



# **BROOKSIDE GOLF COURSE IMPROVEMENTS PROJECT**

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**INITIAL STUDY/MITIGATED NEGATIVE DECLARATION**

**JANUARY 2023**





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# BROOKSIDE GOLF COURSE IMPROVEMENTS PROJECT

Rose Bowl Operating Company

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## Abbreviations and Acronyms

AAQS	ambient air quality standards
AB	Assembly Bill
ACM	asbestos-containing materials
ADA	Americans with Disabilities Act
ADT	average daily traffic
amsl	above mean sea level
AQMP	air quality management plan
AST	aboveground storage tank
bgs	below ground surface
BMP	best management practices
CAA	Clean Air Act
CAFE	corporate average fuel economy
CalEEMod	California Emissions Estimator Model
Cal/EPA	California Environmental Protection Agency
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
Cal/OSHA	California Occupational Safety and Health Administration
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CAP	Climate Action Plan
CBC	California Building Code
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CDOC	California Department of Conservation
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
cfs	cubic feet per second
CGS	California Geologic Survey
CH4	Methane
City	City of Pasadena



## Abbreviations and Acronyms

CNDDDB	California Natural Diversity Database
CNEL	community noise equivalent level
CO	carbon monoxide
CO <sub>2</sub> e	carbon dioxide equivalent
CUP	Conditional Use Permit
CWA	Clean Water Act
dB	decibel
dba	A-weighted decibel
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
DU	Dwelling Unit
DWR	California Department of Water Resources
EPA	United States Environmental Protection Agency
FEMA	Federal Emergency Management Agency
FMMP	Farmland Mapping and Monitoring Program
GHG	greenhouse gases
GSA	Groundwater Sustainability Agencies
I-210	Interstate 210
L <sub>dn</sub>	day-night noise level
L <sub>eq</sub>	equivalent continuous noise level
LBP	lead-based paint
LED	light-emitting diode
LRA	Local Responsibility Area
LST	localized significance thresholds
MMT	million metric tons
MPO	metropolitan planning organization
MND	Mitigated Negative Declaration
MT	metric ton
MTCO <sub>2</sub> e	metric tons of carbon dioxide equivalent
MWD	Metropolitan Water District of Southern California
NAHC	Native American Heritage Commission
NO <sub>x</sub>	nitrogen oxides

## Abbreviations and Acronyms

NPDES	National Pollution Discharge Elimination System
NRHP	National Register of Historic Places
NWI	National Wetland Inventory
O <sub>3</sub>	ozone
OEHHA	Office of Environmental Health Hazards Assessment
OES	California Office of Emergency Services
OS	Open Space
PM	Post Mile
PM <sub>2.5</sub>	fine inhalable particulate matter
PM <sub>10</sub>	coarse inhalable particulate matter
PWP	Pasadena Water and Power
RBOC	Rose Bowl Operating Company
REC	recognized environmental condition
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SGMA	Sustainable Groundwater Management Act
SLM	sound level meter
SR-134	State Route 134
SoCAB	South Coast Air Basin
SO <sub>2</sub>	sulfur dioxide
SO <sub>x</sub>	sulfur oxides
SQMP	stormwater quality management plan
SRA	source receptor area
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TPZ	Tree Protection Zone
UCLA	University of California, Los Angeles
USDA	United State Department of Agriculture
UFAC	Forestry Advisory Committee

## Abbreviations and Acronyms

USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
VHFHSZ	very high fire hazard severity zone
VMТ	vehicle miles traveled
VOC	volatile organic compound

## Abbreviations and Acronyms

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# 1. Project Description

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## 1.1 INTRODUCTION

The Rose Bowl Operating Company (RBOC) proposes to reorient and expand the existing driving range and construct a new miniature golf facility (Project) within the existing driving range area at the Brookside Golf Course (or 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 RBOC will be considering the Project as the Lead Agency under the California Environmental Quality Act (CEQA). 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. This commitment to the Project is undertaken now because the RBOC subsequently needs to seek additional substantial funding for the Project, including from philanthropic sources who will require the level of detail discussed herein and that the funds be used exclusively for the Project. In other words, the RBOC now seeks to build bureaucratic, public, and financial momentum behind the Project, and to ensure that all environmental concerns of the Project that can be reasonably foreseen and analyzed are properly studied and disclosed now. At a later date, the RBOC will apply to the City of Pasadena for a Conditional Use Permit (CUP) associated with the Project.

The expanded driving range and new miniature golf course would be located in the same area as the existing driving range, which is currently located between the concrete-channeled Arroyo Seco to the west, the Brookside Clubhouse to the east, the C.W. Koiner Course to the north and south, and the E.O. Nay Course also located to the north.

The proposed expansion of the driving range from 20 hitting bays to approximately 60 hitting bays and the addition of a 36-hole miniature golf course would reduce the E.O. Nay course from par-70 to par-69; however, it would remain a championship layout and the course reduction would be designed to improve the pace of play. In order to accommodate the expanded driving range and new miniature golf course, tree removal and relocation and surficial grading would be required. Details of the Project description are provided below.

## 1.2 ENVIRONMENTAL SETTING

### 1.2.1 Project Location and Surrounding Uses

The City of Pasadena (City) is approximately 10 miles northeast of downtown Los Angeles in the County of Los Angeles. Regional access to Pasadena is provided by State Route (SR) 134, Interstate 210 (I-210), and State Route 110 (SR-110) (**Figure 1, Regional Location**). Located at 1133 Rosemont Avenue, the Project Site is just west of I-210 and north of SR-134. Local access to the Project Site is provided from Rosemont Avenue, Seco Street, Salvia Canyon Road, West Drive, West Washington Boulevard, and Rose Bowl Drive.

## 1. Project Description

The Brookside Golf Course is located within Arroyo Seco Canyon in the western portion of Pasadena. The Arroyo Seco, a major tributary of the Los Angeles River, flows out of the San Gabriel Mountains in the northwestern portion of Pasadena, through Arroyo Seco Canyon, and ultimately to the Los Angeles River in downtown Los Angeles. As it flows through Pasadena, the Arroyo Seco passes three major areas that comprise Arroyo Seco Canyon: The Upper Arroyo Seco (Hahamonga Watershed Park); the Central Arroyo Seco (the Brookside Golf Course, Rose Bowl, and associated facilities); and the Lower Arroyo Seco. The Brookside Golf Course is located within the Central Arroyo Seco, and the Project Site is situated entirely within the interior of the existing golf course. Central Arroyo Seco is generally bounded by the Colorado Street Bridge to the south, Arroyo Boulevard and Arroyo Terrace to the east, I-210 to the north/east, and Linda Vista Avenue to the west.

Single-family residential neighborhoods bound the Central Arroyo Seco and the Brookside Golf Course to the east and west along the slopes of Arroyo Seco Canyon. The southeast portion of the Central Arroyo Seco also contains the Chandler School along Seco Street and some small areas developed with multi-family residential uses along Arroyo Terrace. Other surrounding land uses in the Central Arroyo Seco include the Rose Bowl, the Recreation Loop, Brookside Park, Kidspace Children's Museum, the Rose Bowl Aquatic Center, the Rosemont Pavilion, the Jackie Robinson baseball and softball diamonds, tennis courts, an amphitheater, recreation and equestrian trails, multipurpose fields, and parks. The Central Arroyo Seco comprises approximately 409 acres and is the most developed and active section of Arroyo Seco Canyon (City of Pasadena, 2003).

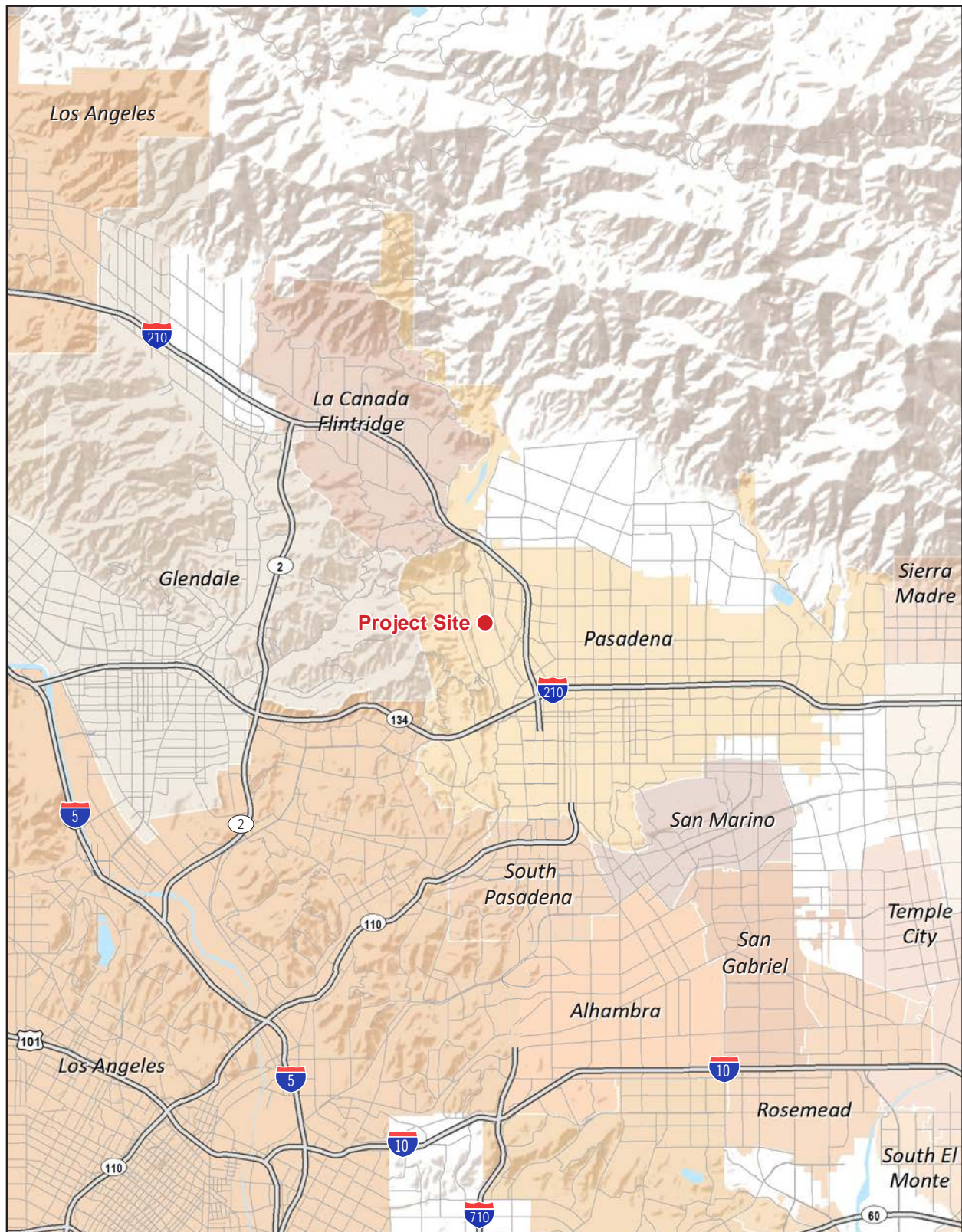
### 1.3 BROOKSIDE GOLF COMPLEX BACKGROUND AND EXISTING CONDITIONS

The Brookside Golf Course and Clubhouse (herein referred to as the Brookside Golf Complex) is managed by RBOC, a California non-profit, public benefit corporation, founded in 1995 by an act of the Pasadena City Council. Board members are appointed by the City Council, the City Manager, the Tournament of Roses, and the Chancellor of the University of California, Los Angeles (UCLA). The purpose of the RBOC is to enhance the economic and civic value of the Rose Bowl as a world-class stadium and the Brookside Golf Course as a professional-quality course.

First opened in 1928, the Brookside Golf Course is a public 36-hole complex designed by famed golf architect William P. Bell. Owned by the City of Pasadena, Brookside Golf Course features two 18-hole tracks: The C.W. Koerner Course, a par 72 course, and the E.O. Nay Course, a par-70 course. The Brookside Golf Complex includes the approximately 18,000-square-foot Brookside Clubhouse, which contains a full-service restaurant, lounge, banquet facilities, meeting rooms, and a retail golf shop. The restaurant and retail golf shop are open to the public daily.

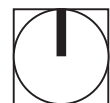
The Brookside Golf Complex is part of a historic district, the Pasadena Arroyo Park and Recreation District (Historic District), which contains 27 contributing historic features (including the Brookside Golf Course) and was listed in 2009 on the National Register of Historic Places (NRHP) (#08000579) at the local level of significance under Criterion A in the areas of entertainment and recreation for its association with the development of Pasadena as a recreational mecca. The parks and recreation facilities and the public open spaces in the Historic District were nominated in the Cultural Landscapes category. A cultural landscape is a geographic area that includes both man-made and natural resources that are important in history.

Figure 1 - Regional Location



Note: Unincorporated county areas are shown in white.  
Source: ESRI, 2021

0 2  
Scale (Miles)



## 1. Project Description

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## 1. Project Description

In addition to golf, the Brookside Golf Complex is also used for Rose Bowl “enterprise” events, attracting up to 20,000 people per event (as distinguished from the larger “displacement” events where attendance is between 20,000 and 90,000 and the golf course is used solely for parking). Some events are held on the golf course while others use the golf course for parking and event activations. Enterprise events typically include wedding ceremonies and receptions, corporate events, car shows, alumni events associated with football games at the Rose Bowl, parties, and celebrations, “Final Friday” events, and golf tournaments are hosted at the Brookside Golf Course. The golf course has also been host to the multi-day multi-stage Arroyo Seco Weekend event (in 2017 and 2018) and other similar events.

Historically, the Brookside Golf Complex has attracted up to 800,000 visitors each year. Each month the C.W. Koiner Course and the E.O. Nay Course receive between 10,000 to 16,000 rounds of golf, with the busiest months from May to August. As with the golf courses, the Brookside Clubhouse also attracts a similar usage in restaurant use and events. The Brookside Clubhouse has undergone extensive interior improvements on multiple occasions over the years.

The Brookside Golf Complex includes an existing driving range, which is located between the concrete-channeled Arroyo Seco Wash to the west, the Brookside Clubhouse to the east, and the C.W. Koiner Course to the north and south, as shown in **Figure 2, Exiting Project Site**. The driving range was developed on the Brookside Golf Course in 1929. In 1967, Hole 8 of the C.W. Koiner Course was moved across the Arroyo Seco Wash to allow for the expansion of the distance on the driving range. In 2004 the driving range was renovated with new tee lines, irrigation, mounds, and short game area. There are 20 hitting bays within the driving range that are generally oriented in a west-east direction, and practice putting greens are located adjacent to the eastern boundary of the existing driving range.

There are several paved surface parking lots in the Central Arroyo Seco to support the various active use areas. Parking lots closest to and directly serving the Brookside Golf Complex include Lots 1A and D, which are located just south of the Brookside Clubhouse and accessed from a driveway off Rosemont Avenue and Rose Bowl Drive. There are about 66 spaces in Lot 1A and 310 spaces in Lot D for a total of approximately 376 spaces within the three parking lots. Additional lots and street parking are located throughout the central arroyo area.

### 1.4 EXISTING PLANNING AND ZONING

Brookside Golf Complex is located within the OS (Open Space) zoning district and is designated as Open Space under the City of Pasadena’s General Plan Land Use Element. This designation allows for a variety of active and passive public recreational facilities and for City-owned open space facilities. The residential neighborhoods surrounding the Brookside Golf Complex are primarily zoned single-family residential, and many are within the Hillside Development Overlay District.

## 1. Project Description

### 1.5 DESCRIPTION OF PROJECT

#### 1.5.1 Project Purpose

In March 2020, the State of California and City of Pasadena responded to the COVID-19 “stay-at-home” orders and recreational activity, including golf, was prohibited. The “stay-at-home” orders were lifted in part on May 8, 2020, and golfing activities were permitted to resume. Since the reopening of golf course activities, overall golf course use has surged, and the Brookside Golf Course has experienced high levels of attendance similar to peak years, such as 2015. Attendance and revenues are up approximately 22 percent from budget. Similar sized golf courses in Los Angeles County and City are seeing around a 20 percent increase as well.

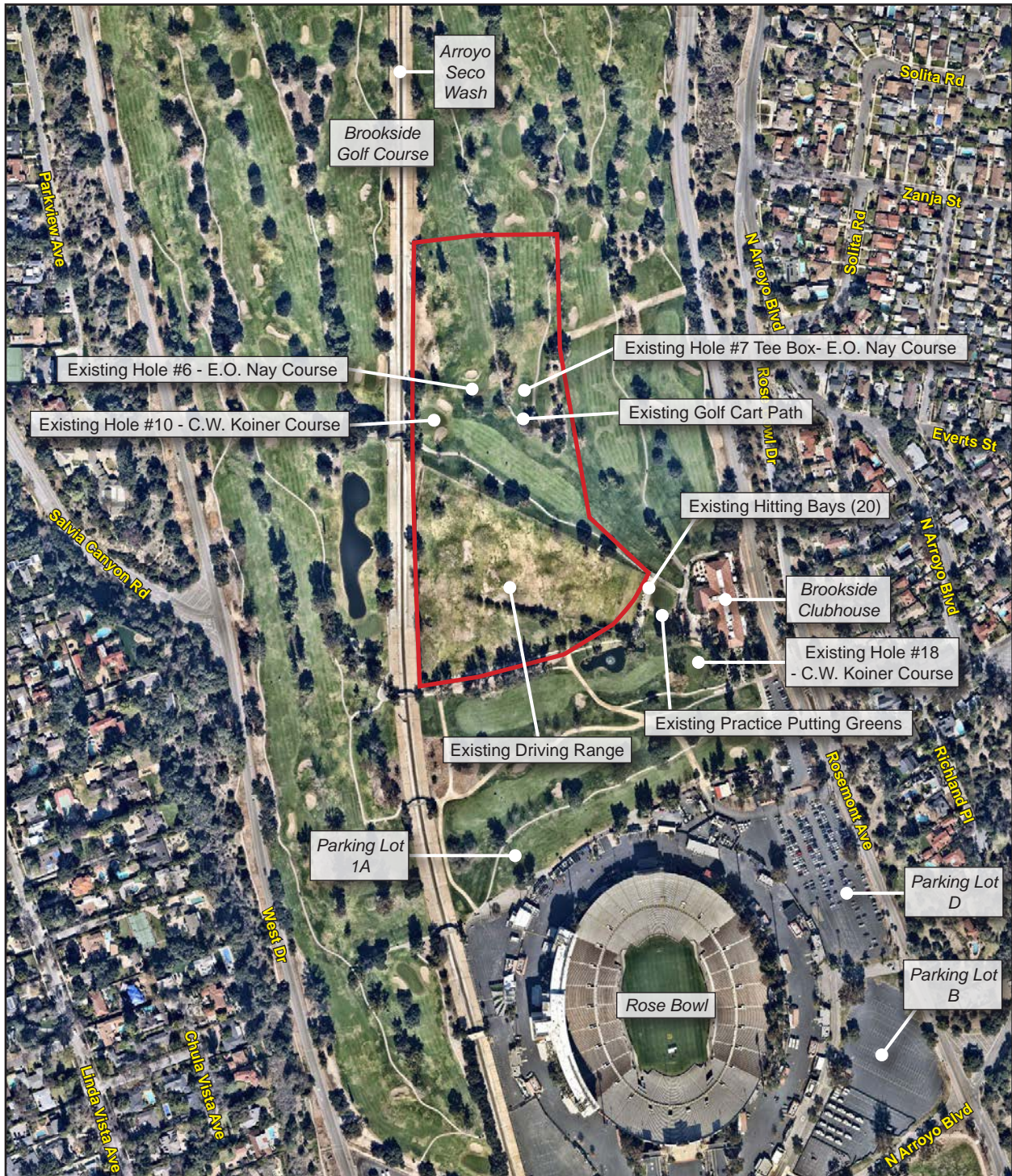
There is currently an inadequate number of driving range stalls (less stalls than holes), and on most days, there is a line to use the driving range facilities. The proposed project would expand the driving range from 20 hitting bays to approximately 60 hitting bays. Expanding the number of stalls would serve the existing demand of golfers. Additionally, the Brookside Golf Course currently has over 1,300 members (known as the Players Club). It is anticipated that this membership number would increase with expansion of the driving range, as more individual golfers who already visit the golf course would take advantage of the membership benefits. Membership represents 30 percent of current play at the golf course, and the intent is to increase memberships (and therefore revenue) to existing players through the provision of these improved facilities. This increase in membership is not anticipated to increase attendance at the golf course, but rather to capture existing users.

In addition, the proposed project would add 36 family-friendly holes of miniature golf. The addition of the 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 into the game, the same way that the First Tee of Greater Pasadena has over the past decade.

The operation of the Rose Bowl and Brookside Golf Complex creates a critical stream of revenue that is essential to ensuring the overall maintenance and longevity of these important community resources. The RBOC has implemented other strategies to increase revenue such as increasing golfing fees in line with other golf courses in the Los Angeles Area. However, the RBOC has identified the need to ensure that the Brookside Golf Course continues to draw historical numbers of visitors. Additionally, the RBOC desires to implement these improvements to better serve existing programs for local golf programs including First Tee of Greater Pasadena that serves youth and veterans. Therefore, the RBOC has identified the need to implement improvements as described below that are intended to return the use and net revenue of the Brookside Golf Complex back to historical levels while broadening user-ship beyond individual golfers to families. In order to implement the improvements, the RBOC will initiate fundraising activities through the Rose Bowl Legacy Foundation to secure funds for final site plans and ultimately construction contractors.



Figure 2 - Existing Project Site



— Project Site

0 500  
Scale (Feet)



Source: Nearmap, 2021

## 1. Project Description

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## 1. Project Description

### 1.5.2 Project Description

The Project consists of two main components within the approximate 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. These elements, including operational and construction details, are described in detail below. A conceptual layout for the Project components is shown in **Figure 3, *Driving Range and Miniature Golf Conceptual Site Plan*** and would require the relocation of Hole 10 of the C.W. Koerner Course, shortening of Hole 6 and Hole 7 of the E.O. Nay Course, and relocation of an existing golf cart path.

#### Driving Range Improvements

The existing 9-acre driving range is situated from a generally east to west hitting experience and consists of 20 bays at the east end. It is surrounded by golf course netting on 64 poles between 20 to 50 feet high with lighting (currently nonoperational) and a row of perimeter trees on the southern side. It is an open grassy range with no ground features other than perimeter trees and several interior trees. The Project would remove existing netting, which are nearing the expected end of their lifespan, reduce the driving range to be approximately 8-acres, and reorient it in the same general location as the existing driving range (to maintain proximity to parking and the Brookside Clubhouse). A new safety net feature would be installed around the new driving range. The driving range would be bounded by Hole 10 and Hole 18 of the C.W. Koerner Course to the north and south, respectively; the proposed miniature golf course and the Arroyo Seco Channel to the west; and the existing putting greens and the Brookside Clubhouse to the east. A 6-foot golf cart path would be designated around the northern perimeter of the driving range. The proposed driving range would include 60 hitting bays at the southern end and would be reoriented to face north rather than west, as shown in Figure 3. Orientation to a south to north layout would limit disruption from sunrise/sunset. “Toptracer” technology, which provides instant shot replays and statistical feedback, would be installed within the driving range bays to enhance the golfer experience.

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. Poles and netting are shown in **Figure 4, *Driving Range Poles and Netting***. LED lighting would be individually adjustable to ensure proper direction and avoidance of light spill into surrounding neighborhoods.

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 existing hitting bays would remain as a concrete pad, and no changes would occur to the existing practice putting greens.

Expansion and reorientation of the driving range would result in the shortening of Hole 6 and Hole 7 of the E.O. Nay Course, which is located approximately 60 yards north of the existing driving range. Approximately 220 yards on the golf course would be removed from play. Although the E.O. Nay Course would be reduced



## 1. Project Description

from a par-70 to par-69 with shortening of the two holes, the E.O. Nay Course would still cater to the less difficult experience. It is estimated that the pace of play on the golf course would be improved by five minutes (less than one golf shot). In addition, the Project would result in alterations to Hole 10 of the C.W. Koiner Course, however Hole 10 would maintain similar distance and shape. The hole would be relocated approximately 20 yards to the north; thus shortening two holes of the E.O. Nay that it would encroach upon (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, and no changes to the Brookside Clubhouse are proposed.

