

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

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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.

O7-4

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.

O7-5

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.

O7-6

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.

O7-7

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

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

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 an 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.

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- 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.

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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.

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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.

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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.

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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.

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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.

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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.

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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.

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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.

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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.

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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.

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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 through 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

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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 exiting 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 3
Driving Range and
Miniature Golf
Conceptual Site Plan





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 programing at Brookside.



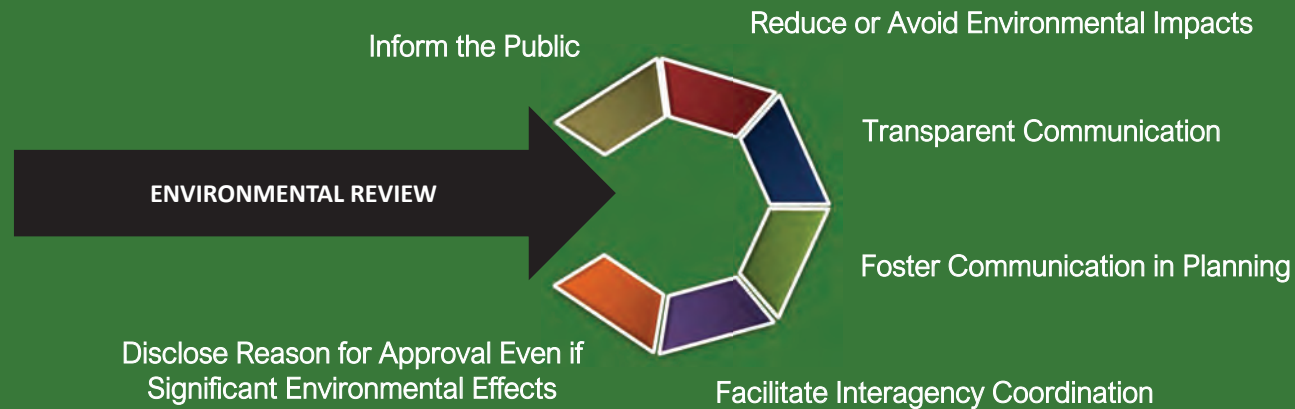
OUTREACH

- 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)

