in violation of the Arroyo Seco Public Lands Ordinance because it would be considered a commercial use in the Arroyo Seco. However; Section 3.32.060(c) states:

No portion of lands within the Arroyo Seco shall be used for any commercial, industrial or institutional purposes other than those which existed at the effective date of the ordinance codified in this chapter.

The Brookside Golf Course has been in operation as a public golf course within the Arroyo Seco since 1928. Implementation of the Project would not introduce new commercial establishments to the Project Site but would operate with recreational uses similar to what already exists on the Brookside Golf Course. Thus, the Project would not violate the Arroyo Seco Public Lands Ordinance. As discussed on page 86 of the IS/MND, Section 5.5, Recreational Courses and Ranges, of the Arroyo Seco Design Guidelines (2003) states that improvements to the recreational courses and ranges in the Arroyo Seco shall be made under the regulation

2. Response to Comments

and industry standard for the sport the course/range is serving; and improvements to recreational courses and ranges shall be of the highest quality craftsmanship and utilize the highest quality materials. In accordance with Section 17.61.030, Design Review, of the Pasadena Municipal Code, the Project would be subject to the City's Design Review process to ensure that all components of the Project reflect the values of the community, enhance the surrounding environment, and visually harmonize with the surroundings.

Additionally, Section 11.2, Lighting, of the Arroyo Seco Design Guidelines states that lighting shall consider surrounding residential areas and "dark sky" considerations and use appropriate shields; that athletic field lighting (new installations and renovations) should be reduced to minimize impacts to the surrounding ecosystem; that lighting improvements in the Central Arroyo subarea must consider the impact to slopes that serve as a wildlife corridor for the larger Arroyo Seco; that exterior lighting around built structures and the surrounding ecosystem must serve both safety and aesthetic purposes; and that lighting of structures of architectural or historical merit must be done by a design professional and reviewed by the Design Commission for aesthetic sensitivities, to protect from over-illumination, and to ensure that the architectural integrity of the structure is maintained. The proposed lights to be used in the driving range and miniature golf course would be consistent with this policy.

In addition, as described in Section 5.3, *Cultural Resources*, of the IS/MND, the Project would implement Mitigation Measure CUL-1 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, and would require the RBOC to 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.

As describe above, implementation of the Project would comply with the Arroyo Seco Master Plan and the Arroyo Seco Public Lands Ordinance. Revisions will be made to the IS/MND to demonstrate the Project's consistency with these policies.

2.1.5 Topical Response 5: Noise

2.1.5.1 SUMMARY OF COMMENTS RECEIVED

Comments expressed concerns with potential noise impacts from the Project. Comments assert that the proposed hours of operation of the driving range and miniature golf course would result in a new visitors to the Brookside Golf Course, which would increase levels of noise in the existing golf course and surrounding residential areas. Several comments on the IS/MND raised concerns that the Project would exceed noise thresholds or be inconsistent with the General Plan Noise Element and/or Pasadena Municipal Code.

2.1.5.2 RESPONSE TO COMMENTS

The noise analysis in Section 3.13, *Noise*, of the IS/MND concludes that noise from implementation of the Project would not cause noise levels to exceed the standards in Chapter 9.36, Noise Restrictions Ordinance, of the Pasadena Municipal Code, which establishes acceptable ambient noise levels to regulate intrusive noises

2. Response to Comments

(i.e., stationary noise) within specific land use zones and provides procedures and criteria for measuring the sound level of noise sources. Under Sections 9.36.040 and 9.36.050 of the Noise Ordinance, a noise level increase of 5 dBA over the existing or presumed ambient noise level at an adjacent property line is considered a violation, with adjustments made for steady audible tones, repeated impulsive noise, and noise occurring for limited time periods. The 5 dBA increase above ambient is applicable to City-regulated noise sources, and it is applicable any time of the day. The ambient noise is defined as the actual measured ambient noise level averaged over a period of 15 minutes, or Leq (L₂₅). To account for people's increased tolerance for short-duration noise events, the City's Noise Ordinance provides the following adjustments:

- **A 5 dBA allowance** for noise sources occurring for more than 5 minutes but less than 15 minutes in any 1-hour period (for a total of 10 dBA above the ambient),
- **A 10 dBA allowance** (total of 15 dBA above the ambient) for noise sources occurring for 5 minutes or less in any 1-hour period,
- **A 20 dBA allowance** (total of 25 dBA above the ambient) for noise sources occurring for less than 1 minute in any 1-hour period.

These additional allowances for short-duration noise sources are applicable to noise sources occurring during daytime (6:00 am to 11:00 pm) periods only. The proposed driving range and miniature golf course would be open to the public between 6:00 am and 10:00 pm seven days a week. Therefore, the Project would comply with the allowable hours as stated in the City's Noise Ordinance.

As discussed on page 89 of the IS/MND, ambient noise monitoring was conducted at four locations in April 2021 to determine noise levels at the nearest residential receptors. The primary noise source observed during measurements was roadway traffic. Secondary noises such as birds chirping and pedestrian activity also contributed to the overall noise environment. Short-Term Location 1 (ST-1) was on West Drive, south of Salvia Canyon Road, approximately 12 feet west of the nearest southbound travel lane centerline; Short-Term Location 2 (ST-2) was at the intersection of Parkview Avenue and Afton Street, overlooking the Brookside Golf Course; Short-Term Location 3 (ST-3) was on Rosemont Avenue, north of Rose Bowl Drive, and approximately 20 feet east of the nearest northbound travel lane centerline; and Short-Term Location 4 (ST-4) was on Rosemont Avenue, south of Rose Bowl Drive, approximately 25 feet east of the nearest northbound travel lane centerline.

Physical damage to human hearing begins at prolonged exposure to noise levels higher than 85 dBA. Exposure to high noise levels affects our entire system, with prolonged noise exposure in excess of 75 dBA increasing body tensions, and thereby affecting blood pressure, functions of the heart, and the nervous system. Extended periods of noise exposure above 90 dBA can result in permanent hearing damage. When the noise level reaches 120 dBA, a tickling sensation occurs in the human ear even with short-term exposure. This level of noise is called the threshold of feeling. As the sound reaches 140 dBA, the tickling sensation is replaced by the feeling of pain in the ear. This is called the threshold of pain. A sound level of 190 dBA will rupture the eardrum and permanently damage the inner ear.

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It was determined that construction noise associated with the driving range would be well under 85 dBA at 100 feet. As described on page 95 of the IS/MND, heavy equipment, such as a dozer or a loader, can have maximum, short-duration noise levels of up to 85 dBA at 50 feet. However, overall noise emissions vary considerably depending on the specific construction activity performed at any given moment. Since noise from construction equipment is intermittent and diminishes at a rate of at least 6 dBA per doubling of distance (conservatively ignoring other attenuation effects from air absorption, ground effects, and shielding effects), the average noise levels at noise-sensitive receptors could vary considerably, because mobile construction equipment would move around the site with different loads and power requirements. Thus, construction noise impacts of the would not be considered significant.

Additionally, as described on page 97 of the IS/MND, noise associated with operation of the Project would be similar to existing noise sources (e.g., voices, club to ball impact noise, and maintenance noise associated with the facilities), and the Project would not include any sound amplification. 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. At that distance, noise levels from unamplified noise sources would substantially decrease and would not significantly increase noise levels above existing conditions. 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. It is a golf project on an existing golf course.

The noise study conducted for the Project indicated that at that distance of the nearest sensitive receptors are located from the Project Site, noise levels from unamplified noise sources would substantially decrease and would not significantly increase noise levels above existing conditions. Additionally, construction and operation of the Project would not expose any sensitive receptors near the Project Site to potential health risks related to noise. Therefore, impacts from operation of the driving range and miniature golf course would not be significant to neighboring residents in the area, and no revisions to the IS/MND are necessary.

2.1.6 Topical Response 6: Recreation

2.1.6.1 SUMMARY OF COMMENTS RECEIVED

Comments expressed concerns with potential impacts to the Brookside Golf Course itself as a result of the Project. With alterations to Holes 6 and 7 of the E.O. Nay Course and Hole 10 of the C.W. Koiner Course, comments assert that the course may not retain its championship course of play.

2.1.6.2 RESPONSE TO COMMENTS

As described in Section 3.16, *Recreation*, of the IS/MND, expansion and reorientation of the driving range could potentially result in the shortening of Hole 6 and Hole 7 of the E.O. Nay Course, which is approximately 60 yards north of the existing driving range. Approximately 220 yards on the golf course could be removed from play. Staff intends to work with a golf course architect in an effort to keep a par 70 for the E.O. Nay Course to continue having a championship layout. There is a high probability that Hole 6 can remain a similar experience to present day. With the help of a golf course architect, staff feel there may be a way to comply with minimum distances for keeping Hole #7 a par 4. In addition, the Project would result in alterations to Hole 10 of the C.W. Koiner Course, but Hole 10 would maintain a similar distance and shape. The hole would be relocated

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approximately 20 yards to the north, altering the two holes of the E.O. Nay (Hole 6 and Hole 7). The existing golf courses, with the exception of Hole 10 of the C.W. Koiner Course, and Hole 6 and Hole 7 of the E.O. Nay Course, would remain unchanged by the Project.

As described in Section 1.5.1, *Project Purpose*, the expansion of the driving range is necessary because there is currently an inadequate number of driving range stalls (fewer stalls than holes), and on most days there is a line to use the driving range. Additionally, the implementation of the new miniature golf course is necessary because miniature golf would enable the golf course to further engage the youth and community that already live, recreate, and visit the Central Arroyo Seco area for recreational purposes. Based on a market study of the surrounding areas and other facilities in the area, it is anticipated that the miniature golf component of the Project would help further the engagement of youth and families into the game, the same way that the First Tee of Greater Pasadena has over the past decade.

Therefore, implementation of the Project would not negatively impact the existing use of either the C.W. Koiner Course or the E.O. Nay Course, and the Brookside Golf Course would continue to have a championship layout while improving the pace of play. No revisions to the IS/MND are necessary.

2.1.7 Topical Response 7: Transportation and Parking

2.1.7.1 SUMMARY OF COMMENTS RECEIVED

Comments expressed concerns with potential traffic and parking impacts from the Project, including potential impacts on local traffic circulation, the lack of parking for the Brookside Golf Course, and whether there is a need for additional parking to accommodate new visitors to the Project Site.

2.1.7.2 RESPONSE TO COMMENTS

Traffic

The IS/MND includes a Transportation Impact Analysis (TIA) that was prepared for the Project (Appendix F), consistent with the City's requirements for addressing transportation-related impacts under CEQA. Intersection turning data and volumes provided in the City-prepared TIA are sufficient for inclusion in the IS/MND, as impacts to intersections and roadways are not considered impacts under CEQA. In November 2014, Pasadena's City Council adopted new transportation review guidelines, metrics, and CEQA thresholds of significance that were designed to align with Senate Bill (SB) 743. The resolution adopted by Pasadena City Council replaced the City's two existing transportation CEQA thresholds of significance (intersection LOS and Street Segment analysis) that focused entirely on automobile travel, with five new transportation CEQA thresholds of significance that include measures of automobile, transit, bicycle, and pedestrian travel. The five adopted transportation CEQA thresholds of significance are, (1) Vehicle Miles Traveled (VMT) per Capita, (2) Vehicle Trips (VT) per Capita, (3) Proximity and Quality of Bike Facilities, (4) Proximity and Quality of Transit Facilities; and (5) Pedestrian Accessibility

The existing uses in the Project Site currently generate approximately 136 daily vehicle trips, and it is estimated that implementation of the Project would generate approximately 539 daily vehicle trips; therefore,

2. Response to Comments

implementation of the Project would result in 403 net new daily vehicle trips. The TIA appropriately assumes that no additional staffing would be required by the Project (see page 15 of the IS/MND).

The Pasadena Department of Transportation (DOT) uses mobility performance measures to assess the quality of walking, biking, transit, and vehicular travel in the city. As described on page 106 of the IS/MND, the Pasadena DOT determined that the Project would not have a significant impact on the surrounding circulation system and would not conflict with the Mobility Element policies pertaining to the circulation system. Additionally, as described on page 60 of the IS/MND, though implementation of the Project would result in an increase in trips to the Project Site, the increase in capacity of the driving range and new miniature golf course would serve the local population as well as pent up demand from users lining up on site to wait for hitting bays to open. Serving the local community could contribute to reducing VMT by providing the local community with closer options. Therefore, potential impacts to traffic circulation were determined to be less than significant, as described in Section 3.17, *Transportation*, of the IS/MND.

Parking

Several comments were received on the IS/MND regarding the Project's impact on parking in the areas surrounding the Brookside Golf Course, and the potential need for additional parking for the Project. It is anticipated that the general hours of use for the new range and miniature golf course would occur primarily during the evenings and would not typically overlap with other uses on the golf course. Since golfers commonly finish their rounds before sunset, parking lots are not anticipated to be filled in the evenings. Staff are discussing potential options for additional parking in lots CH, B and D when the miniature golf course and driving range are implemented. There is existing paved areas that are not currently being used for parking in Lot D. In addition, these three parking lots are currently separated which leaves voided space with curbs, mulch and fencing instead of additional parking stalls.

As described in Section 1.5, *Description of Project*, of the IS/MND, the primary serving parking lots (CH and D) closest to the Brookside Clubhouse and the driving range, contain sufficient parking to accommodate the existing capacity of the golf course. Parking lot CH contains approximately 66 spaces, and parking lot D contains approximately 310 spaces for a total of 376 spaces. Additional short-term parking is along Rosemont Avenue for visitors who would typically visit the driving range and miniature golf course for short periods of time. The IS/MND determined that additional parking would not be necessary because visitors would not exceed the existing capacity of the golf course, and sufficient existing parking is available to meet the needs of the Project. However, if additional parking is needed, parking lot D can be expanded to add approximately 50 new parking spaces on the western portion of the parking lot, as shown in Attachment E. Additionally, parking lot B, which is directly south of parking lot D, would be available to all visitors of the Brookside Golf Course, including the driving range and miniature golf course (see Attachment E). As shown in Table 3, *Brookside Golf Course Parking Lots*, the paved parking lots surrounding the Project Site contain a total of 646 parking spaces within walking distance of the driving range and miniature golf course. Additional lots and street parking are located throughout the Central Arroyo area. Although some of these walking distances may take more than a couple of minutes, this is not an environmental effect but rather an issue of convenience. The RBOC is aware of this comment and can consider it during its business operations planning.

2. Response to Comments

Table 3 Brookside Golf Course Parking Lots

Parking Lot	Spaces
CH	66
B	220
D	360 (including the additional 50 spaces)
Total	646

As described in Topical Response 2, comments were received regarding public safety in the Project Site and the surrounding areas due to the extended hours of operation of the driving range and the miniature golf course, which would operate from 6:00 am to 10:00 pm, seven days a week. Comments assert that the Project Site does not contain sufficient lighting for visitors exiting the Brookside Golf Course after sunset. However, as shown in Attachment C, walkways and parking lots leading to and from the existing driving range provide sufficient lighting to ensure the safety of visitors and staff, and would continue to operate similar to existing conditions with the implementation of the Project.

Therefore, operation of the Project would not result in increased traffic in areas surrounding the Project Site. No changes to the existing circulation system, including the Rose Bowl Recreational Loop or equestrian trails, would occur, and implementation of the Project would not impede the City’s policies with respect to mobility. Additionally, during operation of the Project, the Project Site would be accessed via existing adjacent parking lots and Brookside Golf Course pathways, similar to existing conditions. As demonstrated above, existing parking lots surrounding the Project Site and parking along Rosemont would provide sufficient parking spaces for existing and future uses of the Brookside Golf and all components of the Project. No revisions to the IS/MND are necessary.

2.1.8 Topical Response 8: Project Alternatives

2.1.8.1 SUMMARY OF COMMENTS RECEIVED

Comments expressed interest in potential alternatives to the Project, including alternate designs of the driving range and alternate locations of the miniature golf course.

2.1.8.2 RESPONSE TO COMMENTS

Alternate Design

Several comments were received regarding alternate designs of the Project, including the implementation of a two-story driving range, which would reduce the expanded size of the proposed driving range. In addition, comments asserted that an alternate location should be considered for the miniature golf course. Although Project alternatives are not required to be analyzed in an IS/MND under CEQA, the RBOC considered several other design and location scenarios for the Project during the process and determined that the Project presented in the IS/MND is the most feasible and logical option, compatible with operational needs of the Brookside Golf Course and the RBOC’s economic need to support and grow the game of golf and as it relates to the Rose Bowl Stadium.

2. Response to Comments

Although implementation of a new two-story driving range could potentially reduce the anticipated footprint of the proposed driving range, construction of a two-story driving range would increase environmental impacts to the Project Site and the Arroyo Seco with respect to aesthetics, biological resources, historical resources, noise, traffic, and other environmental topics. The addition of a second level to the proposed driving range would require netting heights and lighting to be raised by a minimum of 20 feet from the proposed Project lighting, which could negatively affect views from the Brookside Clubhouse and potentially result in light spillage into neighboring residences that would not be in compliance with the City of Pasadena's Municipal Code.

A two-story driving range would also result in additional impacts to the Project Site, including restrictions to Americans with Disabilities Act (ADA) access and emergency access issues for events at the Rose Bowl Stadium, including UCLA football games, other sporting events, concerts, and music festivals. Additionally, a two-story driving range would only include approximately 40 bays instead of the proposed 60 bays of the Project, which would not meet the Project's objectives to increase memberships and return to historical (higher) levels of use by expanding services to attract a broader range of visitors, including families, and improve the pace of play on the driving range.

This is not an alternative scenario that RBOC is considering, nor would it reduce environmental impacts.

Alternate Location

Additionally, implementation of the miniature golf course in an alternate location (such as near Kidspace) could result in additional environmental impacts or land use incompatibility in the Arroyo Seco. As described on page 10 of the IS/MND, the location of the miniature golf course is designed to minimize impacts to the remainder of the Brookside Golf Course and to maintain proximity to the Brookside Clubhouse and parking areas, which would not be possible in other locations of the Brookside Golf Course or the Arroyo Seco.

As described on page 6 of the IS/MND, the addition of miniature golf would enable the golf course to further engage the youth and community that already live, recreate, and visit the Central Arroyo Seco area for recreational purposes. Based on a market study of the surrounding areas and other facilities in the area, it is anticipated that the miniature golf component of the Project will help further the engagement of youth and families with the game, the same way that the First Tee of Greater Pasadena has over the past decade. Finally, the miniature golf course is intended to complement and strengthen existing and highly successful youth programs (such as First Tee) that already exist on the golf course—that connection would be lost if it were moved to Kidspace. This is not an alternative scenario that RBOC is considering, nor would it reduce environmental impacts.

Though other concepts were explored by RBOC during this process, the Project as proposed is what is being recommended for approval to the RBOC board. Additionally, as documented throughout the IS/MND and in this document, an MND is the appropriate level of CEQA review.

The purpose of an alternative analysis is to look at ways to avoid or reduce the 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

2. Response to Comments

less-than-significant level. Therefore, because projects supported by MNDs have been determined to have no significant environmental impacts, no analysis of alternatives is required in these documents. Therefore, no evaluation of alternatives is required.

2.2 RESPONSES TO WRITTEN AND VERBAL COMMENTS

Individual written and verbal comments on the IS/MND received during the public review period are addressed in this section. During that time, the RBOC received 7 comment letters from a local organization, 34 comment letters from individual residents, and several verbal comments provided at the community meeting on February 13, 2023. Several comments received on the IS/MND focused on several main issues and topics associated with the Project and the CEQA analysis of Project impacts, including lighting, tree removal, noise, recreation, traffic and parking. As described in Section 2.1, *Topical Responses to Comments*, the RBOC determined it would be appropriate to provide topical responses to address these comments and provide the necessary context for considering the issues raised. All other comments are addressed below.

2. Response to Comments

2.2.1 Responses to Written Comments

COMMENT R1- Lawrence Deady (1 page)

From: Lawrence Deady <lawrence65d@gmail.com>
Date: Tuesday, January 31, 2023 at 9:33 AM
To: Public Comment <publiccomment@rosebowlstadium.com>
Subject: Parking Issues

Parking is already very scarce on Sundays. Probably, an additional 50 (just an estimate) or so cars at peak usage may be needed. They need to take a look at the one hour parking signs. This seems like it could be improved.

R1-1

2. Response to Comments

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2. Response to Comments

R1. Response to Comments from Lawrence Deady, submitted via email January 31, 2023.

R1-1 This comment states that parking at the Brookside Golf Course is limited on specific days, and recommends the use of one hour parking signs. 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. The one hour parking is setup for the restaurant users in mind. The same could be said for the two-hour parking on Rosemont Avenue outside of the Brookside Clubhouse. Changing the signage would not create additional parking spaces. Staff can certainly revisit how the parking areas are setup. At this time, it provides limited spaces provide short time users a needed quicker in and out experience, and those choosing to spending many hours a more expansive selection. Additionally, a game of golf takes approximately 5 hours, and mini golf or driving range uses are estimated to take at least an hour, if not more). Removing short-term parking could contribute to traffic circulation impacts, and is therefore not under consideration as potential mitigation.

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2. Response to Comments

COMMENT R2 - John Landis (2 pages)

From: Jon Landis <jytlandis@gmail.com>
Date: Monday, February 13, 2023 at 5:01 PM
To: Public Comment <publiccomment@rosebowlstadium.com>
Cc: Douglass Philbin <dphilbin626@charter.net>, Ed Kelly <kellyej@earthlink.net>, "agl.law@verizon.net" <agl.law@verizon.net>, "rmarthe@gmail.com" <rmarthe@gmail.com>
Subject: Informational Meeting -

I am unable to attend the informational meeting tonight

The following comments are provided regarding the proposed project for mini golf construction, expanded driving range and modifications to present golf courses. I would very much like be provided answers to the comments/concerns provided below and have them entered into public record of the meeting.