### **Miniature Golf Course**

The Project includes development of a 36-hole miniature golf course on approximately one acre within the footprint of the existing driving range (relatively flat grassy area). The proposed miniature golf course would be located directly west of the proposed driving range and would be bounded by the Arroyo Seco Channel to the west, the proposed driving range to the east and north, and Hole 18 of the C.W. Koiner Course to the south (Figure 3 and Figure 4). 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.

Miniature golf is largely an exercise in putting so from a use standpoint miniature golf would continue the golf-related uses that currently occupy the Project Site. 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. The structures are anticipated to be between 6 and 8-feet in height. The miniature golf course would be designed for family-friendly use and include topographic variation, low-level design, educational information, and low-level lighting to accentuate the player experience. The miniature golf course would include an 18-hole Americans with Disabilities Act (ADA)-accessible course with play options for 9 holes. Landscaping would include drought tolerate desert species between artificial turf.

Figure 3 - Driving Range and Miniature Golf Conceptual Site Plan

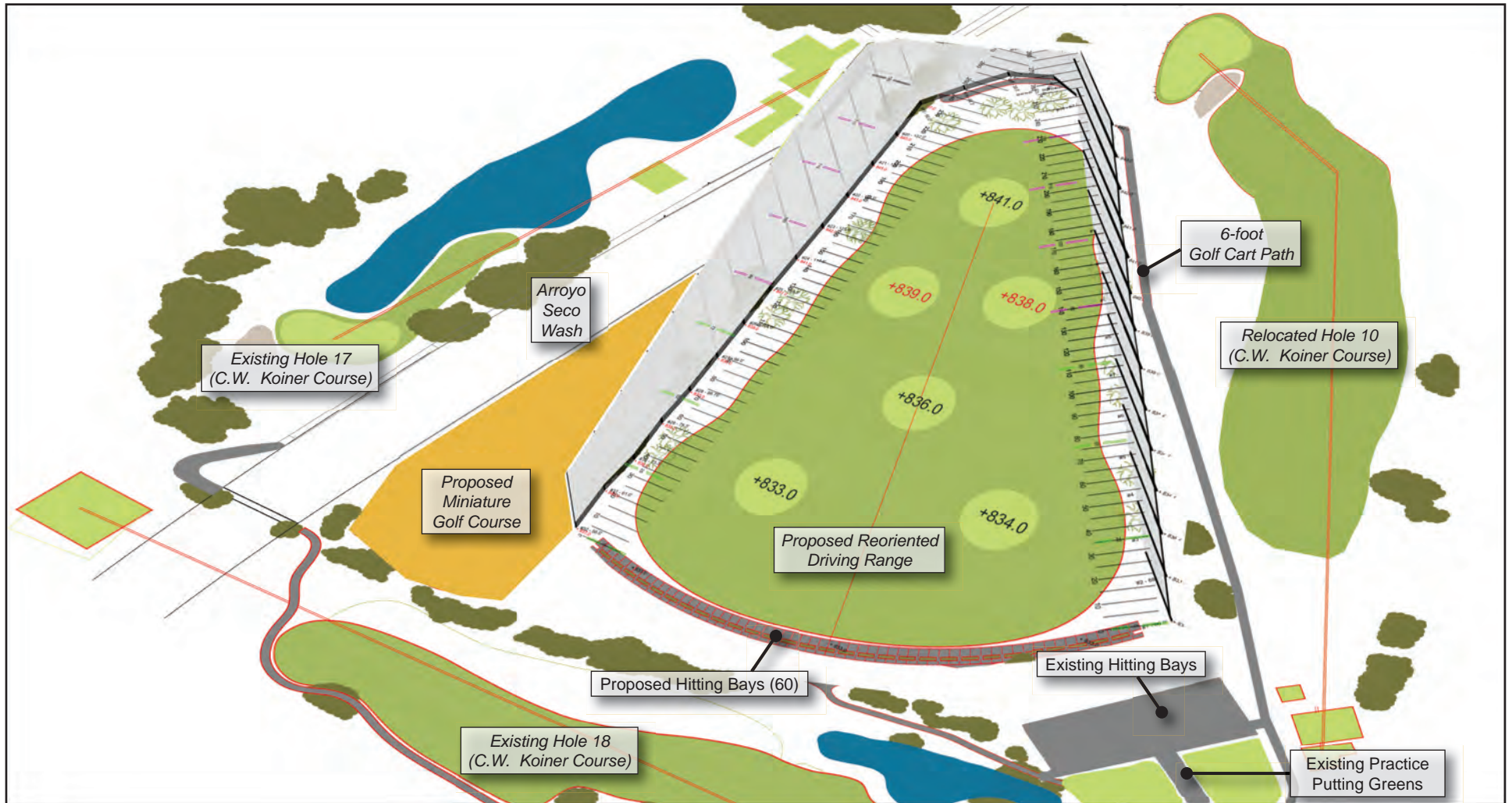


## 1. Project Description

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Figure 4 - Driving Range Poles and Netting



## 1. Project Description

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## 1. Project Description

### 1.5.3 Project Design

As described above regarding the funding process necessary for implementation, the Project is in the conceptual phase and the architect/designer and the ultimate design would be selected when funding is secured. While the location and size of the expanded driving range and proposed miniature golf course are identified and evaluated in this document, the final plans would come at a later time.

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. The Project would be subject to the City's Design Review process as defined in the Pasadena Municipal Code. The purpose of this process is to implement urban design goals and policies and Citywide design principles into project designs and to ensure that future developments reflect the values of the community, enhance the surrounding environment, visually harmonize with surroundings, and avoid nostalgic misrepresentations that may confuse the relationships among structures over time. This process would promote the protection and retention of landmark, native, and specimen trees and other significant landscaping of aesthetic and environmental value. Design review would also promote the conservation, enhancement, preservation, and protection of historic resources. 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.

### 1.5.4 Operational Changes

The objective of the Project is to realize the existing capacity of the Brookside Golf Complex by increasing memberships and returning to historically higher levels of patronage use through the expansion of services to a broader range of visitors including families. The primary serving parking lots (1A and D) contain sufficient parking to accommodate the existing capacity of the golf course, and would be supplemented by additional parking in the various lots and street parking surrounding the Rose Bowl as in current conditions; thus, 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.

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. Similar to current operations, during displacement Rose Bowl events, the driving range would be used for parking and would not be in operation on special event days at the Rose Bowl. The project proposes no changes to the types and frequency of "enterprise events" that may occur on the golf course. However, it is anticipated that the miniature golf course could remain open during such events. The Brookside Golf Complex is currently served by approximately 100 employees, and operation of the Project would not require additional employees.

## 1. Project Description

### 1.5.5 Construction Activities

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). 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.

Construction of the expanded and reoriented driving range would be implemented and operational prior to initiating construction activities on the miniature golf site, as the miniature golf would be located on a portion of the existing driving range. The exact timeline for construction activities will be dependent on the securing of sufficient funding; however, for the purposes of this analysis, it is anticipated that the construction of the driving range would take approximately eight months to complete, and for purposes of this analysis, beginning in 2023. During construction activities, closure of the existing driving range and a portion of the Brookside Golf Course would be required, and the existing driving range would not be operational. The remainder of the golf course would remain operational during construction. Once the driving range project is completed, it is anticipated that construction of the miniature golf course would begin and would take approximately four months to complete.

No road or sidewalk closures would be required during construction. Construction parking for the estimated maximum of 80 construction workers required for construction would be provided in the primary serving lots (1A and D) and would also be supplemented by additional parking in the various lots surrounding the Rose Bowl, as necessary. Construction activities would be limited between 7:00 a.m. to 7:00 p.m., Monday through Friday, 8:00 a.m. to 5:00 p.m., on Saturdays, and no construction activities are anticipated on Sundays or on federal holidays.

## 1.6 INTENDED USE OF THIS MND, RESPONSIBLE AGENCIES, AND PROJECT APPROVALS

Consistent with Section 15065(b) of the CEQA Guidelines, the RBOC is the Lead Agency for the Project. As such, RBOC would use this environmental document when considering whether to approve the Project. At a later date, the City of Pasadena, as a responsible agency, would also rely on this document to process the necessary Conditional Use Permit (CUP) request. In addition to the CUP process, the Project would also be subject to the City's Design Review process as defined in the Pasadena Municipal Code. There are no other responsible or trustee agencies associated with Project approval. The specific action that must be taken prior to approving the Project is:

**Mitigated Negative Declaration (MND) Adoption.** The Final MND would be considered for adoption by RBOC. At a later date, the City of Pasadena would use the Final MND for all land use decisions related to the Project.

## 1. Project Description

The following permits and approvals would be required for the Project:

- RBOC – Allocation of initial funding, authorization to seek additional funding, and proceed with seeking bids for development of final design and construction plans, and undertaking/implementing the proposed project.
- City of Pasadena – Approval of CUP for Commercial Recreation – Outdoor Land Use for the modified driving range and miniature golf course.
- City of Pasadena – Design Review approval required for new development and alterations to all City-owned historic resources, including the Brookside Golf Course.

## 1. Project Description

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## 2. Environmental Checklist

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### 2.1 PROJECT INFORMATION

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1. **Project Title:** Brookside Golf Course Improvements Project
2. **Lead Agency:**  
Rose Bowl Operating Company  
1001 Rose Bowl Drive  
Pasadena CA 91103
3. **Contact Person and Phone Number:**  
Jenessa Castillo  
(626) 577-3104
4. **Project Location:** Brookside Golf Course, 1133 Rosemont Ave, Pasadena, CA 91103
5. **Project Sponsor's Name and Address:**  
Rose Bowl Operating Company  
1001 Rose Bowl Drive  
Pasadena CA 91103
6. **General Plan Designation:** Open Space
7. **Zoning:** Open Space
8. **Description of Project:** The Rose Bowl Operating Company (RBOC) proposes to reorient and expand the existing driving range and construct a new miniature golf facility (Project) within the existing driving range area at the Brookside Golf Course (or golf course). Project improvements would occur on approximately 16 acres within the exiting driving range, Hole 10 of the C.W. Koier Course, and Holes 6 and 7 of the E.O. Nay Course (Project Site). See the Project Description in Section 1.5 for further details.
9. **Surrounding Land Uses and Setting:** Surrounding land uses in the immediate vicinity of the Project Site include the Rose Bowl Stadium and associated surface parking areas to the south, the remaining parts of the Brookside Golf Complex and Interstate 210 (I-210) to the north, and single-family residential on the slopes of the Arroyo Seco Canyon to the east and west. The residential neighborhoods surrounding the Brookside Golf Course are primarily zoned single-family residential, and many are within a hillside development district.
10. **Other Public Agencies Whose Approval Is Required (e.g., permits, financing approval, or participating agreement):** City of Pasadena – CUP approval and Design Review

## 2. Environmental Checklist

- 
- 11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**

*Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.94 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.*

The RBOC and Gabrieleño Band of Mission Indians – Kizh Nation entered into consultation pursuant to Public Resources Code Section 21080.3.1 (AB 52) in June 2021. The results of this consultation are included in the corresponding analysis presented in this Initial Study Checklist. Consultation mutually closed on December 20, 2022.



## 2. Environmental Checklist

### 2.2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact," as indicated by the checklist on the following pages.

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> Aesthetics                  | <input type="checkbox"/> Agriculture / Forestry Resources | <input type="checkbox"/> Air Quality                        |
| <input type="checkbox"/> Biological Resources        | <input type="checkbox"/> Cultural Resources               | <input type="checkbox"/> Energy                             |
| <input type="checkbox"/> Geology/Soils               | <input type="checkbox"/> Greenhouse Gas Emissions         | <input type="checkbox"/> Hazards and Hazardous Materials    |
| <input type="checkbox"/> Hydrology/Water Quality     | <input type="checkbox"/> Land Use / Planning              | <input type="checkbox"/> Mineral Resources                  |
| <input type="checkbox"/> Noise                       | <input type="checkbox"/> Population / Housing             | <input type="checkbox"/> Public Services                    |
| <input type="checkbox"/> Recreation                  | <input type="checkbox"/> Transportation                   | <input type="checkbox"/> Tribal Cultural Resources          |
| <input type="checkbox"/> Utilities / Service Systems | <input type="checkbox"/> Wildfire                         | <input type="checkbox"/> Mandatory Findings of Significance |

### 2.3 DETERMINATION (TO BE COMPLETED BY THE LEAD AGENCY)

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

  
Signature

Jenessa Castillo, Interim Chief Operations Officer

January 11, 2023

Date

## 2. Environmental Checklist

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## 3. Environmental Analysis

### 3.1 AESTHETICS

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>I. AESTHETICS.</b> Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?			<b>X</b>	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				<b>X</b>
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			<b>X</b>	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?		<b>X</b>		

### Discussion

Except as provided in Public Resources Code Section 21099, would the Project:

**a) Have a substantial adverse effect on a scenic vista?**

**Less Than Significant Impact.** A scenic vista is defined as a viewpoint that provides expansive views of a highly valued landscape feature (e.g., a mountain range, lake, or coastline) or of a significant historic or architectural feature (e.g., views of a historic structure). Views from the Project Site include portions of the San Gabriel Mountains, the surrounding hillsides with residential development, the Brookside Golf Course, and the Rose Bowl Stadium. Additionally, the Project Site is located within the Pasadena Arroyo Seco Parks and Recreation District, which is a historic district in the City of Pasadena and is listed on the NRHP. Thus, areas surrounding the Project Site could contribute to a considered a scenic vista. The Project Site is situated within the Central Arroyo Seco, at elevations below the surrounding hillsides. **Figure 5, Photograph Location Map**, shows key view locations from areas within and surrounding the Project Site. Residential neighborhoods and roadways on the adjacent hillsides east and west of the Arroyo Seco have varied partial views of the Central Arroyo Seco, including the Brookside Golf Course (**Figure 6, Views of the Project Site from Offsite Locations**).

### 3. Environmental Analysis

The existing 9-acre driving range is situated from east to west and consists of 20 bays at the east end. It is surrounded by golf course netting on 64 poles between 20 to 50 feet high and a row of perimeter trees on the southern side (see **Figure 7**, *Views of the Project Site from within the Brookside Golf Course*). Implementation of the Project would reorient the driving range to face north rather than west, install 36 replacement poles in addition to 20 existing poles that would remain in place that would support new netting, and construct a new miniature golf course directly west of the proposed driving range. 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. Additionally, Project improvements would result in the relocation of Hole 10 of the C.W. Koiner Course and shortening of Holes 6 and 7 of the E.O. Nay Course which would have little to no visual change as it is a small feature at ground level and not visible from any surrounding location.

Typically, viewer sensitivity is considered high when views are provided that are commonly held as an important component of the recreational experience. In this area, 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. As described above, the average height of the proposed poles would be approximately 90.67 feet; 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. These replaced features would not block or interfere with the existing views of the surrounding areas. Thus, the reoriented driving range, including netting and poles, would not interfere with views of the San Gabriel Mountains, the Rose Bowl Stadium, or other scenic features located within the Pasadena Arroyo Seco Parks and Recreation District. Additionally, views from the surrounding hillsides of the Brookside Golf Course and Rose Bowl Stadium would not be altered as a result of the Project, since the poles and netting would not reach heights or are of a materiality or massing that could potentially block views from the hillsides, and the ample vegetation screens many views along these routes and would generally block the site from view. These changes to the driving range would be consistent with the overall existing character and features of the Brookside Golf Course and the Central Arroyo Seco and would not result in substantial adverse changes to the views of or from the Project Site.

Though ultimate design of the miniature golf course is not available at this time, once funding is secured and design is available, the Project would be required to go through the City of Pasadena's Design Review process as required by the Pasadena Municipal Code, prior to approval to ensure that the ultimate design is consistent with the Arroyo Seco Design Guidelines, reflects the values of the community, enhances the surrounding environment, and visually harmonizes with surroundings. The proposed miniature golf course would be designed to minimize impacts to the remainder of the Brookside Golf Course and would include low-level design (structures or features between 6 and 8-feet in height) and low-level lighting consistent with the existing golf uses at the Brookside Golf Course. The proposed miniature golf course would be located within the interior of the Brookside Golf Course, adjacent to the proposed driving range, and in proximity to the Brookside Clubhouse and parking areas. Thus, since the miniature golf course would only be directly visible to those visiting the driving range, Brookside Clubhouse, and golf

### 3. Environmental Analysis

course, with only limited partial views from surrounding hillside areas, and it would not alter the views of the existing scenic vistas.

Additionally, to ensure that the ultimate Project design is executed to achieve a maximum level of compatibility with the Pasadena Arroyo Park and Recreational District, as required by Mitigation Measure CUL-1 (see below in Section V, *Cultural Resources*), the RBOC would 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.

Because the Project would be only partially visible from limited locations that would not result in a discernable change in the overall sweeping views of the Central Arroyo Seco, and because the ultimate Project design would go through a design review process to ensure compatibility, the Project would not result in a substantial adverse effect to scenic vistas from the Project Site, when compared to existing conditions. Additionally, the Project would not alter or obstruct views of the surrounding golf course, the Rose Bowl Stadium, the San Gabriel Mountains, or the Central Arroyo Seco from the surrounding neighborhood areas. Therefore, impacts would be less than significant.

**b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?**

**No Impact.** According to the California Department of Transportation (Caltrans), a portion of I-210 that is located approximately 0.5 mile from the Project Site, is considered an eligible scenic highway, from Post Mile (PM) R0.0 to R25.0 (Caltrans 2020). However, while portions of the golf course are visible from I-210, the Project Site is not visible from the freeway. Additionally, implementation of the Project would take place entirely within the Brookside Golf Course and would not damage scenic resources located within or near I-210. Therefore, no impacts would occur.

**c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?**

**Less than Significant Impact.** The Project Site is located in the northwestern portion of Pasadena, with a land use designation of Open Space (City of Pasadena 2016), and is zoned Open Space (City of Pasadena 2018). The reoriented driving range would be situated on approximately 8 acres in the same general location of the existing driving range, to maintain proximity to parking and the Brookside Clubhouse. The Project would include reorientation and expansion of the driving range with 60 hitting bays, a new miniature golf course, relocation of Hole 10 of the C.W. Koiner Course, and shortening of Holes 6 and 7 of the E.O. Nay Course. Implementation of the Project would not require any land use or zoning changes within or near the Project Site. The Project would not interfere with view of the San Gabriel Mountains, the Rose Bowl Stadium, or any other features located within the Pasadena Arroyo Seco Parks and Recreation District.

### 3. Environmental Analysis

As described above, the Project would go through the City of Pasadena's Design Review process as required by the Pasadena Municipal Code, prior to approval, which would ensure that Citywide design principles are considered, that the policies and objectives of the Arroyo Seco Design Guidelines are reflected, and that the overall design reflects to values of the community and is visually compatible with its surroundings, which includes hillsides with residential development, the Brookside Golf Course, and the Rose Bowl Stadium. Objective 2 of the Green Space, Recreation and Parks Element calls for the preservation and protection of the Arroyo Seco and adjacent open space areas, which include the Brookside Golf Course; and identifies the need to recognize the importance of the history, cultural resources, and unique character of the Arroyo Seco. As described above, the Project would go through the City of Pasadena's Design Review process as required by the Pasadena Municipal Code, prior to approval, which would ensure it is consistent with the Arroyo Seco Design Guidelines. In addition, as described in Section V, *Cultural Resources*, below, the Project would not substantially affect the historical significance of the Brookside Golf Course. Thus, the Project would not conflict with applicable zoning and other regulations governing scenic quality. Therefore, impacts would be less than significant.

**d) Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?**

**Less Than Significant Impact with Mitigation Incorporated.** While there has been fixed lighting on the existing pole structures surrounding the driving range, they were previously decommissioned from use and there currently is no nighttime lighting of the driving range.

The Arroyo Seco Design Guidelines (City of Pasadena 2003) states that lighted facilities should be limited to designated high-use areas in the Central Arroyo sub-area and subject to environmental evaluation and approval by the Recreation and Parks Commission and Design Commission. The lights to be used in the driving range and miniature golf course would be located in the most active-use area of the Brookside Golf Course, consistent with this policy. Additionally, as stated in the City of Pasadena Zoning Code Section 17.40.080 (a):

*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.*

Therefore, for the purposes of this analysis, 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 Project would install pole lighting on 14 of the 36 netting poles that would be located around the reoriented driving range. The 14 light-mounted poles would include lighting structures at approximately 60 feet in height surrounding the perimeter of the driving range on the east and west sides, and from the hitting bays at the southern end of the driving range. The lighting to be installed would be a leading-edge light-emitting diode (LED) technology with wireless remote-control capability and directionality focused

### 3. Environmental Analysis

downward to the driving range. The lighting technology would include spill and glare control, high-definition, and precise light targeting capabilities. Low-level lighting from the proposed miniature golf course would also be introduced on the Project Site. 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.

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 (see Appendix A). Additionally, lighting for the Project would be screened from offsite residential receptors by the existing topography, mature vegetation, and the Brookside Clubhouse. All LED lighting would be individually adjustable to ensure proper direction and avoidance of light spill into surrounding neighborhoods. Additionally, 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. This would ensure consistency with lighting requirements set forth in the Arroyo Seco Design Guidelines (City of Pasadena 2003), specifically Section 11.2, "Lighting".

The RBOC would ensure that the design of the relocated driving range and miniature golf course, including any new lighting elements, are compatible with existing design elements of the Brookside Golf Course and are sensitive to the location within the Historic District, the Arroyo Seco, and the adjacent Rose Bowl. The Project would also be subject to the City's Design Review process as defined in the Pasadena Municipal Code, which would further confirm that final design and lighting plans do not exceed 1.0 foot candle of light spill to offsite receptors. However, given final design of lighting features is conceptual and not known with certainty at this time, impacts related to light and glare are considered potentially significant. Therefore, Mitigation Measure AES-1 is required and would ensure further testing to ensure the 1.0 foot candle threshold is not exceeded.