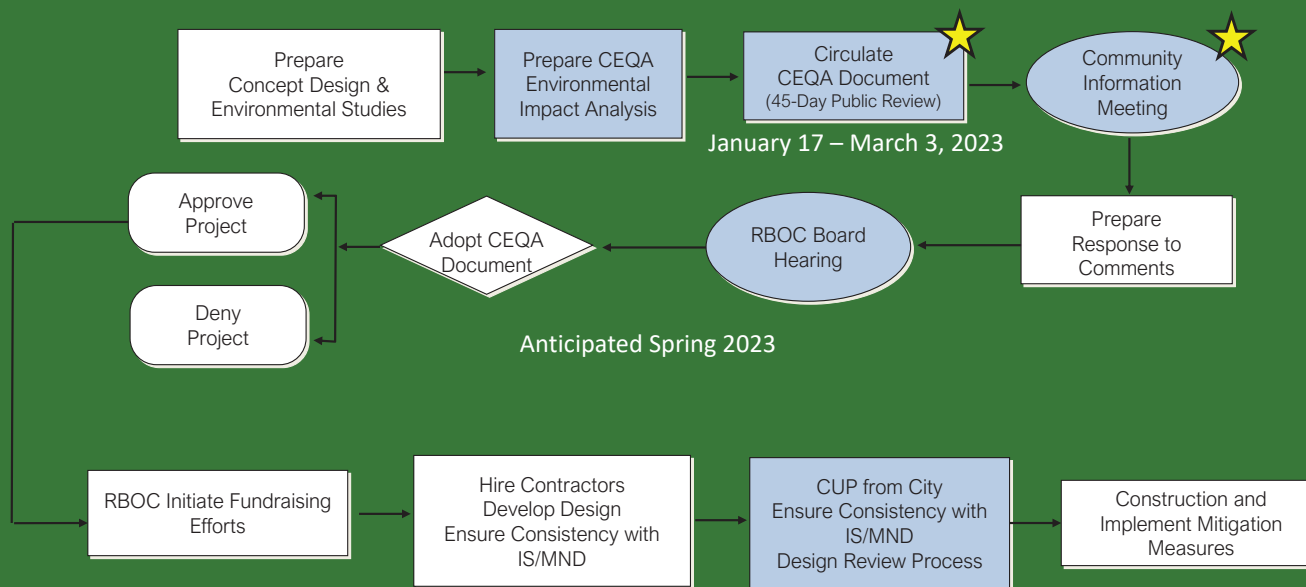


- Rose Bowl Operating Company as Lead Agency under CEQA
- City of Pasadena Responsible Agency for future CUP and Design Review



CEQA PROCESS

MITIGATED NEGATIVE DECLARATION



 Opportunities for Public Input

 We Are Here



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

- ## MITIGATION MEASURES

Vertical #600'

Vertical Points	Average	Minimum	Maximum	Coeff Var
4	6	2	2.17	3.00
1	6	2	2.17	3.00

Vertical #450'

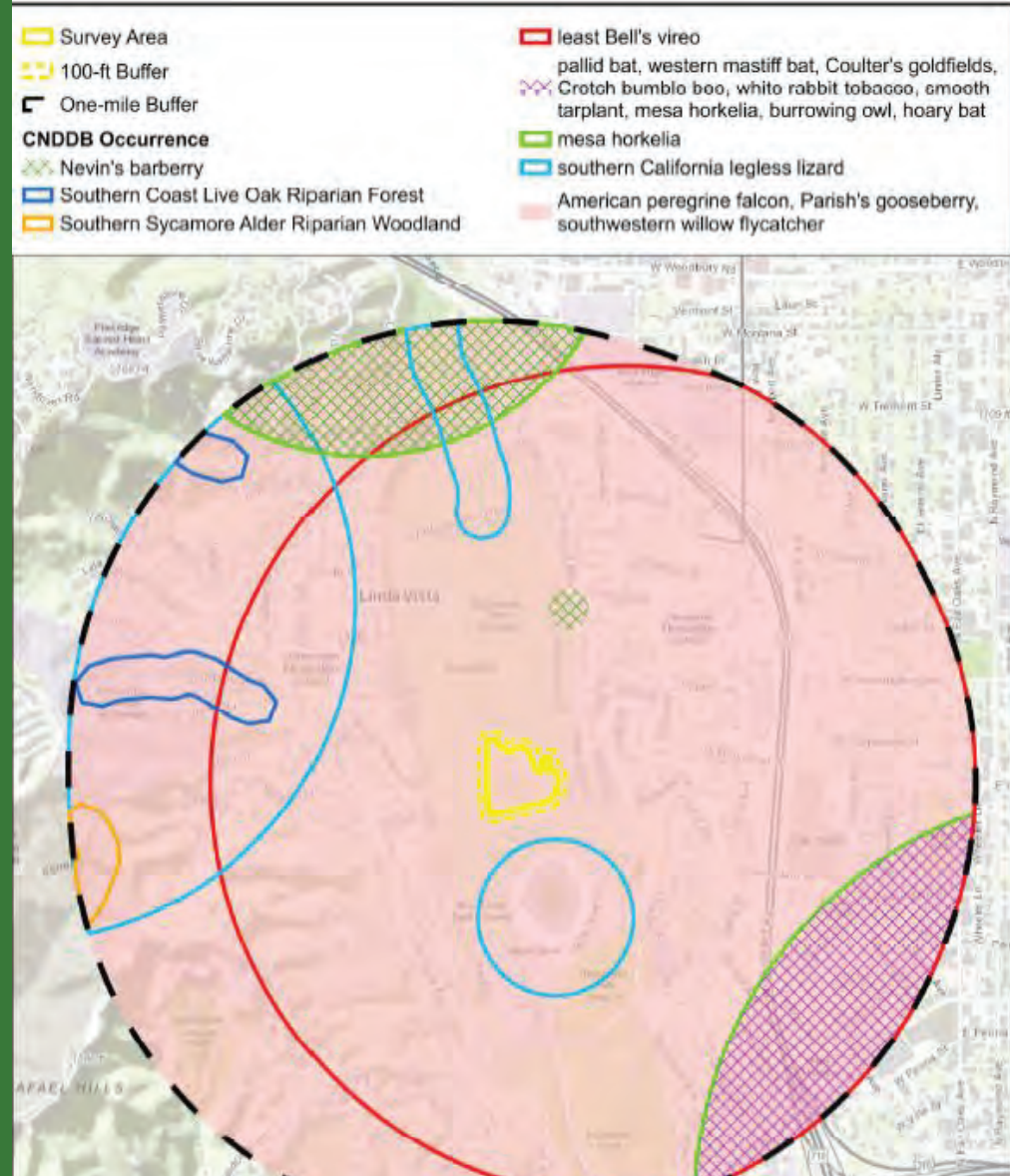
Vertical Points	Average	Minimum	Maximum	Coeff Var
3	5	2	1.7	2.5
2	5	2	1.7	2.5