Revenues & Costs

In the materials provided I could not locate what the expected one-time construction costs, annual expenditures and revenues will be for the subject project

From what I have heard the project is expected to increase revenues by \$3 million annually at a one-time cost of \$10 million and unknown annual expenditures for operation and maintenance.

R2-1

The main purpose for the mini golf area and driving range expansion is obviously to increase revenues. I personally doubt that the mini golf area will provide much if any long-term revenue increases. I do not believe that mini golf is currently popular enough to risk the investment. I do believe increasing the number of tees at the driving range would increase revenues with little added cost after construction of either a 2nd tier over the existing tees or by changing tee direction and increasing fence heights as appropriate.

I would like to see what the revenue projections currently are for each area of the proposed project and learn how these estimates were established and verified.

Given inaccurate past financial projections during renovation work, any future project project(s) MUST be verified by multiple sources prior to expending more public funds and increasing the current RBOC debt further.

What area the added staff requirements for each project items?

Are any increased revenues due to expanded bar and restaurant service times?

What actions will be taken IF the projections are incorrect?

2. Response to Comments

Traffic & Parking

I found the traffic and parking study to be vague. To achieve needed added revenues to justify this project it would seem that a significant number of day trips will be required both around the rose bowl loop AND the surrounding community.

How many more users are needed to achieve the increased revenue projections?

How many more vehicle trips correspond these added users

How many vehicles will be parked near the course by day/time.

Where will the added parking be located?

How will the new area revenues be impacted by the current level of concerts and other course shut downs. Some for weeks at a time.

Note that on weekends and during large fund raising tournaments the current parking lot area is often full, especially after 10 am when the proposed new areas would be most used. The new users will have to walk a significant distance to take advantage of these new facilities. That will also have a negative impact on long term users, especially mini golf users (families & children). Has anyone thought of this? I don't see added parking areas noted on plans.

Modifications to E.O Ney & possibly C.W. Koiner golf courses

The renovations will require changing the E.O. Ney course for par 70 to 68, or have significantly short par 4s on holes 6 and 7. (which are already short). Hole 7 is drivable for some players now (under 300 yds from the blue tees).

Given that this is currently less popular than the Koiner course, what decreased use projections are there for the modified course?

Many golfers don't wish to play on a course less than par 70, and even par 71 so use will decrease. Has there been any study/survey of the golfing community on the impact of shortening of the course?

In summary I understand the need for added revenues due to extensive costs overruns for the most recent Rose Bowl renovation. However, I believe the revenue projections are overstated both due to an over perceived demand for a mini golf facility as well as the negative impacts due to the shortening of E.O. Ney and significant walking distances from expanded parking to the mini golf area.

Jon Landis

857 Michigan Ave

Pasadena

R2-2

R2-3

2. Response to Comments

R2. Response to Comments from John Landis, submitted via email February 13, 2023.

R2-1 This comment states that IS/MND does not provide the costs, expenditures, and revenues of the Project and requests to see the revenue projections for the Project. The comment's recommendation of providing of revenue projections 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.

R2-2 This comment states that the traffic and parking study is vague and expresses concern regarding additional parking requirements in the 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 demand.

It should also be noted that when the golf course hosts large golf tournaments there are actually less golfers per day and less vehicles. Even with outside catered events (weddings, reunions, etc.) parking demand rarely exceeds capacity. The exception would be the monthly flea market where parking is limited based on that vendor using half of lot D.

As described in Topical Response 7, *Transportation and Traffic*, parking lots CH, B and D, which would contain approximately 646 parking spaces combined, would have sufficient space to accommodate all event participants in addition to visitors of the miniature golf course and driving range.

R2-3 This comment states that the Project would decrease the use and desirability of the golf course. Please see Topical Response 6, *Recreation*, regarding potential impacts to the existing golf course.

2. Response to Comments

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2. Response to Comments

COMMENT - R3 John Landis (1 page)

From: Jon Landis <jtlandis@gmail.com>
Date: Monday, February 13, 2023 at 6:00 PM
To: Public Comment <publiccomment@rosebowlstadium.com>
Cc: Douglass Philbin <dphilbin626@charter.net>, Ed Kelly <kellyej@earthlink.net>, "agl.law@verizon.net" <agl.law@verizon.net>, "rmarthe@gmail.com" <rmarthe@gmail.com>
Subject: Re: Informational Meeting - part 2

I am unable to attend the informational meeting tonight

The following comments are provided regarding the proposed project for mini golf construction, expanded driving range and modifications to present golf courses. I would very much like be provided answers to the comments/concerns provided below and have them entered into public record of the meeting.

In reviewing the traffic impact analysis information I found the following

Existing vs existing & project traffic numbers seem exactly the same. Pages 29-40

Intersection turning data is over 10 years old (2012)

Volume count data is over 11 years old (2011)

Am I missing something

The memo dated 6/3/21 Asmar to Rocha on page 45 says the number of employees (100) and service population will not change. How is this possible?

R3-1

R3-2

Jon Landis

857 Michigan Ave

Pasadena

2. Response to Comments

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2. Response to Comments

R3. Response to Comments from John Landis, submitted via email February 13, 2023.

R3-1 This comment states that the transportation impact assessment for prepared for the Project provided unclear and/or insufficient information regarding the Project's potential impacts on traffic. Although portions of the data used in the TIA are from 2011 and 2012, existing conditions within the Project Site and areas surrounding the Brookside Golf Course have not changed substantially since then; thus, the data is still applicable. Additionally, the TIA appropriately assumes that no additional staffing would be required by the Project (see page 15 of the IS/MND); therefore, implementation of the Project would not result in additional traffic impacts. 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.


R3-2 This commenter states that they are unclear how the number of employees and service population for the Project would not increase. As stated on page 15 of the IS/MND, the Project does not propose any changes to the types and frequency of events that currently occur on the Brookside Golf Course; the golf course and the clubhouse is currently served by approximately 100 employees, and operation of the Project would not require additional employees. The Brookside Golf Course currently employs sufficient staff to operate and maintain the proposed components of the Project because operation and maintenance of the miniature golf can be worked into the responsibilities of existing employees, approximately 90 percent of which is part-time staff whose hours can be modified/expanded; as such, the proposed driving range and miniature golf course would not result in an increase of staff. Therefore, no revisions to the IS/MND are necessary and transportation impacts are adequately addressed.

2. Response to Comments

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2. Response to Comments

COMMENT R4 - Andrea Bland (1 page)

	
Comment Card	
Brookside Golf Course Improvements Project Public Informational Meeting February 13, 2022 at 6:00 PM Brookside Golf Course, Mediterranean Room, 1133 Rosemont Avenue, Pasadena, CA 91103	
Please identify any comments regarding the environmental analysis contained in the Brookside Golf Course Improvement Project Initial Study/Mitigated Negative Declaration (MND) (please print):	
Name:	Andrea BLAND
Address or Email:	870 Chula Vista Ave. Pasadena 91103
<p>To Whom it may Concern,</p> <p>As a West Pasadena residents, I'm very concerned about lighting and noise 7 days a week. until 10 pm. Have you considered shutting off lights at 5 pm?</p> <p>If lights stay on, we will not see a beautiful natural sunset in the Arroyo again. That There is no way you can mitigate that.</p> <p>And there will be more noise - it's inevitable.</p> <p>Please consider shutting these these spaces down earlier.</p> <p>Respectfully, Andrea Bland</p>	
R4-1	
R4-2	
Please return this comment card to Jenessa Castillo, Chief Operations Officer, at the end of the Informational Meeting or fold in half, staple, and mail to the Rose Bowl Operating Company using the address provided (see reverse). Comments may also be submitted via email to publiccomment@rosebowlstadium.com; Jenessa may be reached at (626) 577-3104. All comments must be submitted by 5:00 p.m. on Friday, March 3, 2023.	

2. Response to Comments

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2. Response to Comments

R4. Response to Comments from Andrea Bland, submitted via comment card February 13, 2023. (1 page)

R4-1 This comment states that the Project's lighting would have negative effects on the natural views in the Arroyo Seco. 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, as described in Section 3.1, *Aesthetics*, of the IS/MND, viewer sensitivity is considered high when views are provided that are commonly held as an important component of the recreational experience, which in this case would include views of the Rose Bowl Stadium, the canyon-like setting of the Arroyo Seco, and views of the surrounding hillsides with residential uses are considered an important part of the aesthetic backdrop.

The proposed driving range would include 56 total poles, including 20 existing poles to remain and 36 new poles to be installed. The poles would support new netting and have a pole height ranging from 38 feet to 130 feet above ground level (increasing height with distance from the hitting bays) with an average pole height of 90.67 feet. An estimated 14 of the 56 poles would be light-mounted (at 60 feet in height) surrounding the perimeter of the driving range on the east and west sides.

However, each pole would be constructed with sufficient spacing throughout the perimeter of the proposed driving range similar to existing poles, and the new netting would be nearly transparent similar to existing netting. The driving range would not block or interfere with the existing views of the surrounding areas, including the San Gabriel Mountains, the Rose Bowl Stadium, or other scenic features located within the Pasadena Arroyo Seco Parks and Recreation District. Finally, given the elevation of the proposed project (well below the ridge where private homes are located), lighting in this location will not impact sunset views from those private homes as they will look out well over the top of the project site, nor will it impact sunset views from the Arroyo as those views are obscured by the rims of the Arroyo. Therefore, no revisions to the IS/MND are necessary and potential impacts to scenic views are adequately addressed.


R4-2 This comment states that the Project will result in an increase of noise in the areas surrounding the Project Site. 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.

2. Response to Comments

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2. Response to Comments

COMMENT R5 - Megan Foke (1 page)



Comment Card

Brookside Golf Course Improvements Project
Public Informational Meeting
February 13, 2022 at 6:00 PM
Brookside Golf Course, Mediterranean Room, 1133 Rosemont Avenue, Pasadena, CA 91103

Please identify any comments regarding the environmental analysis contained in the Brookside Golf Course Improvement Project Initial Study/Mitigated Negative Declaration (MND) (please print):

Name: Megan Foke

Address or Email: Cmeganfoke@gmail.com

I am very concerned and surprised at the number of trees to be removed. These trees are mature, healthy, and in at least 2 cases specimen trees. Were other designs looked at to save these trees? Our green canopy is disappearing & needs preserving.

We ask you to reconfigure the plan to keep & protect many of these trees.

Remaining important tree canopy will negatively and permanently alter the area.

The trees should - indeed must - be protected.

R5-1

Please return this comment card to Jenessa Castillo, Chief Operations Officer, at the end of the Informational Meeting or fold in half, staple, and mail to the Rose Bowl Operating Company using the address provided (see reverse). Comments may also be submitted via email to publiccomment@rosebowlstadium.com; Jenessa may be reached at (626) 577-3104.
All comments must be submitted by 5:00 p.m. on Friday, March 3, 2023.

2. Response to Comments

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2. Response to Comments

R5. Response to Comments from Megan Foke, submitted via comment card February 13, 2023.

R5-1 This comment expresses concern regarding the number of trees that may be removed as a result of the Project. 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. Please also see historical photos of the golf courses, showing that the Central Arroyo has, throughout its entire history, been considered and managed as a recreational area and not a natural forest. (see Attachment B, *Historic Photographs of Brookside Golf Course*)

2. Response to Comments

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2. Response to Comments

COMMENT R6 - Brian Elerding (1 page)

From: Brian Elerding <brianelerding@gmail.com>
Date: Tuesday, February 14, 2023 at 12:17 PM
To: Public Comment <publiccomment@rosebowlstadium.com>
Subject: Comment on Brookside Golf Course Expansion

To Whom it May Concern,

I am writing in **opposition** to the expansion of the Brookside Golf Course. I am a Pasadena native, and have been enjoying the Arroyo as an outdoor wildlife space since I started going there as a child. I still go there weekly at least, sometimes to go for a walk, sometimes to enjoy the other amenities in the Arroyo.

There are many ways for humans to enjoy the Arroyo in a smart, wildlife-conscious way, and this is not it. I stand firmly opposed to any increase in lighting, and any removal of trees. We should, in my opinion, be slowly winding down the human structures in the Arroyo. We should be making our impact smaller, not larger.

R6-1

We have a miraculous wildlife corridor right in the midst of us, and we should do everything we can to keep it wild and wonderful. Anything that makes life harder on wildlife should be minimized. Anything that welcomes back wildlife should be increased. This project will make life harder on our nonhuman neighbors, therefore it should be opposed.

R6-2

Many thanks for your consideration on this matter.

Brian Elerding

2. Response to Comments

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2. Response to Comments

R6. Response to Comments from Brian Elerding, submitted via email February 14, 2023.

- R6-1 This comment expresses the commenter's opposition to the Project, due to potential impacts on wildlife, increased lighting, and the removal of trees in the Project Site. 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, 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.
- R6-2 This comment states that more should be done to preserve the wildlife corridor within the Arroyo Seco. 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. Please also see historical photos of the golf courses, showing that the Central Arroyo has, throughout its entire history, been considered and managed as a recreational area and not a natural forest

2. Response to Comments

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2. Response to Comments

COMMENT R7 - John Callas (1 page)

On 2/14/23, 4:36 PM, "John Callas" <jcallas@pacbell.net <mailto:jcallas@pacbell.net>> wrote:

Dear Rose Bowl Operating Company,

As a resident of Pasadena and a neighbor of the Rose Bowl, I oppose the proposed expansion of the Brookside golf course to include an expanded driving range and a miniature golf course. The proposed expansion would alter the natural landscape of the Arroyo, resulting in tree removal and the addition of nighttime lighting. We should all be working towards restoring the Arroyo and preserving the natural environment around the Rose Bowl. I understand the need for generating revenues, but alternatives that do not damage or alter the natural environment should be considered instead. Please protect the wonderful natural landscape that is the Arroyo Seco. Thank you.

R7-1

Sincerely,
John Callas
1560 Scenic Drive
Pasadena, CA 91103

2. Response to Comments

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2. Response to Comments

R7. Response to Comments from John Callas, submitted via email February 14, 2023.

R7-1 This comment expresses the commenter's opposition to the proposed expansion of the driving range and implementation of the miniature golf course because the Project would result in the removal of trees in the Project Site and would require the addition of new lighting. The comment provides no specific issue regarding the detailed technical analyses contained within the IS/MND regarding these topics. Please see Topical Response 3, *Tree Removal and Wildlife*, regarding the regarding procedures that would be taken by the RBOC to minimize potential impacts to trees within the Project Site; and 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. Please also see historical photos of the golf courses, showing that the Central Arroyo has, throughout its entire history, been considered and managed as a recreational area and not a natural forest (see Attachment B, *Historic Photographs of Brookside Golf Course*).

2. Response to Comments

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2. Response to Comments

COMMENT R8 - Mary Bucci Bush (1 page)

From: Mary Bucci Bush <mbbucci@aol.com>
Reply-To: Mary Bucci Bush <mbbucci@aol.com>
Date: Tuesday, February 14, 2023 at 12:42 PM
To: Public Comment <publiccomment@rosebowlstadium.com>
Subject: Proposed Golf Course Changes & Mini Golf

I like the idea of updating and expanding the golf course--even though I'm not a golfer and know nothing about the sport-- as long as it does not negatively impact the local residents and nature of the Arroyo with additional lighting and noise, any more than we have already been impacted. The upgrades and expansion appear to be beneficial to many residents.

R8-1

I also like the idea of Pasadena having a new miniature golf course. However, I oppose having it be constructed near the golf course or elsewhere in the Arroyo where excessive lighting will negatively impact residents, birds, other wildlife, and the historically (allegedly) preserved nature of the Arroyo. I would love to see Pasadena invest in a mini golf course elsewhere in the city where the negative impacts on the natural elements and on residents are greatly diminished.

R8-2

Thank you,

Mary Bucci Bush
1588 Casitas Ave.
Pasadena 91103
MBBucci@aol.com

2. Response to Comments

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2. Response to Comments

R8. Response to Comments from Mary Bucci Bush, submitted via email February 14, 2023.

R8-1 This comment expresses support for the Project if no negative impacts related to noise and lighting result from the implementation of the project. The comment provides no specific issue regarding the detailed technical analyses contained within the IS/MND regarding these topics. 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 to ensure impacts associated with lighting would be less-than-significant.

R8-2 This comment states the commenter's opposition to the construction of the miniature golf course within the Project Site or anywhere in the Arroyo Seco, due to excessive lighting and potential impacts to the wildlife and the natural landscape of the Arroyo Seco. 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, 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.

In addition this recommends an alternate location for the proposed miniature golf course, near the Rose Bowl children's playground. Please see Topical Response 8, *Project Alternatives*.

2. Response to Comments

2. Response to Comments

COMMENT R9 - Petrea Burchard (1 page)

From: Petrea Burchard <pb@petreaburchard.com>
Date: Tuesday, February 14, 2023 at 1:47 PM
To: Public Comment <publiccomment@rosebowlstadium.com>
Subject: Brookside Golf Complex Expansion

Miniature golf is fine, but there's no need to ruin the Arroyo for it. Please mark me down as very much against this plan as it stands.

I'm pretty sure that tearing out trees and adding more lighting in the Arroyo is not in compliance with the Arroyo Seco Master plan or the Arroyo Seco Public Lands Ordinance. Meaning: illegal.

Please revise the expansion plan. You can do better. You can create mini-golf without resorting to breaking the law and killing all the wildlife.

Petrea Burchard Sandel
District 3

R9-1

2. Response to Comments

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2. Response to Comments

R9. Response to Comments from Petrea Burchard, submitted via email February 14, 2023.

R9-1 This comment states that they are opposed to the implementation of the Project because of the removal of trees and increase in lighting in the Project Site. Additionally, the comment states that the Project would be illegal because it would not be in compliance with the Arroyo Seco Master Plan or the Arroyo Seco Public Lands Ordinance. 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; and 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 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. It should also be noted that no trees would be impacted as a result of the development of miniature golf. All tree impacts are related to the driving range improvements, as shown in Attachment D, *Potential Locations of Trees to be Removed*.

2. Response to Comments

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2. Response to Comments

COMMENT R10 - William Morris (1 page)

On 2/13/23, 7:19 PM, "Will Morris" <willmorris408@msn.com <mailto:willmorris408@msn.com>> wrote:

- > Please keep the #2 course (EO Nay) as a par 70 - it matters to golfers and the public.
- >
- > Also, please be sensitive to #10 on the CW Koiner course. Please do no harm -
- >
- > William Morris
- > 408 Arroyo Terrace
- > Pasadena, CA 91103

R10-1

2. Response to Comments

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2. Response to Comments

R10. Response to Comments from William Morris, submitted via email February 14, 2023.

R10-1 This comment states that the E.O. Nay course should remain as a Par 70, and alterations to hole 10 should not damage the course. Please see Topical Response 6, *Recreation*, regarding the procedures that would be taken by the RBOC to minimize potential impacts to the recreational facilities in the Project Site, including potential impacts to the E.O. Nay course to ensure impacts associated with recreational facilities would be less-than-significant.

2. Response to Comments

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2. Response to Comments

COMMENT R11 - William Morris (1 page)

On 2/14/23, 9:11 PM, "Will Morris" <willmorris408@msn.com <mailto:willmorris408@msn.com>> wrote:

I understand that you seem to be wed to a particular type of mini golf - but having played many, many miniature golf courses - think you should consider the mini golf and botanical gardens on Kauai. Best facility I have ever seen by far. Educational, ecological and fun.

Also - consider Vitense in Madison, Wisconsin (indoor version) and think of using Pasadena landmarks. Pasadena Heritage could certainly help - Rose Bowl, Gamble House, City Hall, Main Library, Arlington Garden, Cal Tech, Green Hotel, Santa Fe Depot, Huntington Library, Langham Hotel - could be really cool!

Please, please consider - would be wonderful!

Thank you -
Will Morris

Sent from my iPhone

R11-1

2. Response to Comments

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2. Response to Comments

R11. Response to Comments from William Morris, submitted via email February 15, 2023.

R11-1 This comment provided recommendations and examples for the types of miniature golf course that could be implemented for the Project. The comment provides no specific issue regarding the detailed technical analyses contained within the IS/MND regarding these topics. This comment's recommendation 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.

2. Response to Comments

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2. Response to Comments

COMMENT R12 - Vicki Livingstone (1 page)

On 2/15/23, 9:00 AM, "Vicki Livingstone" <vstonedeco1@gmail.com <mailto:vstonedeco1@gmail.com>> wrote:

Hello, I have lived in Pasadena, all my life, mostly on the west side. I have used the Arroyo to walk dogs, walk my children and to generally enjoy the beautiful trees and landscape.

I now hear the Brookside golf course is being touted as a world class golf course. I did not know this fact. None the less, miniature golf should not be considered for the Arroyo. I have read and re-read Tim Brick's commentary on why this should not be allowed and I could not say it any better or add any other comments. You all need to pay attention to those who know the facts and are working hard to preserve the land, not tear it apart by removing trees, etc!! As far as I am concerned you are ruining Pasadena and all it stands for. People who haven't even visited here love it because of the beautiful pictures of the iconic City Hall, etc. Please do not destroy our city. What is motivating you to do this?? I think I know. Sincerely, Vicki Livingstone Sent from my iPad

R12-1

2. Response to Comments

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2. Response to Comments

R12. Response to Comments from Vicki Livingstone, submitted via email February 15, 2023.