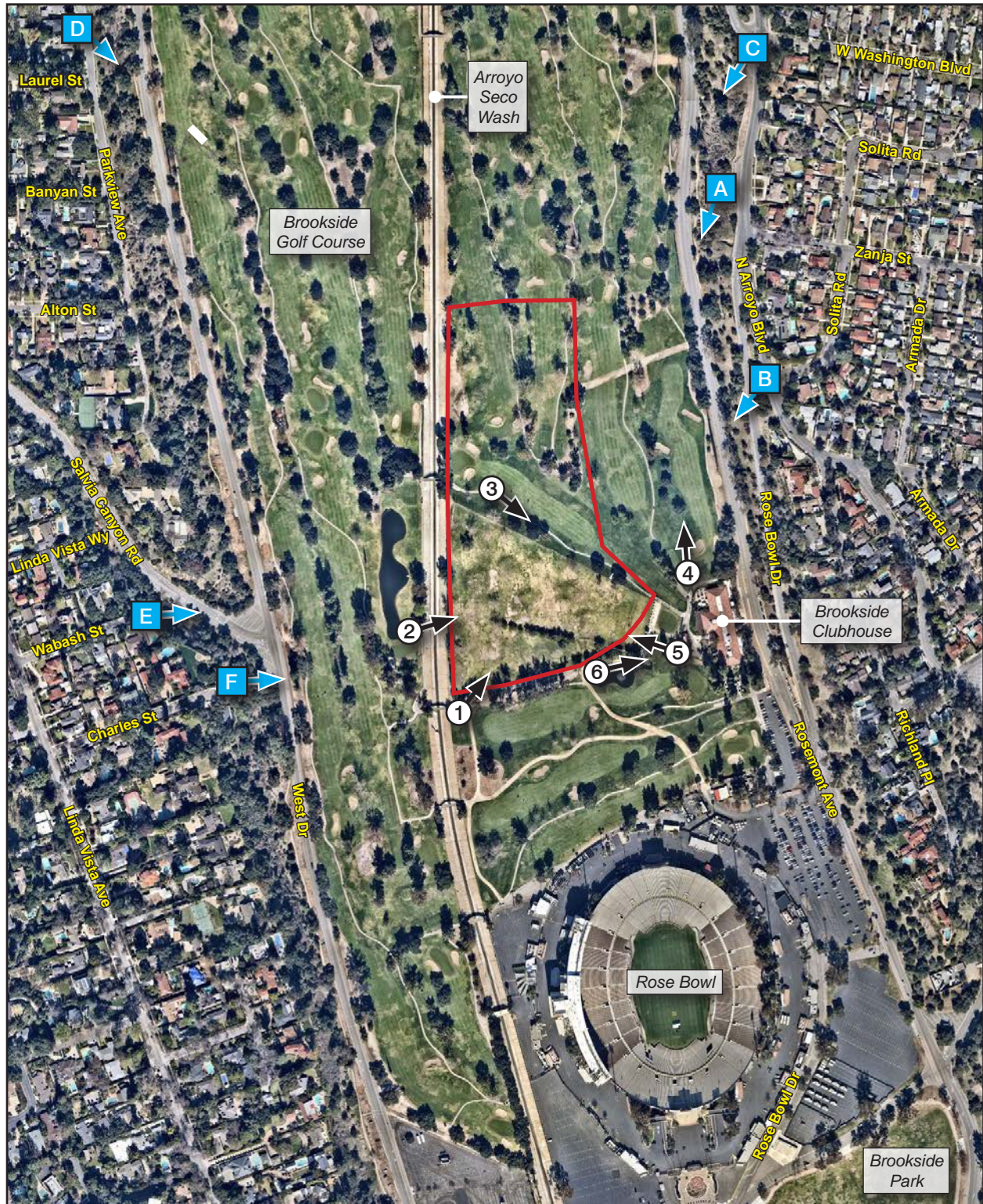
**MM-AES-1** Upon design of the Project, including both miniature golf and driving range lighting fixtures, RBOC shall prepare a quantified lighting study to confirm that final lighting configurations will not exceed 1.0 foot candle from the property line. Prior to installation of final lighting features, RBOC shall conduct a directional lighting test to further determine no exceedance of 1.0 foot candle of light spill.

### 3. Environmental Analysis

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Figure 5 - Photograph Location Map



— Project Site



Photo Location and Direction from Golf Course



Photo Location and Direction from Surrounding Golf Course

0 550  
Scale (Feet)



Source: Nearmap, 2021

PlaceWorks

### 3. Environmental Analysis

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Figure 6 - Views of the Project Site from Offsite Locations



A - View from Rose Bowl Drive and Arroyo Boulevard - facing southwest.



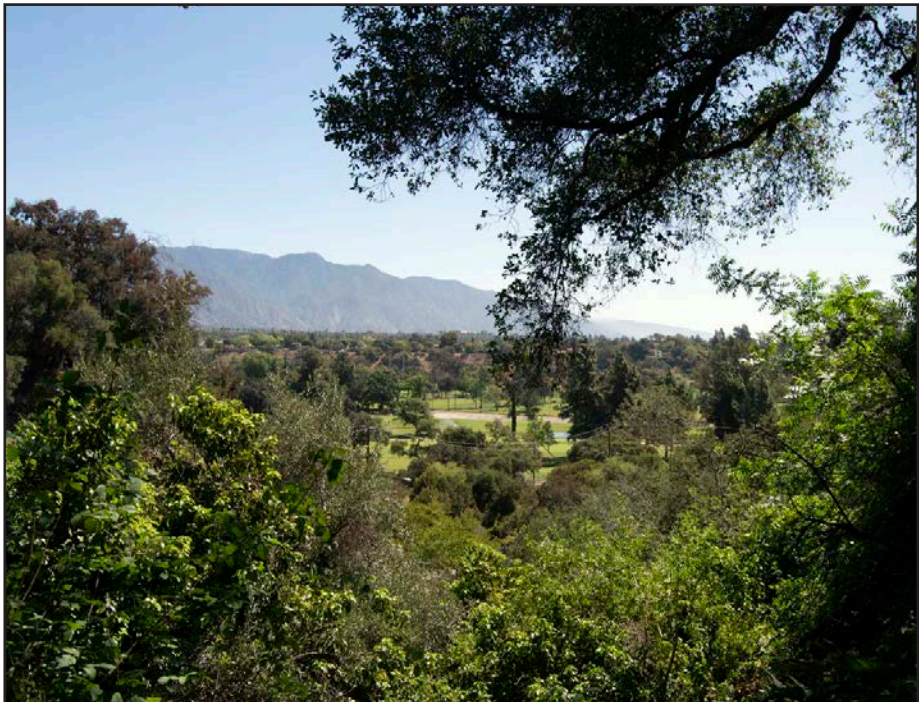
B - View from Arroyo Boulevard - facing west.



C - View from Washington Boulevard and Arroyo Boulevard - facing southwest.



D - View from Parkview Avenue - facing southeast.



E - View from Wabash Street - facing east.



F - View from Charles Street - facing east.



### 3. Environmental Analysis

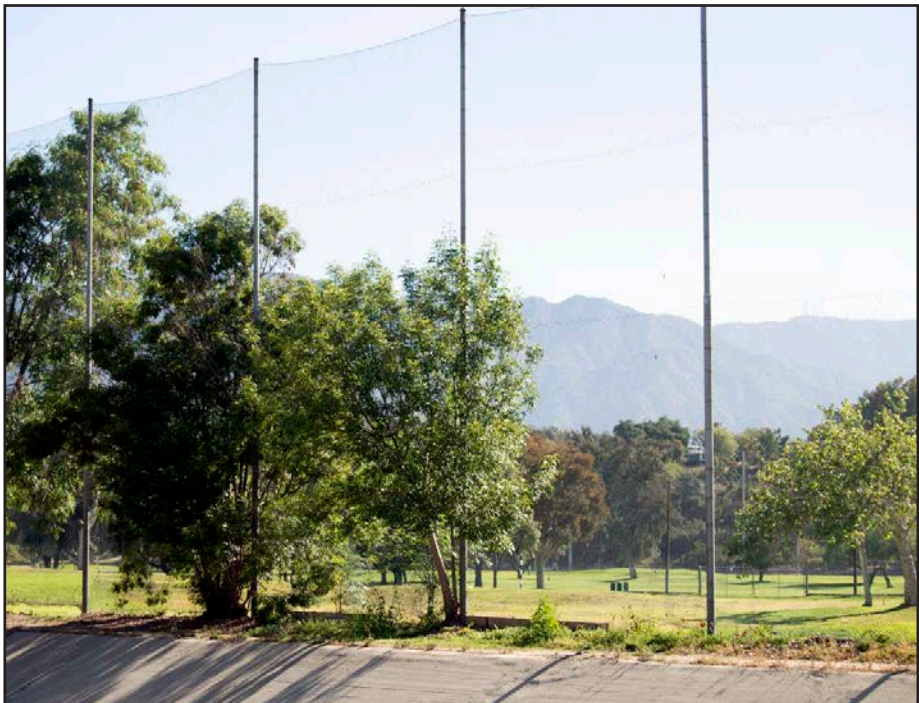
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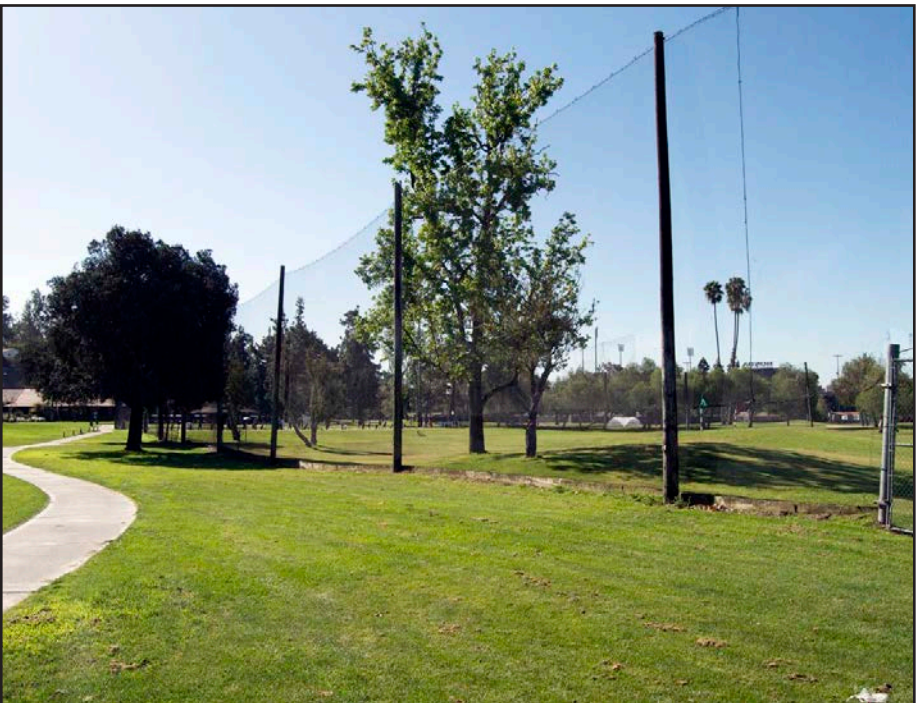
Figure 7 - Views of the Project Site from within the Brookside Golf Course



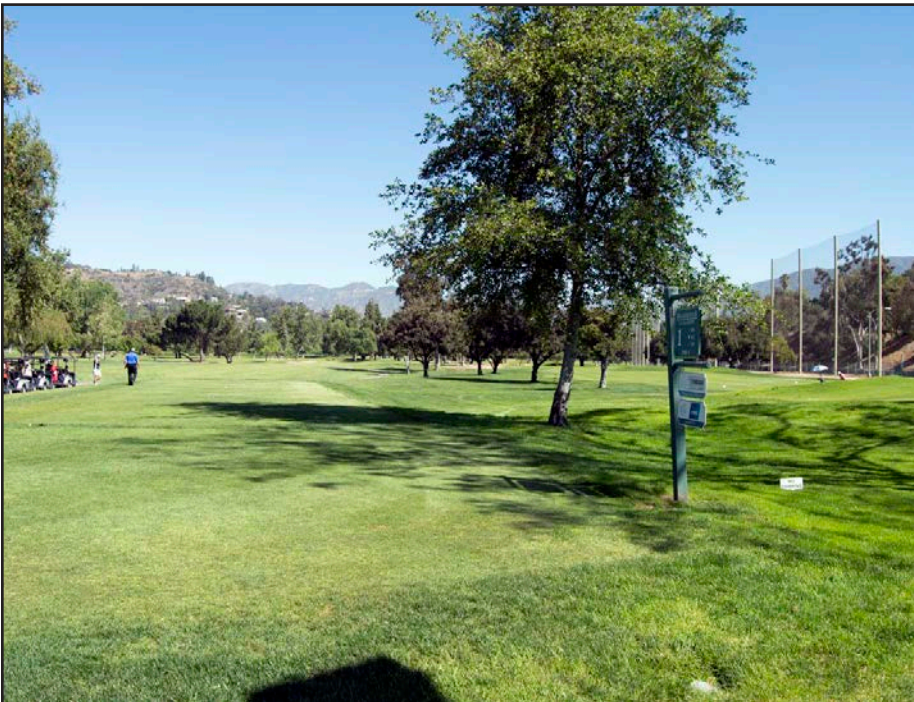
1 - View from southwest corner of existing driving range - facing northeast.



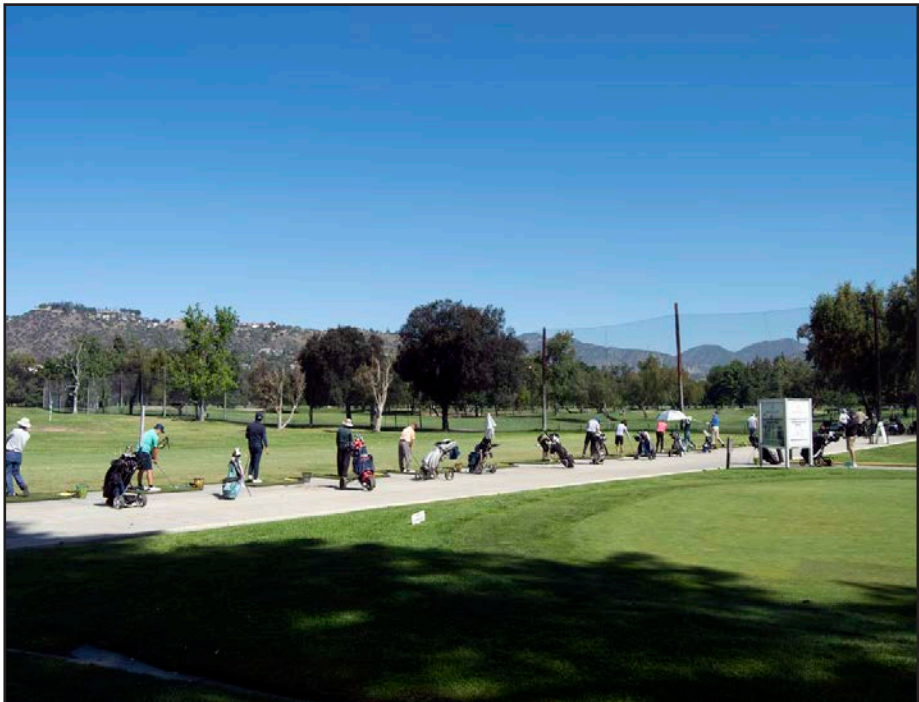
2 - View from west end of existing driving range - facing east.



3 - View from northwest corner of existing driving range - facing southwest.



4 - View from Brookside Clubhouse - facing north.



5 - View from existing practice putting greens - facing west.



6 - View from south end of existing driving range - facing east.



### 3. Environmental Analysis

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### 3. Environmental Analysis

## 3.2 AGRICULTURE AND FORESTRY RESOURCES

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>II. AGRICULTURE AND FORESTRY RESOURCES.</b> In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				<b>X</b>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				<b>X</b>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?				<b>X</b>
d) Result in the loss of forest land or conversion of forest land to non-forest use?				<b>X</b>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				<b>X</b>

### Discussion

#### Would the Project:

- a) **Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**

**No Impact.** The Project Site is located in the northwestern portion of Pasadena, with a land use designation of Open Space. The Project site is primarily surrounded by land uses designated as Low Density Residential (0-6 DU/Acre), and is located approximately a half-mile from land uses that include Institutional, Medium Density Residential (0-16 DU/Acre), Med-High Density Residential (0-32 DU/Acre), Low Commercial (0.0-1.0 FAR), Med Commercial (0.0-2.0 FAR), and Med Mixed Use (0.0-2.25 FAR, 0-87 DU/Acre) (City of Pasadena 2016). According to the California Department of Conservation (CDOC), pursuant to the Farmland Mapping and Monitoring Program (FMMP), the Project

### 3. Environmental Analysis

Site is located within Urban and Built-Up Land, and the nearest farmland is located approximately 4.25 miles northeast of the Project Site (CDOC 2016). Thus, there are no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance that would be converted to a non-agricultural use. Therefore, no impacts would occur.

**b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?**

**No Impact.** The Project Site is located within lands designated as Open Space by 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 CDOC, pursuant to the FMMP, the Project Site is located within Urban and Built-Up Land, and the nearest farmland is located approximately 4.25 miles northeast of the Project Site (CDOC 2016). Land uses within or near the Project Area are not zoned for agricultural uses, and are not subject to a Williamson Act contract. According to the CDOC, there is no land within the City of Pasadena that is subject to a Williamson Act contract (CDOC 2018). Thus, the Project would not conflict with an agricultural use zoning or Williamson Act contract. Therefore, no impacts would occur.

**c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?**

**No Impact.** As discussed above, the Project Site has the zoning designation of Open Space primarily surrounded by developed uses. There are no forest or timberlands located within or in proximity to the Project Site. Thus, the Project would not conflict with a forest land or timberland zoning designation or result in the rezoning of forest land or timberland to non-forest uses. Therefore, no impacts would occur.

**d) Result in the loss of forest land or conversion of forest land to non-forest use?**

**No Impact.** According to the United States Department of Agriculture (USDA), the Project Site does not contain forest land, or timberland (USDA 2016). Thus, the Project would not result in the loss or conversion of forest land to non-forest uses. Therefore, no impacts would occur.

**e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?**

**No Impact.** There no farmlands located near the Project Site. The Project Site is located within Urban and Built-Up Land, and the nearest farmland is located approximately 4.25 miles northeast of the Project Site (CDOC 2016). Thus, the Project would not result in the conversion of farmland to a non-agricultural use. Therefore, no impacts would occur.



## 3. Environmental Analysis

### 3.3 AIR QUALITY

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>III. AIR QUALITY.</b> Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?			<b>X</b>	
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?			<b>X</b>	
c) Expose sensitive receptors to substantial pollutant concentrations?			<b>X</b>	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			<b>X</b>	

#### Discussion

The Air Quality section addresses the impacts of the Project on ambient air quality and the exposure of people, especially sensitive individuals, to unhealthful pollutant concentrations. A background discussion on the air quality regulatory setting, meteorological conditions, existing ambient air quality in the vicinity of the Project Site, and air quality modeling can be found in Appendix B.

The primary air pollutants of concern for which ambient air quality standards (AAQS) have been established are ozone (O<sub>3</sub>), carbon monoxide (CO), coarse inhalable particulate matter (PM<sub>10</sub>), fine inhalable particulate matter (PM<sub>2.5</sub>), sulfur dioxide (SO<sub>2</sub>), nitrogen dioxide (NO<sub>2</sub>), and lead (Pb). Areas are classified under the federal and California Clean Air Act as either in attainment or nonattainment for each criteria pollutant based on whether the AAQS have been achieved. The South Coast Air Basin (SoCAB), which is managed by the South Coast Air Quality Management District (South Coast AQMD), is designated nonattainment for O<sub>3</sub>, and PM<sub>2.5</sub> under the California and National AAQS, nonattainment for PM<sub>10</sub> under the California AAQS, and nonattainment for lead (Los Angeles County only) under the National AAQS (CARB 2021).

Furthermore, the South Coast AQMD has identified regional thresholds of significance for criteria pollutant emissions and criteria air pollutant precursors, including volatile organic compound (VOC), CO, NO<sub>x</sub>, sulfur oxides (SO<sub>x</sub>), PM<sub>10</sub>, and PM<sub>2.5</sub>. Development projects below the regional significance thresholds are not expected to generate sufficient criteria pollutant emissions to violate any air quality standard or contribute substantially to an existing or projected air quality violation. Where available, the significance criteria established by the South Coast AQMD may be relied upon to make the following determinations.

### 3. Environmental Analysis

**Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:**

**a) Conflict with or obstruct implementation of the applicable air quality plan?**

**Less Than Significant Impact.** A consistency determination plays an important role in local agency project review by linking local planning and individual projects to the air quality management plan (AQMP). It fulfills the CEQA goal of informing decision makers of the environmental efforts of the project under consideration at an early enough stage to ensure that air quality concerns are fully addressed. It also provides the local agency with ongoing information as to whether they are contributing to clean air goals in the AQMP.

The South Coast AQMD adopted the 2022 Air Quality Management Plan (AQMP) on December 2, 2022. Regional growth projections are used by South Coast AQMD to forecast future emission levels in the SoCAB. For southern California, these regional growth projections are provided by the Southern California Association of Governments (SCAG) and are partially based on land use designations included in city/county general plans. Typically, only large, regionally significant projects have the potential to affect the regional growth projections. In addition, the consistency analysis is generally only required in connection with the adoption of General Plans, specific plans, and significant projects. Changes in population, housing, or employment growth projections have the potential to affect SCAG's demographic projections and therefore the assumptions in South Coast AQMD's AQMP. These demographic trends are incorporated into SCAG's 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) to determine priority transportation projects and vehicle miles traveled in the SCAG region.

The Project would result in improvements to the existing Brookside Golf Course. As discussed in Section XIV, *Population and Housing*, the Project would not induce population growth as implementation of the Project would not involve the development of new housing or businesses within or adjacent to the Project Site. Additionally, as demonstrated below in Section III(b), the regional emissions that would be generated by the operational phase of the Project would be less than the South Coast AQMD emissions thresholds and would therefore not be considered by South Coast AQMD to be a substantial source of air pollutant emissions that would have the potential to affect the attainment designations in the SoCAB. Therefore, the Project would not affect the regional emissions inventory or obstruct implementation of the 2022 AQMP, and impacts would be less than significant.

**b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?**

**Less Than Significant Impact.**

The following describes project-related impacts from regional short-term construction activities and regional long-term operation of the Project.

### 3. Environmental Analysis

#### *Regional Short-Term Construction Impacts*

Construction activities would result in the generation of air pollutants. These emissions would primarily be 1) exhaust from off-road diesel-powered construction equipment; 2) dust generated by construction activities; 3) exhaust from on-road vehicles; and 4) off-gassing of VOCs from paints and asphalt.

Construction activities for the Project are anticipated to disturb 11 acres on the 16-acre Project Site. The Project would involve demolition, site preparation, grading, utilities trenching, fencing, and paving. Construction of the driving range is anticipated to take approximately eight months, and for purposes of this analysis starting in 2023. Once the driving range project is completed, it is anticipated that the miniature golf project would begin and would take four months to complete. Construction emissions shown in **Table 1**, *Maximum Daily Regional Construction Emissions* were estimated using the California Emissions Estimator Model (CalEEMod), Version 2020.4, and are based on the preliminary construction duration and equipment mix provided by the RBOC. As shown in **Table 1**, *Maximum Daily Regional Construction Emissions*, and shows maximum daily emissions for VOC, NO<sub>x</sub>, CO, SO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> from construction-related activities would be less than their respective South Coast AQMD regional significance threshold values. Therefore, impacts to the regional air quality associated with construction of the Project would be less than significant.

**Table 1 Maximum Daily Regional Construction Emissions**

Construction Phase	Pollutants (lb./day) <sup>1, 2, 3</sup>					
	VOC	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Year 2022 (Driving Range)</b>						
Demolition	3	26	21	<1	1	1
Site Preparation	3	33	20	<1	10	6
Grading	4	39	30	<1	6	3
Trenching and Fencing	2	14	11	<1	1	<1
Paving	1	12	16	<1	1	1
<b>Year 2023 (Miniature Golf Course)</b>						
Demolition	1	9	8	<1	1	<1
Site Preparation	1	9	5	<1	3	2
Grading	1	9	6	<1	3	1
Trenching and Paving	1	8	10	<1	1	<1
Paving	1	5	7	<1	<1	<1
<b>Maximum Daily Construction Emissions</b>						
Maximum Daily Emissions	4	39	30	<1	10	6
<b>South Coast AQMD Regional Construction Threshold</b>	<b>75</b>	<b>100</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
<b>Significant?</b>	No	No	No	No	No	No

Source: CalEEMod Version 2020.4.

<sup>1</sup> Based on the preliminary information provided by the RBOC. Where specific information regarding project-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by South Coast AQMD of construction equipment.

<sup>2</sup> Includes implementation of fugitive dust control measures required by South Coast AQMD under Rule 403, including watering disturbed areas a minimum of two times per day, reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186-compliant sweepers.

<sup>3</sup> Modeling assumes construction would start in year 2023 for the most conservative emissions output. Later start dates would result in less emissions because CalEEMod assumes a more fuel-efficient construction equipment mix as older models are retired each year.

### 3. Environmental Analysis

#### *Long-Term Operation-Related Air Quality Impact*

Typical long-term air pollutant emissions are generated by area sources (e.g., landscape fuel use, aerosols, architectural coatings, and asphalt pavement), energy use (natural gas), and mobile sources (i.e., on-road vehicles). The Project would reorient and expand the driving range, install replacement poles that would support new netting, and construct a new miniature golf on the Project Site. Overall, the facility would operate consistent with the existing and past uses. The purpose of the Project is to realize the existing capacity of the Brookside Golf Complex by increasing memberships and returning to historically higher levels of patronage use through the expansion of services to a broader range of visitors including families. However, to provide a conservative analysis, and to reflect trip generation prepared by the City (see Appendix F) operational trips were assumed and modeled to calculate operational air quality emissions. As shown in **Table 2, Maximum Daily Regional Operation Emissions**, it is anticipated that operation of the Project would result in overall minimal emissions and would not exceed the South Coast AQMD regional operation-phase significance thresholds. Impacts to the regional air quality associated with operation of the Project would be less than significant.