Vertical #1200'

Vertical Points	Average	Minimum	Maximum	Coeff Var
1	1	0	1.0	1.0
1	1	0	1.0	1.0

- ## 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

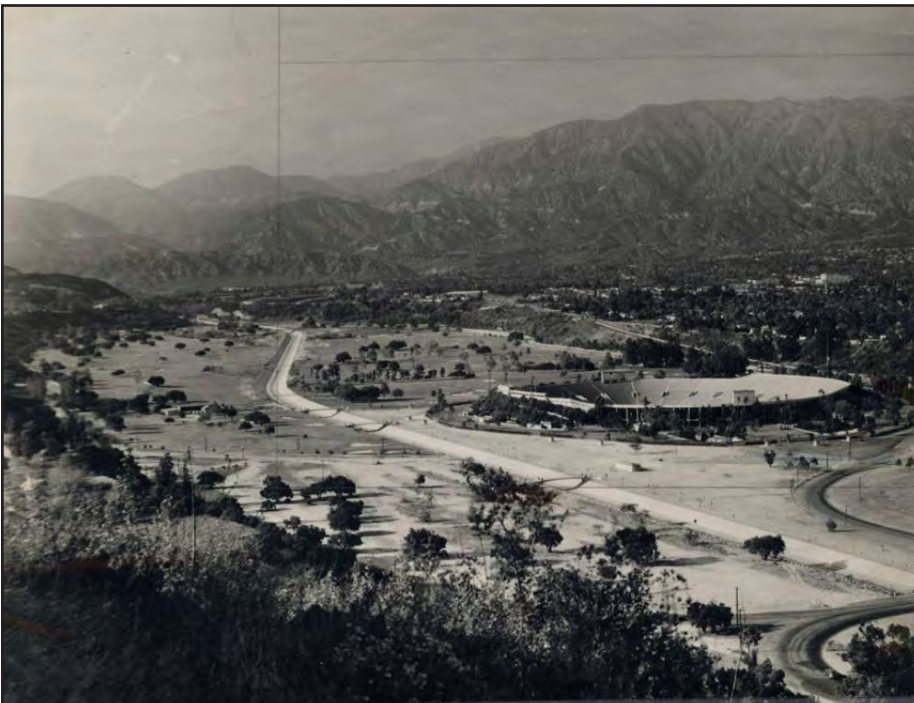
- Verbal or Written Comments During Meeting
- Email Comments to publiccomment@rosebowlstadium.com
- RBOC Board Meeting March 2, 2023