R12-1 This comment expresses opposition to the miniature golf course because of the removal of trees within the Project Site. They reference commentary provided by Tim Brick of the Arroyo Seco Foundation – please see response to comments O7-4 and O10-1. 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

2. Response to Comments

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2. Response to Comments

COMMENT R13 - Susan Whichard (2 pages)

From: Susan Whichard <smwhichard@gmail.com>
Date: Thursday, February 16, 2023 at 7:48 AM
To: Public Comment <publiccomment@rosebowlstadium.com>
Subject: Mini Golf Project

I appreciate the comments and information from the meeting held at Brookside regarding the Mini Golf and Driving Range expansion. While I believe the driving range could use some improvement, I do not believe this to be a functional or safe project.

R13-1

By changing the Koiner hole #10 to a par 3 and reducing the Nay #6 and #7, this reduces the "championship" status for the Nay course. Shortening of holes 6 and 7 on the Nay course, would not create a better pace of play, in fact it would cause more of a backup in that area. The aspect that one course is "better" than the other is not valid in my opinion. Course 2 Nay, is just as important as course 1. In fact, many people prefer the Nay course.

R13-2

While expanding the driving range to the proposed area, this would eliminate the First Tee teaching area, the Brookside instructor's area, and the short game area. The First Tee has many teaching tools that would require open spaces, not driving range stalls. You say spots on the range would be reserved, but I can tell you, people will not abide by this and would use the slots. When we currently have slots reserved for tournaments, etc., the public still use the slots. I volunteer as an ambassador and many times have had to ask people to leave the spots.

R13-3

The dangers of this proposal are many. First, the families would be walking to the mini golf area apparently behind the golfers on the range, while they are swinging clubs. Many times, I have seen children run in front of their parents and almost hit by golfer practicing. Unless you have a fenced walkway for them to walk, there is danger of this and being hit from golfer on Course 1 hole 18. This would also require lighting to guide them safely to and from the course. The area between the driving range and hole 18 on course 1 is very dark after sunset. This could cause tripping injuries if not lit. Many families are not going to walk the ¼ mile it will take to get from the parking lot to the mini golf course.

R13-4

The next danger is the Arroyo next to the mini golf area. Unless there is a fence placed around the mini golf area, you may have children or even adults venture into the Arroyo canal and this proposes a possibility of injury. Perhaps a child hits a ball into the Arroyo, you can bet they will go after it.

2. Response to Comments

The revenue projected seems to be out of line. For families to use the facility it would normally only be weekends. During school hours or work hours for parents, it would basically be empty. There is also the possibility of a noise issue not only to the residents, but to the golfers on Hole 17 and 18 on Course 1. No one wants to hear children screaming while they are golfing.

R13-5

Then there is the matter of staffing. You say there will be no increased labor costs, but if the mini golf and range are open after 5 pm there will need to be someone staffing the Pro Shop to collect for the mini golf and supervise if problems arise. Who will be watching the mini golf? Will there be additional equipment to rent? Yes, golf balls can be automated, but what happens if the machine runs out at 6 pm? Also, who is going to maintain the mini golf course, such as clearing debris, etc. If you have trackman at some of the stations, who is responsible if they "go down" while a player is practicing. Someone must be on site to address any issues that arise. So yes, there will be an increase in labor costs.

R13-6

The next biggest issue is the parking. Most of the times there is not enough room for golfers to park. Using the outer parking lots is not a solution. Again, another hazard walking to their cars at night. There are times when the parking lot is cut in half, i.e., the Sunday swap meet. Golfers have been known to park up in residential areas in order to get to the course, sometimes being as late as 1 hour for their tee time. This is unacceptable. There is no proposal for additional parking.

R13-7

Brookside often has double shotgun tournaments when the entire course is closed. Will that close the mini golf course and driving range also? A full day of no revenue if that is the case.

R13-8

I do not believe this to be a safe environment for the mini golf area. Between children running around and golfers in carts, there is a potential for injury. Perhaps a better plan for an expanded driving range, without reducing the current golf course, could be presented. I do not believe the mini golf will generate the revenue you have projected.

R13-9

It was suggested to go with a multi-tier driving range. This is done at a local course in Alhambra and may be a solution for an expanded driving range. There would still be a need for new poles and fencing.

R13-10

A possible solution is to move the mini golf to near the Rose Bowl children's playground. There is sufficient space and additional parking for families. This area is much more appropriate for children and families. It did not appear any of the slides shown were attached to a golf course, two or three were attached to Kid Space Museum or children's play parks.

Thank you for your time.

Susan Whichard

smwhichard@gmail.com

2. Response to Comments

R13. Response to Comments from Susan Whichard, submitted via email February 16, 2023.

R13-1 This comment states that the commenter does not believe the expansion of the driving range and implementation of the miniature golf course is a functional or safe 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; therefore, no further response is required.

R13-2 This comment states that the alterations to the E.O. Nay and C.W. Koiner course would reduce the championship status of the Brookside Golf Course, and would cause more backup on the existing courses. Please see Topical Response 6, *Recreation*, which demonstrates how implementation of the Project would not negatively impact the existing use of either the C.W. Koiner Course or the E.O. Nay Course, and the Brookside Golf Course would continue to have a championship layout while improving the pace of play.

R13-3 This comment states that the Project would impact the First Tee teaching area, the Brookside instructor's area, and the short game area. 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.

R13-4 This comment expresses concern for the safety of families and children that would visit the proposed miniature golf course, due to the swinging golf clubs at the driving range, walking distance from the parking lot, and proximity to Arroyo Seco channel, which would create the western boundary of the Project Site. The existing Project Site is currently fenced along the Arroyo Seco channel, and implementation of the Project would continue to include fencing along the perimeter of the Project Site, including around the miniature golf course. The existing Brookside Golf Course is currently open to families and children that participate in programs such as First Tee – Greater Pasadena. Although the implementation of the miniature golf course would increase the number of visitors, additional safety impacts to families and children would not be anticipated.

With respect to public safety in the Project Site and the surrounding areas, Attachment C, *Existing Light at Brookside Golf Course*, shows that walkways and parking lots leading to and from the existing driving range provide sufficient lighting to ensure the safety of visitors and staff that exit the Brookside Golf Course after sunset, in current conditions. Additionally, please see Topical Response 2, *Lighting*, which describes that IS/MND accurately assesses impacts related lighting and pedestrian safety within the Project Site and the parking lot areas

2. Response to Comments

- R13-5 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. Additionally, the commenter states that there is a possibility for increased noise that would disrupt residents surrounding the Project Site and golfers within the Brookside Golf Course. 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.
- R13-6 This comment expresses the commenter's concern with staffing and maintenance costs of the Project. The Brookside Golf Course currently employs sufficient staff to operate and maintain the proposed components of the Project; as such, the proposed driving range and miniature golf course would not result in an increase of staff. The commenter's statements regarding labor costs 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. .
- R13-7 This comment states the commenter's concern with parking impacts that would result from the Project. 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, and ensure pedestrian safety within the Project Site and the parking lot areas. The commenter's statements will be provided to the RBOC for its consideration as part of its decision-making for this project.
- R13-8 This comment discusses the potential loss of revenue due to the double shotgun tournament. 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.
- R13-9 This comment also expresses concern for the safety of children that would visit the proposed miniature golf course, due golf carts on the golf course. The existing Brookside Golf Course is currently open to families and children that participate in programs such as First Tee – Greater Pasadena, and safety risks to young golfers have not been an issue

2. Response to Comments

over the life of the program. Although the implementation of the miniature golf course would increase the number of visitors, additional safety impacts to families and children are not anticipated, particularly given the distance separation between the mini golf area and anywhere that golf carts may be driven.

The comment provides no specific issue regarding the detailed technical analyses contained within the IS/MND regarding these topics. The commenter's statement 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.

- R13-10 This comment states that the RBOC should consider the implementation of a multi-tier driving range and an alternate location for the proposed miniature golf course, near the Rose Bowl children's playground. 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. With respect to the alternative suggested, it would result in environmental impacts beyond those associated with the Project and created emergency access issues with the site.

2. Response to Comments

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2. Response to Comments

COMMENT R14 - Jill Sigler (1 page)

On 2/16/23, 12:21 PM, "JILL SIGLER" <jillsigler626@gmail.com <mailto:jillsigler626@gmail.com>> wrote:

I oppose the addition of a mini golf course and the removal of so many trees to accommodate it. Additionally, there is already enough traffic and congestion in the area around the clubhouse and the surrounding neighborhoods...we don't need more!

R14-1

R14-2

Thank you

Jill Sigler

2. Response to Comments

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2. Response to Comments

R14. Response to Comments from Jill Sigler, submitted via email February 16, 2023.

- R14-1 This comment opposes the implementation of the miniature golf course because of the removal of trees within the Project Site. 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. It should also be noted that no trees would be removed due to development of the miniature golf. It should also be noted that no trees would be removed due to the miniature golf project. All tree impacts are related to the driving range improvements, as shown in Attachment D, *Potential Locations of Trees to be Removed*.
- R14-2 This comment states that the Project would increase traffic in areas surround the Project Site. 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.

2. Response to Comments

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2. Response to Comments

COMMENT R15 - Patricia Crook (1 page)

On 2/18/23, 3:40 AM, "patriciacrook39@yahoo.com <mailto:patriciacrook39@yahoo.com>" <patriciacrook39@yahoo.com <mailto:patriciacrook39@yahoo.com>> wrote:

I a a long time resident of Pasadena and am opposed to the plan to remove trees and install a mini golf course. | R15-1

Patricia Crook
605 EvergreenDr
Pasadena, CA 91105

1

2. Response to Comments

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2. Response to Comments

R15. Response to Comments from Patricia Crook, submitted via email February 18, 2023.

R15-1 This comment expresses the commenter's opposition to the removal of trees for the construction of the Project. 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. Additionally, the comment expresses 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 recommendation regarding opposition to the miniature golf course will be provided to the RBOC for its consideration as part of its decision-making for this Project. It should also be noted that no trees would be removed due to development of the miniature golf 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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2. Response to Comments

COMMENT R16 - James Treidler (10 pages)

From: James Treidler <berick.treidler@gmail.com>
Date: Saturday, February 18, 2023 at 5:37 AM
To: Public Comment <publiccomment@rosebowlstadium.com>
Subject: Miniature Golf and Driving Range Comments - NMD

Please see the attached comments on the proposed changes to the golf course and driving range.

2. Response to Comments

MINIATURE GOLF ANALYSIS

1

MINIATURE GOLF ANALYSIS

Existing Proposal

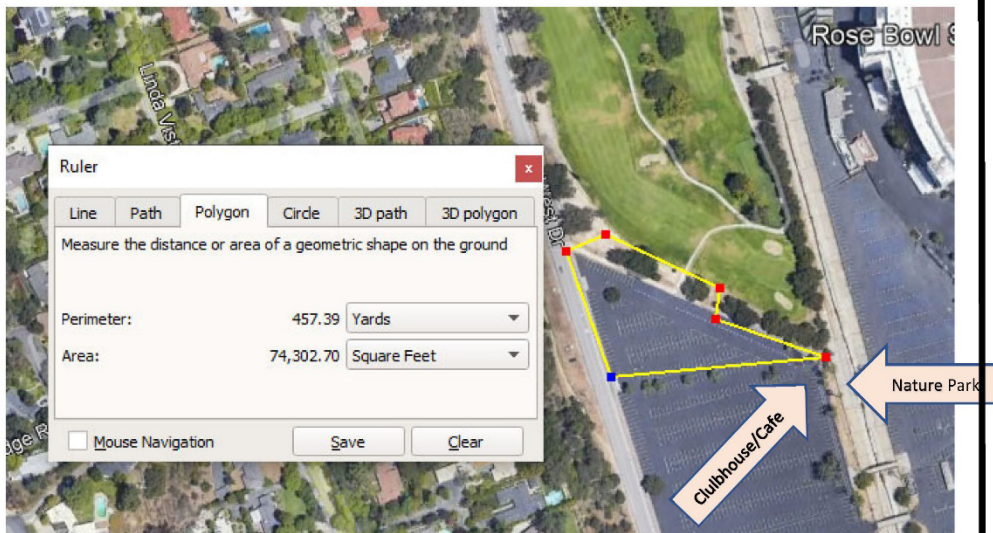
Challenging elements of the proposed miniature golf course at the western edge of the existing driving range are:

- The location is more than one-quarter mile from the prime parking area which is too far and would likely negatively impact long-term utilization
- The prime parking lot is heavily utilized and the additional volume of users would exacerbate the current situation
- The facility would have no exposure and an unattractive entryway along the driving range stalls
- The design does not include any additional amenities to make this an attractive recreational opportunity
- The overall benefit to the general public is minimal

R16-1

Alternative Proposal – Lot K

The following Google Earth exhibit shows an alternative location for the miniature golf course. A description of the design and benefits of this option are discussed after the exhibit.



R16-2

- This location is one of the least utilized parking lots within the Rose Bowl and would have minimal impact on existing uses

2. Response to Comments

MINIATURE GOLF ANALYSIS

2

- The actual site area used could be modified to meet optimum specifications by the course architect (the sketch is larger than the land area of the existing proposal)
- The course design should incorporate all existing trees and would remove asphalt paving resulting in a net positive environmental impact
- The design could be expanded to include:
 - o An educational nature park along the west side of the Arroyo with outdoor seating extending from the pedestrian bridge to the south to the clubhouse
 - o The clubhouse should incorporate a walk-up café to encourage walkers, bikers and other users of the Rose Bowl loop to park in Lot K. The café concept is similar to The Trails café at 2333 Fern Dell Drive in Griffith Park – outdoor only with a walk-up window.
 - o Incorporate a trail head and a trail linking the proposed nature park across the parking lot to the existing equestrian trail on the west side of West Drive. The current trail along the south side of the 7th hole is in poor condition and almost never used.

If executed properly, this alternative proposal would be a net benefit to the community as it would create a new, readily accessible area for the public to gather and enjoy the splendor of this unique environment.

R16-2
Cont'd

2. Response to Comments

DRIVING RANGE ANALYSIS

1

DRIVING RANGE ANALYSIS

Existing Proposal

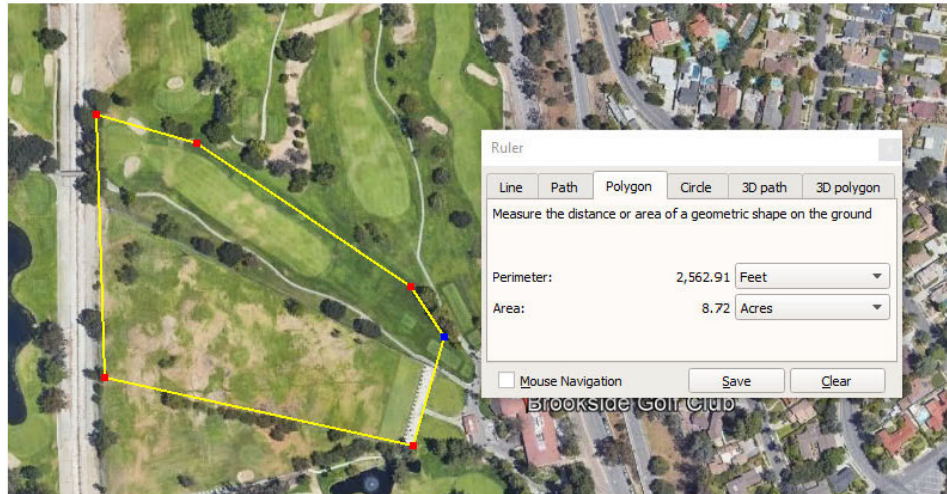
Challenging elements of the proposed driving range are:

- The negative impact on the E.O. Nay course is severe and the 6th hole as it exists is unique and should not be altered
- The proposed tree removal is extensive and unnecessary
- Lighting the driving facility is not compatible with the historic use or public benefit

Because the proposed design is not optimal other options should be explored including the following two proposals.

Alternative Proposal 1 - Driving Range and 10th Hole New Location

The following Google Earth exhibits shows an alternative location for the driving range which incorporates all of the 10th hole of the Koiner Course. This proposal recognizes that removal of the existing 10th hole would not significantly alter the overall appeal of the Koiner Course.



Benefits of this design are:

- Stalls could be expanded to the north
- A two-level structure could be built and should net 50+ stalls
- The trees could remain as they add a visual element to the range.
- The existing 10th hole green could remain as a target for long-ball hitters.

R16-3

R16-4

2. Response to Comments

DRIVING RANGE ANALYSIS

2

The following Google Earth exhibit shows an alternative location for the 10th hole using the existing chipping/sand trap area to create a 170-yard, Par 3 hole.



R16-4
Cont'd

Benefits of this design are:

- It is an opportunity to create a "signature" hole with unique elements that are different than the rest of the course
- The existing trees form a natural border for the hole and the cart path access is very attractive as it meanders through trees along the pond/fountain area
- There is a mature Sycamore tree at the western edge that could be used to create a target for the green
- The existing 10th hole and driving range would remain open until the new hole is complete resulting in no disruption in play
- The overall cost should be lower as only one hole is being impacted
- The Koiner Course would still be a par-71 championship course and depending on the design of the 10th hole it could even be more challenging than the current layout

2. Response to Comments

DRIVING RANGE ANALYSIS

3

Alternative Proposal 2 – Build a Structure

Another option would be to design a two-story structure do double the number of bays with no other changes. Benefits of this design are:

- Lowest cost as no significant changes are required.
- It maintains the chipping/sand trap area
- It does not require the removal of any trees

R16-4
Cont'd

2. Response to Comments

LIGHTING ANALYSIS

1

LIGHTING ANALYSIS

Challenging elements of the proposed lighting for the driving range are:

- Lighting the driving facility is not compatible with the historic use
- It is not necessary for the operation of the golf courses
- The golf course and driving range should remain unlit as this results in a "dark" area which is a benefit (particularly for nocturnal animals)
- Ambient lighting is already extensive and all proposals should include mitigating measures which result in a net lower level of foot candles within the wider area (e.g. pay for the cost of modernizing older lighting in the area to reduce total foot candles).

R16-5

Lighting Documentation

The photographs on the following pages demonstrate the existing infrastructure and illustrate the impact of existing lighting. These photographs were taken at approximately 4:00am on February 17, 2023. Items to note are:

- The first three photographs demonstrate the extensive ambient light from fixtures at the Rose Bowl and associated parking lots.
- The 4th and 5th photographs show that the golf course is effectively dark beyond the lighting at the clubhouse and surrounding structures (the light in the driving range photograph is a maintenance worker on a tractor collecting balls).

R16-6

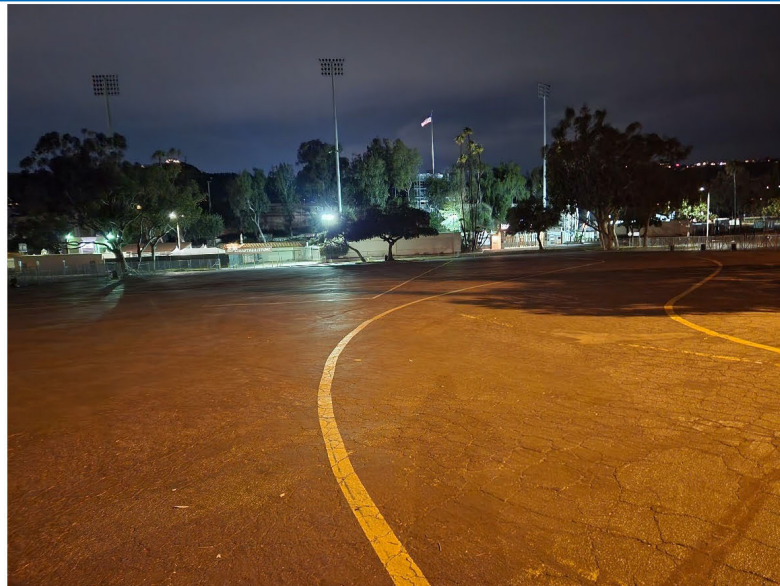
2. Response to Comments

LIGHTING ANALYSIS PHOTOGRAPHS

2



Rose Bowl from Armada Drive



Rose Bowl from Lot B

R16-6
Cont'd

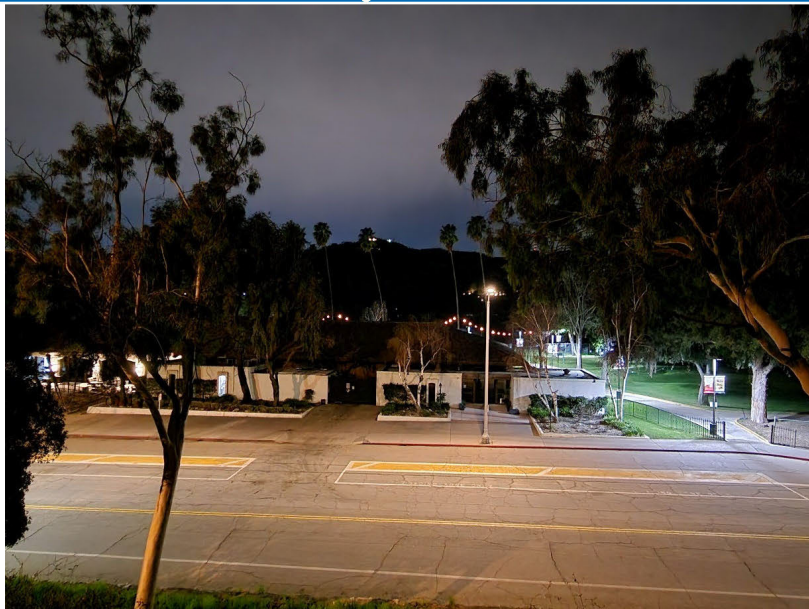
2. Response to Comments

LIGHTING ANALYSIS PHOTOGRAPHS

3



Parking lot access road



Brookside Clubhouse from Rose Bowl Drive

R16-6
Cont'd

2. Response to Comments

LIGHTING ANALYSIS PHOTOGRAPHS

4



Driving Range From Southeast Corner

R16-6
Cont'd

2. Response to Comments

R16. Response to Comments from James Treidler, submitted via email February 18, 2023.