**Table 2 Maximum Daily Regional Operation Emissions**

Source	Maximum Daily Emissions (lbs./Day)					
	VOC	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Max Daily Emissions</b>						
Area	<1	<1	<1	0	<1	<1
Energy	0	0	0	0	0	0
Mobile	1	2	15	<1	3	1
Total	1	2	15	<1	3	1
<b>South Coast AQMD Regional Threshold</b>	<b>55</b>	<b>55</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
<b>Exceeds Threshold?</b>	No	No	No	No	No	No

Source: CalEEMod Version 2020.4.

Notes: lbs.: Pounds. Highest winter or summer emissions are reported.

#### **c) Expose sensitive receptors to substantial pollutant concentrations?**

**Less Than Significant Impact.** The Project could expose sensitive receptors to elevated pollutant concentrations if it causes or significantly contributes to elevated pollutant concentration levels. Unlike regional emissions, localized emissions are typically evaluated in terms of air concentration rather than mass so they can be more readily correlated to potential health effects.

#### *Construction LSTs*

Localized significance thresholds (LSTs) are based on the California AAQS, which are the most stringent AAQS to provide a margin of safety in the protection of public health and welfare. They are designated to protect sensitive receptors most susceptible to further respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and people engaged in strenuous work or exercise. The screening-level construction LSTs are based on the size of the Project Site, distance to the nearest sensitive receptor, and Source Receptor Area (SRA). The nearest offsite sensitive receptors are the residences along Wotkins Drive to the east of the Project Site.

### 3. Environmental Analysis

Air pollutant emissions generated by construction activities would cause temporary increases in air pollutant concentrations. **Table 3, *Localized Construction Emissions – Driving Range***, and **Table 4, *Localized Construction Emissions – Miniature Golf Course***, show that the maximum daily construction emissions (pounds per day) for NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> construction emissions would be less than their respective South Coast AQMD screening-level LSTs for both the driving range and miniature golf course. Therefore, air quality impacts from project-related construction activities would be less than significant.

**Table 3 Localized Construction Emissions – Driving Range**

Construction Activity	Pollutants(lbs./day) <sup>a</sup>			
	NO <sub>x</sub>	CO	PM <sub>10</sub> <sup>b</sup>	PM <sub>2.5</sub> <sup>b</sup>
<b>South Coast AQMD ≤1.00 Acre LST</b>	69	535	19.38	5.57
Demolition	26	21	1.24	1.16
Trenching and Fencing	13	11	0.77	0.72
Paving	12	15	0.59	0.54
<b>Exceeds LST?</b>	No	No	No	No
<b>South Coast AQMD 3.50 Acre LST</b>	123	1,176	36.12	9.36
Site Preparation	33	20	10.02	5.80
<b>Exceeds LST?</b>	No	No	No	No
<b>South Coast AQMD 4.00-Acre LSTs</b>	131	1,297	39.21	10.11
Grading	39	29	5.57	3.07
<b>Exceeds LST?</b>	No	No	No	No

Source: CalEEMod Version 2020.4. South Coast AQMD 2008 and 2011.

Notes: In accordance with South Coast AQMD methodology, only onsite stationary sources and mobile equipment are included in the analysis. Screening level LSTs for NO<sub>x</sub> and CO LSTs are based on 82 ft receptor (employees), while PM<sub>10</sub> and PM<sub>2.5</sub> LSTs are based on 250 ft receptors (residences) in SRA 8 as employees would not be onsite 24hrs/day.

<sup>a</sup> Based on the preliminary information provided by the RBOC. Where specific information for project-related construction activities or processes was not available modeling was based on CalEEMod defaults. These defaults are based on construction surveys conducted by the South Coast AQMD.

<sup>b</sup> Includes fugitive dust control measures required by South Coast AQMD under Rule 403, such as watering disturbed areas a minimum of two times per day, reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186–compliant sweepers.

**Table 4 Localized Construction Emissions – Miniature Golf Course**

Construction Activity	Pollutants(lbs./day) <sup>a</sup>			
	NO <sub>x</sub>	CO	PM <sub>10</sub> <sup>b</sup>	PM <sub>2.5</sub> <sup>b</sup>
<b>South Coast AQMD ≤1.00 Acre LST</b>	69	535	19.38	5.57
Demolition	9	8	0.43	0.40
Site Preparation	9	5	3.19	1.80
Grading	9	5	2.47	1.42
Trenching and Paving	8	9	0.46	0.42
Paving	5	7	0.23	0.22
<b>Exceeds LST?</b>	No	No	No	No

Source: CalEEMod Version 2020.4. South Coast AQMD 2008 and 2011.

Notes: In accordance with South Coast AQMD methodology, only onsite stationary sources and mobile equipment are included in the analysis. Screening level LSTs for NO<sub>x</sub> and CO LSTs are based on 82 ft receptor (employees), while PM<sub>10</sub> and PM<sub>2.5</sub> LSTs are based on 250 ft receptors (residences) in SRA 8 as employees would not be onsite 24hrs/day.

<sup>a</sup> Based on the preliminary information provided by the RBOC. Where specific information for project-related construction activities or processes was not available modeling was based on CalEEMod defaults. These defaults are based on construction surveys conducted by the South Coast AQMD.

### 3. Environmental Analysis

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<sup>b</sup> Includes fugitive dust control measures required by South Coast AQMD under Rule 403, such as watering disturbed areas a minimum of two times per day, reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186-compliant sweepers.

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#### *Construction Health Risk*

Emissions from construction equipment primarily consist of diesel particulate matter (DPM). In 2015, the Office of Environmental Health Hazards Assessment (OEHHA) adopted guidance for preparation of health risk assessments, which included the development of a cancer risk factor and non-cancer chronic reference exposure level for DPM over a 30-year time frame (OEHHA 2015). Currently, South Coast AQMD does not require the evaluation of long-term excess cancer risk or chronic health impacts for a short-term project. The Project is anticipated to be completed in approximately eight months for the driving range and four months for the miniature golf course, which would limit the exposure to onsite and offsite receptors. Furthermore, construction activities would not generate onsite exhaust emissions that would exceed the screening-level construction LSTs. Thus, construction emissions would not pose a health risk to onsite and offsite receptors, and project-related construction health impacts would be less than significant.

#### *Operation LSTs*

Operation of the Project would not generate substantial emissions from onsite stationary sources. Land uses that have the potential to generate substantial stationary sources of emissions include industrial land uses, such as chemical processing and warehousing operations where truck idling would occur onsite and would require a permit from South Coast AQMD. The Project involves improvements to a portion of the Brookside Golf Course and would not fall within these categories of uses. In addition, operation of the driving range and miniature golf course would not use standard onsite mechanical equipment such as heating, ventilation, and air conditioning. Thus, localized air quality impacts related to operation-related emissions would be less than significant.

#### *Carbon Monoxide Hotspots*

Vehicle congestion has the potential to create pockets of CO called hotspots. Hotspots are typically produced at intersections, where traffic congestion is highest because vehicles are backed-up and idle for longer periods and are subject to reduced speeds. These pockets could exceed the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9.0 ppm. Because CO is produced in greatest quantities from vehicle combustion and does not readily disperse into the atmosphere, adherence to ambient air quality standards is typically demonstrated through an analysis of localized CO concentrations.

The SoCAB has been designated attainment under both the national and California AAQS for CO. Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited—in order to generate a significant CO impact (BAAQMD 2017). The Project-related net increase of 37 PM peak hour vehicle trips would be minimal compared to the AAQS screening levels. The Project would not substantially increase CO hotspots at intersections and impacts would be less than significant.

### 3. Environmental Analysis

**d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?**

**Less Than Significant Impact.** The Project would not result in objectionable odors. The threshold for odor is if a project creates an odor nuisance pursuant to South Coast AQMD Rule 402, Nuisance, which states:

A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

The type of facilities that are considered to have objectionable odors include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities. The Project involves improvements to a portion of the Brookside Golf Course and would not fall within the objectionable odors land uses. Emissions from construction equipment, such as diesel exhaust and volatile organic compounds from architectural coatings and paving activities may generate odors. However, these odors would be low in concentration, temporary, and would not affect a substantial number of people. Odor impacts would be less than significant.

### 3. Environmental Analysis

#### 3.4 BIOLOGICAL RESOURCES

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>IV. BIOLOGICAL RESOURCES. Would the project:</b>				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?		<b>X</b>		
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?			<b>X</b>	
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				<b>X</b>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?		<b>X</b>		
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?		<b>X</b>		
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				<b>X</b>

#### Discussion

Information contained within this discussion is based on the following documents, which can be found as appendices to the Initial Study/MND.

- Biological Resources Assessment for the Brookside Golf Course Improvement Project, ESA 2020 (Appendix C).
- Tree Report for the Brookside Golf Course Improvements Project, ESA 2020 (Appendix C)

#### Would the Project:

- a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?



### 3. Environmental Analysis

**Less Than Significant Impact with Mitigation Incorporated.** The Project Site is located within a landscaped and developed area within the Brookside Golf Course, which contains various paved and developed surfaces, with little to no native vegetation or soils that could support sensitive biological resources. The golf course vegetation is highly landscaped and regularly maintained and does not support sensitive species. The miniature golf course would form the western boundary of the driving range, and would be located adjacent to the Arroyo Seco channel. The channel flows north-south and provides connectivity to the Upper Arroyo/Hahamongna Watershed Park to the north of Project Site. This segment of the Arroyo Seco is concrete lined with no vegetation and does not support sensitive species. Central Arroyo Seco could serve as a suitable corridor for native resident wildlife to move through the area, particularly medium to large mammals such as coyote (*Canis latrans*), Virginia opossum (*Didelphis virginiana*), mule deer (*Odocoileus hemionus*), and raccoon (*Procyon lotor*), which may forage within the landscaped vegetation of the golf course during nighttime hours when it is closed. Additionally, other wildlife located within or around the Project Site include Anna's hummingbird (*Calypte anna*), house finch (*Carpodacus mexicanus*), American kestrel (*Falco sparverius*), California towhee (*Melospiza crissalis*), Northern mockingbird (*Mimus polyglottos*), spotted towhee (*Pipilo maculatus*), bushtit (*Psaltiriparus minimus*), lesser goldfinch (*Spinus psaltria*), Bewick's wren (*Thryomanes bewickii*), mourning dove (*Zenaidura macroura*), California ground squirrels (*Otospermophilus beecheyi*), and Botta's pocket gopher (*Thomomys bottae*).

One special-status species has the potential to reside in the Project Site. Cooper's hawk (*Accipiter cooperii*) (designated as being on the State Watch List and State Special Animal) has a moderate potential to forage and breed within 500 feet of the Project Site and may be affected by Project construction activities. Mitigation Measures MM-BIO-1 and MM-BIO-2 would be implemented to avoid impacts to nesting birds during construction as well as any potential indirect impacts that may be created by additional nighttime light sources during operation. Therefore, impacts would be less than significant with mitigation measures incorporated.

**MM-BIO-1.** If construction activities occur within the bird nesting season (generally defined as February 15 through September 15), a qualified biologist shall conduct a nesting bird survey within 3 days prior to the proposed start date, to identify any active nests (including Cooper's hawk) 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. Construction buffers shall be 300 feet for passerines and up to 500 feet for any raptor species; however, avoidance buffers may be reduced at the discretion of the biologist, depending on the location of the nest and species tolerance to human presence and construction-related noises and vibrations.

**MM-BIO-2.** To minimize potential indirect impact to nesting birds that may utilize ornamental/landscape vegetation onsite and/or wildlife movement along the Arroyo Seco, nighttime lighting associated with the driving range and miniature golf course shall be shielded downward to limit spillage onto these sensitive receptors.

### 3. Environmental Analysis

- b) **Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?**

**Less Than Significant Impact.** No critical habitat was found within the Project Site. Three distinct communities are located within the Project Site: landscaped vegetation, developed land use, and unvegetated concrete-lined channel. The developed and landscaped areas present no riparian or other sensitive natural community. While the Arroyo Seco is located immediately adjacent to the Project Site, this segment of the channel is concrete lined, and it does not support riparian habitat. Additionally, the Project would have no impact to the channel, directly or indirectly. The golf uses are already existing along this entire segment of the Arroyo Seco and would not change conditions. Therefore, impacts would be less than significant.

- c) **Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

**No Impact.** Wetlands are areas where water covers the soil, or is present either at or near the surface of the soil all year or for varying periods of time during the year, including during the growing season (US EPA 2018). According to the National Wetland Inventory (NWI), the Arroyo Seco channel, which would form the western boundary of the driving range, is considered a Riverine habitat; however, the Project would not result in any construction or indirect impacts to the channel. Additionally, there are no state or federally protected wetlands near or within the Project Site (USFWS 2021). Therefore, no impacts would occur.

- d) **Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

**Less Than Significant Impact with Mitigation Incorporated.** The Project Site is located within a modified and landscaped area within the Brookside Golf Course, which contains various paved and developed surfaces, with little to no native vegetation or soils that could support sensitive biological resources. 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.

The mature trees that occur on and adjacent to the Project Site, including within the surrounding area, provide foraging and breeding opportunities for common wildlife, such as California ground squirrels (*Otospermophilus beecheyi*), and Botta's pocket gopher (*Thomomys bottae*). In addition, the landscaping and mature trees located on and surrounding the Project Site could provide suitable nesting habitat for avian species protected under the Migratory Bird Treaty Act (MBTA), including Anna's hummingbird (*Calypte anna*), house finch (*Carpodacus mexicanus*), American kestrel (*Falco sparverius*), California towhee (*Melospiza crissalis*), Northern mockingbird (*Mimus polyglottos*), spotted towhee (*Pipilo maculatus*), bushtit (*Psaltirparus minimus*), lesser goldfinch (*Spinus psaltria*), Bewick's wren (*Thryomanes bewickii*), mourning dove (*Zenaidura macroura*), particularly during the nesting season that generally occurs from February through August. Disturbing or destroying active nests is a violation of the MBTA (16 U.S.C. 703 et seq.) and active nests and eggs are protected in accordance with Fish and

### 3. Environmental Analysis

Game Code Section 3503. Avian species that could build a nest on the Project Site are species that would typically occur in urban environments and already occur on the golf course and would be relatively accustomed to a high level of human presence and noise and light disturbance.

As discussed below, implementation of the Project could potentially require the removal of trees located within the Project Site, which could result in direct impacts to active bird nests, as well as indirect impacts to nests that may occur in adjacent trees through noise and vibration that may be generated during construction activities. However, Mitigation Measures MM-BIO-1 and MM-BIO-2 would be implemented to avoid impacts to nesting birds during construction. Therefore, impacts are anticipated to be less than significant with mitigation incorporated.

**e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**

**Less Than Significant Impact with Mitigation Incorporated.** The City's Trees and Tree Protection Ordinance (Title 8, Chapter 8.52) (Tree Ordinance) 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". Furthermore, it defines native trees as:

"any tree with a trunk more than 8 inches in diameter at a height of 4 ½ feet above natural grade that is one of the following species: *Quercus agrifolia* (coast live oak), *Quercus engelmannii* (Engelmann oak), *Quercus chrysolepis* (canyon oak), *Platanus racemosa* (California sycamore), *Juglans californica* (California walnut), *Quercus berberidifolia* (scrub oak), *Quercus lobata* (valley oak), *Umbellularia californica* (California bay), *Populus fremontii* (cottonwood), *Alnus rhombifolia* (California alder), *Populus trichocarpa* (black cottonwood), *Salix lasiolepis* (arroyo willow), and *Aesculus californica* (California buckeye)."

In accordance with the Tree Ordinance, public trees are defined as "a tree located in a place or area under ownership or control of the city including but without limitation streets, parkways, open space, parkland, and including city owned property under the operational control of another entity by virtue of a lease, license, operating or other agreement". Mature trees are defined as "an otherwise non-protected tree with a diameter-at-breast-height (DBH) of 19 inches or greater". The City also provides a list<sup>1</sup> of tree species and criteria of trees that possess distinctive form, size or age at certain trunk diameters or heights, herein referred to as 'specimen' trees. Specimen trees are also considered protected.

The Project Site is located within the Brookside Golf Course, which includes numerous trees throughout the golf course grounds. All trees located within the boundaries of the Brookside Golf Course are considered public trees and are therefore protected under the Ordinance. There are 81 trees within the Project Site that are therefore protected in accordance with Tree Ordinance. Construction of the Project would result in direct and indirect impacts to protected trees.

<sup>1</sup> [https://www.cityofpasadena.net/wp-content/uploads/sites/52/2017/06/TPO\\_6-Specimen-Tree-List.pdf](https://www.cityofpasadena.net/wp-content/uploads/sites/52/2017/06/TPO_6-Specimen-Tree-List.pdf)

### 3. Environmental Analysis

As described above, 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. However, it is estimated that implementation of the Project could potentially require the removal of up to 47 protected trees located within the Project Site to accommodate the reoriented driving range and miniature golf course, 16 trees could be encroached upon to accommodate project construction, and 18 protected trees within the survey area could be avoided. In addition, trees qualifying as specimen or native also exist within the grading limits of the Project and are included in the aforementioned trees that could be removed, encroached and avoided.

Protected trees located in proximity to the Project Site could be encroached upon to accommodate project construction resulting in indirect impacts. Project-related activities such as excavation, trenching, soil compaction, change of grade, drainage, pruning, mechanical damage from construction equipment, landscaping, and irrigation may negatively affect the root system of trees in the vicinity without implementing protective measures. These activities have the potential to negatively affect not only the encroached trees, but also other trees present in the vicinity of construction activities.

When the Project goes through the design development, RBOC would ensure that tree removals are limited and that as many trees are retained as part of the design to the extent that public safety and feasibility regarding golf course design allows. Additionally, the Project would be required to go through the City's Design Review process, which would promote the protection and retention of landmark, native, and specimen trees and other significant landscaping of aesthetic and environmental value. Furthermore, vegetation, including trees, would be included as part of the final design. As such, tree removals would be minimized to the extent possible and consistent with ongoing regular tree maintenance and safety requirements.

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). This includes the following required elements:

#### *Regarding Tree Removals:*

- For tree removals, the City Manager will notify the abutting property owners and applicant ten days prior to the removal. For three or more public trees the City Manager will also notify the City Council, Design Commission, and any known neighborhood association.
- Requests for the removal of a landmark, native and specimen tree will be denied unless one of the following findings is made:
  - There is a public benefit, or a public health, safety, or welfare benefit, to the injury or removal that outweighs the protection of the specific tree (public benefit means a public purpose, service, or use which affects residents as a community and not merely as particular individuals); or
  - The present condition of the tree is such that it is not reasonably likely to survive; or
  - There is an objective feature of the tree that makes the tree not suitable for protection; or

### 3. Environmental Analysis

- There would be a substantial hardship to a private property owner in the enjoyment and use of real property if the injury or removal is not permitted; or
  - To not permit the injury or removal would constitute a taking of the underlying real property; or
  - The project includes a landscape design plan that will result in a tree canopy coverage of greater significance than the tree canopy coverage being removed, within a reasonable time after completion of the project.
- In addition, a request for the removal of a landmark tree will be denied unless the procedures specified for the removal of landmarks and the granting of a certificate of appropriateness is first followed. Relocation of a specimen or native tree will be treated as a removal.
  - Tree removal requests with a discretionary action will be reviewed by the applicable decision-maker. Decisions on tree removal are subject to standard appeal and call-for-review procedures. Specimen and native tree removal requests, not associated with any discretionary action, will be reviewed by the City Manager or designated staff, with a decision rendered 15 days after the application has been deemed complete. In this case, the appeal process is the same as for a planning director decision.

#### *Regarding Tree Protection for Retained Trees:*

- Preparation of a Tree Protection Plan to ensure that all preserved trees within or adjacent to the property will be protected during construction activities, as well as in perpetuity following completion of the Project.
- Establishment of a Tree Protection Zone (TPZ) to the extent of the tree dripline plus four radial feet
- Protective fencing (6-foot high minimum) and subject to City staff approval
- Pre-construction meeting with City staff to discuss tree protection measures
- Inspection of rough grading, any work in TPZs, as well as periodic inspections

Additionally, any landscaping installed as part of 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.

Overall, compliance with the City’s Design Review process and Tree Ordinance including preparation of the required Tree Protection Plan would ensure impacts related to the protection of biological resources, such as a tree preservation policy or ordinance, to be less than significant.

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**f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?**

**No Impact.** The Project Site is located a developed area, entirely within the Brookside Golf Course. According to the California Department of Fish and Wildlife (CDFW) the Project Site is not located within an adopted habitat conservation plan, natural community conservation plan, or similar plan (CDFW 2021). Therefore, no impact would occur.

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#### 3.5 CULTURAL RESOURCES

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>V. CULTURAL RESOURCES. Would the project:</b>				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?		<b>X</b>		
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?		<b>X</b>		
c) Disturb any human remains, including those interred outside of dedicated cemeteries?			<b>X</b>	

#### Discussion

Information contained within this discussion is based on the following document, which can be found as Appendix D to the Initial Study/MND.

- Historical Resources Technical Report for the Brookside Golf Course Improvement Project, Historic Resources Group, 2021 (Appendix D).

#### Would the Project:

- a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

**Less Than Significant Impact with Mitigation Incorporated.**

#### *History of the Brookside Golf Course*

The Brookside Golf Course is one of the oldest golf courses in Los Angeles County. The City of Pasadena had planned on the development of a golf course in the Arroyo since 1918. Funding for its construction was confirmed by the City of Pasadena in 1922. While a course was staked out between Lester Avenue (now Seco Street) and Dakota Street (now Washington Boulevard), the City lacked the funds to construct it. After several false starts, the first nine holes of a golf course were constructed in 1925 and opened to the public on July 4th of that year. The completed C.W. Koiner Course was opened to the public in 1928. In 1929 the Brookside Clubhouse was completed and formally opened to the public. Later, the first half of E.O. Nay Course was completed in 1931. The two courses and clubhouse were designed by William P. Bell, a distinguished Southern California golf course architect active in the 1920s through the 1940s.

In the 1960s the golf course became known as the Brookside Golf Course. During this time, it went through substantial improvement to the facilities and the original Brookside Clubhouse was replaced with a new structure designed by architect William Randolph. Additionally, in 1967, upgrades to the golf courses were designed by distinguished golf course architect Desmond Muirhead.

### 3. Environmental Analysis

#### *Historic Resource Listings*

The Brookside Golf Course is considered a contributing site to the Pasadena Arroyo Park and Recreation District, which was listed in the NRHP in 2008. Because it is listed in the NRHP, the District is also listed in the California Register of Historical Resources and is considered a historical resource for the purposes of CEQA.

The Historic District was determined eligible for listing at the local level under NRHP Criterion A for its association with parks and recreation development in Pasadena. The period of significance for the Historic District is 1909–1939. It contains 24 contributing buildings, structures, and sites. On the Brookside Golf Course property, both the C.W. Koiner Course and the E.O. Nay Course are considered collectively as a contributing site. A restroom building at the northern portion of the E.O. Nay Course is also considered a contributing building.

#### *Impact Analysis*

The Project consists of two main components: (1) reorient and expand the existing driving range; and (2) develop a new miniature golf course adjacent to the proposed driving range. Potential impacts of both features are addressed below.

#### *Driving Range*

As noted above, the driving range has been in its existing location historically since at least 1930. Component parts, particularly the design, location and number of driving bays have been changed over time, but the following aspects have been largely consistent:

- The location west of the Brookside Clubhouse.
- The triangular shape widening and hitting from east to west.
- The spatial arrangement of tee line and driving bays located at the eastern end of the range and the range fairway stretching west.
- Landscape areas, putting greens and/or trees located between the Brookside Clubhouse and the driving range.
- Flanking fairways to the north and south
- Western limit defined by the flood control channel

The driving range would generally remain in its original location west of the Brookside Clubhouse, but it would be reoriented to face south-north and concede space for a new miniature golf use to the west. The overall size and dimensions of the driving range, however, have changed throughout its history, including during the late 1960s when the (then) 8th hole was moved to the west side of the flood control channel allowing for the driving range to be lengthened approximately 40 yards to the west. The location of tee lines



### 3. Environmental Analysis

and putting greens have also been changed, effectively expanding and contracting the length of the driving range.