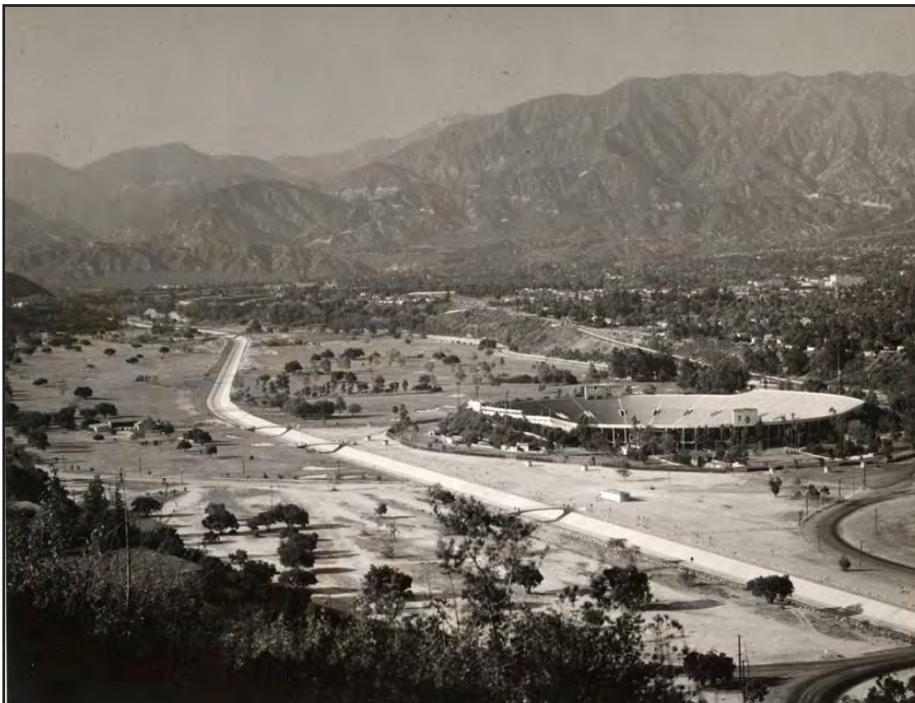
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Attachment B. Historic Photographs of Brookside Golf Course

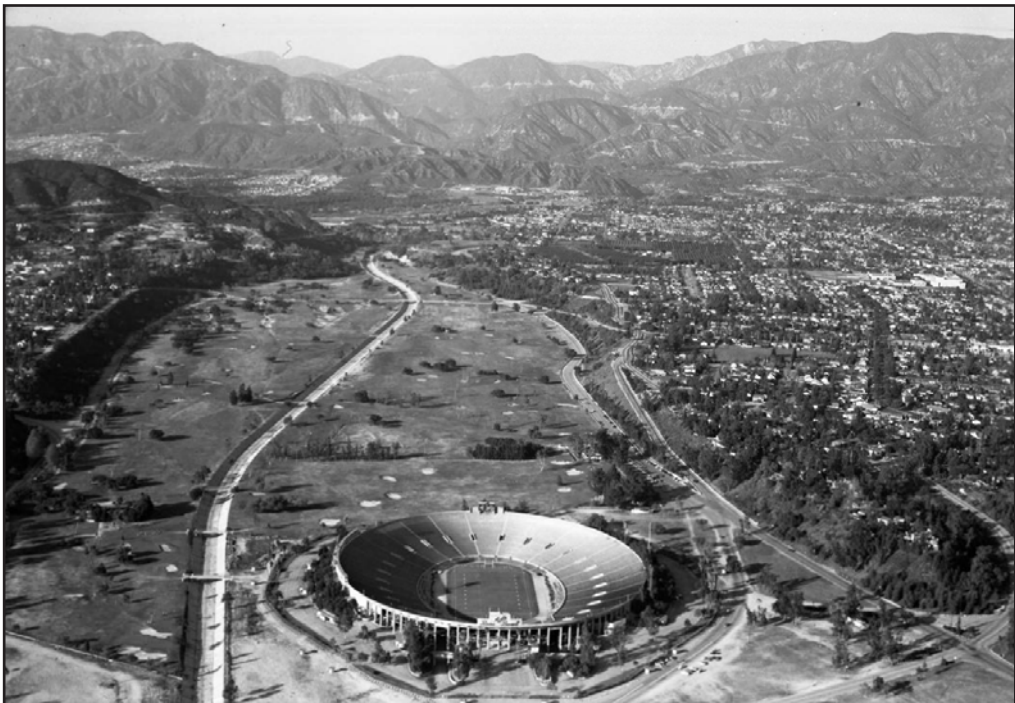
Attachment B: Historic Photographs of Brookside Golf Course