- R16-1 This comment states that the distance to the parking lot from the proposed miniature golf site is too far, and would also result in insufficient parking within the existing lots. 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. The commenter also states the components of the Project would be unattractive and the design of the Project does not include any additional amenities. As stated throughout the IS/MND, 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. The commenter's recommendation regarding opposition to the miniature golf course 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.
- R16-2 This comment provides an alternative location for the miniature golf course, near parking lot K. 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. It should also be noted that Lot K is contractually obligated to UCLA and the Tournament of Roses; therefore, alterations or removal of parking spaces is not feasible.
- R16-3 This comment states that the project would have negative impact to the E.O. Nay course. Please see Topical Response 6, *Recreation*, which demonstrates how implementation of the Project would not negatively impact the existing use of either the C.W. Koiner Course or the E.O. Nay Course, and the Brookside Golf Course would continue to have a championship layout while improving the pace of play. Additionally, the comment states that the Project would require extensive and unnecessary removal of trees within the Project Site, and the proposed lighting for the driving range would not be compatible with the historic use of the Arroyo Seco. 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; and 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.
- R16-4 This comment provides alternative design for the proposed driving range, including expansion of the Project Site boundaries, and implementation of a two-story driving range. Please see Topical Response 8, *Project Alternatives*, regarding the alternatives and how

2. Response to Comments

the IS/MND is sufficient in not evaluating environmental impacts of other alternatives. With respect to the alternative suggested, it would result in environmental impacts beyond those associated with the Project and create emergency access issues within the Project Site. The current driving range tee line is an emergency exit path for Rose Bowl events such as the Rose Bowl Game and music festivals. A permanent two-story structure would restrict access for emergency responders to the Project Site and the surrounding golf course during events at the Rose Bowl Stadium, including UCLA football games, other sporting events, concerts, and music festivals.

R16-5 This comment states that the proposed lighting for the driving range would not be compatible with the historic use of the Project Site. Additionally, the commenter suggests that the proposed lighting is unnecessary and that the Project Site should remain unlit because it is a benefit to the wildlife in the area. Finally, the commenter states that the Project should include mitigation measures that result in net lower level of foot candles with 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. In addition, please see Topical Response 3, *Tree Removal and Wildlife*, regarding the procedures that would be taken by the RBOC to minimize potential lighting impacts to wildlife within the Project Site, including Mitigation Measure BIO-1 to reduce lighting impacts to wildlife.

R16-6 This comment contains images provided by the commenter for the purpose of demonstrating the existing infrastructure and illustrated the impact of the existing lighting on the Project Site. As described in Topical Response 2, *Lighting*, the Project, through both compliance with City of Pasadena requirements and through the implementation of additional mitigation, would not exceed established lighting thresholds applicable to the Project. Therefore, no revisions are necessary.

2. Response to Comments

COMMENT R17 - Jennifer Jacobs (1 page)

On 2/18/23, 4:06 PM, "Jennifer Jacobs" <jenn.r.jacobs@gmail.com <mailto:jenn.r.jacobs@gmail.com>> wrote:

I live on Arroyo Blvd and I am disgusted by the idea of removing 47 healthy mature trees from our community. We have enough problems with deaths of mature trees being besieged by new diseases and insects which we can not control. These are trees which we have the option to keep/save. It's utterly appalling that this is even being considered. You would never let a local homeowner take down a mature tree, how can this rule sidestepped by Brookside to such an extreme?

R17-1

Go back to the drawing board. This is really poor idea. By the way if you polled the actual residents of Pasadena, I guarantee that they would not be the ones using the mini golf course...you would just be providing entertainment for people outside our community.

R17-2

Sincerely,
Jennifer Jacobs
Arroyo Seco Resident.

Sent from Jennifer's iPhone

2. Response to Comments

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2. Response to Comments

R17. Response to Comments from Jennifer Jacobs, submitted via email February 18, 2023.

R17-1 This comment states the commenter's opposition to the removal of trees for the Project. 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. It is important to note that no rules are being sidestepped by the RBOC, that it works closely with the City's Public Works Department to manage trees, and complies with the City's Tree Protection Ordinance. It should also be noted that no trees would be impacted as a result of the development of miniature golf. All tree impacts are related to the driving range improvements, as shown in Attachment D, *Potential Locations of Trees to be Removed*. Any tree removals needed would go through UFAC and then to the City Manager just as is the case for any open space trees in Pasadena.

R17-2 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 comment 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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2. Response to Comments

COMMENT R18 - Ellen G. Strauss (3 pages)

From: "Strauss, Ellen G." <strausse@caltech.edu>
Date: Sunday, February 26, 2023 at 8:44 AM
To: Public Comment <publiccomment@rosebowlstadium.com>
Subject: Proposed developments of driving range and miniature golf

Here are my comments.

To whom it may concern:

I recently attended the informational meeting at the Brookside Gold Clubhouse concerning the proposed "improvements" and am sharing my thoughts.

I am a local resident and a non-golfer and a senior citizen, which may explain my biases. I found the meeting to be somewhat distressing for many reasons. It was obvious that the attendees at the meeting were not a cross-section of either the population of Pasadena, or even of the area surrounding the Golf Course, for >90% of the audience were Caucasian men over 60. I assume this is the demographic of local golfers. However, the individuals who spoke at the meeting were largely the same mix, with a few more women represented. Also notable was the fact that all of the speakers were opposed to the proposed enhancements.

R18-1

I found the meeting in general to be long on hand-waving and very short on specifics. Many in the audience questioned various aspects of the changes and were told "that is still to be worked out." It was obvious that two different projects have been bundled together, which address different audiences and should be considered separately, namely 1) increasing the capacity of the driving range and 2) constructing a miniature golf course.

R18-2

One of the first things to be determined, to my mind, is to identify who would benefit from the proposed changes. If you are a non-golfer, you get no benefit at all. If you are a local resident, you get no benefit at all.

R18-3

I must admit I learned, by Googling after the meeting, a lot about miniature golf, since my view of miniature golf dates from the 50's and 60's, and I had envisioned a small local course, full of Disneyesque castles, ramps, and fantasy obstacles. I was also unaware that within 12 miles of the Rose Bowl there are currently > 10 miniature golf courses. Reading comments and reviews from users I did not get the idea that any of these were crowded, and in one case the course was

R18-4

2. Response to Comments

described as "run-down", implying that miniature golf is not a flourishing activity locally. Indeed one of the locally courses offered "live music" as an inducement! Thank goodness this was not suggested here. The courses illustrated as examples by the proponents looked like small (miniature) replicas of a standard golf course, and actually did not look like very much fun. I failed to see how they would attract over-stimulated young people raised on video-gaming. So to my mind, the case for introducing a miniature golf course within Brookside at all has not been made. Nor do I feel it will increase golf participation by (minority) youth, even though the proponents will probably try to justify it to increase "equity" and "diversity." One possibility to be considered, it to locate the miniature golf course down at the other end of the open space near the swimming pools and playgrounds, where currently there seems to be adequate parking, and already some night-time events with lights take place in the soft-ball stadium.

R18-4

Listening to the grumpy comments from nearby audience members, I came to the conclusion that expanding the capacity of the driving range would be welcomed. However, I believe that the first type of increased capacity to be considered would be to construct a double-decked driving range, which would double the capacity without requiring more space. Such double-decked driving ranges are very popular in Japan, and are found throughout urban areas, and caged, so they do not impinge on parkland. Moreover I would hope that the driving range could be constructed of astro-turf, such that water use would not increase. I found it disingenuous that the proponents also propose to increase the hours available (current hours of operation were not given for comparison), and increasing the lighting to permit night use. This was another aspect that was not mentioned until specifically raised by an audience member.

R18-5

Ecologically, the two proposals are disastrous. Our city fathers seem to be in favor of increased urbanization and increased population density as part of the Pasadena Master Plan. This means that such open, spaces that we have must be carefully fostered and preserved. By this I mean spaces largely left alone for wildlife which form oases of quiet, dark, woodland. The city fines residents if they try to cut down a single tree, but seemingly endorse this proposal which will take out a minimum of 47 mature trees. Again, saying this will not be done until "after the nesting season" is bureaucratic hogwash. A mature tree provides decades of nesting seasons, not one.

R18-6

One example, Brookside Golf Course is a valuable habitat now. I live up a small canyon west of the course, and keep careful records of bird sightings, and it is notable that although we have seen almost 100 species on our property, there are an additional 25 species that we have seen in the micro-habitat at Brookside that do not reach our property.

I am less than convinced that installing 100ft tall lights to be left on every night of the year until 10 PM will not be deleterious to the health of not only the wildlife in the park, but also the quality of life for the residents overlooking the Arroyo on all sides. Light pollution is a true scourge.

R18-7

Other problems were not even touched upon in the meeting, such as general congestion, parking, lighting not only of the actual driving range and miniature golf course, but also of the walkways to and from these venues and throughout the parking lots for them, and noise even without "live

R18-8

2. Response to Comments

music". If these venues are open at night, what about concessions? restrooms? How can the proponents believe that increased personnel would not be needed for these increased visitation hours? Golf, by its nature is elitist, people do not come to a golf course on the bus or on a bicycle; they come in cars.

R18-8

It is not clear what strictures are in effect on the use of the land in its city charter, and whether increased commercialization of the Arroyo is in conflict with the efforts of the Friends of the Arroyo to restore the watercourse to a more natural landscape. With the loss of acres and acres of riparian habitat above Devil's Gate Dam due to the flood control activities, it is even more important to preserve what we already have at Brookside. Moonrise over the course is an awesome sight from Parkview, and especially so at times of lunar eclipse; this would be lost due to light pollution.

R18-9

Thank you. Ellen G. Strauss

2. Response to Comments

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2. Response to Comments

R18. Response to Comments from Ellen G. Strauss, submitted via email February 26, 2023.

- R18-1 This comment expresses concern with the information that was provided at the February 13, 2023 community information meeting and those who were in attendance. The comment provides no specific issue regarding the detailed technical analyses contained within the IS/MND regarding these topics. The commenter's statement 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.
- R18-2 This comment states that the two components of the Project, the expansion of the driving range and the implementation of the miniature golf course, should be considered separately. Given the financing mechanisms necessary for implementation, the RBOC has determined that both elements of this Project should be considered together as one Project, and that should the two aspects of the Project be considered separately, it could be considered "piecemealing" under CEQA, which is expressly prohibited by CEQA Guidelines.
- R18-3 The commenter questions who will benefit from the implementation of the Project. The comment provides no specific issue regarding the detailed technical analyses contained within the IS/MND regarding these topics. The commenter's statement 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.
- R18-4 The commenter provides information gathered during review of other miniature golf courses in the region to illustrate the other courses are not overly crowded, run down, or provide activities beyond those proposed by the RBOC for this Project. The comment also states that alternate an alternate location should be considered for the miniature golf course, near the Rose Bowl Aquatic Center and playgrounds. 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. 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.
- R18-5 This comment states that the RBOC should consider the implementation of a double-decker driving range to double capacity without requiring more space on the Project Site. 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. With respect to the alternative suggested, it would result in environmental impacts beyond those associated with the Project and created emergency access issues with the site. Additionally, the commenter states their disagreement with the proposed increased hours of operation for the driving range, which would increase use of nighttime lighting on the Project Site

2. Response to Comments

and that current hours of operation are not provided for comparison. As states on page 15 of the IS/MND, current operational hours of the driving range and golf course are from 6:00 a.m. to 8:00 p.m. seven days a week. The driving range and miniature golf course would be open to the public between 6:00 a.m. and 10:00 p.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. 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.

- R18-6 This comment expresses concern that the Project will negatively impact wildlife in the Brookside Golf Course and the proposed tree removal would harm nesting birds in the area. 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, including the implementation of Mitigation Measures MM-BIO-1 and MM-BIO-2.
- R18-7 This comment expresses concern with the proposed lighting for the driving range, and how it will impact wildlife, as well as neighboring residents 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 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.
- R18-8 This comment states that the Project would result in increased traffic congestion and parking 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. The commenter also 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. Additionally, please see Topical Response 5, *Noise*, regarding the City's noise regulations and how the Project complies with all policies regarding light and noise, and requires additional mitigation measures to ensure impacts associated with lighting would be less-than-significant.
- R18-9 This comment states that the Project could states that the project would not be consistent with the City of Pasadena's land use regulations for the Arroyo. 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.

2. Response to Comments

Additionally this comment states that implementation of the Project would have a negative effect on wildlife habitats and lighting in 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; and 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.

2. Response to Comments

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2. Response to Comments

COMMENT R19 - Maureen Hosp (1 page)

On 3/1/23, 4:25 PM, "Maureen Hosp" <moehosp@gmail.com <mailto:moehosp@gmail.com>> wrote:

To whom it may concern:

This email is to express my concerns over the scope of the above referenced improvements project. I am a Linda Vista resident. I and many residents are very concerned about the impact that

1. Lighting the driving range until 10 PM every night 365 days a year and corresponding noise would impact surrounding neighborhoods and those that overlook the Rose Bowl. R19-1
2. The amount of traffic that would be brought into the area would greatly change the dynamics and aesthetics of our unique neighborhood. R19-2
3. lighting and commotion for hours on end will definitely disrupt wildlife and the natural environment. R19-3

I am opposed to the plan in its current form.

Please forward this email and comments to the appropriate department. Thank you

Maureen Hosp
Sent from my iPhone.

2. Response to Comments

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2. Response to Comments

R19. Response to Comments from Maureen Hosp, submitted via email March 1, 2023.

- R19-1 This comment expresses concern regarding the increased lighting for the driving range and corresponding noise impacts that would result from the driving range's proposed hours of operation. 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.
- R19-2 This comment states that the project would result in increased traffic in the areas surrounding the Project Site. 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.
- R19-3 This comment states that the noise and lighting from the driving range and miniature golf course would negatively impact wildlife in the area. 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.

2. Response to Comments

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2. Response to Comments

COMMENT R20 - Frank Clem (1 page)

From: Frank Clem <frankclem@me.com>
Date: Wednesday, March 1, 2023 at 4:45 PM
To: Public Comment <publiccomment@rosebowlstadium.com>
Subject: Rose Bowl golf changes

All,

While I am certainly not against change or finding a way to keep the doors open in the Rose Bowl, I find parts of this proposal to be rushed and inconsistent.

First,

I love mini golf, but it doesn't belong next to real golf nor should land be taken from real golf for mini golf. Both courses at the Rose Bowl are proper and challenging courses with a long history. They should not be compromised for mini golf.

R20-1

There is a lot of open room near the Kidspace and more parking there as well. That seems to be the natural location for mini golf.

As to the lighting issue, we in the area already put up with a lot with concerts, sporting events etc. But those are not every night. This project would light up the arroyo every night and stress an already stressed parking situation by the Bowl.

R20-2

We live here full time and will be dealing with this project for years to come. It needs more thought and better solutions.

Best,

Frank Clem
Parkview Ave.

Office in the Saddle

2. Response to Comments

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2. Response to Comments

R20. Response to Comments from Frank Clem, submitted via email March 1, 2023.

R20-1 This comment expresses the commenter's opposition to the implementation of the miniature golf course within the existing Brookside Golf Course, due to the potential effects it would have on the E.O. Nay and C.W. Koiner course. Please see Topical Response 6, *Recreation*, which demonstrates how implementation of the Project would not negatively impact the existing use of either the C.W. Koiner Course or the E.O. Nay Course, and the Brookside Golf Course would continue to have a championship layout while improving the pace of play. Additionally, the commenter recommends an alternate location for the proposed miniature golf course, near the Kidspace museum. 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.

R20-2 This comment states that the Project would result in increased lighting in the area, that they would have to deal with every night. 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, the commenter states that the Project would result in negative impacts to parking in the areas surrounding the Project Site. 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.

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2. Response to Comments

COMMENT R21 - Nancy Gadel (1 page)

On 3/1/23, 5:08 PM, "Nancy Gadel" <ciaotunzi@aol.com <mailto:ciaotunzi@aol.com>> wrote:

Have lived in Linda Vista for 40 years. Every aspect of this project saddens me!
What a shame re: expansion: the removal of so many perfectly healthy trees, the toll it will take on wildlife and the impact on nearby residents (myself included).
Very disappointing.

R21-1

Nancy Gadel

Sent from my iPhone

2. Response to Comments

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2. Response to Comments

R21. Response to Comments from Nancy Gadel, submitted via email March 1, 2023.

R21-1 This comment expresses the commenter's opposition to the Project due to the removal of trees, and potential impacts to wildlife located within the Arroyo Seco. 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. This comment's recommendation will be provided to the RBOC for its consideration as part of its decision-making for this Project.

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2. Response to Comments

COMMENT R22 - Patty Montbriand (2 pages)

From: Patty Montbriand <montbrilliant@gmail.com>
Date: Wednesday, March 1, 2023 at 8:03 PM
To: Public Comment <publiccomment@rosebowlstadium.com>, Tyron Hampton <Info@tyron.us>, Cushon Bell <cbell@cityofpasadena.net>, Victor Gordo <vgordo@cityofpasadena.net>
Subject: Oppose the inappropriate addition proposed to Arroyo Seco

Dear community leaders, committee leaders and residents,

I went to a meeting a couple of weeks ago that made my hair stand on end. I heard about this meeting by reading a newspaper article. There's been no conversation. There's been no notice to our neighborhood that the Rose Bowl is thinking of ripping out dozens of venerable trees on the golf course and replacing them with "directional light posts" on the golf course. The proposal is tripling the size of the driving range.

R22-1

R22-2

R22-3

Years ago the Tournament of Roses wanted to build three warehouses at Brookside Park. Luckily, the neighbors got together and one float warehouse was built, which is now Rosemont pavilion. So had the neighbors not said anything there would be three monstrous warehouses in the Arroyo instead of just one monstrous warehouse that sits there,

R22-4

2. Response to Comments

reflects the sun into the neighborhood, and is lit up like it's in an industrial park. Bright lights every night. Profits to the T of R. But I get sidetracked.

R22-4
Cont'd

This golf course debacle includes a miniature golf course running parallel to the driving range. The way that mini golf course is situated just makes no sense to me to have families playing where errant balls are sure to fly.

R22-5

I am wholeheartedly against this project. Losing trees for profit, adding artificial light to the floor of our Arroyo Seco, adding more traffic until late in the night, 7 days a week.

R22-6

The Arroyo Seco is becoming a carnival zone for the benefit of the Rose Bowl.

Thank you for the opportunity to comment.

Sincerely, yours,
Patty Montbriand
517 Prospect Terrace
Pasadena, CA 91103
Montbrilliant@gmail.com
(626)399-3242

Sent from my handheld device.

2. Response to Comments

R22. Response to Comments from Patty Montbriand, submitted via email March 1, 2023.

- R22-1 This comment states that notices were not sent to neighbors surrounding the Project Site. However, as stated in Section 1.5, *Public Engagement*, the RBOC circulated a Notice of Intent (NOI) to Adopt a Mitigated Negative Declaration (MND) to addresses within 500 feet of Project Site, which included a total of 531 residences. Additionally, the RBOC emailed notification to the interested party distribution list consisting of over 1,000 recipients. The Project was properly noticed consistent with CEQA Guidelines Section 15072.
- R22-2 This comment states that the RBOC is considering removing dozens of trees in the Project Site and replacing them with “directional light posts”. As discussed in the IS/MND, the final number of trees that would require removal or relocation is dependent on the final design of the Project. 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.
- R22-3 This comment states that the Project would triple the size of the existing driving range. As stated on page 6 of the IS/MND, expanding the number of stalls would serve the existing demand of golfers who now may wait over an hour for a hitting bay to open.
- 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.
- R22-4 This comment states that a previous project was implemented in the Arroyo Seco. The comment provides no specific issue regarding the detailed technical analyses contained within the IS/MND regarding these topics. 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.
- R22-5 This comment states that the location of the miniature golf course would be unsafe for families due to the golfing activities that would be occurring on the golf course. The existing Brookside Golf Course is currently open to families and children that participate in programs such as First Tee – Greater Pasadena. Although the implementation of the miniature golf course would increase the number of visitors, additional safety impacts to families and children are not anticipated, and in any event safety is a key element of the proposed netting around the driving range. 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

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the content or adequacy of the IS/MND and does not raise a specific environmental issue; therefore, no further response is required.

- R22-6 This comment expresses the commenter's opposition to the Project due to the loss of trees within the Project Site, the addition of new lighting in the Arroyo Secco, and increase in traffic that could result from the Project. 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, and 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 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.