The driving range would retain its triangular shape common to driving ranges, but the triangle would be canted so that the narrow end of the triangle is to the north. More importantly, the primary orientation of the driving range (hitting east to west) would be shifted to a south-north orientation. Spatial arrangements would also be altered with the primary tee line driving bays relocated along the southern portions of the range and the driving range fairway stretching north. A south-north orientation for the driving range, however, is not without precedent. A tee line located at the southern edge of the driving range has been in existence since the late 1960s when a secondary tee line was introduced as a night range. The southern tee line (hitting south to north) has been enhanced and expanded since that time and is currently used for instructional purposes.

The Project would install a total of 36 poles to support protective netting with many of the netting support poles substantially taller than what exists today. There are currently 64 poles of which approximately 20 would remain for a total of 56 poles. Support poles and safety netting have been part of the driving range since the 1950s; lighting poles were added in the late 1960s with the introduction of a night range. In addition, tall poles and safety netting are present in many areas along the perimeter of the Golf Course Complex. As such, support poles and safety netting have been part of the Brookside Golf Course landscape for decades.

Golf course fairways would continue to flank the driving range to the north and south. C.W. Koerner Course Hole 10 to the north would be altered by an extended fairway and relocated green. E.O. Nay Course Hole 6 and Hole 7 would also be shortened to accommodate the change to the C.W. Koerner Course Hole 10. Despite these alterations, Hole 6, Hole 7, and Hole 10 would still read as a tee, fairway and green in the same locations.

When looked at in total, changes to the driving range proposed by the Project would be relatively minor. Although the primary east-west orientation of the driving range would be changed to a south-north orientation, the driving range already incorporates a southern tee line and south-to-north hitting for instruction purposes. The introduction of new and in some cases taller poles for safety netting and lighting would continue infrastructure elements that have been integral to the driving range since the 1950s. The area would continue to be used as a driving range as it has since at least 1930 and it would contain the wide expanse of fairway, tee line driving bays, safety netting, and support poles that have characterized the driving range for decades.

#### ***Miniature Golf Course***

The area west of the driving range between the driving range and the flood channel would host a new 36-hole miniature golf course. Miniature golf is largely an exercise in putting so from a use standpoint miniature golf would continue the golf-related uses that currently occupy the Project Site. 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 anticipated to be between 6 and 8-feet in height.

The Brookside Golf Course has been characterized by a distinctive landscape comprising tees, fairways, greens, bunkers, lake hazards, mature trees and perimeter stone walls. The net effect is a naturalistic and unified landscape that is not only coherent to itself but seamlessly relates to the natural landscape of the arroyo and

### 3. Environmental Analysis

surrounding hillsides. The miniature golf course would introduce a new design element to the Brookside Golf Course. Design of a miniature golf course is necessarily complex with many elements compiled into a relatively small area. The theme aspect of the design can also introduce an esthetic at odds with the historic character of the Golf Complex.

With the introduction of a new design element acknowledged, the proposed miniature golf course would be located at what is currently the far end of the driving range bordered by the concrete flood channel, an area that isn't generally traversed by golfers and hasn't been for decades. In addition, the entire miniature golf area would be approximately one acre in size out of the approximately 230 acres total that comprise the Brookside Golf Course. In other words, approximately 0.4 percent of the total Brookside Golf Course would be affected by the construction of the miniature golf course.

#### *Summary*

For the Project to result in a substantial adverse change, it must be shown that the integrity and/or significance of the Brookside Golf Course would be materially impaired by the proposed alteration. When looked at in total, reorienting and expanding the existing driving range would be relatively minor and it would continue to be used as a driving range as it has since at least 1930. The miniature golf course would construct a new design element at the Brookside Golf Course that can potentially present a different aesthetics than the historic character of the Brookside Golf Course. The miniature golf course would consist of approximately one acre, or 0.4 percent, of the approximately 230 acres total that comprise the Brookside Golf Course.

As described above, it is estimated that implementation of the Project could potentially require the removal of up to 47 protected trees located within the Project Site to accommodate the reoriented driving range and miniature golf course, 16 trees could be encroached upon to accommodate project construction, and 18 protected trees within the survey area could be avoided. The number and location of trees on the Brookside Golf Course have changed over the years. And even with the tree removals, the overwhelming majority of the site elements that characterize the Brookside Golf Course would continue to retain their original location, general overall boundaries, and routing; thus, the Brookside Golf Course would continue to maintain a substantial amount of integrity.

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

The Project would be subject to the City's Design Review process as defined in the Pasadena Municipal Code. The purpose of this process is to implement urban design goals and policies and Citywide design principles into project designs and ensure that future development reflect the values of the community, enhance the surrounding environment, visually harmonize with surroundings, and avoid nostalgic misrepresentations that may confuse the relationships among structures over time. The Design Review process would ensure consistency with the Arroyo Seco Design Guidelines, specifically Section 4.2, "Cultural Resources

### 3. Environmental Analysis

Preservation”. This process would promote the protection and retention of landmark, native, and specimen trees and other significant landscaping of aesthetic and environmental value. Design review would also promote the conservation, enhancement, preservation, and protection of historic resources.

However, given there is no final design available at this time, there could be a potentially significant indirect impact related to the larger Pasadena Arroyo Park and Recreational District. Therefore, Mitigation Measure CUL-1 is required and would ensure that design of the Project would avoid any impacts to the historical resource.

**MM-CUL-1.** To ensure that the ultimate Project design is executed to achieve a maximum level of compatibility with the Pasadena Arroyo Park and Recreational District, RBOC shall 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 C.W. Koiner and E.O. Nay Courses are compatible with the existing Brookside Golf Course landscape, the Pasadena Arroyo Park and Recreational District, and the policies set forth in the Arroyo Seco Design Guidelines including Section 3.2, “Public Use Structures”. This will include consideration of design elements including but not limited to the form and materials of new circulation paths and driving bays; the placement, dimensions and materiality of driving range netting support poles; netting color and transparency; and lighting placement, brightness, and intensity. Design issues to be considered by the qualified historic preservation professional for the miniature golf course include but are not limited to grading and topographic changes; new plantings, trees, and vegetation; the scale, form, and materiality of theme features; perimeter fencing and security/safety elements; signage and wayfinding; and lighting placement, brightness, and intensity.

**b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?**

**Less Than Significant Impact with Mitigation Incorporated.** Archaeological resources are cultural resources of prehistoric or historic origin that reflect human activity. Archaeological resources include both structural ruins and buried resources. The term “unique archaeological resource” is defined in PRC Section 21083. 2(g).

... ‘unique archaeological resources’ means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- 1) Has information needed to answer important scientific research questions and there is a demonstrable public interest in that information.
- 2) Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- 3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.

### 3. Environmental Analysis

The Project Site and all surrounding areas have been extensively modified by construction of the Brookside Golf Course, the Rose Bowl Stadium, parking lots, and roadways. The Project Site is also continuously disturbed through active use for golf, regular maintenance and landscaping, and parking during certain events at the Rose Bowl. Prior development of the Project Site and larger Brookside Golf Course has required grading and filling, which resulted in extensive ground disturbance. Additionally, limited areas of undisturbed ground surface are located within or near the Project Site, due to extensive paving and landscaping, and regular landscaping maintenance of the golf course.

Construction of the relocated and expanded driving range and miniature golf course would require some grading and limited excavation, with all disturbed soils balanced onsite. Although the potential for discovery of archaeological resources within the Project Site is minimal, implementation of MM CUL-2 would address the treatment of cultural resources that may be inadvertently discovered during construction. Therefore, impacts would be less than significant with MM CUL-2 incorporated (see also Mitigation Measures MM-TCR-1, 2, and 3 in Section XVII, *Tribal Cultural Resources*, below for more information).

**MM-CUL-2.** Prior to the initiation of any earthmoving activity in which native soil is disturbed (as defined in the future geotechnical investigation that will be prepared for the Project Site), the RBOC shall be responsible for retaining a qualified archaeologist to observe grading activities and to salvage and catalogue archaeological resources, as necessary. Mitigation Measure TCR-1 below also requires a Native American Monitor during all ground disturbing activity. If historical or unique archaeological resources are discovered during construction activities, all work shall stop, and a qualified archaeologist would be retained to make an evaluation of significance of the resource. If it is determined to be historical or a unique archaeological resource, or if the discovery is not historical or unique but the archaeologist determines the possibility of further discoveries, a monitoring program shall be prepared and implemented for the remainder of the earthwork activities. Additionally, if archaeological resources that could be of Native American importance, or Native American resources are discovered, Mitigation Measures MM-TCR-1, 2 and 3 would be implemented.

#### c) Disturb any human remains, including those interred outside of dedicated cemeteries?

**Less Than Significant Impact.** During construction of the current land uses, extensive earthwork (excavation and grading) occurred. Additionally, earthmoving activities required for Project construction are relatively limited. Therefore, human remains are not anticipated. In the unlikely event that human remains are uncovered during Project construction, Government Code Sections 27460 et seq. mandate that there shall be no further excavation or soil disturbance until the Los Angeles County Coroner has determined that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner, and cause of death, and the required recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in PRC Section 5097.98.

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Pursuant to California Health and Safety Code Section 7050.5, the coroner shall make his or her determination within two working days of notification of the discovery of the human remains. If the coroner determines that the remains are not subject to his or her authority and recognizes or has reason to believe that they are those of a Native American, he or she shall contact the Native American Heritage Commission within 24 hours. Compliance with existing regulations would ensure that impacts related to the discovery of human remains would be less than significant. Additionally, mitigation contained in MM-TCR-3 would be enforced with respect to human remains of tribal affiliation.

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#### 3.6 ENERGY

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VI. ENERGY. Would the project:</b>				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			<b>X</b>	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				<b>X</b>

#### Discussion

A background discussion on the energy regulatory setting and energy calculations can be found in Appendix B to this Initial Study.

#### Would the Project:

- a) **Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?**

**Less Than Significant Impact.** The Project would result in short-term construction and long-term operational energy consumption. The following discusses the potential energy demands from activities associated with the construction and operation of the golf course.

#### *Short-Term Construction Impacts*

Construction of the Project would create temporary increased demands for electricity and vehicle fuels compared to existing conditions and would result in short-term transportation-related energy use.

#### *Electrical Energy*

Electricity use during construction of the Project would vary during different phases of construction. The majority of construction equipment would be gas- or diesel-powered, and electricity would not be used to power most of the construction equipment. Later construction phases could result in the use of electricity-powered equipment for completing small structures and architectural coatings. However, it is anticipated that the majority of electric-powered construction equipment would be hand tools (e.g., power drills, table saws) and lighting, which would result in minimal electricity usage during construction activities. Therefore, project-related construction activities would not result in wasteful or unnecessary electricity demands, and impacts would be less than significant.

### 3. Environmental Analysis

#### *Natural Gas Energy*

It is not anticipated that construction equipment used for the Project would be powered by natural gas, and no natural gas demand is anticipated during construction. Therefore, impacts would be less than significant with respect to natural gas usage.

#### *Transportation Energy*

Transportation energy use depends on the type and number of trips, vehicle miles traveled, fuel efficiency of vehicles, and travel mode. Transportation energy use during construction would come from the transport and use of construction equipment, delivery vehicles and haul trucks, and construction employee vehicles that would use diesel fuel and/or gasoline. It is anticipated that the majority of off-road construction equipment, such as those used during demolition and grading, would be gas or diesel powered. Energy consumption during construction was calculated using the CalEEMod (Version 2020.4) computer model and data from the EMFAC2017 (v. 1.0.3) and OFFROAD2017 (v. 1.0.1) databases. The results are shown in **Table 5, Construction-Related Fuel Usage**.

To limit wasteful and unnecessary energy consumption, the construction contractors are anticipated to minimize nonessential idling of construction equipment during construction, in accordance with 13 California Code of Regulations (CCR) Section 2449. In addition, construction trips would not result in unnecessary use of energy since the Project Site is centrally located and is served by numerous regional freeway systems (e.g., I-210, I-710, and SR-134) that provide the most direct routes from various areas of the region. Furthermore, electrical energy would be available for use during construction from existing power lines and connections, precluding the use of less efficient generators. Moreover, all construction equipment would cease operating upon completion of Project construction. Thus, energy use during construction of the Project would not be considered inefficient, wasteful, or unnecessary. Impacts would be less than significant.

**Table 5 Construction-Related Fuel Usage**

Project Component	Gas		Diesel		Electricity	
	VMt	Gallons	VMt	Gallons	VMt	kWh
Construction Worker Commute	71,416	2,520	518	12	1,107	364
Construction Vendor Trips	367	73	4,117	511	0	0
Construction Off-Road Equipment	N/A	1,509	N/A	36,051	N/A	0
<b>Total</b>	<b>71,783</b>	<b>4,101</b>	<b>4,635</b>	<b>36,574</b>	<b>1,107</b>	<b>364</b>

Source: CalEEMod Version 2020.4; EMFAC2017 Version 1.0.3; OFFROAD2017 Version 1.0.1. Modeling uses the EMFAC 2017 vehicle mix, which includes electric vehicles.

Notes: VMt = vehicle miles traveled; kWh = kilowatt hour

#### *Long-Term Impacts During Operation*

Operation of the Project would create increased demands for electricity and vehicle fuels compared to existing conditions.

### 3. Environmental Analysis

#### *Electrical Energy*

Operation of the Project would require additional electricity to power the new light poles and miniature golf course to be installed. Electrical service to the Project would be provided by Pasadena Water and Power (PWP) through connections to existing off-site electrical lines and new on-site infrastructure. As shown in **Table 6, Electricity Consumption**, implementation of the Project would result in an estimated 31,098 kilowatt hours of electricity use per year.

**Table 6 Electricity Consumption**

	Electricity (kWh/year)
Driving Range Lighting <sup>1</sup>	31,098

<sup>1</sup> Electricity use is based on lighting specifications for the proposed driving range as provided by the RBOC and assumes that the lighting will be operational for 4 hours per day, 365 days per year. Please see Appendix B for lighting calculations.

While the Project could result in a higher electricity demand than existing conditions, the new lighting on the Project Site would use LED lights. In addition, these lights would only be operated during the evening. Therefore, operation of the Project would not result in wasteful or unnecessary electricity demands and would not result in a significant impact related to electricity.

#### *Natural Gas Energy*

Operation of the Project would not generate additional demand for electricity and natural gas on the Project Site. Therefore, the Project would not result in wasteful or unnecessary natural gas demands and would result in a less than significant impact.

#### *Transportation Energy*

The purpose of the proposed project is to realize the existing capacity of the Brookside Golf Complex by increasing memberships and returning to historically higher levels of patronage use through the expansion of services to a broader range of visitors including families. However, to provide a conservative analysis, and to reflect trip generation prepared by the City (see Appendix F) operational trips were assumed and modeled to calculate energy consumption. Therefore, it is assumed that the Project would generate additional transportation energy use during operations from the use of motor vehicles. The efficiency of these motor vehicles is unknown, such as the average miles per gallon. Estimates of transportation energy use are based on the overall vehicle miles traveled (VMT) and associated transportation energy use. The Project-related VMT would primarily come from the visitors to the Brookside Golf Course. The VMT for the Project is estimated to be 4,364 miles daily or 1,588,536 miles annually, as shown in **Table 7, Project Annual Operation-Related Fuel Usage**. While implementation of the Project would result in an increase in trips to the site, the increase in capacity of the driving range and new miniature golf course would serve the local population. Serving the local community could contribute to reducing VMT by providing the local community with closer options. These features of the Project would contribute to minimizing VMT and transportation-related fuel usage (see Table 7). Thus, it is expected that operation-related fuel usage associated with the Project would not be inefficient, wasteful, or unnecessary. Therefore, impacts would be less than significant with respect to operation-related fuel usage.



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**Table 7 Project Annual Operation-Related Fuel Usage**

	Gasoline		Diesel		Compressed Natural Gas (CNG)		Electricity	
	Annual VMT	Annual Gallons	Annual VMT	Annual Gallons	Annual VMT	Annual Gallons	Annual VMT	Annual kWh
<b>Project</b>	1,492,867	56,570	66,804	4,816	1,105	320	27,764	9,056

Source: CalEEMod Version 2020.4.; EMFAC2017 v. 1.0.3. Modeling uses the EMFAC 2017 vehicle mix, which includes electric vehicles.

**b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

**No Impact.** The State's electricity grid is transitioning to renewable energy under California's Renewable Energy Program. Renewable sources of electricity include wind, small hydropower, solar, geothermal, biomass, and biogas.

Electricity production from renewable sources is generally considered carbon neutral. The State's renewable portfolio standard (RPS) require 33 percent renewable energy by 2020 (SB X1-2), 40 percent by 2024 (SB 350), 50 percent by 2026 (SB 100), 60 percent by 2030 (SB 100), 90 percent by 2035 (SB 1020), and 100 percent carbon free by 2045 (SB 100 and SB 1020). SB 100 also establishes RPS requirements for publicly owned utilities that consist of 44 percent renewable energy by 2024, 52 percent by 2027, and 60 percent by 2030. SB 1020 requires zero-carbon resources to reach 100 percent clean electricity by 2045.

The statewide RPS goal is not directly applicable to individual development projects, but to utilities and energy providers such as PWP, which is the utility that would provide all of electricity needs for the Project. Compliance of PWP in meeting the RPS goals would ensure the State meets its objective in transitioning to renewable energy. Operation of the Project would generate minimal demand for electricity from the new lighting and would not generate demand for natural gas on the Project Site. Therefore, implementation of the Project would not conflict or obstruct plans for renewable energy and energy efficiency, and no impact would occur.

***City of Pasadena Climate Action Plan***

Adopted by the City of Pasadena in 2018, the Climate Action Plan (CAP) was prepared to establish a framework for evaluating and mitigating Greenhouse Gas (GHG) emissions by providing an emissions inventory, emissions reduction goals, and strategies for reducing emissions, including measures to reduce energy consumption within the City (Pasadena 2018). While most of the reduction measures under each strategy within the CAP apply specifically to municipal operations, city infrastructure improvements, or existing structures, the Project is consistent with the broad strategies outlined in the CAP as they relate to energy consumption discussed below. Therefore, the Project would not interfere with implementation of the City's CAP, and no impact would occur.

- **Sustainable Mobility and Land Use.** Implementation of the Project would not result in changes to existing circulation as the reoriented and expanded driving range and miniature golf course would be accessed via existing adjacent parking lots and Brookside Golf Course pathways as during existing

### 3. Environmental Analysis

conditions. In addition, these uses would reduce VMT by providing the local population with closer options for these recreation uses, thereby reducing energy consumption as a result of the Project.

- **Energy Efficiency and Conservation.** The energy efficiency and conservation measures generally pertain to construction of new buildings, energy retrofits for existing buildings, municipal operations, and residential and commercial projects. These measures would not be applicable to the Project as the project would involve reorienting and expanding the driving range and adding a miniature golf course.

### 3. Environmental Analysis

## 3.7 GEOLOGY AND SOILS

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VII. GEOLOGY AND SOILS. Would the project:</b>				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				<b>X</b>
ii) Strong seismic ground shaking?			<b>X</b>	
iii) Seismic-related ground failure, including liquefaction?			<b>X</b>	
iv) Landslides?			<b>X</b>	
b) Result in substantial soil erosion or the loss of topsoil?			<b>X</b>	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			<b>X</b>	
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?			<b>X</b>	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				<b>X</b>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			<b>X</b>	

### Discussion

#### Would the Project:

- a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
- i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

**No Impact.** According to the CDOC, the Alquist-Priolo earthquake fault zones are regulatory zones surrounding the surface traces of active faults in California. An active fault, for the purposes of the Alquist-Priolo Earthquake Fault Zoning Act (Alquist-Priolo Act), is one that has ruptured in the last

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11,000 years. Wherever an active fault exists, if it has the potential for surface rupture, a structure for human occupancy cannot be placed over the fault and must be a minimum distance from the fault (generally fifty feet) (CDOC 2019).

The Project Site is not located within an Alquist-Priolo Earthquake Fault Zone. The boundaries of the nearest Fault Zones to the Project Site are the Los Angeles Fault Zone, located approximately 2.9 miles south of the Project Site, and the El Monte Fault Zone, located approximately 3.7 miles southeast of the Project Site (CDOC 2019). Thus, the likelihood of surface fault rupture at the Project Site is low. Therefore, there would be no impacts related to fault rupture.

#### ii) Strong seismic ground shaking?

**Less Than Significant Impact.** Southern California is a seismically active region. Impacts from ground shaking could occur many miles from an earthquake epicenter. The potential severity of ground shaking depends on many factors, including the distance from the originating fault, the earthquake magnitude, and the nature of the earth materials beneath a given site. Although the Project Site is not located within an active fault zone, there are several known faults in the region. The nearest fault to the Project is the Raymond fault, which is approximately 3.1 miles south of the Project Site, and the boundaries of the nearest Fault Zones to the Project Site are the Los Angeles Fault Zone, located approximately 2.9 miles south of the site, and the El Monte Fault Zone, located approximately 3.7 miles southeast of the site (CDOC 2019). The Project is not developing any new structures or habitable buildings, and proposed uses would be consistent with existing golf course uses. Therefore, seismic ground shaking impacts would be less than significant.

#### iii) Seismic-related ground failure, including liquefaction?

**Less Than Significant Impact.** According to the United States Geological Survey (USGS), liquefaction takes place when loosely packed, water-logged sediments at or near the ground surface lose their strength in response to strong ground shaking. Liquefaction occurring beneath buildings and other structures can cause major damage during earthquakes (USGS 2021). The Project Site is located within a liquefaction zone (CDOC 2019); thus, the Project Site could potentially subject to liquefaction caused by ground shaking or seismic-related ground failure. However, the Project includes the same golf uses within the existing Brookside Golf Course and would not include the construction of new permanent structures, including new housing or commercial uses, which could potentially further expose people to the risk of injury as a result of seismic related ground failure, including liquefaction. Thus, the Project would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death related to liquefaction. Therefore, impacts would be less than significant.

#### iv) Landslides?

**Less Than Significant Impact.** According to the USGS, a landslide is the movement of a mass of rock, debris, or earth down a slope. Slope movement occurs when forces acting down-slope (mainly due to gravity) exceed the strength of the earth materials that compose the slope. Causes include factors that increase the effects of down-slope forces and factors that contribute to low or reduced strength.

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Landslides can be initiated in slopes already on the verge of movement by rainfall, snowmelt, changes in water level, stream erosion, changes in ground water, earthquakes, volcanic activity, disturbance by human activities, or any combination of these factors (USGS 2021). The Project Site is located within and adjacent to a landslide zone (CDOC 2019); however, construction and operational activities of the Project would be situated entirely within the relatively level Brookside Golf Course in the Arroyo Seco Canyon, away from sloping areas. Although the potential exists for landslides to occur in Arroyo Seco Canyon, the potential for large, deep-seated landslides in these areas surrounding the Project Site is considered low (City of Pasadena 2002). Thus, the Project would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death related to landslides. Therefore, impacts would be less than significant.

#### b) Result in substantial soil erosion or the loss of topsoil?

**Less Than Significant Impact.** The Project consists of reorienting and expanding the existing driving range and constructing a new miniature golf course within the existing Brookside Golf Course. Existing golf turf may be removed and replaced for the relocation of the driving range. Earth-moving activities would occur during construction of the Project, including grading of existing soils within the golf course and tree removal and relocation (all soils would be balanced onsite). Construction projects of one acre or more (such as the Project) are regulated under the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2012-0006-DWQ) issued by the State Water Resources Control Board. Project applicants obtain coverage by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) estimating sediment risk from construction activities to receiving waters, and specifying best management practices (BMPs) that would be incorporated into the construction plan to minimize stormwater pollution. Categories of BMPs used in SWPPPs are described in **Table 8, Construction BMPs**. The Project Site is approximately 16 acres; thus, Project construction would be subject to the Statewide General Construction Permit and implementation of BMPs specified in the SWPPP. With these requirements, construction-phase soil erosion impacts would be less than significant. Therefore, impacts would be less than significant.