1. Brookside Golf Course - 1930's



2. Brookside Golf Course - 1940's



3. Brookside Golf Course - 1950's



4. Brookside Golf Course - 1960's

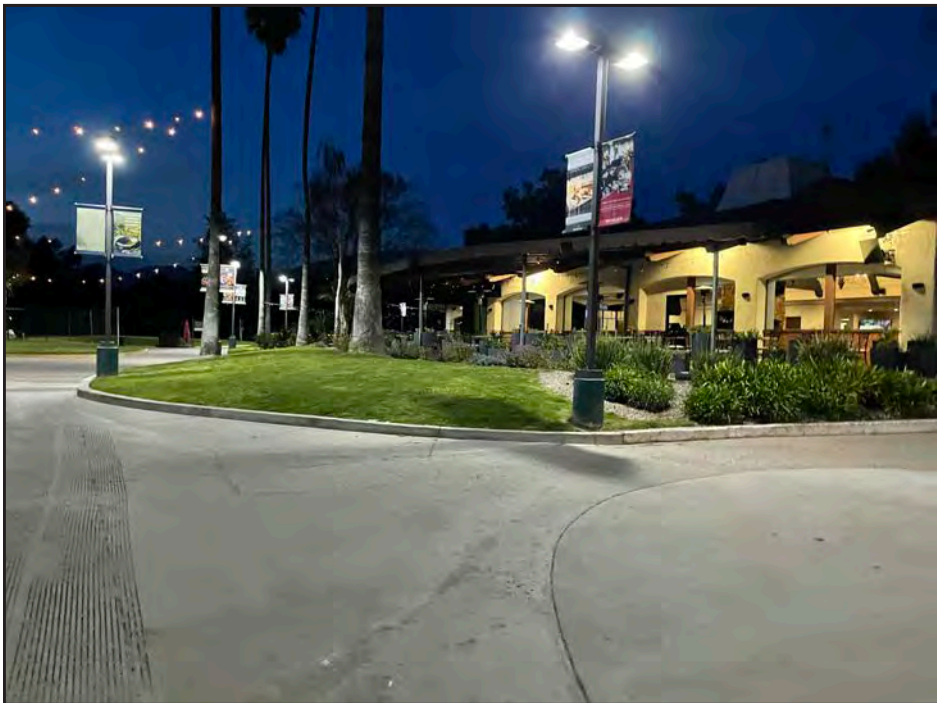


5. Brookside Golf Course - 1970's

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Attachment C. Existing Lighting at Brookside Golf Course