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COMMENT R23 - Patrick Feely (1 page)

On 3/2/23, 8:37 AM, "Pat Feely" <psfeely10@gmail.com <mailto:psfeely10@gmail.com>> wrote:

I want to add my voice to the many that object to the project under consideration. I am a golfer at Brookside and Linda Vista area resident about a quarter mile from the golf course. Our golf course is a public facility that should be left alone without massive development into something it was never intended to be. It should never be viewed as a "business" as the committee often seems to view it. Rather it is a service to the community, not a commercial endeavor. Sure it needs to pay for itself: but the course is so popular that it is hard to get a starting time, so just raise the prices if you need more money to pay the bills. This is also sure to change the character of our neighborhood and should not proceed under any circumstances without full town council approval.

Patrick Feely

R23-1

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2. Response to Comments

R23. Response to Comments from Patrick Feely, submitted via email March 2, 2023.

R23-1 This comment states that the Brookside Golf Course should not be viewed as a “business” and should instead be viewed a service to the community, not a commercial endeavor. The commenter also provides recommendations for increasing revenues, without the implementation of the Project. The commenter’s recommendations 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.

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2. Response to Comments

COMMENT R24 - Geoff Bland (1 page)

From: Geoff Bland <geoff.bland@wedbushcapital.com>
Date: Thursday, March 2, 2023 at 9:08 AM
To: Public Comment <publiccomment@rosebowlstadium.com>
Subject: No on Brookside Golf Course Improvement Project

To the Rose Bowl Operating Committee Board,

I write this note with the understanding that you are looking to achieve financial sustainability, but I am adamantly against your project for the following reasons:

- Lack of transparency with regard to our community – this is been underway for more than a year, but I just heard about it about one month ago.
- Removal of trees – harmful to our wildlife
- More congestion without additional parking
- More noise
- Cost of funding – irresponsible to borrow more until your current RoseBowl debt is paid off
- And lastly, and more importantly, Lighting until 10pm (and likely longer with cleanup) – even with the “special lights” that were noted, this will make sleeping more difficult, it will be an eyesore in the Arroyo and it will negatively affect wildlife. The “permanent” glow will FOREVER change the Arroyo.

R24-1

R24-2

R24-3

R24-4

R24-5

R24-6

Sincerely,
Geoff Bland
870 Chula Vista Avenue
Pasadena, CA 91103

Geoff Bland
Wedbush Capital | Chief Investment Officer
1000 Wilshire Blvd | Suite 830 | Los Angeles | CA | 90017
213-688-8012 direct | 213-688-8018 main | geoff.bland@wedbushcapital.com

2. Response to Comments

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2. Response to Comments

R24. Response to Comments from Geoff Bland, submitted via email March 2, 2023.

- R24-1 This comment states that there is a lack of transparency, because they have just now been made aware of the Project. In accordance with Section 15072 of the CEQA Guidelines, the RBOC has provided public notice of the Project within a reasonable period of time prior to adoption of the IS/MND. As stated in Section 1.5, *Public Engagement*, the RBOC circulated a NOI to addresses within 500 feet of Project Site, which included a total of 531 residences. Additionally, the RBOC emailed notification to the interested party distribution list consisting of over 1,000 recipients. Therefore, the Project was appropriately noticed in compliance with the CEQA Guidelines.
- R24-2 This comment states that the removal of trees would be harmful to wildlife in the Project Site. 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.
- R24-3 This comment states that the Project would result in more traffic congestion in areas surrounding the Project Site, without the addition of new parking. 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.
- R24-4 This comment states that the Project would result in increased noise but provides no specificity regarding analysis of noise impacts presented in the IS/MND. 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.
- R24-5 This comment expresses concern regarding funding of 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.
- R24-6 This comment states that lighting for the Project would make sleeping more difficult for neighbors surrounding the Project Site, would negatively affect wildlife, and permanently change the Arroyo Seco. 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.

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COMMENT R25 - Irena Petrack (1 page)

On 3/2/23, 9:26 AM, "Irena Petrack" <petracirena233@gmail.com <mailto:petracirena233@gmail.com>> wrote:

I live on 960 Linda Vista Ave. My family and my neighbors, whose properties are on the east side of the street, have carried an unfair burden of continuous harm due to the excessive use of Rose Bowl over the years, ever accelerating. Our weekends are marred with horrific noises, traffic jams and gas pollution, not to mention pyrotechnics. And now, the all-night lightning proposal with all that goes with it!!!
The Rose Bowl business consortium, obviously in cahoots with our city bosses, are about to turn our community into regular Nazi concentration camp-like grounds. This absolutely needs to be prevented. We are talking residential community here where nights are reserved for rest. Somebody needs to remind our city fathers of that.

R25-1

Our neighborhood association needs get into legal action immediately. What else is the association for any way but to protect the quality of life for its constituency. What is this begging and pleading all about? My family and my neighbors have compensation coming from the city for all the damage done to us over the years, instead of being further harmed and taxed to boot by local government representatives who obviously could'nt care less about those who pay their keep.

R25-2

Sincerely, and please keep me in the loop for insight into this racket.
Irena

Sent from my iPad

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2. Response to Comments

R25. Response to Comments from Irena Petrack, submitted via email March 2, 2023.

- R25-1 This comment states that the areas surrounding the Project Site already have excessive noise and traffic, and the increase in lighting from the Project would make conditions unpleasant for current residents. Please see Topical Response 7, *Transportation and Parking*, Topical Response 5, *Noise*, and Topical Response 2, *Lighting*, regarding the City's noise, lighting, and traffic regulations and how the Project complies with all policies to ensure impacts would be less-than-significant.
- R25-2 This comment states that legal action should be taken in opposition of the Project to protect the quality of life within the neighborhood. 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.

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2. Response to Comments

COMMENT R26 - Susan Burns (1 page)

On 3/2/23, 1:08 PM, "Susan Burns" <sburns640@netscape.net <mailto:sburns640@netscape.net>> wrote:

I am a homeowner on Prospect Blvd and only heard today of the mini golf course plan. I am 100% opposed to that plan and I want to know why no notice has been sent to impacted neighbors. Has the historical foundation been involved? I wish to be advised on how the neighborhood consensus was circumvented.

R26-1

Sent from my iPhone

2. Response to Comments

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2. Response to Comments

R26. Response to Comments from Susan Burns, submitted via email March 2, 2023.

R26-1 This comment states the commenter's opposition to the miniature golf course and questions why notices were not sent to impacted neighbors surrounding the Project Site. However, as stated in Section 1.5, *Public Engagement*, the RBOC circulated a NOI to addresses within 500 feet of Project Site, which included a total of 531 residences. Additionally, the RBOC emailed notification to the interested party distribution list consisting of over 1,000 recipients. Therefore, the Project was appropriately noticed in compliance with the CEQA Guidelines.

In addition, the commenter questions if the historical foundation has been involved. RBOC met with Pasadena Heritage as described above in Section 1.5, *Public Engagement*, regarding the Project and the historical evaluation that was conducted for the IS/MND (see Appendix D to the IS/MND). To date, Pasadena Heritage did not provide a comment letter regarding the analysis contained in the report or the mitigation measures that are required in order to reduce impacts to historical resources.

2. Response to Comments

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2. Response to Comments

COMMENT R27 - Michael Clayton (2 pages)

From: Michael Clayton <mwclayton@earthlink.net>
Date: Thursday, March 2, 2023 at 2:25 PM
To: Public Comment <publiccomment@rosebowlstadium.com>
Cc: "Info@tyron.us" <Info@tyron.us>
Subject: Proposed Venues in Arroyo

Greetings,

As a resident whose home would be directly affected by the proposed expansion of the Brookside driving range and new miniature golf facility, I would like to share my concerns:

- The driving range is a proven source of income for the golf course. A more realistic approach would be to increase the size by 50% and reduce the impact on the Arroyo with the removal of fewer trees and less lighting than what would be required with a 60 bay venue. R27-1
- Establishing a miniature golf course would have the greatest impact on the Arroyo and affect all neighbors the most. More traffic, increased noise, more lighting and operating hours into the night is highly undesirable. Strong opposition to this proposal. R27-2
- No studies or cost/income analysis were shared for the establishment and operations of either a 60-bay driving range or mini golf course. R27-3
- I never received any notice about these proposed projects either from the RBOC or EARA. Many neighbors reported never hearing about these projects that would directly affect their homes and their quality of life. Poor communications. R27-4

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- No parking plans were ever shared as to where these venues would park the additional visitors. Increase in traffic, hours, entry and exit pathways are unknown. Has any planning been done regarding these major concerns?

R27-5

- If successfully completed, it would only be a matter of time until the venues would be available for private parties and that means additional amplified sound and total disregard for the neighbors that must deal with noise from all the events in Area H most every weekend. The Rose Bowl has a poor track record when controlling amplified sound.

R27-6

Thank you for allowing a resident to voice their concern regarding the proposal of these projects.

Michael W. Clayton

Prospect Terrace

Pasadena, CA

2. Response to Comments

R27. Response to Comments from Michael Clayton, submitted via email March 2, 2023.

- R27-1 This comment states that the Project should increase the size of the driving range by 50 percent to reduce the removal of trees and additional lighting that would be required on the Project Site. 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 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. Additionally, the Project would be subject to the City's Design Review process as defined in the Pasadena Municipal Code. 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. Additionally, 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.
- R27-2 This comment expresses the commenter's opposition to the implementation of the miniature golf course, because it would increase traffic, noise, and lighting in the Project Site. No specific comments were provided regarding deficiencies in the analysis provided in the IS/MND regarding these issues. Please see Topical Response 7, *Transportation and Parking*, Topical Response 2, *Lighting*, and Topical Response 5, *Noise*, regarding the City's noise, lighting and traffic regulations and how the Project complies with all policies to ensure impacts would be less-than-significant.
- R27-3 This comment states that no cost/income analysis was shared for the construction and operation of the proposed driving range and/or miniature golf course. 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.
- R27-4 This comment states that they did not receive notice regarding the Project from the RBOC. In accordance with Section 15072 of the CEQA Guidelines, the RBOC has provided public notice of the Project within a reasonable period of time prior to adoption of the IS/MND. As stated in Section 1.5, *Public Engagement*, the RBOC circulated a NOI to addresses within 500 feet of Project Site, which included a total of 531 residences. Additionally, the RBOC emailed notification to the interested party distribution list consisting of over 1,000 recipients. This list included residents and members of the West Pasadena Residents' Association (WPRA) and East Pasadena Residents Association.

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Therefore, the Project was appropriately noticed in compliance with the CEQA Guidelines.

- R27-5 This comment states that not parking plans have been completed for the Project to identify additional parking location near the Project Site; in addition to increase in traffic, and entry and exit from the Project Site. 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.
- R27-6 This comment states that the Project would eventually result in additional visitors to the Project Site, which would result in additional noise impacts for neighbors of the Brookside Golf Course from amplified sound. No amplified sound is proposed for the Project. 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.

2. Response to Comments

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

2. Response to Comments

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2. Response to Comments

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

2. Response to Comments

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.

2. Response to Comments

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 mitigate 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

2. Response to Comments

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2. Response to Comments

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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2. Response to Comments

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

2. Response to Comments

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2. Response to Comments

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.

2. Response to Comments

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2. Response to Comments

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.

2. Response to Comments

All the best,

Marcus Renner
970-426-8392

--

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)

2. Response to Comments

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.

2. Response to Comments

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2. Response to Comments

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.

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?

R32-1

R32-2

2. Response to Comments

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.

2. Response to Comments

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

2. Response to Comments

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.

2. Response to Comments

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)

2. Response to Comments

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2. Response to Comments

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

2. Response to Comments

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.

2. Response to Comments

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>

2. Response to Comments

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2. Response to Comments

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.

2. Response to Comments

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2. Response to Comments

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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POST OFFICE BOX 50252 – PASADENA, CA 91115

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2. Response to Comments

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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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POST OFFICE BOX 50252 - PASADENA, CA 91115**

2. Response to Comments

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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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POST OFFICE BOX 50252 - PASADENA, CA 91115**

2. Response to Comments

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2. Response to Comments

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

2. Response to Comments

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.

2. Response to Comments

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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2

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.

**WEST PASADENA RESIDENTS’ ASSOCIATION
POST OFFICE BOX 50252 - PASADENA, CA 91115**

2. Response to Comments

3

Thank you for your consideration of our points of view.

Respectfully,

/s/ Evan J. Davis

Evan Davis, President
West Pasadena Residents' Association

**WEST PASADENA RESIDENTS' ASSOCIATION
POST OFFICE BOX 50252 - PASADENA, CA 91115**

2. Response to Comments

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2. Response to Comments

- 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

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](https://www.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

2. Response to Comments

- 1) 47 mature trees will be destroyed. O3-2
- 2) There is no financial certainty that the \$2 million investment (not counting thousands already spent) will actually be profitable. O3-3
- 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) 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) 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. Response to Comments

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.

2. Response to Comments

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

	<p>Brookside Golf Club 1133 Rosemont Ave. Pasadena, CA 91103 (626) 543-4708 Office www.firstteegreaterpasadena.org</p>
2023 Board of Directors	
Dennis Ayers Treasurer	March 2, 2023
Andrew Ellis 1st Vice Chair	Mayor Victor Gordo and Pasadena City Council Pasadena City Hall 100 North Garfield Avenue Pasadena, CA 91109
Brandon Fox	Re: Family Golf at Brookside Golf Club
Erika Foy	Dear Mayor Gordo and City Council Members,
Kaleb Gleason	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.
Steve Haderlein	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.
Travis Harada Mark Holdsworth Chair	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.
Patrick Kelly Matt Kohorst 2nd Vice Chair	Sincerely,
Laura Morrison Secretary	
Michael O'Connor	Mark Holdsworth Chair First Tee Greater Pasadena
Brandon O'Neill	
Ron Okum	
Blair Salisbury	
Scott Scozzola	
John Sinner	
Sally Yeh Wong Robert Baderian Executive Director	

O4-1

2. Response to Comments

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2. Response to Comments

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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2. Response to Comments

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.

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 [Stoephemillenniumhollywood.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:

Page 1 of 7

O5-1

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].)

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.* 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.

05-1

2. Response to Comments

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

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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.

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.

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

O5-4

O5-5

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.

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.

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

2. Response to Comments

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

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2. Response to Comments

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.

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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

2. Response to Comments

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.

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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 Canyon² 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 species³ 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>

2. Response to Comments

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.

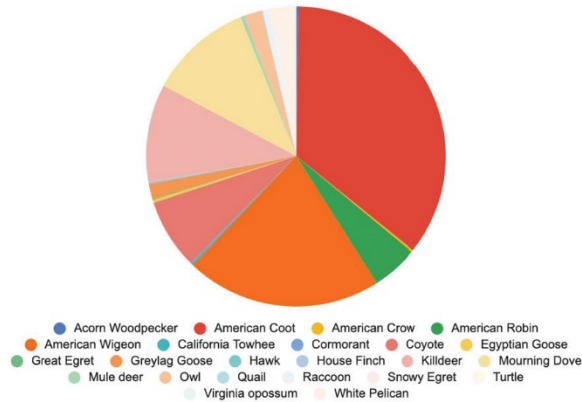
O6-8

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.

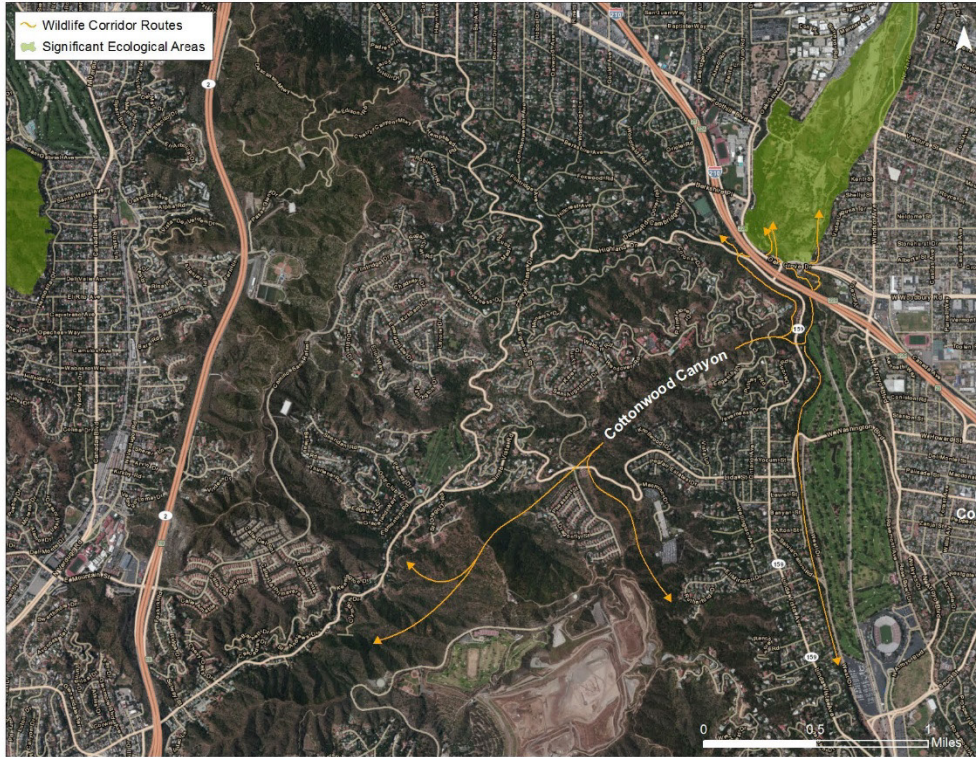
Number of Photos per Species



2. Response to Comments

<i>Species</i>	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

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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

2. Response to Comments

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

2. Response to Comments

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.

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

2. Response to Comments

COMMENT O7 - Tim Brick (Arroyo Seco Foundation) (2 pages)

From: Tim Brick <tim@arroyoseco.org>
Date: Friday, March 3, 2023 at 12:39 PM
To: Public Comment <publiccomment@rosebowlstadium.com>
Subject: Brookside Golf Course Improvements Project

To: Rose Bowl Operating Company

The Arroyo Seco Foundation is strongly opposed to the plan to expand the driving range and add a new miniature golf course to Brookside Golf Course in the Arroyo Seco. We find the negative declaration to be totally inadequate to address the impacts of the program. A full environmental impact report should be required.

O7-1

The Rose Bowl Operating Company seems to have lost its sense of place. The natural beauty and character of the Arroyo Seco are a great part of the attractiveness of the Rose Bowl and a vital framing element to consider in future plans for Brookside Golf Course and the Rose Bowl itself.

O7-2

The Rose Bowl Operating Company needs to turn its attention to enhancing the natural character of the Arroyo Seco and not junking it up with dubious playthings.

The Arroyo Seco is a stream, a major tributary of the Los Angeles River. It has occasionally flooded with grave consequences in the past. Brookside Park and the Rose Bowl itself were flooded in 1938.

The area slated to be the site of the driving range expansion and the miniature golf course will flood again in the future. Climate change has brought a new era to era of uncertainty to the Arroyo. The floods which periodically roll through the Arroyo are predicted to be larger and more devastating than the historical floods. The flood channel that bisects Brookside Golf Course and the Arroyo Seco does not have adequate capacity to manage future floods. There will be flooding, and that threat should be considered by a full Environmental Impact that includes alternatives for the Arroyo Seco.

O7-3

2. Response to Comments

It would be very irresponsible for RBOC and Brookside Golf Course to site "improvements" in the historic flood plain.

There are other important concerns that the implementation of the plan would affect:

- Nighttime lighting will have detrimental impacts on the wildlife visits and live in the Arroyo Seco area.
- Traffic and noise will be aggravated by the miniature golf course.
- Large expanses of turf are very wasteful and will suffer from anticipated future dry conditions and drought.
- Scores of trees that now grace the area will be fed to chippers and reduced to sawdust.

The environmental document for the Brookside Golf Course Improvements Project fails to adequately address these elements and many others. It proceeds from a foolish assumption that since the natural character has already been disturbed and destroyed by the Rose Bowl and the golf course, there would be no further environmental detriment from these new pseudo-improvements.

RBOC and Pasadena now need to plan how to deal with the ominous impacts of nature and climate change. The restoration of natural systems is a key part of that. Restoring the Arroyo Seco stream and canyon is a major solution to dealing positively with the challenges of climate change.

Please do not ignore another essential ingredient for a viable future for the Rose Bowl and Brookside Golf Course -- community support. The lack of care and the pseudo-improvements contained in this plan undermine the credibility of the Rose Bowl Operating and the City of Pasadena as stewards of nature and the environment.

Let's restore a living river in the Arroyo Seco!

Sincerely,
Tim Brick
Managing Director
Arroyo Seco Foundation
tim@arroyoseco.org
(626) 492-2884

O7-4

O7-5

O7-6

O7-7

2. Response to Comments

O7. Response to Comments from Tim Brick of the Arroyo Seco Foundation, submitted via email March 3, 2023.

- O7-1 This comment states that the use of a [Mitigated] Negative Declaration (MND) for the Project is inadequate, and instead the RBOC should prepare and Environmental Impact Report (EIR). As addressed in the responses below, the commenter does not provide a fair argument that implies the project would result in significant unavoidable impacts. Please see responses to comments below.
- O7-2 This comment states that the RBOC needs to consider the natural beauty and character of the Arroyo Seco for future plans within the Project Site. As stated throughout the IS/MND, RBOC will ensure that the final 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. The Project includes enhancement to a one-acre portion of the existing golf course and to the driving range and would be consistent with the historical uses of the Brookside Golf Course. It should be noted that those historical uses at the golf course, spanning 100 years, include maintaining the public recreational area for public golf, public parking, and other recreational uses.
- O7-3 This comment states that there is a possibility that the Project Site would flood in the future. 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 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 majority of the Project would result in similar amounts of impervious surfaces as the existing driving range (all natural turf). 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; however, stormwater from the Project would flow to the existing stormwater drainage system within the Project Site, 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.