**Table 8 Construction BMPs**

Category	Purpose	Examples
Erosion Controls and Wind Erosion Controls	Cover and/or bind soil surface, to prevent soil particles from being detached and transported by water or wind.	Mulch, geotextiles, mats, hydroseeding, earth dikes, swales.
Sediment Controls	Filter out soil particles that have been detached and transported in water.	Barriers such as straw bales, sandbags, fiber rolls, and gravel bag berms; desilting basin; cleaning measures such as street sweeping.
Tracking Controls	Minimize the tracking of soil off-site by vehicles.	Stabilized construction roadways and construction entrances/exits; entrance/outlet tire wash.
Non-storm Water Management Controls	Prohibit discharge of materials other than stormwater, such as discharges from the cleaning, maintenance, and fueling of vehicles and equipment. Conduct various construction operations, including paving, grinding, and concrete curing and finishing, in ways that	BMPs specifying methods for: paving and grinding operations; cleaning, fueling, and maintenance of vehicles and equipment; concrete curing; concrete finishing.

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**Table 8 Construction BMPs**

Category	Purpose	Examples
	minimize non-stormwater discharges and contamination of any such discharges.	
Waste Management and Controls (i.e., good housekeeping practices)	Management of materials and wastes to avoid contamination of stormwater.	Spill prevention and control, stockpile management, and management of solid wastes and hazardous wastes.

Source: California Stormwater Quality Association (CASQA). 2012, July. California Construction Best Management Practices Handbook.

- c) **Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?**

**Less Than Significant Impact.** Construction and operational activities of the Project would be situated entirely within the relatively level Brookside Golf Course in the Arroyo Seco Canyon, away from sloping/unstable areas. The Project would be located in the same location as the existing driving range within the Brookside Golf Course. The miniature golf course would also be located within the existing golf Course on turf areas.

As described above, the Project Site is located entirely within a landslide and a liquefaction zone (CDOC 2019). The Project Site could potentially be subjected to liquefaction caused by ground shaking or seismic-related ground failure. However, the Project would be located within a developed area and would not include the construction of new permanent structures, including new housing or commercial uses that could potentially further expose people to the risk of injury as a result of seismic related ground failure, including liquefaction. Additionally, although the potential exists for landslides to occur in Arroyo Seco Canyon, the potential for large, deep-seated landslides in these areas surrounding the Project Site is considered low (City of Pasadena 2002). Lateral spreading results from earthquake-induced liquefaction, causing landslides associated with gentle slopes that flow laterally, like water. Land subsidence occurs when large amounts of groundwater have been withdrawn from certain types of sediments, causing the land to subside. When the water is withdrawn the sediments collapse in on itself. Potential for lateral spreading impacts in within the Project Site would be considered low. Therefore, the impacts would be less than significant.

- d) **Be located on expansive soil, as defined in Table 18 1 B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?**

**Less Than Significant Impact.** Expansive soils are fine-grained soils with variable amounts of clay minerals that can undergo significant volumetric changes as a result of changes in moisture content. The upward pressures induced by the swelling can have significant harmful effects upon structures and other surface improvements (CDOC 2015). The Project Site is underlain by Holocene Alluvium, which consists of gravel, sand, and silt. These sediments, also known as Tujunga and Ramona soils, are unconsolidated, poorly sorted, coarse sand and pebble, cobble, and boulder gravel that lacks development of a soil profile on the surface (CDOC 2015). The density of these deposits has been described as very loose to loose, and the deposits on the site are considered to have a soft profile and, as such, the underlying native soils are considered slightly

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expansive. The Project would require minimal grading and excavation and would be required to comply with standard construction regulations including, but not limited to the 2019 California Building Code and Section 14.04 of Title 14 of the Pasadena Municipal Code (PMC). Any recommendations provided in a geotechnical investigation to meet those regulations would be implemented. Additionally, operation of the Project would contain golf uses as existing conditions, and no habitable structures would be present on the Project Site. Therefore, impacts would be less than significant.

**e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?**

**No Impact.** The Project would not involve the construction of any restrooms or use of potable water, and wastewater generated at the Project Site would be within similar capacities as the existing uses and utilize the existing wastewater disposal system. Thus, the Project would not require the use of septic tanks or alternative wastewater disposal systems. Therefore, no impact would occur.

**f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

**Less Than Significant Impact.** A significant impact would occur if ground-disturbing activities (e.g., grading, excavation, etc.) associated with project construction would disturb, damage, or destroy previously unknown buried prehistoric or historic features and deposits that could be considered significant resources. According to the City of Pasadena General Plan Environmental Impact Report (EIR) (specifically Figure 5.4-2, Paleo Sensitivity), the Project Site and the Brookside Golf Course are not located within an area that is considered sensitive for paleontological resources. Native soils underlying the Project Site include Holocene Alluvium, which consists of gravel, sand, and silt. These sediments, also known as Tujunga and Ramona soils, are unconsolidated, poorly sorted, coarse sand and pebble, cobble, and boulder gravel that lacks development of a soil profile on the surface (CDOC 2015). The density of these deposits has been described as very loose to loose, and the deposits on the site are considered to have a soft profile. Construction activities would require surficial grading and minimal excavation over the Project Site. Thus, the Project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. Therefore, impact would be less than significant.

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## 3.8 GREENHOUSE GAS EMISSIONS

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>VIII. GREENHOUSE GAS EMISSIONS. Would the project:</b>				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			<b>X</b>	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			<b>X</b>	

### Discussion

Scientists have concluded that human activities are contributing to global climate change by adding large amounts of heat-trapping gases, known as greenhouse gases (GHGs), into the atmosphere. The primary source of these GHG is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHGs—water vapor, carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), and ozone (O<sub>3</sub>)—that are the likely cause of an increase in global average temperatures observed within the 20th and 21st centuries. Other GHG identified by the IPCC that contribute to global warming to a lesser extent include nitrous oxide (N<sub>2</sub>O), sulfur hexafluoride (SF<sub>6</sub>), hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons.<sup>2</sup>

Information on manufacture of cement, steel, and other “life cycle” emissions that would occur as a result of the Project are not applicable and are not included in the analysis.<sup>3</sup> Black carbon emissions are not included in the GHG analysis because the California Air Resources Board (CARB) does not include this pollutant in the state’s Senate Bill 32 (SB 32) inventory and treats this short-lived climate pollutant separately.<sup>4</sup> A background discussion on the GHG regulatory setting and GHG modeling can be found in Appendix B to this Initial Study.

<sup>2</sup> Water vapor (H<sub>2</sub>O) is the strongest GHG and the most variable in its phases (vapor, cloud droplets, ice crystals). However, water vapor is not considered a pollutant, but part of the feedback loop rather than a primary cause of change.

<sup>3</sup> Life cycle emissions include indirect emissions associated with materials manufacture. However, these indirect emissions involve numerous parties, each of which is responsible for GHG emissions of their particular activity. The California Resources Agency, in adopting the CEQA Guidelines Amendments on GHG emissions found that lifecycle analyses was not warranted for project-specific CEQA analysis in most situations, for a variety of reasons, including lack of control over some sources, and the possibility of double-counting emissions (CNRA 2018). Because the amount of materials consumed during the operation or construction of the Project is not known, the origin of the raw materials purchased is not known, and manufacturing information for those raw materials are also not known, calculation of life cycle emissions would be speculative. A life-cycle analysis is not warranted (OPR 2008).

<sup>4</sup> Black carbon emissions have sharply declined due to efforts to reduce on-road and off-road vehicle emissions, especially diesel particulate matter. The state’s existing air quality policies will virtually eliminate black carbon emissions from on-road diesel engines within 10 years (CARB 2017a.).



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#### Would the Project:

- a) **Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

**Less Than Significant Impact.** Global climate change is not confined to a particular project area and is generally accepted as the consequence of global industrialization over the last 200 years. A typical project, even a very large one, does not generate enough greenhouse gas emissions on its own to influence global climate change significantly; hence, the issue of global climate change is, by definition, a cumulative environmental impact.

Project-related construction and operation-phase GHG emissions are shown in **Table 9, *Project-Related Operation GHG Emissions***. Implementation of the Project would result a reoriented driving range and new miniature golf course. The purpose of the proposed project is to realize the existing capacity of the Brookside Golf Complex by increasing memberships and returning to historically higher levels of patronage use through the expansion of services to a broader range of visitors including families. However, to provide a conservative analysis, and to reflect trip generation prepared by the City (see Appendix F) operational trips were assumed and modeled to calculate operational greenhouse gas emissions. Therefore, it is assumed that the Project would generate a net increase of 404 weekday vehicle trips from existing conditions. Furthermore, operation of the Project would result in an increase in water demand, wastewater and solid waste generation, area sources (e.g., consumer cleaning products), and energy use from lighting.

Annual average construction emissions were amortized over 30 years and included in the emissions inventory to account for one-time GHG emissions from the construction phase of the Project. Overall, development and operation of the Project would not generate annual emissions that exceed the South Coast AQMD screening threshold of 3,000 metric tons of carbon dioxide equivalent (MTCO<sub>2</sub>e) per year (South Coast AQMD 2010). In addition, the Project would include sustainability features such as water conservation through the Pasadena Department of Water and Power (PWP) Non-Potable Water Project and solid waste reduction through compliance with the City's Construction and Demolition Waste Management Ordinance (PMC Chapter 8.62), as discussed in Section XIX, *Utilities and Service Systems*. Furthermore, as seen in Section I, *Aesthetics*, the lighting to be installed would be a leading-edge light-emitting diode (LED) technology and would be energy efficient, consistent with lighting requirements set forth in the Arroyo Seco Design Guidelines. Therefore, the Project's cumulative contribution to GHG emissions would be less than significant.

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**Table 9 Project-Related Operation GHG Emissions**

Source	GHG	(MTCO <sub>2</sub> e/Year)
Area	<1	<1%
Energy (Lighting)	12	2%
Mobile (Vehicle Trips)	547	95%
Solid Waste	<1	<1%
Water	4	1%
Amortized Construction Emissions <sup>1</sup>	12	2%
<b>Total</b>	<b>575</b>	<b>100%</b>
South Coast AQMD Bright-Line Threshold	3,000 MTCO <sub>2</sub> e/Yr.	NA
<b>Exceeds Bright-Line Threshold?</b>	<b>No</b>	<b>NA</b>

Source: CalEEMod, Version 2020.4.

Notes: MTons = metric tons; MTCO<sub>2</sub>e = metric ton of carbon dioxide equivalent

<sup>1</sup> Total construction emission are amortized over 30 years per South Coast AQMD methodology (South Coast AQMD 2009).

**b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

**Less Than Significant Impact.** Applicable plans adopted for the purpose of reducing GHG emissions include CARB's Scoping Plan, SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and the City's Climate Action Plan. A consistency analysis with these plans is presented below.

#### *CARB Scoping Plan*

On November 16, 2022, CARB adopted the 2022 Scoping Plan for Achieving Carbon (2022 Scoping Plan), which lays out a path to achieve carbon neutrality by 2045 or earlier and to reduce the State's anthropogenic GHG emissions (CARB 2022). The 2022 Scoping Plan is applicable to state agencies and is not directly applicable to cities/counties or individual projects (i.e., the 2022 Scoping Plan does not require the city to adopt policies, programs, or regulations to reduce GHG emissions). However, new regulations adopted by the state agencies outlined in the 2022 Scoping Plan result in GHG emissions reductions at the local level. As a result, local jurisdictions benefit from reductions in transportation emissions rates, increases in water efficiency in the building and landscape codes, and other statewide actions that affect a local jurisdiction's emissions inventory from the top down. Statewide strategies to reduce GHG emissions include the LCFS and changes in the corporate average fuel economy standards (e.g., Pavley I and Pavley California Advanced Clean Cars program).

Buildout of the Project would adhere to the programs and regulations identified by the 2022 Scoping Plan and implemented by state, regional, and local agencies to achieve the statewide GHG reduction goals of AB 32, SB 32, and AB 1279. For example, the increase in capacity of the driving range and new miniature golf course would serve the local population and could contribute to reducing VMT by providing the local community with closer options.

### 3. Environmental Analysis

Therefore, the Project would be consistent with State efforts to reduce motor vehicle emissions and generate GHG emissions consistent with the reduction goals of AB 32, SB 32, and AB 1279. The Project would not obstruct implementation of the 2022 Scoping Plan, and a less than significant impact would occur.

#### ***SCAG's Regional Transportation Plan/Sustainable Communities Strategy***

SCAG adopted the 2020-2045 RTP/SCS (Connect SoCal) in September 2020. Connect SoCal identifies that land use strategies that focus on new housing and job growth in areas rich with destinations and mobility options are consistent with a land use development pattern that supports and complements the proposed transportation network. The overarching strategy in Connect SoCal is to plan for the southern California region to grow in more compact communities in transit priority areas and priority growth areas; provide neighborhoods with efficient and plentiful public transit; establish abundant and safe opportunities to walk, bike, and pursue other forms of active transportation; and preserve more of the region's remaining natural lands and farmlands (SCAG 2020). Connect SoCal's transportation projects help more efficiently distribute population, housing, and employment growth, and forecast development is generally consistent with regional-level general plan data to promote active transportation and reduce GHG emissions. The projected regional development, when integrated with the proposed regional transportation network in Connect SoCal, would reduce per-capita GHG emissions related to vehicular travel and achieve the GHG reduction per capita targets for the SCAG region.

The Connect SoCal Plan does not require that local general plans, specific plans, or zoning be consistent with the SCS, but provides incentives for consistency for governments and developers. The Project involves improvements to the existing golf course, including a driving range and miniature golf course. While implementation of the Project would result in an increase in trips to the site, the increase in capacity of the driving range and new miniature golf course would serve the local population. Serving the local community could contribute to reducing VMT by providing the local community with closer options. Therefore, the Project would not interfere with SCAG's ability to implement the regional strategies outlined in the Connect SoCal Plan, and impacts would be less than significant.

#### ***City of Pasadena Climate Action Plan***

Adopted by the City of Pasadena in 2018, the CAP was prepared to establish a framework for evaluating and mitigating GHG emissions by providing an emissions inventory, emissions reduction goals, and strategies for reducing emissions (Pasadena 2018). Furthermore, the CAP provides measures to meet the goal of reducing community GHG emissions to a level 15 percent below 2009 emissions for 2020, 49 percent below for 2030, 59 percent below for 2035, and 83 percent below for 2050. Cumulatively, the measures listed in the CAP are estimated to reduce emissions in the City by approximately 181,197 MTCO<sub>2</sub>e by 2020 and 458,181 MTCO<sub>2</sub>e by 2035.

The City's CAP includes five emissions reduction strategies for (1) sustainable mobility and land use, (2) energy efficiency and conservation, (3) water conservation, and (4) solid waste reduction, and (5) urban greening. **Table 10** below shows the measures associated with each of these reduction strategies. As previously stated, the Project involves improvements to the existing golf course, including a driving range and miniature golf course intended to realize the existing capacity of the Brookside Golf Complex by increasing memberships and returning to historically higher levels of patronage use through the expansion of services to a broader

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range of visitors including families. The Project would not include changes to the parking lot or buildings and indoor areas. Reduction strategies that pertain to these uses would not be applicable for the proposed Project. However, as demonstrated in the table below, the Project would be consistent with the strategies pertaining to improvements to bicycle and pedestrian safety, water conservation, waste reduction, and urban greening. Overall, the Project would not interfere with implementation of the City's CAP, and impacts would be less than significant.

**Table 10 City of Pasadena CAP Consistency Checklist**

GHG Reduction Strategy and Sustainable Development Action		Consistency with CAP
<b>Mandatory Actions</b>		
T-1.2	Continue to improve bicycle and pedestrian safety: <ul style="list-style-type: none"> <li><b>Bicycle Storage:</b> Does the project provide bicycle storage lockers, racks, or other bicycle storage facilities for residents/employees?</li> </ul>	<b>Consistent.</b> Based on the nature of the Project in that it would reorient and expand the existing driving range and develop a new miniature golf course, this existing recently installed and improved bicycle parking facilities at Brookside Golf Club would be sufficient to serve the Project.
T-3.1	Decrease annual commuter miles traveled by single occupancy vehicles: <ul style="list-style-type: none"> <li><b>Transportation Demand Management (TDM):</b> Does the project include a TDM plan? A TDM plan is required for the following projects: multifamily residential development that are 100 or more units; mixed-use developments with 50 or more residential units or 50,000 square feet or more of non-residential development; or non-residential projects which exceed 75,000 square feet. If applicable, please submit the TDM plan for review.</li> </ul>	<b>Not Applicable.</b> Based on the nature of the Project in that it would reorient and expand the existing driving range and develop a new miniature golf course, this measure would not be applicable. The uses would serve existing visitors to the Brookside Golf Course and no new development is proposed.
T-4.1	Expand the availability and use of alternative fuel vehicles and fueling infrastructure <ul style="list-style-type: none"> <li><b>Alternative Vehicle Fueling Wiring:</b> For projects with more than three parking spaces, does the project provide wiring for at least one 240V Type II electric car charger? Please include specifications on the project plans.</li> </ul>	<b>Not Applicable.</b> The Project would only reorient and expand the existing driving range and develop a new miniature golf course. The Project does not include the addition of any new parking or changes to the existing parking areas that serve the project site. Therefore, this measure would not be applicable.
E-1.2	Encourage the use of energy conservation devices and passive design concepts that make use of the natural climate to increase energy efficiency <ul style="list-style-type: none"> <li><b>Passive Design Features:</b> Does the project utilize passive design techniques such as awnings or overhangs on the east, west, and south facing windows which block the high summer sun but allow in lower winter sun? Please include specifications on the project plans.</li> </ul>	<b>Not Applicable.</b> Based on the nature of the Project in that it would reorient and expand the existing driving range and develop a new miniature golf course, this measure would not be applicable. No permanent structures are proposed.
WC-1.1	Reduce potable water usage throughout Pasadena <ul style="list-style-type: none"> <li><b>Irrigation Efficiency:</b> Will the project utilize drought tolerant landscaping and/or drip irrigation and/or weather controllers to reduce outdoor water use? Please include specifications on the project plans</li> </ul>	<b>Consistent.</b> The Project would include utilization of a subterranean irrigation device that delivers water to the roots of the trees below ground to avoid the loss and evaporation of irrigated and above ground sprayed water, which would aid in conserving water and delivering water more efficiently to the newly planted landscaping.

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**Table 10 City of Pasadena CAP Consistency Checklist**

WR-1.1	<p>Continue to reduce solid waste and landfill GHG emissions</p> <ul style="list-style-type: none"> <li>• <b>Facilitate Recycling:</b> Does the project include a space for separate trash and recycling bins as well as provide informational signage/handouts for residents/employees outlining materials to be recycled? Please include specifications on the project plans.</li> </ul>	<p><b>Consistent.</b> The RBOC utilizes a three-bin color-coded container system to help patrons separate paper and food waste, bottles and cans, and all other non-recyclable material.</p>
<b>Energy Efficiency and Conservation</b>		
E-1.1	<p>Increase energy efficiency requirements of new buildings to perform better than 2016 Title 24 Standards.</p> <ul style="list-style-type: none"> <li>• <b>Zero-Net Energy (ZNE):</b> Does the project generate 100% of electricity required on site? ZNE calculations must be provided.</li> <li>• <b>Energy Efficiency (Exceed 2016 Title 24):</b> Does the project exceed the 2016 Title 24 Efficiency Standards by at least 5%? Please include Title 24 energy model.</li> </ul>	<p><b>Not Applicable.</b> The Project would only reorient and expand the existing driving range and develop a new miniature golf course. The Project does not include construction of new buildings. Therefore, this measure would not be applicable.</p>
E-4.1	<p>Increase city-wide use of carbon neutral energy by encouraging and/or supporting carbon-neutral technologies.</p> <ul style="list-style-type: none"> <li>• <b>Renewable Energy:</b> Does the project generate at least 60% of the building's projected electricity needs through renewable energy? Please include specifications on the project plans.</li> </ul>	<p><b>Not Applicable.</b> The Project would only reorient and expand the existing driving range and develop a new miniature golf course. The Project does not include construction of new buildings. Therefore, this measure would not be applicable.</p>
<b>Sustainable Mobility and Land Use</b>		
T-1.1	<p>Continue to expand Pasadena's bicycle and pedestrian network.</p> <ul style="list-style-type: none"> <li>• <b>End-of-Trip Bicycle Facilities</b> (Commercial Development): Does the project provide at least one shower for every 50 employees? Please include these specifications on the project plans.</li> <li>• <b>Bike Share:</b> Does the project include a bike share station? Please include these specifications on the project plans.</li> </ul>	<p><b>Consistent.</b> The Project would only reorient and expand the existing driving range and develop a new miniature golf course. The Project does not include changes to the existing recently installed and improved bicycle parking at Brookside Clubhouse, nor does it include an increase in employees.</p>
T-3.1	<p>Decrease annual commuter miles traveled by single occupancy vehicles.</p> <ul style="list-style-type: none"> <li>• <b>Car Sharing:</b> Does the project provide/facilitate car sharing by providing a designated car share space on or within the immediate vicinity of the project site? Examples of car share options include ZipCar, PitCarz, and Getaround. Please include these specifications on the project plans.</li> <li>• <b>Parking De-Coupling:</b> Does the project separate the cost of parking from the cost of commercial space and/or residential housing by charging for each individually? Please include these specifications on the project plans</li> <li>• <b>Transportation Demand Management (TDM):</b> Does the project include a TDM plan? Please submit the TDM plan for review (Note: this measure cannot be combined with the mandatory measure that requires a TDM plan for projects that meet certain size thresholds.)</li> </ul>	<p><b>Consistent.</b> Based on the recreational uses of the Project and the family-oriented nature of miniature golf uses, existing and future patrons regularly carpool and are not typically single-occupancy vehicle trips, which reduces VMT.</p>

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**Table 10 City of Pasadena CAP Consistency Checklist**

T-4.1	<p>Expand the availability and use of alternative fuel vehicles and fueling infrastructure.</p> <ul style="list-style-type: none"> <li>Alternative Vehicle Fueling Infrastructure: Does the proposed project include functioning 240V Type II electric car chargers at 3% of parking spaces (at least one charger) AND conduit to allow for future charger installation to 25% of spaces?</li> </ul>	<b>Not Applicable.</b> The Project would only reorient and expand the existing driving range and develop a new miniature golf course. The Project does not include the addition of any new parking or changes to the existing parking areas that serve the project site. Therefore, this measure would not be applicable.
T-5.1	<p>Facilitate high density, mixed-use, transit-oriented, and infill development.</p> <ul style="list-style-type: none"> <li>Transit Oriented Development: Is the project located within 0.25 mile of a major transit stop as defined in the Zoning Code. Please include a map outlining the nearest transit stop.</li> </ul>	<b>Not Applicable.</b> Based on the nature of the Project in that it would reorient and expand the existing driving range and develop a new miniature golf course, this measure would not be applicable. No development is proposed as part of the Project.
T-6.1	<p>Reduce GHG emissions from heavy duty construction equipment and vehicles.</p> <ul style="list-style-type: none"> <li>Reduce GHG emissions from heavy-construction equipment: Will the project utilize at least 30% alternative fueled construction equipment (by pieces of equipment) and implement an equipment idling limit of 3 minutes? Please provide idling limit plan including implementation strategies along with the total pieces of equipment and those utilizing alternative fuels.</li> </ul>	<b>Consistent.</b> Construction activities will be conducted in compliance with 13 California Code of Regulations (CCR) Section 2499, which requires that nonessential idling of construction equipment is restricted to five minutes or less. There would be minimal ground disturbance beyond surficial grading and therefore minimal heavy duty construction equipment and vehicles are necessary to implement the Project.
<b>Water Conservation</b>		
WC-1.1	<p>Reduce potable water use throughout Pasadena.</p> <ul style="list-style-type: none"> <li>Indoor Water Efficiency: Will the project achieve at least a 35% reduction in indoor water use per the LEED V4 Indoor Water Use Reduction Calculator? Please attach the calculator output.</li> </ul>	<b>Not Applicable.</b> The Project would only reorient and expand the existing driving range and develop a new miniature golf course. The Project does not include construction of new buildings, and the existing onsite restrooms and facilities would serve the Project. Therefore, this measure would not be applicable.
WC-2.1	<p>Increase access to and use of non-potable water.</p> <ul style="list-style-type: none"> <li>Rainwater Capture and Reuse: Does the project utilize a rainwater capture and reuse system to reduce the amount of potable water consumed on site? Please include these specifications on the project plans.</li> <li>Indoor &amp; Outdoor Recycled Water: Will the project be plumbed to utilize recycled water for either indoor or outdoor water use? Please include these specifications on the project plans.</li> <li>Greywater: Will the project be plumbed to take advantage of greywater produced on site such as a laundry to landscape system or another on-site water reuse system? Please include these specifications on the project plans.</li> </ul>	<b>Consistent.</b> The Project would include utilization of a subterranean irrigation device that delivers water to the roots of the trees below ground to avoid the loss and evaporation of irrigated and above ground sprayed water, which would aid in conserving water and delivering water more efficiently to the newly planted landscaping. The overall amount of landscaping and irrigation required would be minimal if any, given the entire site is currently irrigated turf.
WC-3.1	<p>Improve storm water to slow, sink, and treat water run-off, recharge groundwater, and improve water quality.</p> <ul style="list-style-type: none"> <li>Permeable Surfaces: Is at least 30% of the hardscape (e.g., surface parking lots, walkways, patios, etc.)</li> </ul>	<b>Consistent.</b> The Project would incorporate the Rose Bowl Stadium's own compost as part of a regular landscape maintenance regime. By treating the bare grounds with compost where once turf grass existed and is now highly