Attachment C: Existing Lighting at Brookside Golf Course



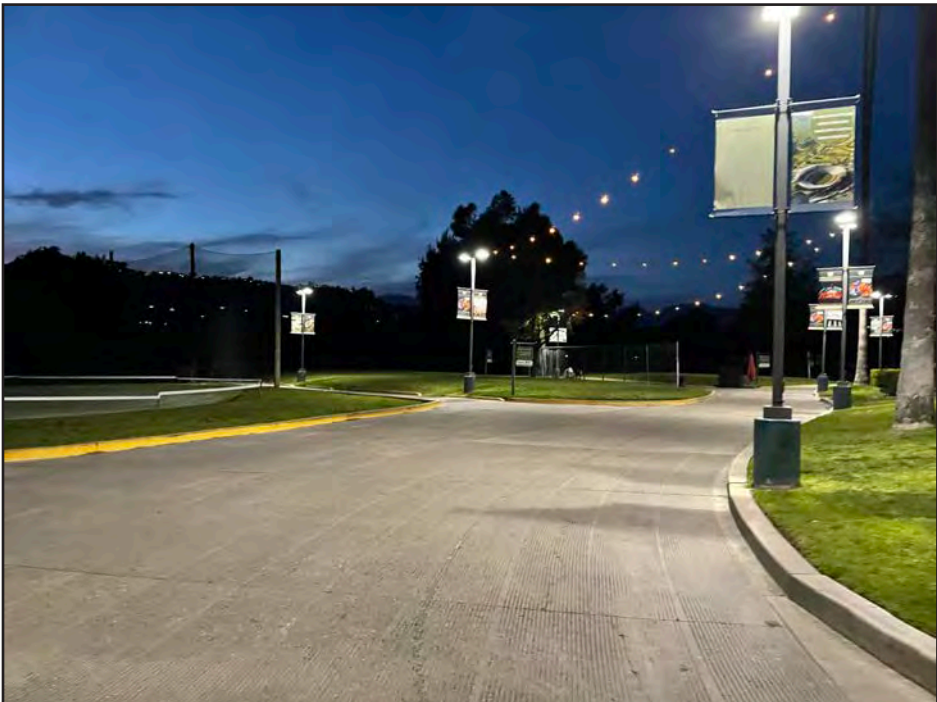
1. Brookside Golf Course Clubhouse.



2. Driving Range View from Clubhouse.



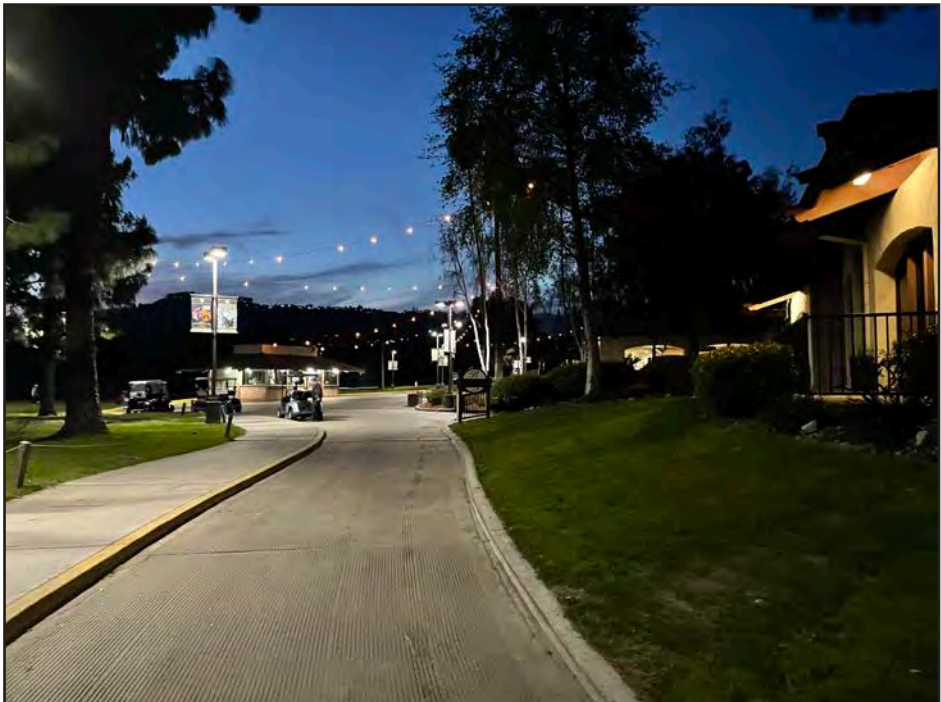
3. Walkway towards Rosemont Avenue.