2. Response to Comments

- O7-4 This comment states that tree removal, increased lighting, and additional traffic would result in negative impacts in the Project Site. The comment provides no specific issue regarding the detailed technical analyses contained within the IS/MND regarding these topics. Please see Topical Response 3, *Tree Removal and Wildlife*, Topical Response 2, *Lighting*, and Topical Response 7, *Transportation and Parking*.
- O7-5 The commenter states that the IS/MND fails to adequately address the elements of the Project stated in response O7-4. Please see previous response. Additionally, the analysis contained in the IS/MND appropriately assumes the existing conditions present at the site, and not former natural conditions that were present before the development of the golf course, 100 years ago (see Attachment B, *Historic Photographs of Brookside Golf Course*).
- O7-6 This comment states that the RBOC needs to plan how to deal with the future effects of climate change, including the Arroyo Seco stream and canyon. The RBOC, nor this golf course project within the existing golf course, are responsible for restoration of the Arroyo Seco channel. That is outside the scope of this IS/MND and the RBOCs jurisdiction. The comment's recommendation 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 Project or adequacy of the IS/MND; therefore, no further response is required.
- O7-7 This comment requests that the RBOC should not ignore community support for the Project, and that the lack of care and improvements contained in the Project undermine the credibility of the RBOC. The comment provides no specific issue regarding the detailed technical analyses contained within the IS/MND regarding these topics. This comment is not a direct comment on the content or adequacy of the IS/MND; therefore, no further response is required.

2. Response to Comments

2.2.2 Responses to Verbal Comments

COMMENT R35 - Nina Chomsky

R35. Response to Comments from Nina Chomsky, submitted verbally on February 13, 2023. Please also see responses to Comment Letter O5, provided by the same commenter.

R35-1 The commenter states that the Project Description is not complete, and does not provide sufficient information regarding design and mitigation for the Project. Please see Topical Response 1, *Unstable Project Description*, and response to comment O5-2, 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.

R35-2 The commenter states that the Project does not comply with the Arroyo Seco Public Lands Ordinance which bans commercialization of the Arroyo Seco. Please see Topical Response 4, *Land Use and Planning*, and response to comment O5-5, regarding how implementation of the Project would comply with the Arroyo Seco Master Plan and the Arroyo Seco Public Lands Ordinance.

2. Response to Comments

COMMENT R36 - Bill Fennessy

R36. Response to Comments from Bill Fennessy, submitted verbally on February 13, 2023.

R36-1 The commenter expressed support of the project as long as the RBOC sets aside some of the revenue for the capital projects that the golf course requires and can maintain the E.O. Nay course at a Par 70. Please see Topical Response 6, *Recreation*, regarding the procedures that would be taken by the RBOC to minimize potential impacts to the recreational facilities in the Project Site, including potential impacts to the E.O. Nay course.

2. Response to Comments

COMMENT R37 - Doug Philbin

R37. Response to Comments from Doug Philbin, submitted verbally on February 13, 2023.

- R37-1 The commenter does not support the Project because it will devalue the golf course. The Project would result in the golf course going from par 70 to par 69 and would not be a championship course anymore. Please see Topical Response 6, *Recreation*, regarding the procedures that would be taken by the RBOC to minimize potential impacts to the recreational facilities in the Project Site, including potential impacts to the E.O. Nay course.
- R37-2 The commenter states parking needs to be further studied for the project. 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.
- R37-3 There needs to be lighting for nighttime use of the miniature golf course. 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.
- R37-4 The commenter states that the purpose statement is misleading because the actual purpose is to regain revenues for the RBOC. The comment provides no specific issue regarding the detailed technical analyses contained within the IS/MND regarding these topics. 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.

2. Response to Comments

COMMENT R38 - Craig Kessler

R38. Response to Comments from Craig Kessler, submitted verbally on February 13, 2023. Please also see responses to Comment Letter O11, provided by the same commenter.

R38-1 The commenter states that they will not oppose 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.

2. Response to Comments

COMMENT R39 - Dianne Philibosian

R39. Response to Comments from Dianne Philibosian, submitted verbally on February 13, 2023.

- R39-1 The commenter states light pollution cannot be mitigated without the lights being turned completely off. 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.
- R39-2 The commenter expresses concern that the Project will negatively impact wildlife in the Brookside Golf Course and the proposed tree removal would harm nesting birds in the area. 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.

2. Response to Comments

COMMENT R40 - Alan Behr

R40. Response to Comments from Alan Behr, submitted verbally on February 13, 2023.

- R40-1 The commenter states that the RBOC should consider the implementation of a double-decker driving range to double capacity without requiring more space on the Project Site. Please see Topical Response 8, *Project Alternatives*, the alternatives and how the IS/MND is sufficient in not evaluating environmental impacts of other alternatives. With respect to the alternative suggested, it would result in environmental impacts beyond those associated with the Project and created emergency access issues with the site.
- R40-2 The commenter expresses concern regarding the increased lighting for the driving range and corresponding noise impacts that would result from the driving range's proposed hours of operation. 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.

2. Response to Comments

COMMENT R41 - Betsy Nathane

R41. Response to Comments from Betsy Nathane, submitted verbally on February 13, 2023.

R41-1 This comment expresses the commenter's opposition to the Project due to the required removal of trees located within the Arroyo Seco. 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.

2. Response to Comments

COMMENT R42 - Mark Whichard

R42. Response to Comments from Mark Whichard, submitted verbally on February 13, 2023.

- R42-1 The commenter expresses concerns regarding the 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.
- R42-2 This commenter recommends an alternate location for the miniature golf course, possibly next to the Rose Bowl Aquatic Center. 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.

2. Response to Comments

COMMENT R43 - Jaime Scott

R43. Response to Comments from Jaime Scott, submitted verbally on February 13, 2023.

R43-1 The commenter opposes lighting be extended from 6:30 pm (current) to 10:00 pm (proposed). 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.

2. Response to Comments

COMMENT R44 - Felix Brenden

R44. Response to Comments from Felix Brenden, submitted verbally on February 13, 2023.

R44-1 This comment states the commenter's opposition to the removal of trees for the Project. 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.

2. Response to Comments

COMMENT R45 - Philip Jespersen

R45. Response to Comments from Philip Jespersen, submitted verbally on February 13, 2023.

R45-1 This comment expresses support for the Project because it will be kid/family friendly. The comment provides no specific issue regarding the detailed technical analyses contained within the IS/MND regarding these topics. The comments in support of the Project are acknowledged and 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

COMMENT R46 - Mario

R46. Response to Comments from Mario, submitted verbally on February 13, 2023.

R46-1 This comment expresses support for the Project because it will be kid/family friendly. The comment provides no specific issue regarding the detailed technical analyses contained within the IS/MND regarding these topics. The comments in support of the Project are acknowledged and 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

COMMENT R47 - Kelly Holmes

R47. Response to Comments from Kelly Holmes, submitted verbally on February 13, 2023.

R47-1 This comment expresses concern regarding the trees and wildlife, and would like the project to be further reviewed. 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.

2. Response to Comments

COMMENT R48 - Patty Brugman

R48. Response to Comments from Patty Brugman, submitted verbally on February 13, 2023.

R48-1 This commenter is concerned about the heights of the fences and would prefer height restricted balls for the driving range. 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

COMMENT O8 - Nina Chomsky (Linda Vista-Annandale Association)

O8. Response to Comments from Nina Chomsky from Linda Vista-Annandale Association, submitted verbally on February 13, 2023. Please also see responses to Comment Letter O5, provided by the same commenter.

- O8-1 This comment states that the appropriate document for the Project would be a focused Environmental Impact Report, not an IS/MND. Refer to response to comment O2-6 above.
- O8-2 This comment expresses concern that the lights are going to be on all the time, resulting in permanent lighting in the Central Arroyo due to the proposed hours of operation. 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.
- O8-3 This comment states that a focused EIR would provide alternatives to the Project and should have been considered for the Project. 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.
- O8-4 This comment states that LVAA is concerned with the amount of trees that would be cut down for the Project. 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.

2. Response to Comments

COMMENT O9 - Pete Ewing (West Pasadena Residents Association)

O9. Response to Comments from Pete Ewing from the West Pasadena Residents Association), submitted verbally on February 13, 2023. Please also see responses to Comment Letter O1, provided by the Evan Davis of the WPRA.

- O9-1 The commenter states that it is a problem that the Project is not fully designed. Please refer to comment response O1-2 above, 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.
- O9-2 The commenter states that the proposed lights will be intrusive to residents, and there will be amplified noise from the Project. 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. No amplified noise is proposed.
- O9-3 The commenter states that there is no analytical data for the financial costs of 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.

2. Response to Comments

COMMENT O10 - Tim Brick (Arroyo Seco Foundation)

O10. Response to Comments from Tim Brick from Arroyo Seco Foundation, submitted verbally on February 13, 2023. Please also see responses to Comment Letter O7, provided by the same commenter.

O10-1 The commenter expresses concern with the trees that would be removed from the Project Site. 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.

O10-2 The commenter states that the RBOC is ignoring the flood channel located adjacent to the Project Site, which would eventually flood because the flood channel does not have the capacity to handle the flooding that will eventually occur. 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 majority of the Project would result in similar amounts of impervious surfaces as the existing driving range (all turf). 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; however, stormwater from the Project would flow to the existing stormwater drainage system within the Project Site, 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.

2. Response to Comments

COMMENT O11 - Craig Kessler (Southern California Golf Association)

O11. Response to Comments from Craig Kessler from the Southern California Golf Association, submitted verbally on February 13, 2023. Please also see responses to Comment Letter R38, provided by the same commenter.

- O11-1 The commenter states that they are warm to the concept and understand concern. The express confidence that parking and lighting expressed during the meeting will be resolved. 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, 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.
- O11-2 Commenter states that trees on the golf course are regularly removed. That trees on golf courses are often replaced, have come, have gone, and this will continue. 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
- O11-3 This comment expresses financial concerns regarding 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.

2. Response to Comments

COMMENT O12 - Andy Gantner (Linda Vista-Annandale Association)

O12. Response to Comments from Andy Gantner from the Linda Vista-Annandale Association), submitted verbally on February 13, 2023. Please also see responses to Comment Letter O5, provided by Nina Chomsky of LVAA.

- O12-1 The commenter is concerned with the number of trees that would be removed for the project. The commenter asked if the trees that are removed would be replaced. 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.
- O12-2 The commenter expresses concerns regarding lighting and hours of operation. Until 10:00 p.m., seven days a week is too much, and suggests 8:00 p.m. as a compromise. 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.
- O12-3 The commenter is concerned with shortening of hole 6 and 7, and states that the removal of holes would diminish the value of the golf course. Please see the Topical Response 6, *Recreation*, regarding the procedures that would be taken by the RBOC to minimize potential impacts to the recreational facilities in the Project Site, including potential impacts to the E.O. Nay course.

2. Response to Comments

COMMENT O13 - Doug Philbin (Brookside Men's Golf Club)

O13. Response to Comments from Doug Philbin from the Brookside Men's Golf Club), submitted verbally on February 13, 2023. Please also see responses to Comment Letter R37, provided by the same commenter.

- O13-1 The commenter expresses concern regarding reduction of the golf course from a par 70 to par 69, and that this reduction would devalue the property as it would no longer be a championship course. The project would eliminate the short key and practice areas. Please see Topical Response 6, *Recreation*, regarding the procedures that would be taken by the RBOC to minimize potential impacts to the recreational facilities in the Project Site, including potential impacts to the E.O. Nay course.
- O13-2 The commenter 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.
- O13-3 The commenter states that parking is not adequately addressed and that it is not realistic to park in outer parking lots for families and golfers. 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.

2. Response to Comments

COMMENT O14 - Geoffrey Baum (West Pasadena Residents Association)

O14. Response to Comments from Geoffrey Baum from the West Pasadena Residents Association), submitted verbally on February 13, 2023. Please also see responses to Comment Letter O2, provided by the same commenter.

- O14-1 The commenter expresses they are not opposed to concept of ideas to generating revenue. Concerns expressed by the commenter include insufficient community input, and meetings but no dialogue. The commenter recommends that the RBOC should pause the Project. Please refer to comment response O1 though O8 above.
- O14-2 The commenter expressed concerns regarding noise. 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.
- O14-3 The commenter expressed concerns regarding light, the proposed hours of operation, and if the lights would bleed into the neighborhood. 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.
- O14-4 The commenter expressed concern regarding the commercialization of the Arroyo Seco. 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.
- O14-5 The commenter expressed concerns regarding the scale of the miniature golf course. As described on page 10 of the IS/MND, the Project includes development of a 36-hole miniature golf course on approximately one acre (approximate 0.4 percent of the Brookside Golf Course) within the footprint of the existing driving range (relatively flat grassy area). Concept ideas for the design of the miniature golf course are provided in Appendix A to this document, which were shared during the public informational meeting on date. The location of the miniature golf course is designed to minimize impacts to the remainder of the golf course, and to maintain proximity to the Brookside Clubhouse and parking areas.
- The design of the miniature golf area, however, would differ from a typical putting green, incorporating a complex arrangement of pathways and landscape elements with intermittent objects and structures.
- O14-6 The commenter states that the IS/MND does not provide an accurate or stable project description. Please see Topical Response 1, *Unstable Project Description*, and response to comment O5-1, 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

2. Response to Comments

analyze environmental impacts of Project implementation and define appropriate mitigation.

- O14-7 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.

3. Revisions to the Initial Study/Mitigated Negative Declaration

3.1 INTRODUCTION

This section contains revisions to the IS/MND based on (1) additional or revised information required to prepare a response to a specific comment, (2) applicable updated information that was not available at the time of IS/MND publication, and/or (3) typographical errors. Changes made to the IS/MND are identified here in ~~strikeout text~~ to indicate deletions and in double underlined text to signify additions.

3.2 IS/MND REVISIONS IN RESPONSE TO WRITTEN COMMENTS

The following text has been revised in response to comments received on the IS/MND.

Page 5, Section 1.3, *Brookside Golf Complex Background and Existing Conditions*; Page 15, Section 1.5.4, *Operational Changes*; Page 16, Section 1.5.5, *Construction Activities*; and Page 106, Section 3.17, *Transportation*, are hereby modified based on comments received.

~~Parking Lot 1A~~ in the IS/MND will be revised to Parking Lot CH.

Page 16, Section 1.5.5, *Construction Activities*; is hereby modified based on comments received.

As part of the reorientation of the driving range, some trees could be removed and/or relocated, which would be subject to review and approval by the City's Urban Forestry Advisory Committee (UFAC), and the City Manager. Surficial grading would be required (no excavation) over the total approximately 16-acre Project Site. All soils would be balanced onsite, and no soil export would be required. Consistent with all other Rose Bowl construction and production delivery, any construction vehicles entering the area would use the Mountain/Seco exit off I-210 for ingress and egress.

Page 85-86, Section 3.11, *Land Use and Planning*, is hereby modified based on comments received.

The Project Site is located within lands designated as Open Space by the Pasadena General Plan Land Use Element, primarily surrounded by land uses designated as Low Density Residential (0-6 DU/Acre)(City of Pasadena 2016). According to the Pasadena General Plan Land Use Element, the Open Space classification is intended to provide active and passive recreational opportunities for Pasadena's residents, and is characterized by a variety of public and private natural and developed open spaces including City-owned open space facilities,

3. Revisions to the Initial Study/Mitigated Negative Declaration

private golf courses, natural open spaces and areas which have been designated as environmentally and ecologically significant, and land which is publicly owned though in some instances public access may be restricted (City of Pasadena 2016). Implementation of the Project would expand the existing driving and develop and new miniature golf course within the existing Brookside Golf Course; however, the Project would continue to provide recreational uses and would continue to maintain the Open Space land use designation and zone. The Project would be consistent with Chapter 3.32, Arroyo Seco Public Lands, of the Pasadena Municipal Code. Implementation of the miniature golf course and reorientation of the driving range would result in continued golf uses on the Project Site, in compliance with Section 3.32.460, Brookside Golf Course Area– Permitted Uses, which permits golf uses within the Brookside Golf Course. Additionally, Section 3.32.060(c) states that no portion of lands within the Arroyo Seco shall be used for any commercial, industrial or institutional purposes other than those which existed at the effective date of the ordinance codified in this chapter. However, the Brookside Golf Course has been in operation as a public golf course within the Arroyo Seco since 1928. Implementation of the Project would not introduce new commercial establishments to the Project Site but would operate with recreational uses similar to what already exists on the Brookside Golf Course. Thus, the Project would be consistent with the Arroyo Seco Public Lands Ordinance. This is consistent with the Pasadena General Plan and the Municipal Code. Thus, the Project would not conflict with any land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect.

Attachment A. Informational Community Meeting Presentation

BROOKSIDE GOLF COURSE

FAMILY GOLF PROJECT

PUBLIC INFORMATION MEETING



B

BROOKSIDE

AT THE ROSE BOWL

February 13, 2023



AGENDA

- Team Introductions
- Overview of Proposed Project
- Outreach Summary
- CEQA Process
- Initial Study/MND Content
- Public Comment
- Next Steps





TEAM INTRODUCTIONS

- Rose Bowl Operating Company
 - Jens Weiden, General Manager
 - Brandon Fox, Director of Golf Operations
 - Jenessa Castillo, Chief Operations Officer
- PlaceWorks – Independent CEQA Consultant
 - Addie Farrell, Project Director
 - Alen Estrada-Rodas, Planner





PROJECT OVERVIEW

- RBOC 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. Project improvements would occur on 16 acres within the existing driving range, Hole 10 of the C.W. Koiner Course, and Holes 6 and 7 of the E.O. Nay Course (Project Site).
- The driving range would be expanded from 20 hitting bays to 60 hitting bays. Expanding the number of stalls would serve the existing demand of golfers.
- The driving range would include 56 total poles, including 20 existing poles to remain and 36 new poles to be installed. The poles would support new netting and lighting (on 14 poles). Pole height would range from 38 feet to 130 feet above ground level (increasing height with distance from the hitting bays) with an average pole height of 90.67 feet.
- The project would add 36 family-friendly holes of miniature golf on approximately one acre within the footprint of the existing driving range and adjacent to the Arroyo channel.
- The design of the miniature golf area would incorporate an arrangement of pathways and landscape elements.





PROJECT OVERVIEW (Continued)

- New turf and modified irrigation system, as well as other minor landscape modifications would be installed. Site furniture, signage, and markers would be updated. A new electrical service line with generator would be provided.
- The RBOC is undertaking this environmental review concurrent with a substantial allocation of public funds toward the Project, even though the RBOC is not yet ready to break ground. There is no final design of the project at this stage.
- The ultimate design would be subject to the City's Design Review process as defined in the Pasadena Municipal Code to ensure compatibility policies and objectives of the Arroyo Seco Design Guidelines and overall visual harmony with surroundings.
- Project is intended to serve existing demand on driving range and further engage the youth and community that already live, recreate, and visit the Central Arroyo Seco area for recreational purposes. No new staff required.





Figure 2
Existing Project Site



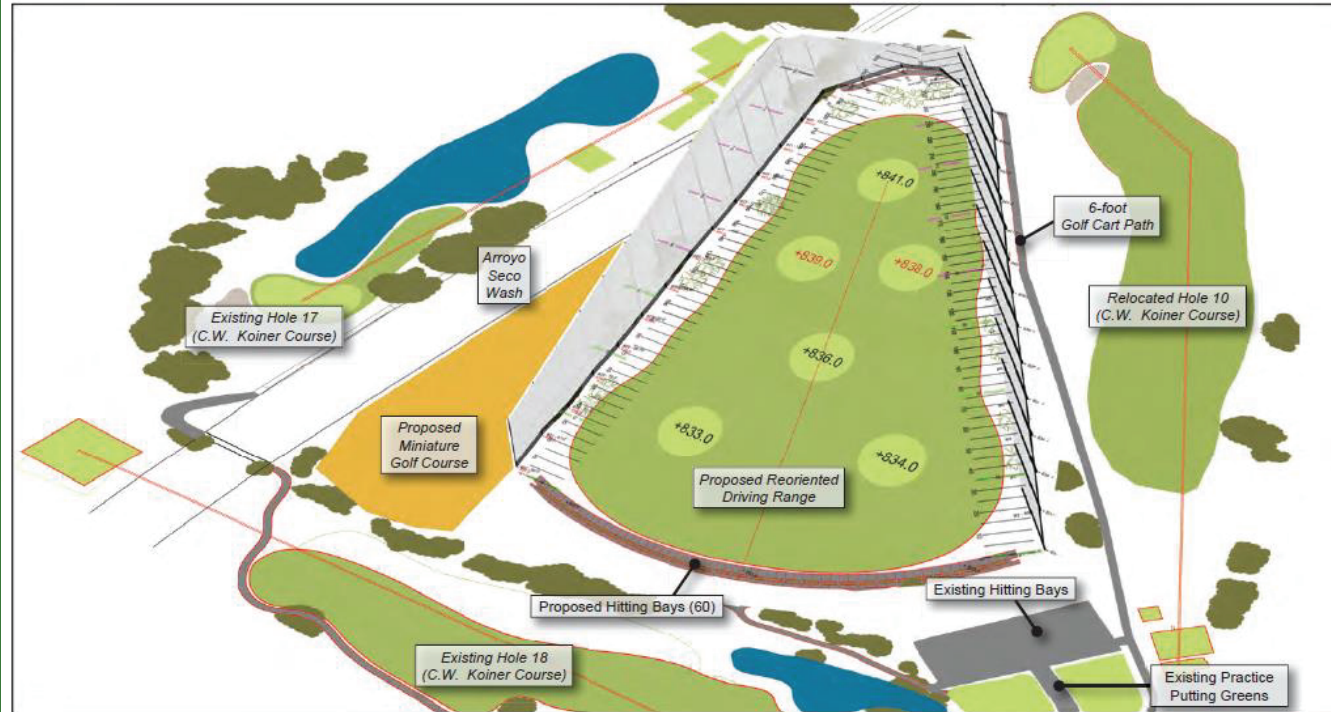
Project Site



Figure 3
Driving Range and
Miniature Golf
Conceptual Site Plan



Figure 4 - Driving Range Poles and Netting



Source: Tanner Consulting, 2020



Figure 4 Driving Range Poles and Netting



**Case Study
Examples:**

**Indianapolis
Children's
Museum**



**Case Study
Examples:**

**Cox Science
Center**



**Case Study
Examples:**

**Heritage Asante
by
Lennar Homes**



**Case Study
Examples:**

Popstroke



**Case Study
Examples:**

**Valley Golf
Center Driving
Range**



POSITIVE IMPACT FOR FIRST TEE OF GREATER PASADENA

The expansion and reorientation of the driving range, as well as the addition to the 36 hole miniature golf course would create positive impact on the First Tee of Greater Pasadena. As a non-profit organization that annually welcomes and services more than 40,000 youth and veterans to the chapter's programs through the game of golf, these improvements at Brookside will undoubtedly provide expanded areas for training, teaching, and learning amongst all skill levels. The range expansion also accounts for the current range needs of the First Tee of Greater Pasadena enabling to continue their programming at Brookside.