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**Table 10 City of Pasadena CAP Consistency Checklist**

	<p>permeable to allow infiltration? Please include these specifications on the project plans.</p> <ul style="list-style-type: none"> <li>Stormwater Capture: Is the project designed to retain stormwater resulting from the 95th percentile, 24 hour rain event as defined by the Los Angeles County 95th percentile precipitation isohyetal map? Please provide the engineered stormwater retention plan with the project plans</li> </ul>	<p>compacted, infiltration rates can dramatically improve. As a result of improved permeability, irrigation and water demand can be reduced and water conserved. Overall, using and applying compost helps to retain water and moisture longer which ultimately translates into reduced irrigation costs.</p>
<b>Waste Reduction</b>		
WR-1.1	<p>Continue to reduce solid waste and landfill GHG emissions.</p> <ul style="list-style-type: none"> <li>Recycled Materials: Does the project utilize building materials and furnishings with at least 50% (pre- or post-consumer) recycled content or products which are designed for reuse? At a minimum, projects must show at least 10% of the material by cost meets the recycled content requirement. Please submit the plan for review.</li> </ul>	<p><b>Not Applicable.</b> The Project would only reorient and expand the existing driving range and develop a new miniature golf course. The Project does not include construction that would require use of recycled content. Therefore, this measure would not be applicable.</p>
WR-3.1	<p>Implement a city-wide composting program to limit the amount of organic material entering landfills.</p> <ul style="list-style-type: none"> <li>On-Site Composting: Does the project include an area specifically designated for on-site composting? Please include these specifications on the project plans.</li> </ul>	<p><b>Consistent.</b> The Rose Bowl Stadium is currently recovering and processing its food waste from Brookside Clubhouse. Implementation of the Project would continue compost all of the food waste it recovers on a weekly basis. The food waste would contribute to the production of compost by the Rose Bowl Stadium for use on landscaping onsite. The composting footprint for Rose Bowl Stadium is approximately 18 feet by 7 feet or approximately 126 square feet and is located towards the northeast side of the yard along the fence line. The composting system also has incorporated solar panels to power a blower that is needed to maintain proper aeration and biological conditions throughout the processing period.</p>
<b>Urban Greening</b>		
UG-1.1	<p>Continue to preserve, enhance, and acquire additional green space throughout Pasadena to improve carbon sequestration, reduce the urban heat-island effect, and increase opportunities for active recreation.</p> <ul style="list-style-type: none"> <li>Greenspace: Does the project include at least 500 sq. ft. of public use greenspace (landscaped yards, parklets, rooftop garden, etc.)? At a minimum, 50% of the required greenspace must include softscape landscaping (e.g., trees, plants, grass, etc.).</li> </ul>	<p><b>Consistent.</b> The Project Site is currently greenspace with trees and grass. While the layout slightly changes upon implementation, the majority of the area remains greenspace. There is roughly 50,000 sq. ft. of space that would become artificial turf, plants and trees for miniature golf. It should be noted that the Brookside Golf Courses have been asked to reduce irrigated turf due to drought conditions. The total scale of the property is over 8 million sq. ft. of greenspace.</p>
UG-2.1	<p>Continue to protect existing trees and plant new ones to improve and ensure viability of Pasadena's urban forest.</p> <ul style="list-style-type: none"> <li>Trees: Does the project result in a net gain of trees? Please include these specifications on the project plans.</li> </ul>	<p><b>Consistent.</b> Any trees removed are to be replaced with approved native species by the City of Pasadena in other locations on the property.</p>

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## 3.9 HAZARDS AND HAZARDOUS MATERIALS

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:</b>				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			<b>X</b>	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			<b>X</b>	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				<b>X</b>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				<b>X</b>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				<b>X</b>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				<b>X</b>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?			<b>X</b>	

### Discussion

#### Would the Project:

- a) **Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

**Less Than Significant Impact.** Construction of the Project could potentially involve the use and disposal of hazardous materials, including fuels, lubricants, adhesives, sealers, fertilizers, pesticides, herbicides, and other materials commonly used in construction and maintenance of golf courses and related practice facilities. However, all chemical applications would be transported, handled, and disposed of in accordance with all applicable federal, state, and local laws and regulations pertaining to the management and use of hazardous materials. There would be no change in the operational routine use of these materials. Thus, the use of these materials for their intended purpose would not pose a significant risk to the public or environment. Therefore, impacts related to the routine transport, use, or disposal of hazardous materials would be less than significant.



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**b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?**

**Less Than Significant Impact.** As described above, construction of the Project could potentially involve the use and disposal of hazardous materials commonly used in construction and maintenance of golf courses and related practice facilities. However, all chemical applications would be transported, handled, and disposed of in accordance with all applicable federal, state, and local laws and regulations pertaining to the management and use of hazardous materials. Potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Thus, the use of these materials for their intended purpose would not pose a significant risk to the public or environment.

In the event of a reasonably foreseeable upset and accident regarding the release of hazardous materials, procedures and policies would be followed to remove the materials in a safe and timely manner. The State of California Office of Emergency Services provides a Hazardous Material Incident Contingency Plan, which outlines the procedures and responsibilities of agencies and private organizations concerning hazardous materials emergencies (Cal OES 1991). Additionally, the City of Pasadena requires all businesses to submit a Hazardous Materials Business Plan which includes an inventory of hazardous materials, a site map, an emergency plan, and training program for employees to reduce potential risks of accidental release of hazardous materials (City of Pasadena Fire Department 2013). Implementation of the Project would follow the appropriate procedures and policies mentioned above, and other applicable federal and state regulations. Therefore, the potential for hazardous materials impacts through reasonably foreseeable upset and accident conditions to occur during construction or operation of the Project would be less than significant.

**c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

**No Impact.** The Project is not located within one-quarter mile of an existing or proposed school. The nearest schools to the Projects Site are Chandler Middle School, which is approximately 0.47 mile southeast of the Project Site; Cleveland Elementary School, which is approximately 0.5 mile east of the site; and Roosevelt Elementary School, which is approximately 1.15 mile south of the site. Surficial grading would be required over the Project Site and all soils would be balanced onsite within limited need for hauling/truck trips passing schools. Project construction would not involve the handling or transportation of significant amounts of hazardous materials, and any such use would be subject to applicable federal, state, and local health and safety regulations. Therefore, no impacts would occur.

**d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?**

**No Impact.** According to the State Water Resources Control Board's (SWRCB) GeoTracker, the Project Site is not located on or within 0.5 mile of a hazardous materials site (SWRCB 2021). Additionally, according to the Department of Toxic Substance Control's (DTSC) EnviroStor, the Project Site is not located on or within 0.5 mile of a toxic substance site (DTSC 2021). Thus, the Project Site is not included on a list of hazardous

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materials sites compiled pursuant to Government Code Section 65962.5, and would not create a significant hazard to the public or the environment. Therefore, no impacts would occur.

- e) **For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?**

**No Impact.** The Project Site is not located within an airport land use plan or within two miles of a public use airport. The nearest public use airport is the San Gabriel Valley Airport located in the City of El Monte, approximately 9 miles to the southeast (Los Angeles County Department of Public Works 2020). Therefore, no impacts would occur.

- f) **Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

**No Impact.** The City of Pasadena maintains a citywide Emergency Operations Plan (EOP) which goes into effect at the onset of a major disaster (e.g., a major earthquake). The Fire Marshall maintains the disaster plan. In case of a disaster, the Fire Marshall is responsible for implementing the plan, and the Pasadena Police Department devises evacuation routes based on the specific circumstance of the emergency (City of Pasadena 2011). According to the City's General Plan Safety Element, the Project Site is located within a dam inundation zone (City of Pasadena 2002). The Devil's Gate Reservoir is located 1.4 miles north of the Project Site and could cause catastrophic damage to the Arroyo Seco, the Project Site, and the Rose Bowl. Although the City's EOP does not currently provide specific evacuation routes in the case of a dam failure, Chapter 2, Operations Section, identifies different agency responsibilities and the coordination and operations needed to protect life and property (City of Pasadena 2011). No changes to access or overall uses of the area would occur with the Project. Construction and operation of the Project would follow the appropriate local procedures and policies, and other applicable federal and state regulations regarding emergency response, and would not interfere with any adopted emergency response or evacuation plan. Therefore, no impacts would occur.

- g) **Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?**

**Less Than Significant Impact.** The Project Site is not located within a state or local Fire Hazard Severity Zone (FHSZ); however, a Local Responsibility Area (LRA) Very High FHSZ is located approximately 0.10 mile west of the Project Site, within the residential neighborhoods located along West Drive.

The Project Site consists of a regularly maintained landscaped golf course with no overgrown vegetation that would place the Project Site at risk of wildfire, and there would be no physical changes to the Project Site or surrounding area as a part of the Project that would put the area at a greater risk for wildland fires. Given the Project Site's proximity to known a Very High FHSZ, the Project would be subject to Section 325.2.1 of the Los Angeles County Fire Code for properties adjoining land covered with flammable growth, which requires clearing and fuel modifications around and near properties with high fire risk (County of Los Angeles 2021). Continued compliance with these guidelines reduces the movement of a potential fire to the Project Site. Therefore, risk of exposure of people or structures to wildfires would be less than significant.

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#### 3.10 HYDROLOGY AND WATER QUALITY

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>X. HYDROLOGY AND WATER QUALITY. Would the project:</b>				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			<b>X</b>	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			<b>X</b>	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in a substantial erosion or siltation on- or off-site;			<b>X</b>	
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;			<b>X</b>	
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or			<b>X</b>	
iv) impede or redirect flood flows?			<b>X</b>	
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				<b>X</b>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			<b>X</b>	

#### Discussion

##### Would the Project:

- a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

**Less Than Significant Impact.** Section 303 of the federal Clean Water Act (CWA) requires states to develop water quality standards to protect the beneficial uses of receiving waters. In accordance with California's Porter-Cologne Water Quality Control Act, the Regional Water Quality Control Boards (RWQCBs) of the State Water Resources Control Board (SWRCB) are required to develop water quality objectives that ensure their region meets the requirements of Section 303 of the Clean Water Act.

The City of Pasadena is located in the greater Los Angeles River watershed and is within the jurisdiction of the Los Angeles RWQCB. The Los Angeles RWQCB adopted water quality objectives in its Stormwater Quality Management Plan (SQMP), which is designed to ensure stormwater discharge achieves compliance

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with receiving water limitations. Compliance with the SQMP is ensured by Section 402 of the Clean Water Act, which is known as the National Pollution Discharge Elimination System (NPDES). Under this section, municipalities are required to obtain permits for water pollution generated by stormwater in their jurisdiction, known as Municipal Separate Storm Sewer Systems (MS4) permits. Under this MS4 Permit, each permitted municipality is required to comply with SQMP requirements.

In addition, as required by the MS4 permit, the City of Pasadena has adopted the Stormwater Management and Discharge Control Ordinance (Chapter 8.7 of the Pasadena Municipal Code). Chapter 8.70.097 of this ordinance requires implementation of a Standard Urban Stormwater Mitigation Plan (SUSMP) ordinance to ensure new developments within the City comply with SQMP. The Stormwater Management and Discharge Control Ordinance requires most new developments to submit a plan to the City that demonstrates how a project would comply with the City's SUSMP (City of Pasadena, 2015). Additionally, Chapter 8.70.095 includes required BMPs that would apply to construction of all projects requiring a grading or building permit, including (City of Pasadena 2021):

- Sediment and construction waste from construction sites and parking areas shall not leave the site.
- Between October 15th and April 15th, any sediments or other materials which are tracked off the site shall be removed the same day as they are tracked off the site. A sediment barrier shall be installed on land exceeding 15 percent slope in accord with Chapter 14.05 of this code, and where determined necessary by the building official.
- Excavated soil shall be located on the site in a manner that eliminates the possibility of sediments running into the street or adjoining properties. Between October 15th and April 15th, soil piles shall be covered until the soil is either used or removed.
- No washing of construction or other industrial vehicles shall be allowed adjacent to a construction site. No runoff from washing vehicles on a construction site is allowed to leave the site.

The Project would result in physical changes to the Project Site that consist of reorientation and expansion the existing driving range, construction of a new miniature golf course at the Brookside Golf Course, modification to Hole 10 of the C.W. Koiner Course and shortening of Holes 6 and 7 of the E.O. Nay Course. 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. Although Project construction would require some grading, 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.

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Additionally, a General Permit for Discharges of Storm Water Associated with Construction Activity (General Permit) would be required prior to any ground disturbing activities because the construction area exceeds one acre. A SWPPP would be prepared and submitted to the City for approval, which would include identification of Project-specific BMPs that would be designed to avoid/reduce potential effects of soil erosion or siltation both on- and off-site (see Table 8 in Section VII, *Geology and Soils*, above) and ensure compliance with water quality standards. Construction of the Project would also comply with the required BMPs listed above and in Chapter 8.70.095 of the PMC including restrictions related to the protection of natural water courses and containment and notification of spills. Operation of the Project would result in no waste discharge and would be same as current golf course operations. Therefore, impacts would be less than significant.

**b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?**

**Less Than Significant Impact.** The Project Site is located within an unconfined groundwater aquifer called the Raymond Basin. The Raymond Basin is approximately 40 square miles in area and underlies much of the City of Pasadena. It is bounded to the north by the San Gabriel Mountains, to the west by the drainage divide at Pickens Canyon Wash, to the southwest by the San Rafael Hills, to the south by the Raymond Fault, and to the east by the San Gabriel Valley (Los Angeles County Waterworks District 2021). Water to the Project Site is supplied by the Pasadena Department of Water and Power (PWP). PWP water supply consists of surface water purchased from Metropolitan Water District of Southern California (MWD) and local groundwater from the Raymond Basin. PWP has 7 wells that tap into the basin at depths of 300-500 feet, drawing out 13 million gallons of groundwater or more per day, on average (Pasadena Department of Water and Power 2021).

The Project does not include any features that would directly require groundwater uses. Similar to existing conditions, the Project Site would remain mostly as landscaped pervious surfaces (turf) and would not interfere with recharge of the Raymond Basin. Although the Project would result require some water usage during construction, water consumption for irrigation as a result of the Project would be similar to current operating conditions. Therefore, impacts would be less than significant.

**c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:**

**i) Result in substantial erosion or siltation on- or off-site;**

**Less Than Significant Impact.** Construction of the Project would include grading and tree removal and relocation. There would be no direct or indirect modifications or activities within the adjacent Arroyo Seco channel, and this drainage pattern would not be altered. The Project would be consistent with the existing topography with all soils balanced onsite and would adhere to the City's Municipal Code Grading Standards to reduce the potential for erosion or siltation damage within the golf course and the Project Site.

The entire property is underlain by Holocene Alluvium, which consists of gravel, sand, and silt. These soils are somewhat excessively drained and have little to no runoff potential. Implementation of BMPs

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as required by the City's MS4 Permit and Project-specific SWPPP would ensure that impacts from construction-related activities would not result in substantial erosion or siltation on- or off-site. Additionally, similar to current conditions, turf on the Project Site would reduce the potential for substantial on- or off-site erosion or siltation. Therefore, impacts would be less than significant.

**ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;**

**Less Than Significant Impact.** According to the Federal Emergency Management Agency (FEMA), the Project Site is not located within a 100-year floodplain (FEMA 2008). As described above, the soils underlying the Project Site consist of gravel, sand, and silt, which are typically well-drained and have little to no run-off potential. Construction of the Project would require some grading; however, the Project would be consistent with the existing topography of the Brookside Golf Course with all soils balanced onsite. During construction, standard BMPs identified within the City's Municipal Code Grading Standards and Project-specific SWPPP would be incorporated to reduce potential flooding impacts. Following construction, all the turf would be replaced on the driving range. The miniature golf course would have similar landscaping and would also include hardscaped and decorative features. 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, impacts would be less than significant.

**iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or**

**Less Than Significant Impact.** The Project consists of reorienting and expanding the existing driving range and constructing a new miniature golf course, within a 9-acre portion of the existing Brookside Golf Course. Stormwater collected during construction and operation of the Project would continue to discharge into municipal storm drains, and no new impervious surfaces would be introduced that would have the potential to exceed current stormwater drainage capacity. Thus, the Project would not alter the existing drainage pattern in a manner which would create or contribute runoff water which would exceed existing stormwater drainage capacity. Therefore, impacts would be less than significant.

**iv) Impede or redirect flood flows?**

**Less Than Significant Impact.** According to FEMA, the Project Site is not located within a flood zone (FEMA 2008). The Arroyo Seco channel is located adjacent to the western edge of the Project Site, and serves as western Pasadena's main storm drainage channel and a tributary to the Los Angeles River. Fencing around the existing driving range, vegetation, and topography currently separate the Arroyo Seco from the golf course, and construction and operational activities under the Project would not impede or redirect flows within this feature. The proposed grading and drainage changes would be in compliance with the City's Municipal Code Grading Standards.

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Prior to any ground disturbing activities, a SWPPP would be prepared and submitted to the City for approval, which would include identification of Project-specific BMPs that would be designed to avoid/reduce potential effects of on and offsite flooding. Thus, construction and operation of the Project would not alter the existing drainage pattern in a manner which would impede or redirect flood flows. Therefore, impacts would be less than significant.

**d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?**

**No Impact.** The Project Site is not located within a flood zone (FEMA 2008). Additionally, the City of Pasadena is not located near any large bodies of water or the Pacific Ocean, which is located approximately 22 miles from the Project Site. According to the CDOC, the Project Site is not located within a tsunami hazard area (CDOC 2019). A seiche is defined as a standing wave oscillating in a body of water (NOAA 2021). As described above, the Project Site is not located near or adjacent to any large bodies of water; thus, it is not located within a seiche zone.

Significant inundation by seiches, tsunami, or mudflow on the Project Site would not be expected to occur and development of the Project would not risk the release of pollutants. Therefore, no impacts would occur.

**e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?**

**Less Than Significant Impact.** The California Department of Water Resources (DWR) is required to prioritize and update California's groundwater basins in accordance with the requirements of Sustainable Groundwater Management Act (SGMA) and related laws. SGMA requires that groundwater resources be managed sustainably for long-term reliability for current and future beneficial uses. SGMA applies to all California groundwater basins and requires that high- and medium-priority groundwater basins form Groundwater Sustainability Agencies (GSAs) (CDWR 2021). DWR is required to prioritize California's 517 groundwater basins and sub-basins as either high, medium, low, or very low. Raymond Basin's adjudication in 1944 established a management that utilizes a fixed safe-yield operation. As a result, the Raymond Basin was determined by DWR to be "Very Low" priority and is therefore not subject to the requirements to form a Groundwater Sustainability Agency to develop a Groundwater Sustainability Plan.

The Water Quality Control Plan for the Central Coastal Basin (Basin Plan) is the Los Angeles RWQCB's water quality control planning document for the Los Angeles Region, which includes the City of Pasadena. The Basin Plan: (i) identifies beneficial uses for surface and groundwater, (ii) includes the narrative and numerical water quality objectives that must be attained or maintained to protect the designated beneficial uses and conform to the state's anti-degradation policy, and (iii) describes implementation programs and other actions that are necessary to achieve the water quality objectives established in the Basin Plan (LARWQCB 2020).

The Project does not include any facilities or land uses that could generate pollutants that could result in water quality impacts. Operational long-term maintenance would be the same as the existing condition. Compliance with the City's SUSMP would protect and enhance water quality of watercourses, water bodies, and wetlands in a manner pursuant to and consistent with the federal Clean Water Act, and pursuant to the City's NPDES MS4 Permit. Restrictions in the Stormwater Management and Discharge Control Ordinance, which requires

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implementation of a SUSMP, are applicable to both construction activities and operations. Additionally, compliance with the General Permit issued by the SWRCB would require implementation of BMPs during construction to address the potential for pollutants from entering the Arroyo Seco. The Project would not to violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Therefore, impacts would be less than significant.



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#### 3.11 LAND USE AND PLANNING

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XI. LAND USE AND PLANNING. Would the project:</b>				
a) Physically divide an established community?				<b>X</b>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			<b>X</b>	

#### Discussion

##### Would the Project:

##### a) Physically divide an established community?

**No Impact.** The Project Site is located entirely within the existing Brookside Golf Course, which does not contain any residential uses. The Project would include reorientation and expansion of the existing driving range to face north rather than west, and development of a new miniature golf course directly west of the driving range. The Project Site is located within lands designated as Open Space by Pasadena General Plan Land Use Element, primarily surrounded by land uses designated as Low Density Residential (0-6 DU/Acre)(City of Pasadena 2016). Implementation of the Project would not require the change of any land use designations within or adjacent to the Project Site and would not result in division of established communities and neighborhoods that surround the Central Arroyo. Therefore, no impacts would occur.

##### b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

**Less than Significant Impact.** 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, 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. 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.

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Section 4.9 of the Central Arroyo Master Plan identifies the four entities that maintain the Central Arroyo (City of Pasadena Parks and Natural Resources Division, RBOC, Rose Bowl Aquatics Center, and the County of Los Angeles) and recommends coordination of activities and intensity of activities to ensure the facilities are not damaged by overuse. The Project would be consistent with these recommendations.

Section 3.2, “Public Structures,” of the Arroyo Seco Design Guidelines (City of Pasadena 2003) contains policies that apply to architectural design concepts and lighting. The Project would be required to be “of a scale and character appropriate to the Arroyo Seco and their location shall be environmentally sensitive and integrated to the site.” Section 5.5, “Recreational Courses and Ranges” contains policies specific to golf course improvements and requires all improvements be made under the regulation and industry standard for the facility. The Design Review process required by the Pasadena Municipal Code as described above in Section 1.5.3, *Project Design*, would ensure consistency with the Design Guidelines. Therefore, impacts would be less than significant.

### 3. Environmental Analysis

#### 3.12 MINERAL RESOURCES

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XII. MINERAL RESOURCES. Would the project:</b>				
a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?				<b>X</b>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				<b>X</b>

#### Discussion

##### Would the Project:

- a) **Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**

**No Impact.** The Project Site is located in an area classified as mineral resource zone (MRZ) MRZ-2, which are areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood exists for the presence (CDOC 1994). However, construction activities would require surficial grading and minimal excavation over the Project Site. Additionally, mining is not an allowable use in the City of Pasadena per the City's zoning code. Thus, the Project would not directly or indirectly result in the loss of a known mineral resource. Therefore, no impacts would occur.