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

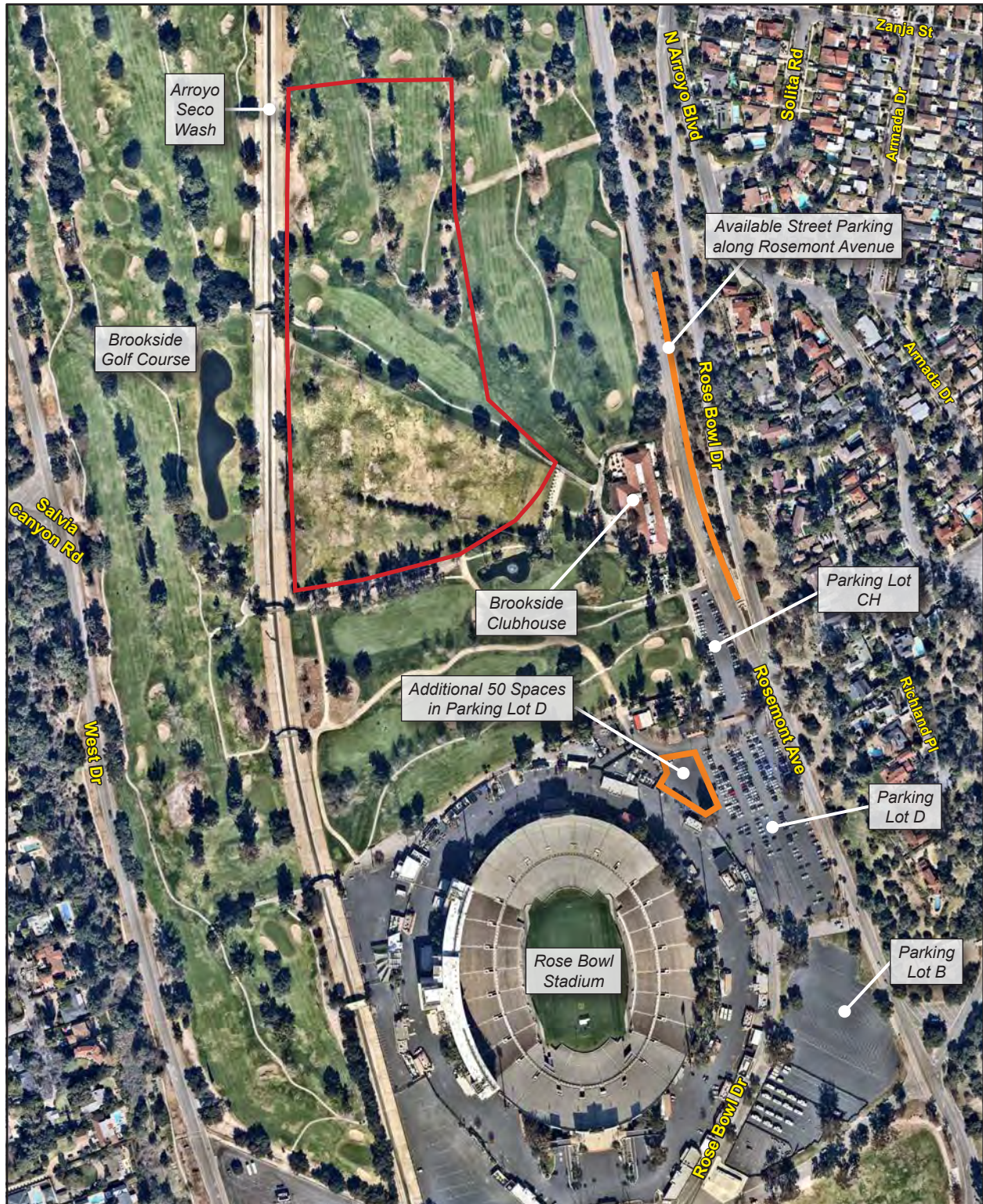
Attachment D: Potential Locations of Trees to be Removed



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Attachment E. Parking Lot Locations and Improvements

Attachment E: Parking Lot Locations and Improvements



— Project Site

0 400
Scale (Feet)



Source: Nearmap, 2021

PlaceWorks

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