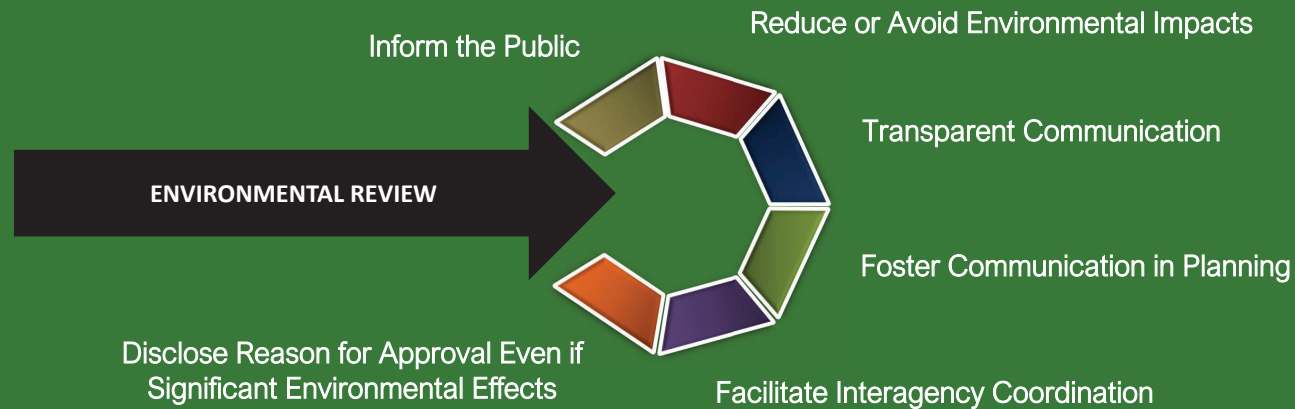
OUTREACH

- 9/22/2021 – Pasadena Heritage Meeting
- 9/20/2022 – Virtual Neighborhood Meeting
- 10/4/2022 – Golf Committee Presentation
- 10/5/2022 – Golf Advisory Committee
- 10/5/2022 – Virtual West Pasadena Residents Association Meeting
- 10/6/2022 – RBOC Board Presentation
- 10/11/2022 – Ladies Club EO Nay Presentation
- 10/11/2022 – Greens Committee Presentation
- 10/12/2022 – Ladies Club Presentation
- 11/8/2022 – Men's Club Presentation
- 11/17/2022 – Linda Vista | Annandale Association Resident In-Person Meeting
- 1/17/2023 – Mailer to 1k+ Residents
- 1/30/2023 – Email Men's Club Database
- 1/30/2023 – Email RBOC Board and Stakeholders
- 2/1/2023 – Email 15k RBOC Resident Database
- 2/2/2023 – Email 27k in Brookside Database
- 2/13/2023 – Today's Informational Meeting





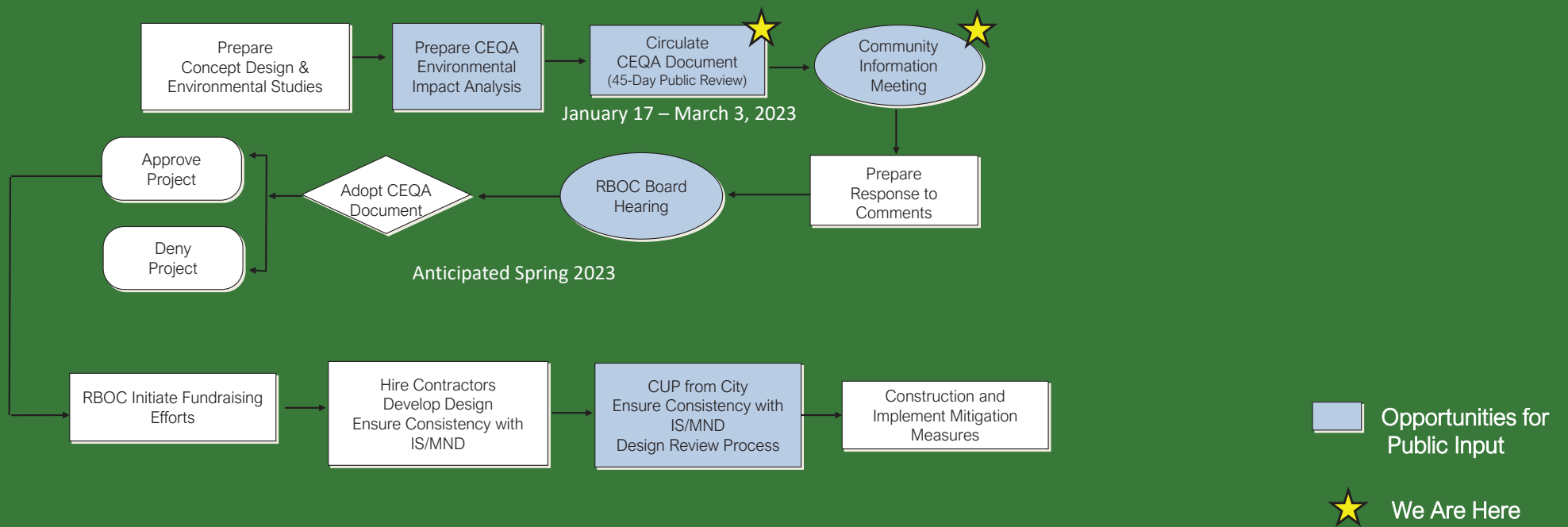
CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)



- Rose Bowl Operating Company as Lead Agency under CEQA
- City of Pasadena Responsible Agency for future CUP and Design Review



CEQA PROCESS MITIGATED NEGATIVE DECLARATION





INITIAL STUDY/MND

- Project Description and Background
- CEQA Process
- Analysis of 21 Topical Areas
- Supporting Technical Appendices
 - Lighting Study
 - Air Quality and Greenhouse Gas Modeling
 - Biological Resources
 - Historical Resources
 - Noise
 - Transportation



BROOKSIDE GOLF COURSE IMPROVEMENTS PROJECT

INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

JANUARY 2023





No Impact

- Agricultural and Forestry Resources
- Energy
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use
- Mineral Resources
- Population and Housing

Less than Significant Impact

- Air Quality
- Geology and Soils
- Greenhouse Gas Emissions
- Noise
- Public Services
- Recreation
- Transportation
- Utilities
- Wildfire

AESTHETICS

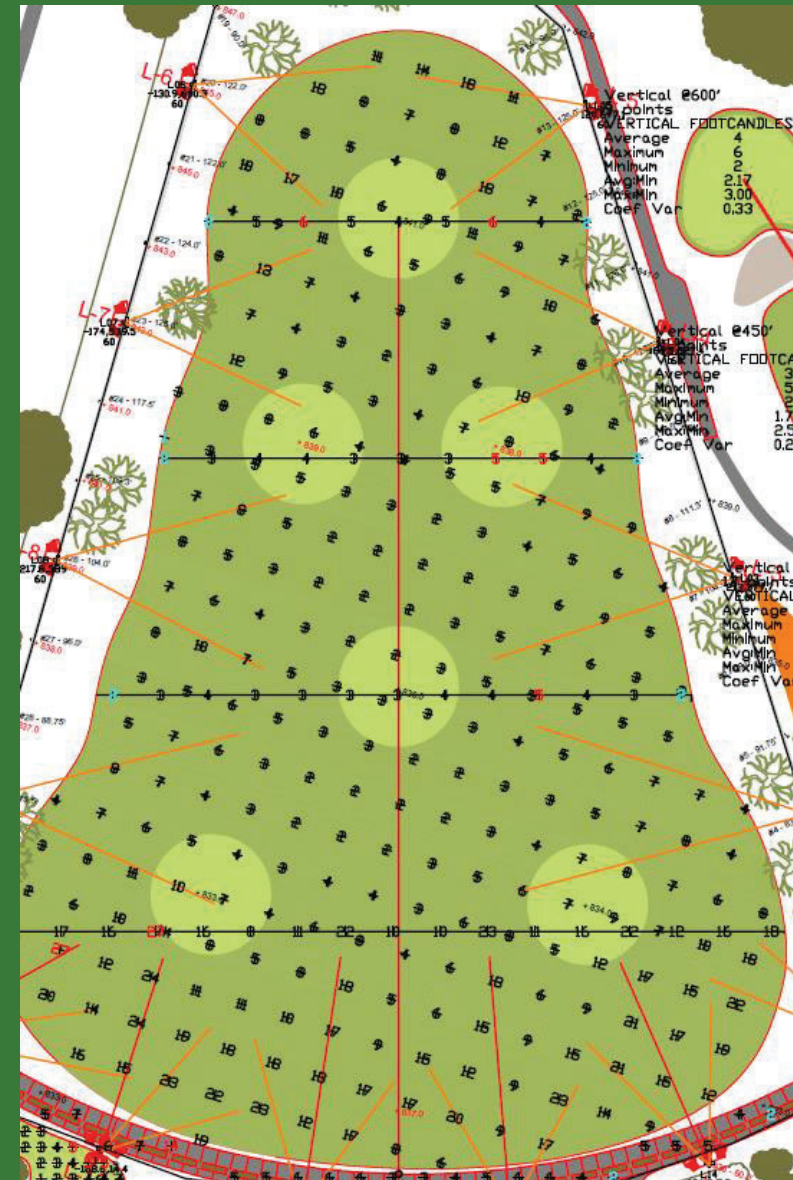
Light and Glare



- Quantified Lighting Study
- 14 lighting poles
- LED technology, remote operated, precise lighting directionality
- Low-level illumination from miniature golf
- Demonstrates lighting spill would not exceed 1 foot candle
- Given no final design at this time, potentially significant

MITIGATION MEASURES

Lighting plan for final design and further testing to confirm no exceedance of 1 footcandle



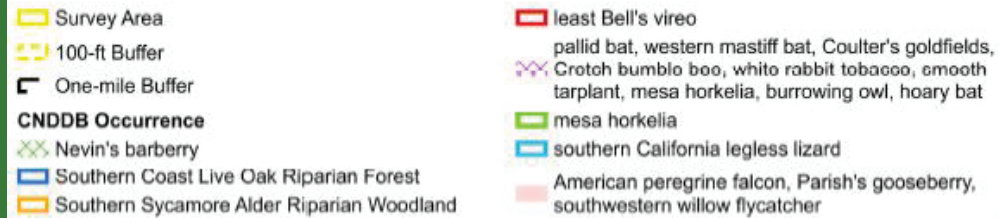
BIOLOGICAL RESOURCES



- Biological Survey and Research
- Tree Survey and Report
- Approx 47 Trees Potentially Removed
- Compliance with City Tree Ordinance

MITIGATION MEASURES

Preconstruction surveys for nesting raptors.
Ensure lighting is directed downward away from trees.



- First Opened in 1925
- National Register of Historical Places & California Register of Historic Resources
- Contributing feature of Arroyo Park and Recreation District
 - Changes consistent with historical uses
 - Changes to approx. 0.4% of District
 - Uses consistent with historical use
- While no impact to integrity of resource, no final design – therefore potential impact

MITIGATION MEASURES

RBOC to retain a qualified historic preservation professional to ensure alterations to the driving range, design of the miniature golf course, and overall modifications to the Course are compatible with the existing Brookside Golf Course landscape, the Pasadena Arroyo Park and Recreational District, and the Arroyo



CULTURAL RESOURCES

Historical Resources





TRIBAL AND ARCHAEOLOGICAL RESOURCES

- Consultation with Native American tribes pursuant to AB 52
- Potential impacts from ground disturbing activities in native soils

MITIGATION MEASURES

Tribal and archeological monitors during construction activities.



PUBLIC COMMENTS

- State Name
- Limit to 3 Minutes
- Focus on Content of Initial Study/MND



NEXT STEPS

- Accepting Comments through March 3, 2023
- Prepare Response to Comments
- RBOC Board to Consider Adoption (Anticipated Spring)
- Funding → Design → CUP → Design Review → Construction

HOW TO COMMENT

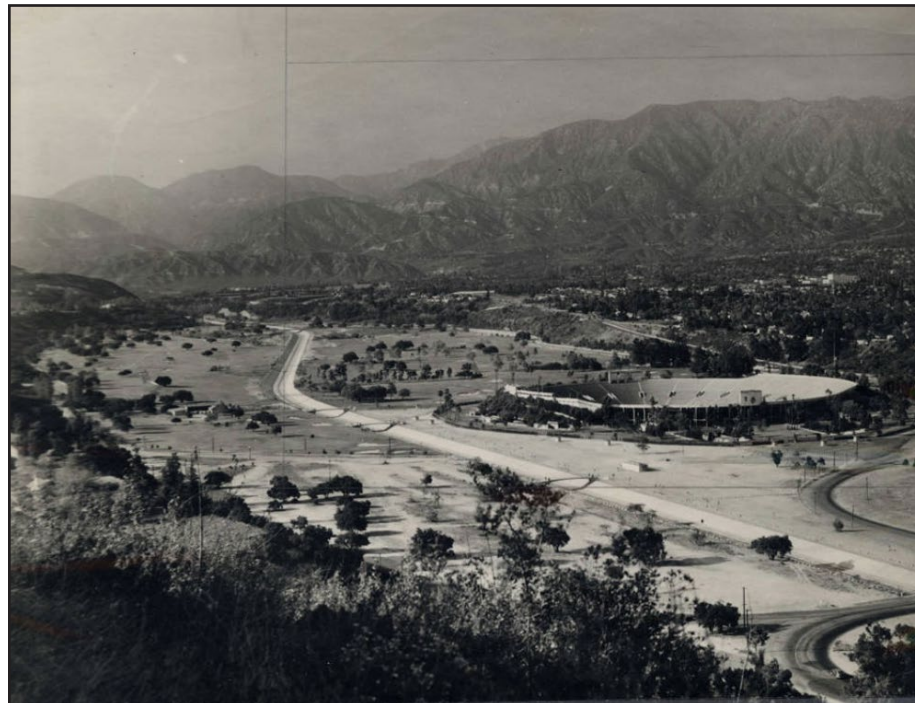
- Verbal or Written Comments During Meeting
- Email Comments to publiccomment@rosebowlstadium.com
- RBOC Board Meeting March 2, 2023



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Attachment B. Historic Photographs of Brookside Golf Course

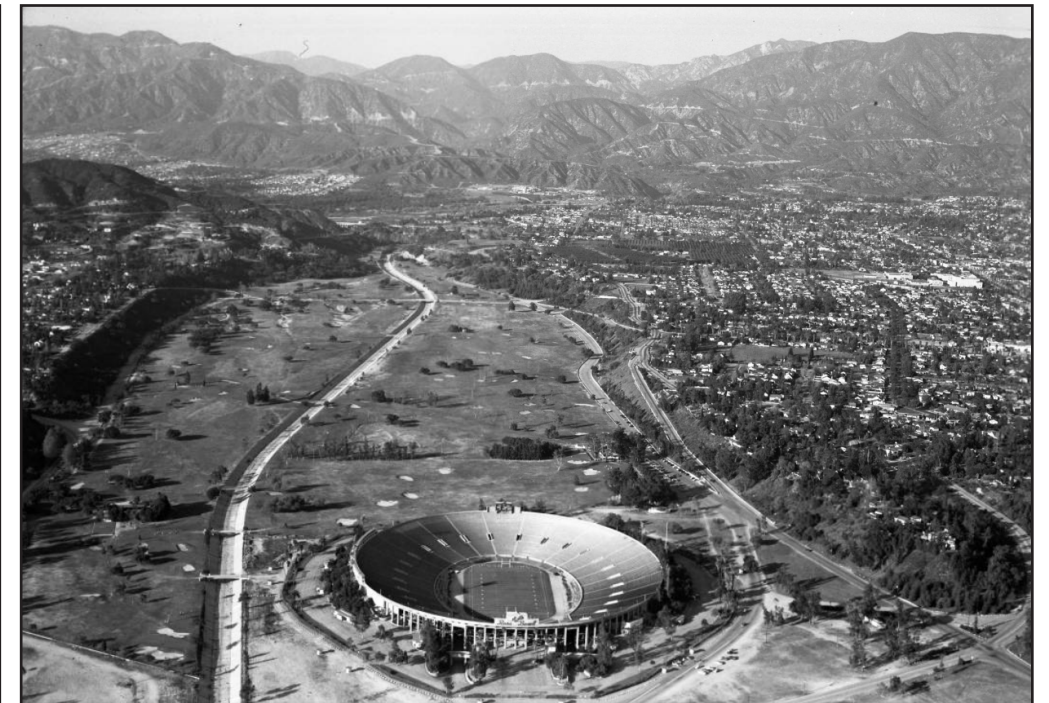
Attachment B: Historic Photographs of Brookside Golf Course



1. Brookside Golf Course - 1930's



2. Brookside Golf Course - 1940's



3. Brookside Golf Course - 1950's



4. Brookside Golf Course - 1960's

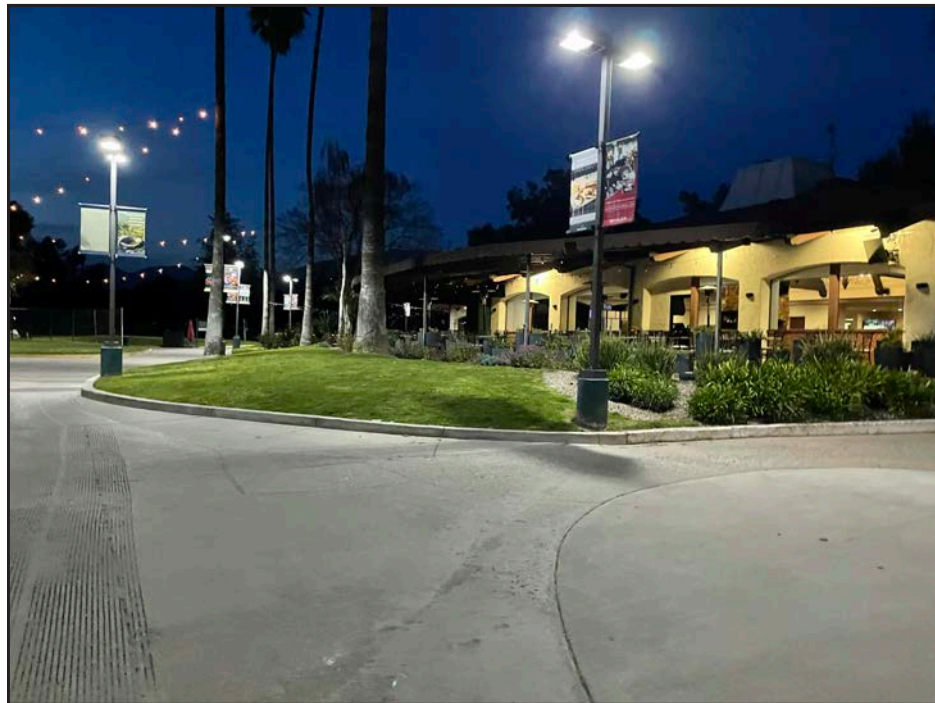


5. Brookside Golf Course - 1970's

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Attachment C. Existing Lighting at Brookside Golf Course

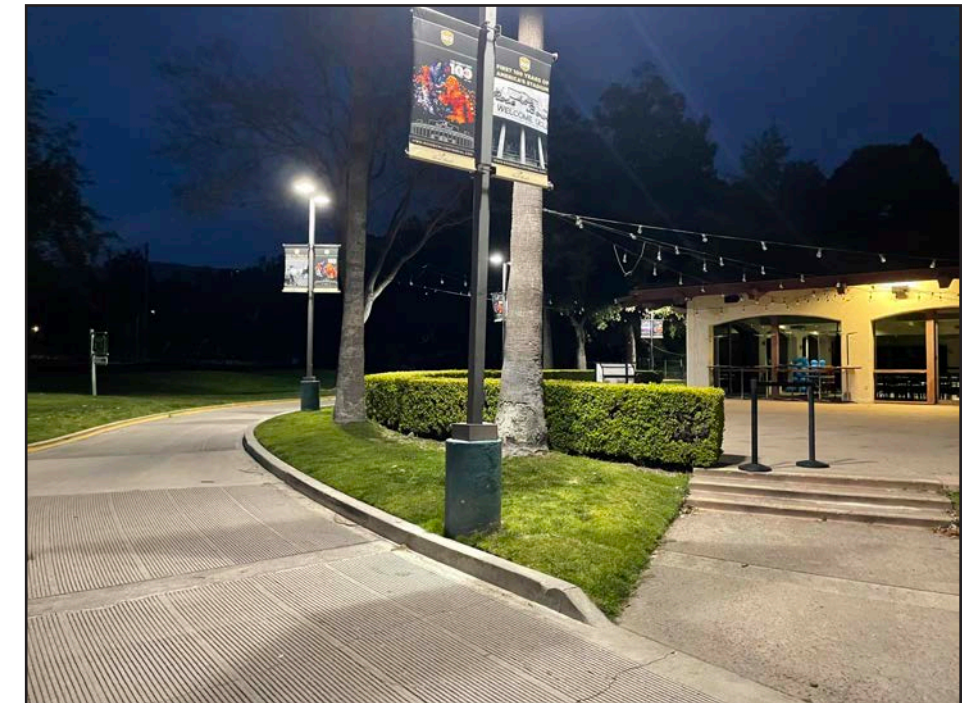
Attachment C: Existing Lighting at Brookside Golf Course



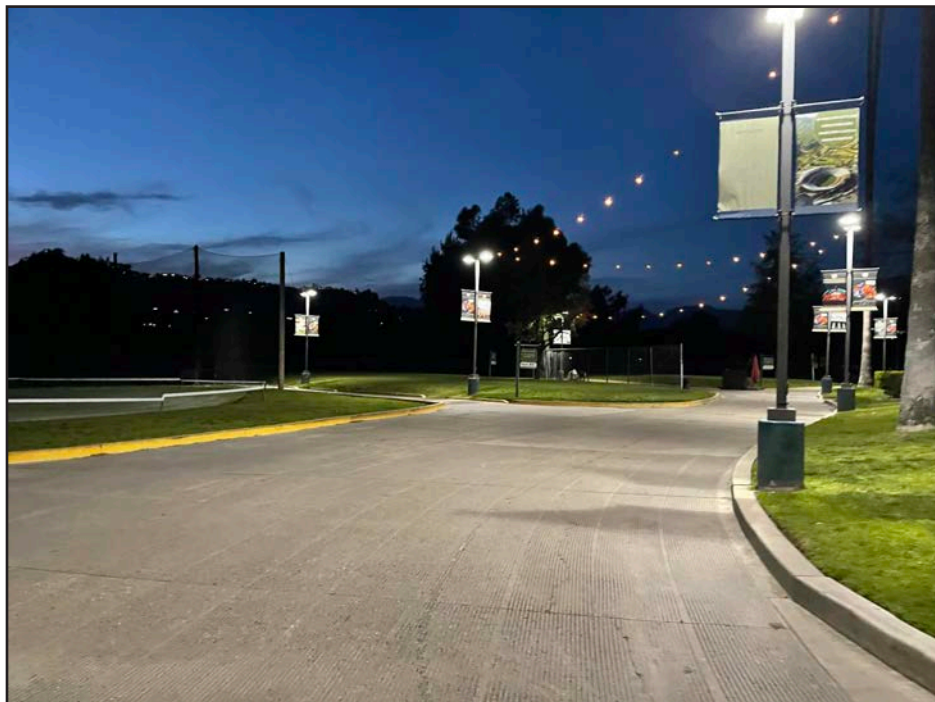
1. Brookside Golf Course Clubhouse.



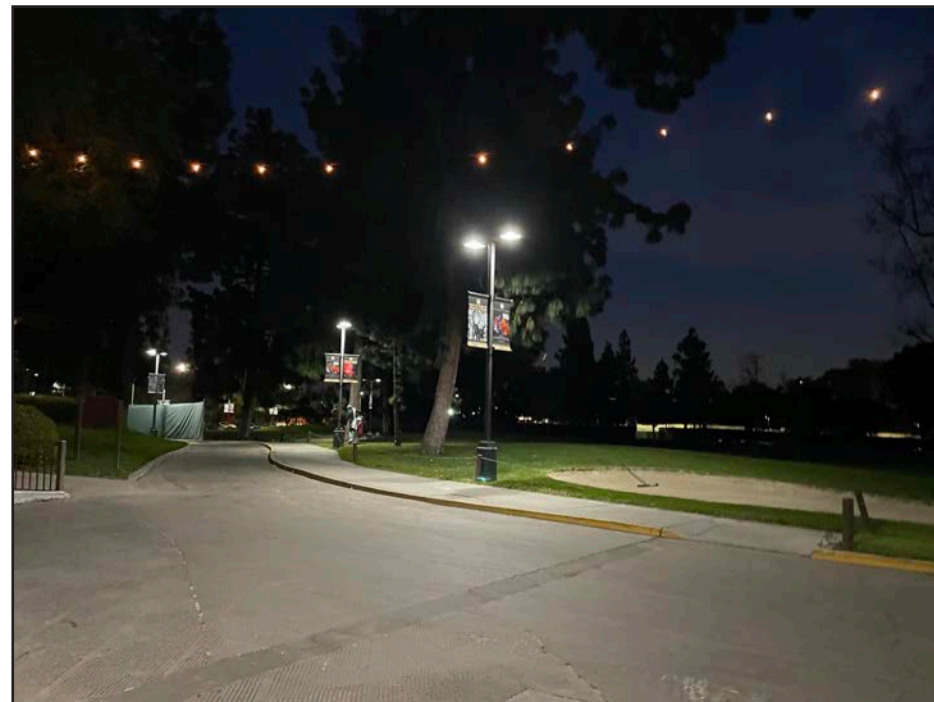
2. Driving Range View from Clubhouse.



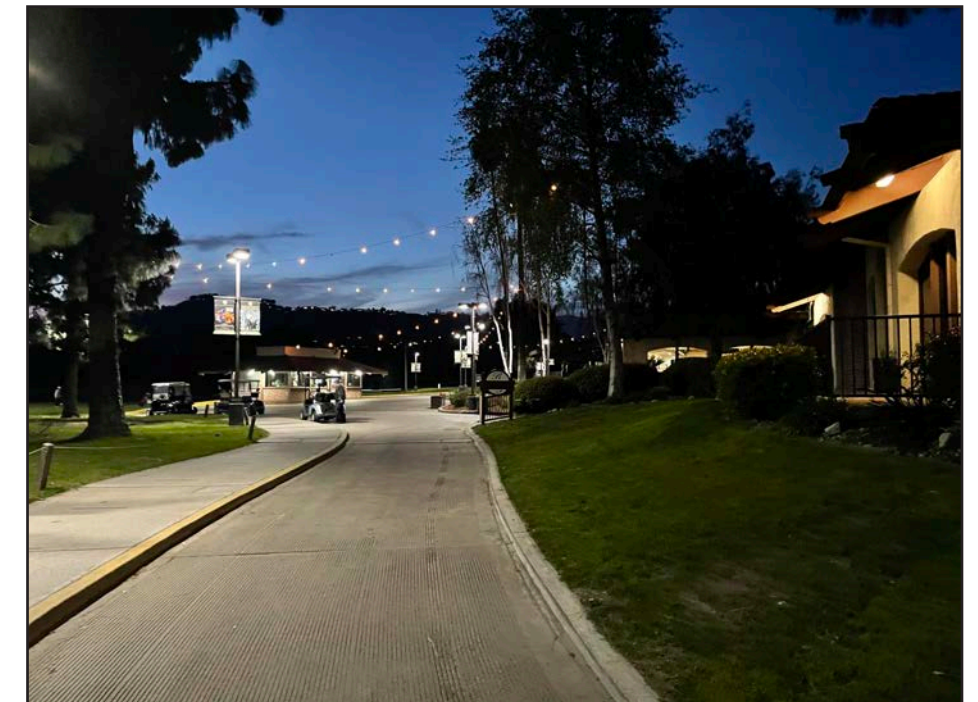
3. Walkway towards Rosemont Avenue.



4. Golf Course View from Clubhouse.

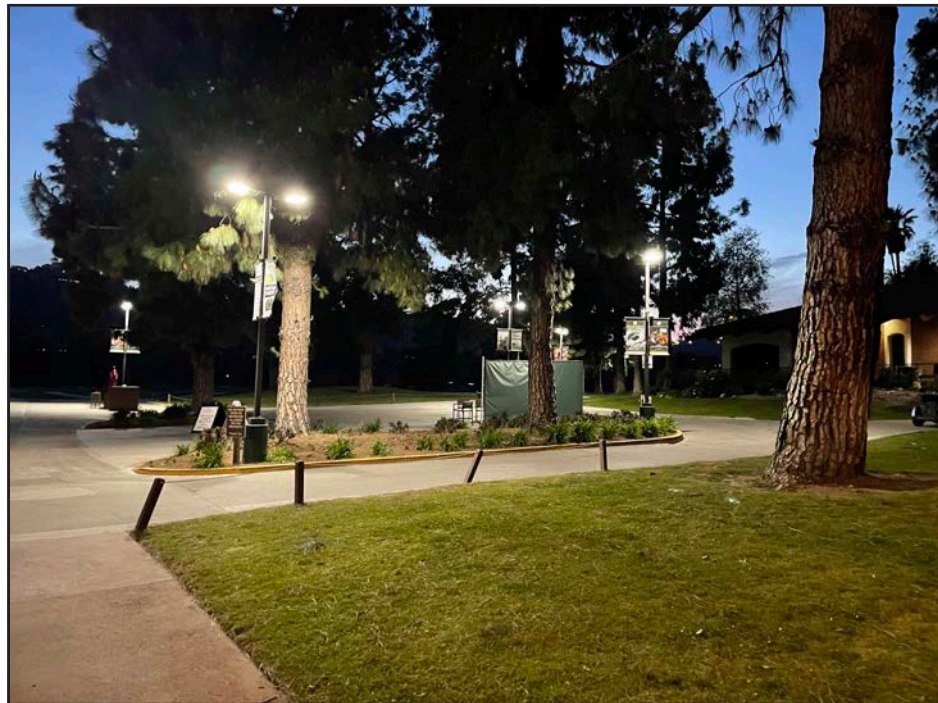


5. Walkway towards Parking Lot CH from Driving Range and Clubhouse.



6. Walkway towards Driving Range.

Attachment C: Existing Lighting at Brookside Golf Course



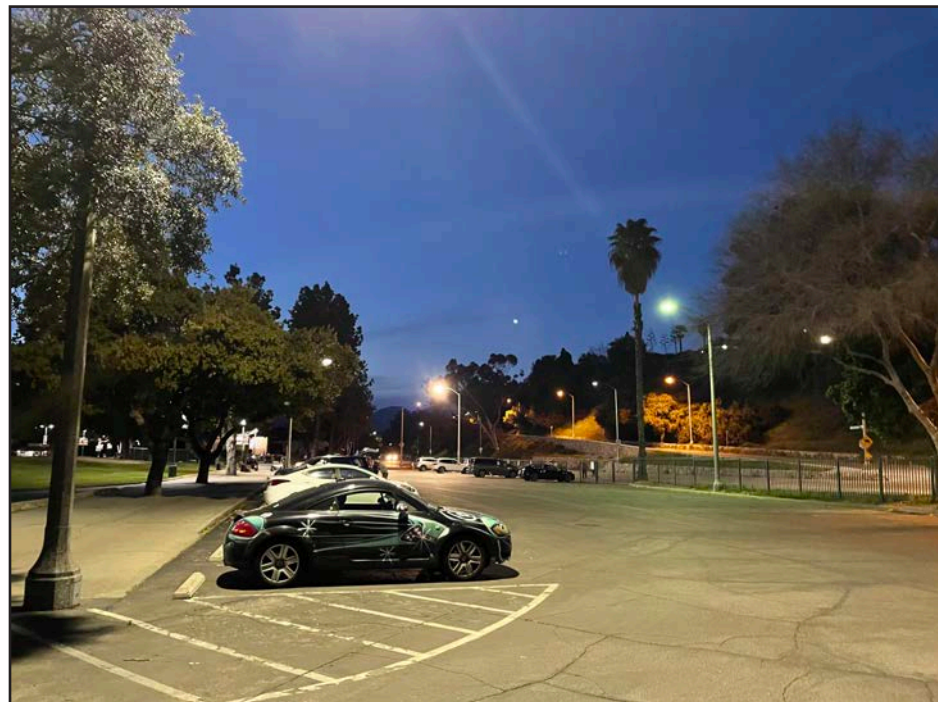
7. Walkway from Parking Lot CH to Clubhouse.



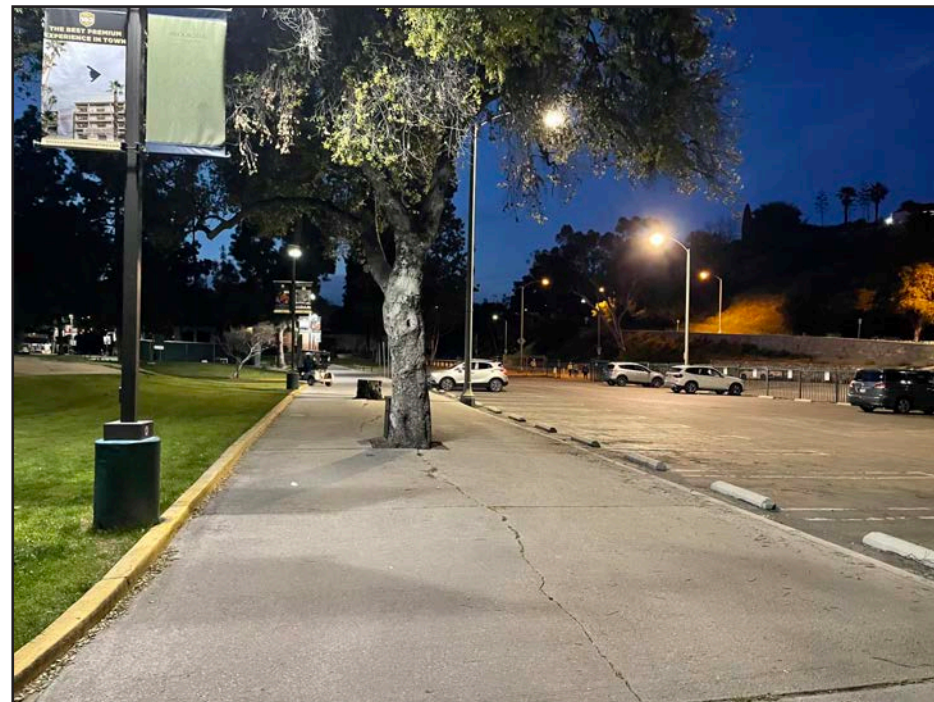
8. Walkway Towards Clubhouse from Parking Lot CH.



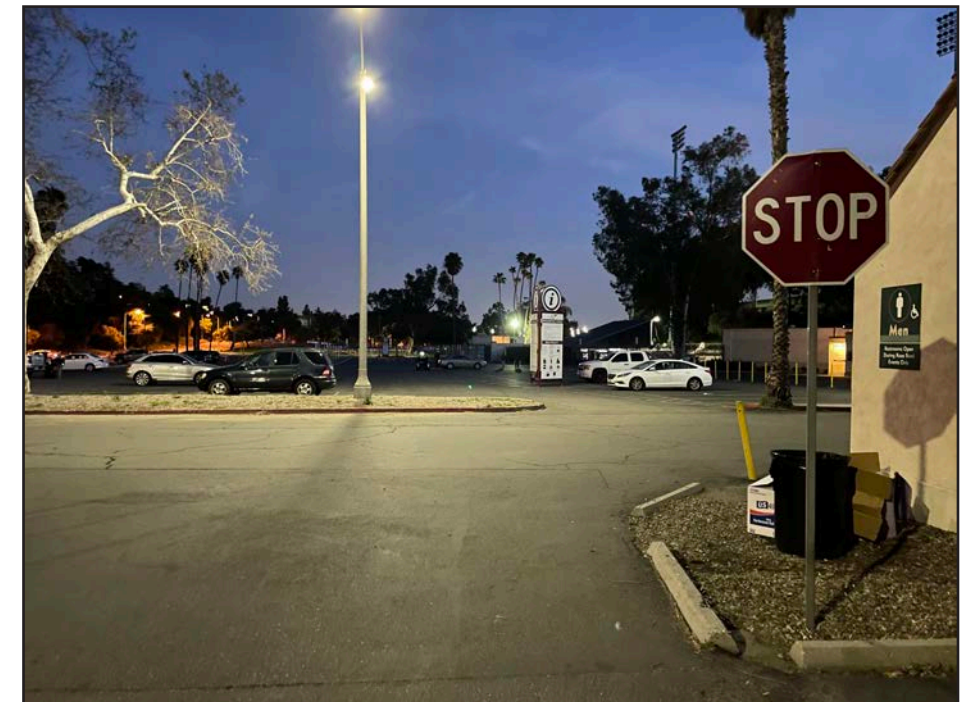
9. Parking Lot CH - Facing South.



10. Parking Lot CH - Facing North.



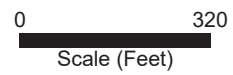
11. Walkway Towards Clubhouse from Parking Lot D.



12. Parking Lot D - Facing South.

Attachment D. Potential Location of Trees to Be Removed

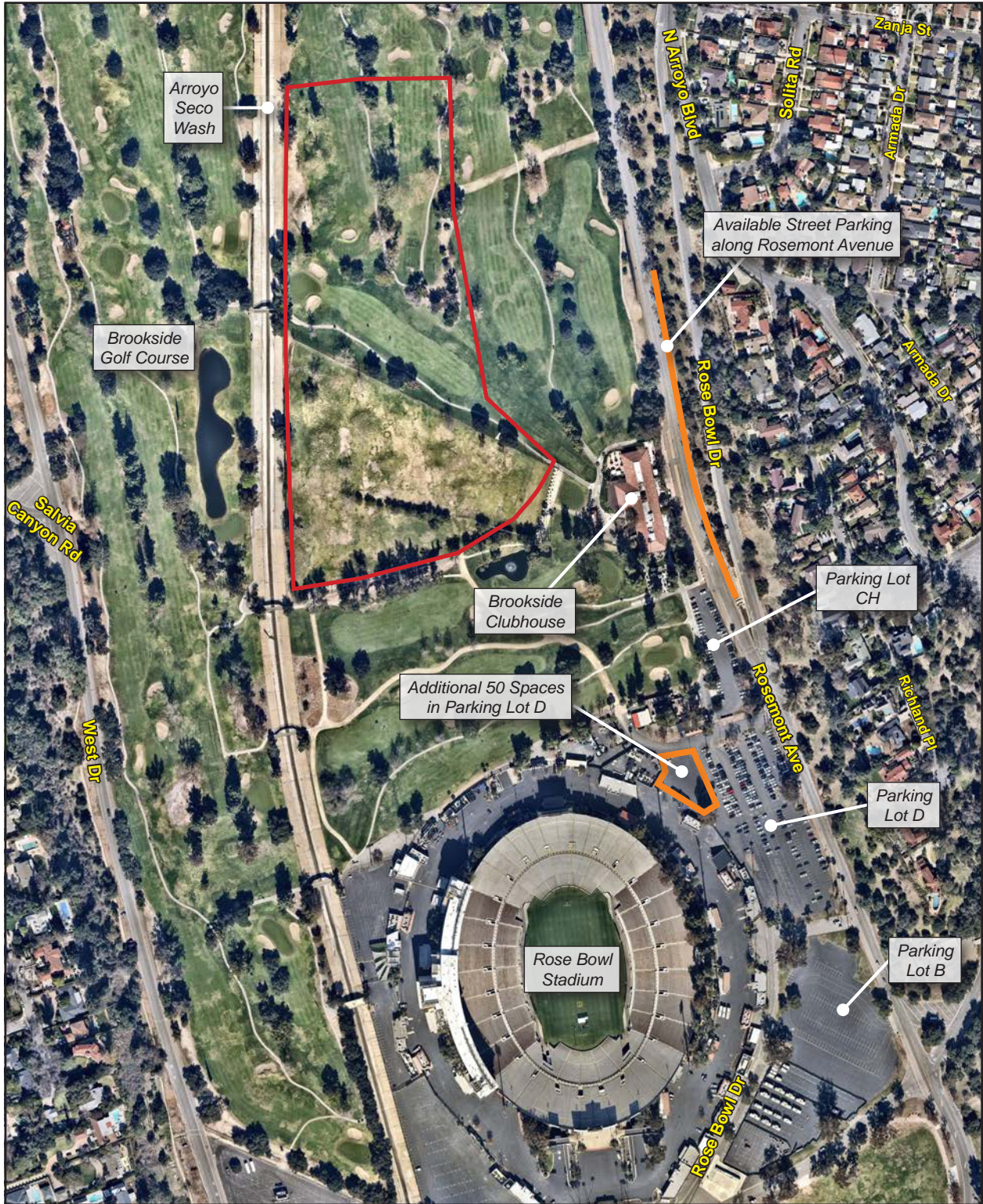
Attachment D: Potential Locations of Trees to be Removed



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Attachment E. Parking Lot Locations and Improvements

Attachment E: Parking Lot Locations and Improvements



— Project Site



Source: Nearmap, 2021

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