- b) **Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?**

**No Impact.** As described above, construction activities would require surficial grading and minimal excavation over the Project Site; thus, the Project would not directly or indirectly cause a loss of locally important mineral resource. Therefore, no impact would occur.

### 3. Environmental Analysis

#### 3.13 NOISE

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XIII. NOISE. Would the project result in:</b>				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			<b>X</b>	
b) Generation of excessive groundborne vibration or groundborne noise levels?			<b>X</b>	
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				<b>X</b>

#### Discussion

##### *Noise Fundamentals*

Noise is unwanted sound, known to have several adverse effects on people, including hearing loss, speech and sleep interference, physiological responses, and annoyance. Based on these known adverse effects of noise, the federal, state, and city governments have established criteria to protect public health and safety and to prevent the disruption of certain human activities, such as classroom instruction, communication, or sleep. Appendix E provides the fundamentals of noise and vibration, additional local regulatory background information, and the construction and traffic noise modeling data for the Project.

##### *Environmental Setting*

The noise environment in the vicinity of the Project Site is primarily influenced by existing recreational activities within the Central Arroyo as well as traffic noise from Rosemont Avenue, West Drive, and to a lesser degree, Interstate 210 (I-210). The City of Pasadena's revised Noise Element has existing and future traffic noise contours. The future noise contours are based on the year 2015. Based on the Noise Element future noise contours, the Project Site is entirely within the 60 dBA CNEL noise contour. Short-term ambient noise measurements were also conducted in the Project's immediate vicinity and results are discussed below.

##### *Sensitive Receptors*

Certain land uses are particularly sensitive to noise and vibration. These uses include residences, schools, hospital facilities, houses of worship, and open space/recreation areas where quiet environments are necessary for the enjoyment, public health, and safety of the community. The Project is north of the Rose Bowl Stadium and surrounded by residential neighborhoods. The nearest sensitive receptors are the single-family homes to the east and west approximately 530 feet and 850 feet, respectively, as measured from the edge of the Project boundary to the receptor property line.

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#### *Ambient Noise Measurements*

To determine noise levels at the nearest residential receptors, ambient noise monitoring was conducted at four locations on Wednesday, April 28, 2021. The primary noise source during measurements observed was roadway traffic. Secondary noises such as birds chirping and pedestrian activity also contributed to the overall noise environment. Meteorological conditions during the measurement period were favorable for outdoor sound measurements and were noted to be representative of the typical conditions for the season. Conditions included mostly clear skies with daytime temperatures of up to 81 degrees Fahrenheit (°F) and average wind speeds of 2 miles per hour (mph). The sound level meter was equipped with a windscreen during measurements.

The sound level meter used for noise monitoring (Larson Davis model LxT) satisfies the American National Standards Institute (ANSI) standard for Type 1 instrumentation. The sound level meter was set to “slow” response and “A” weighting (dBA). The meter was calibrated prior to the monitoring period. All measurements were at least 5 feet above the ground and away from reflective surfaces. Noise measurement observations are described below, monitoring results are summarized in **Table 11, Short-Term Noise Measurements Summary (dBA)**, and locations are shown in **Figure 8, Approximate Noise Monitoring Locations**.

- **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. A 15-minute noise measurement was conducted beginning at 5:20 pm. Noise levels generated by traffic generally ranged between 62 dBA to 68 dBA. Other noise sources included pedestrians walking and talking nearby. Noise levels from pedestrians were below 50 dBA.
- **Short-Term Location 2 (ST-2)** was at the intersection of Parkview Avenue and Afton Street, overlooking the Brookside Golf Course. A 15-minute noise measurement was conducted beginning at 4:42 pm. Noise levels generated by traffic generally ranged between 51 dBA to 52dBA. Other noise sources included pedestrians walking and talking.
- **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. A 15-minute noise measurement was conducted beginning at 5:38 pm. Noise levels from roadway traffic generally ranged between 61 dBA and 73 dBA. Other noise sources included pedestrians walking and talking nearby.
- **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. A 15-minute noise measurement was conducted beginning at 6:31 pm. Noise levels from roadway traffic generally ranged between 58 dBA and 68 dBA except for a motorcycle which was observed to generate noise levels of up to 83 dBA. Other noise sources included pedestrians walking and talking nearby.

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**Table 11 Short-Term Noise Measurements Summary (dBA)**

Monitoring Location	Description	15-minute Noise Level, dBA						
		L <sub>eq</sub>	L <sub>max</sub>	L <sub>min</sub>	L <sub>2</sub>	L <sub>8</sub>	L <sub>25</sub>	L <sub>50</sub>
ST-1	West Drive, south of Salvia Canyon Road 5:20 pm, 4/28/2021	61.2	75.5	40.1	70.6	67.0	59.5	52.0
ST-2	Near Parkview Avenue and Afton Street 4:42 pm, 4/28/2021	50.9	66.7	40.8	58.6	53.5	50.5	47.7
ST-3	Rosemont Avenue, north of Rose Bowl Drive 5:38 pm, 4/28/2021	62.1	77.1	47.0	71.7	67.9	59.7	52.5
ST-4	Rosemont Avenue, south of Rose Bowl Drive 6:31 pm, 4/28/2021	62.4	87.0	44	68.2	64.4	58.9	54.4

#### *Applicable Standards*

##### ***State Regulations***

The State of California regulates freeway noise, sets standards for sound transmission, provides occupational noise control criteria, identifies noise standards, and provides guidance for local land use compatibility. State law requires that each county and city adopt a general plan that includes a noise element prepared according to guidelines adopted by the Governor’s Office of Planning and Research. According to these guidelines, the purpose of the noise element is to “limit the exposure of the community to excessive noise levels.” However, as a result of the Supreme Court decision regarding the assessment of the environment’s impacts on projects (California Building Industry Association (CBIA) v. Bay Area Air Quality Management District (BAAQMD), 62 Cal. 4th 369 (No. S 213478), issued December 17, 2015), it is generally no longer the purview of the CEQA process to evaluate the impact of existing environmental conditions on any given project. As a result, though noise from existing sources is taken into account as part of the baseline, the direct effects of exterior noise from nearby noise sources relative to land use compatibility of a future project is typically no longer a required topic for impact evaluation under CEQA. Generally, no determination of significance is required with the exception of certain school projects, projects affected by airport noise, and projects that would exacerbate existing conditions (i.e., projects that would have a significant operational impact).

##### ***City of Pasadena General Plan Noise Element***

The Noise Element of the City of Pasadena General Plan establishes CNEL guidelines for land use compatibility and includes a number of objectives and policies for land use planning purposes. Applicable objectives and policies for the General Plan are summarized below. The General Plan’s Noise and Land Use Compatibility Table can be found in Appendix E. The City also has regulations to control unnecessary, excessive, and annoying noise, as set forth in the PMC, Title 9, Chapter 9.36. These regulations are described further below.

- **Objective 5.** The City will balance the effects of noise associated with events held in the Central Arroyo with the benefits of events occurring at Central Arroyo facilities.



Figure 8 - Approximate Noise Monitoring Locations



- Project Boundary
- ST-X Approximate Short-Term Noise Monitoring Locations (4)

0 550  
Scale (Feet)



Source: Nearmap, 2021



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- **Policy 5a.** The City will continue to seek improvements to noise generating equipment and activities at the Rose Bowl, Aquatics Center, Jackie Robinson Field, Brookside Park, Area H, and the future Kids Space Museum in order to minimize the effects of noise on nearby residents.
- **Policy 5b.** The City will continue to coordinate events in the Central Arroyo to minimize noise to the degree feasible.

#### *City of Pasadena Municipal Code*

Chapter 9.36, Noise Restrictions Ordinance, establishes acceptable ambient noise levels to regulate intrusive noises (i.e., stationary noise) within specific land use zones and provides procedures and criteria for the measurement of the sound level of noise sources. These procedures recognize and account for differences in the perceived level of different types of noise and/or noise sources. Under Section 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, 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 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 5 minutes or less in any 1-hour period,
- A 20 dBA allowance (total of 25 dBA above the ambient) for noise sources occurring 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 a.m. to 11:00 p.m.) periods only. Furthermore, the Noise Ordinance provides a reduction of 5 dBA for audible tone noise or repeated impulsive noises.

#### *Construction Projects*

Under Section 9336.070, Construction Projects, the following is restrictions are applicable to the Project:

- No person shall perform any construction or repair work on buildings, structures or projects within a residential district or within a radius of 500 feet therefrom in such a manner that a reasonable person of normal sensitiveness residing in the area is caused discomfort or annoyance at any time other than:
  - From 7:00 a.m. to 7:00 p.m. Monday through Friday;
  - From 8:00 a.m. to 5:00 p.m. on Saturday;

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Performance of construction or repair work is prohibited on Sundays and holidays.

- Prohibited construction activities on Sundays and holidays shall not apply under either of the following conditions:
  - The construction is actually performed by an individual who is the owner or lessor of the premises and who is assisted by not more than two individuals;
  - The person performing the construction shall have provided the building official with a petition which indicates the consent of 65 percent of the households residing within 500 feet of the construction site and the unanimous consent of the households adjacent to the construction site. Said petition shall be on a form promulgated by said building official and shall be accompanied by a fee, the amount of which shall be established by resolution by the city council.
- The prohibitions shall not apply to the performance of emergency work as defined in Section 9.36.030(E) of the Municipal Code.
- Holidays are New Year's Day, Martin Luther King Jr. Day, Lincoln's Birthday, Washington's Birthday, Memorial Day, Independence Day, Labor Day, Veterans Day, Thanksgiving Day, Day after Thanksgiving, and Christmas.

#### *Construction Equipment*

Under Section 9.36.080, Construction Equipment, the Municipal Code states that it is unlawful for any person to operate any powered construction equipment if the operation of such equipment emits noise at a level in excess of 85 dBA when measured within a radius of 100 feet from such equipment.

The following are exempt from the noise chapter under Section 9.36.170, Exemptions:

The Noise Restrictions Chapter of the Municipal Code is not intended to regulate construction or maintenance and repair activities conducted by public agencies or their contractors necessitated by emergency conditions or deemed necessary by the city to serve the best interests of the public and to protect the public health, safety and welfare. These operations may include, but are not limited to, street sweeping, debris and limb removal, removal of downed wires, restoring electrical service, repairing traffic lights, unplugging sewers, vacuuming catch basins, repairing water hydrants and mains, gas lines, oil lines, storm drains, roads, sidewalks, etc.

The City currently does not have any adopted standards, guidelines, or thresholds relative to ground-borne vibration. As such, the Federal Transit Administration (FTA) criterion for vibration damage to non-engineered timber and masonry buildings (applicable to residential structures) of 0.2 inches per second (in/sec) peak particle velocity (PPV) is used to determine impact significance.

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Would the project result in:

- a) **Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

**Less Than Significant Impact.**

#### *Construction Noise*

##### *Construction Vehicles*

The transport of workers and materials to and from the construction site could incrementally increase noise levels along access road or roads. Individual construction vehicle pass-by trips may create momentary noise levels of up to approximately 85 dBA (Lmax) at 50 feet from the vehicle, but these occurrences would generally be infrequent and short lived.

Construction generates temporary trips from workers and vendors vehicles. Based on air quality CalEEMod modeling, Project construction is anticipated to generate a maximum of 24 worker and vendor daily trips during rough and fine grading and no haul truck trips are anticipated. The addition of 24 worker vendor trips would result in less than 0.5 dBA CNEL increase when compared to the existing 2,806 daily trips along the primary access road, Rosemont Avenue.<sup>5</sup> Therefore, impacts would be less than significant.

##### *Construction Equipment*

Noise generated by on-site construction equipment is dependent on the type of equipment used, its location relative to sensitive receptors, and the timing and duration of noise-generating activities. Each phase of construction involves different kinds of equipment and has distinct noise characteristics. The basis for noise levels from construction activities are typically the loudest piece or pieces of equipment. The dominant equipment noise source is typically the engine, although work-piece noise (such as dropping of materials) can also be noticeable.

The noise produced at each construction phase is determined by combining the Leq contributions from each piece of equipment used at a given time, while accounting for the ongoing time variations of noise emissions (commonly referred to as the usage factor). 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. Noise attenuation due to distance, the number and type of equipment, and the load and power requirements to accomplish tasks at each construction phase would result in different noise levels from construction activities at a given receptor. 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 Project Site with different loads and power requirements. Noise levels from Project-related construction activities were calculated from the simultaneous use of the

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<sup>5</sup> Pasadena Department of Transportation, May 2021. *Transportation Impact Analysis for 1133 Rosemont Avenue*.

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three loudest construction equipment during each phase. For overlapping phases, the simultaneous use of the five loudest pieces of construction equipment was modeled. Each phase was modeled at spatially averaged distances (i.e., from the approximate acoustical center of each activity phase) to the property line of the nearest receptors to best represent potential average construction-related noise levels at the various sensitive receptors per phase.

Anticipated construction phasing activity information was used to estimate construction noise using the Federal Highway Administration (FHWA) Roadway Construction Noise Model (RCNM). Construction equipment and phasing for the driving range and the mini golf course were modeled, which assumes construction of the two Project components would not overlap.

The nearest sensitive receptors to both the driving range and miniature golf construction areas are existing residences to the west across West Drive (ST-1). **Table 12, Driving Range Construction Noise, Leq dBA**, highlights the noise levels generated from the driving range construction at 100 feet (per the Municipal Code requirement) and at the nearest receptors. As shown in Table 11, construction noise associated with the driving range would not exceed 85 dBA at 100 feet. Therefore, impacts would be less than significant. **Table 13, Miniature Golf Construction Noise, Leq dBA**, highlights the noise levels generated from the miniature golf construction at 100 feet (per the Municipal Code requirement) and at the nearest receptors. As shown, construction noise associated with the miniature golf course would not exceed 85 dBA at 100 feet. Therefore, impacts would be less than significant. RCNM modeling worksheets for both the driving range and mini golf course are included in Appendix E.

**Table 12 Driving Range Construction Noise, Leq dBA**

Activity Phases	RCNM Reference Noise Level	Noise Levels at 100 feet per Municipal Code Requirement	Residences to the East	Residences to the West
<i>Distance in feet</i>	50	100	1000	900
Demolition	85	79	59	59
<i>Distance in feet</i>	50	100	630	1,550
Site Preparation	84	78	58	57
Grading (Driving Range Area)	85	79	59	58
Trenching	82	76	56	55
<i>Distance in feet</i>	50	100	660	870
Fencing	82	76	60	57
Overlapping Fencing and Trenching (Driving Range)	84	78	62	60
<i>Distance in feet</i>	50	100	1,050	1,050
Paving (Golf Cart Path)	84	78	58	58
<b>Exceeds 85 dBA Municipal Code Standard at 100 feet?</b>		<b>No</b>		

**Notes:**

Calculations performed with the FHWA RCNM software are included in Appendix E Distances were measured using Google Earth 2021 from the approximate acoustical center of the construction site.

Decibels rounded to the nearest whole number.

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**Table 13 Mini Golf Construction Noise,  $L_{eq}$  dBA**

Activity Phases	RCNM Reference Noise Level	Noise Levels at 100 feet per Municipal Code Requirement	Residences to the East	Residences to the West
Distance in feet	50	100	1000	900
Demolition	85	79	59	59
Distance in feet	50	100	1200	900
Site Preparation	84	78	56	59
Grading (Mini Golf Course Area)	83	77	55	58
Trenching	82	76	54	57
<b>Exceeds 85 dBA Municipal Code Standard at 100 feet?</b>		<b>No</b>		

**Notes:**

Calculations performed with the FHWA RCNM software are included in Appendix E Distances were measured using Google Earth 2021 from the approximate acoustical center of the construction site.

Decibels rounded to the nearest whole number.

#### ***Stationary Noise during Operation***

The Project would expand the existing driving range by adding 40 hitting bays and providing for 36 holes of miniature golf course. The driving range expansion would involve re-orientation from east to west (existing) to south to north (proposed). 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.

#### ***Traffic Noise***

A project will normally have a significant effect on the environment related to noise if it substantially increases the ambient noise levels for adjoining areas. Most people can detect changes in sound levels of approximately 3 dBA under normal, quiet conditions, and changes of 1 to 3 dBA are detectable under quiet, controlled conditions. Changes of less than 1 dBA are usually indiscernible. A change of 5 dBA is readily discernible to most people in an exterior environment. Based on this, the following thresholds of significance similar to those recommended by the Federal Aviation Administration (FAA), are used to assess traffic noise impacts at sensitive receptor locations. A significant impact would occur if traffic noise increases would exceed:

- 1.5 dBA increase for ambient noise environments of 65 dBA CNEL and higher.
- 3 dBA increase for ambient noise environments of 60 to 64 CNEL.
- 5 dBA increase for ambient noise environments of less than 60 dBA CNEL.

The purpose of the proposed project is to realize the existing capacity of the Brookside Golf Complex by increasing memberships and returning to historically higher levels of patronage use through the expansion of

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services to a broader range of visitors including families. However, to provide a conservative analysis, and to reflect trip generation prepared by the City (see Appendix F) operational trips were assumed and modeled to calculate operational noise increases from traffic. **Table 14, Project Traffic Noise Increases, dBA CNEL**, shows the existing baseline daily volumes and project daily volumes at study roadway segments. Traffic volume increases due to the Project as calculated by the City (see Appendix F) would result in a less than 1 dBA CNEL increase. Therefore, impacts would be less than significant.

**Table 14 Project Traffic Noise Increases, dBA CNEL**

Roadway Segment	Existing Baseline ADT <sup>1</sup>	Project ADT	Existing Baseline Plus Project ADT	Traffic Noise Increase <sup>2</sup>
Washington Boulevard – Forest Avenue to Lincoln Avenue	2,806	60	2,866	<0.1
Rosemont Avenue – Prospect Terrace to Freemont Drive.	5,238	101	5,339	<0.1

Source: Pasadena Department of Transportation, May 2021. Transportation Impact Analysis for 1133 Rosemont Avenue.

Notes:

<sup>1</sup> The TIA baseline volumes were adjusted by a growth factor of 1.15.

<sup>2</sup> Traffic noise increase calculated by the logarithmic equations: dBA CNEL Increase =  $10 \cdot \log_{10}(\text{Existing Baseline Plus Project ADT} / \text{Existing Baseline ADT})$ .

#### b) Generation of excessive groundborne vibration or groundborne noise levels?

##### Less Than Significant Impact.

##### Construction Vibration

Construction can generate varying degrees of ground vibration, depending on the construction procedures and equipment. Operation of construction equipment generates vibrations that spread through the ground and diminish with distance from the source. The effect on buildings near the construction site varies depending on soil type, ground strata, and receptor-building construction. The effects from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels. Vibration from construction activities rarely reaches the levels that can damage structures.

As previously stated, the FTA sets a vibration damage criterion of 0.2 in/sec PPV for non-engineered timber and masonry buildings (residential homes). **Table 15, Vibration Levels for Typical Construction Equipment**, shows vibration levels for typical construction equipment generate up to 0.21 in/sec PPV at a distance of 25 feet. The nearest off-site structures to the Project are the single-family homes to the east and west of the Project Site approximately 580 feet and 900 feet, respectively, as measured from the edge of the Project boundary to the façade (not property line) of the residential structure. At these distances, vibration levels would not exceed the FTA criterion of 0.2 in/sec PPV. Therefore, impacts would be less than significant.

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**Table 15 Vibration Levels for Typical Construction Equipment**

Construction Activity Phase	PPV (in/sec)		
	FTA Reference Vibration Levels at 25 feet	Residential to east at 580 feet	Residential to west at 975 feet
Vibratory Roller	0.21	0.002	0.001
Clam shovel	0.202	0.002	0.001
Hoe Ram	0.089	0.001	<0.001
Large Bulldozer	0.089	0.001	<0.001
Caisson Drilling	0.089	0.001	<0.001
Loaded Trucks	0.076	0.001	<0.001
Jackhammer	0.035	<0.001	<0.001
Small Bulldozer	0.003	<0.001	<0.001

Source: Federal Transit Administration (FTA), 2018.

#### *Operational Vibration*

Operation of the Project would not include any substantial long-term vibration sources. Thus, no significant vibration effects from operation of the Project would occur. No mitigation measures are required.

- c) **For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?**

**No Impact.** The nearest public airport is San Gabriel Valley Airport in El Monte, California, approximately 9 miles southeast of the Project. The Project would not expose people working or residing in the Project area to excessive noise levels. No impact would occur.

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#### 3.14 POPULATION AND HOUSING

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XIV. POPULATION AND HOUSING. Would the project:</b>				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				<b>X</b>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				<b>X</b>

#### Discussion

##### Would the Project:

- a) **Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

**No Impact.** The Project would not induce population growth. Implementation of the Project would not involve the development of new housing or businesses within or adjacent to the Project Site. The Project Site is located within a developed urbanized area, and the reoriented driving range and new miniature golf course would not be anticipated to attract new residents to the region. The Project would be served by existing roads and other infrastructure, and no new roads, expanded utility lines, and housing that could induce population growth would be constructed or required as part of the Project. Therefore, no impacts related to population growth would occur.

- b) **Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

**No Impact.** The Project Site is located entirely within the Brookside Golf Course, which does not include any residential uses. Implementation of the Project would not require any right-of-way acquisitions from any adjacent residences or properties; thus, the Project would not displace any people or housing, and would not require construction of replacement housing. Therefore, no impact would occur.



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#### 3.15 PUBLIC SERVICES

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XV. PUBLIC SERVICES. Would the project:</b>				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?			<b>X</b>	
Police protection?			<b>X</b>	
Schools?				<b>X</b>
Parks?			<b>X</b>	
Other public facilities?				<b>X</b>

#### Discussion

- a) **Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:**

**i) Fire Protection?**

**Less Than Significant Impact.** The Pasadena Fire Department currently provides fire protection and emergency medical services to the Project Site. The nearest fire stations to the Project Site are Station No. 38, located at 1150 Linda Vista, approximately 0.5 mile west of the Project Site; and Station No. 36, located at 1140 N. Fair Oaks Avenue, approximately 1 mile east of the Project Site. Project implementation could result in a slight increase in calls for fire protection and emergency medical service. However, considering the existing firefighting resources available in and near the City and the consistent uses proposed, Project impacts on fire protection and emergency services (including response times) are not expected to occur. Additionally, in the event of an emergency at the Project Site that would require more resources than Fire Stations 36 and 38 could provide, the Pasadena Fire Department would direct resources to the Project Site from other Los Angeles County Fire Department stations nearby and, if needed, would request assistance from other nearby fire departments.

Development of the Project would be required to comply with the most current adopted fire codes, building codes, and nationally recognized fire and life safety standards, which impose design standards and requirements that seek to minimize and mitigate fire risk. Compliance with these codes and standards

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is ensured through the Pasadena Fire Department development review and building permit process. Based on the preceding, the Project would not adversely affect the Pasadena Fire Department's ability to provide adequate service and would not require new or expanded fire facilities that could result in adverse environmental impacts. Therefore, impacts would be less than significant.

#### ii) Police

**Less Than Significant Impact.** The Pasadena Police Department provides police service to the City of Pasadena including the Project Site. The nearest police station to the Project Site is located at 207 Garfield Avenue, approximately 2 miles southeast of the Project Site. Project implementation could result in a slight increase in calls for police protection service. However, considering the existing police resources available in and near the City and the consistent uses proposed, Project impacts on police services (including response times) are not expected to occur. Additionally, in the event of an emergency at the Project Site that would require more resources than the station at 207 Garfield Avenue could provide, the police department would direct resources to the Project Site from other local police/Los Angeles County Sheriff stations nearby and, if needed, would request assistance from other nearby police/sheriff departments. Thus, the Project would not adversely affect the police department's ability to provide adequate service and would not require new or expanded police facilities that could result in adverse environmental impacts. Therefore, impacts would be less than significant.

#### iii) Schools

**No Impact.** The increase in student generation and the need for new or expanded school facilities is tied to population growth. The Project does not include the development of new homes, which could increase student population and thereby, the need for additional school facilities. The Project involves the reorientation and expansion of the existing driving range and development of a new miniature golf course. Thus, Project development would not generate an increase in the student population in the area, nor result in the need for new or expanded school facilities. Therefore, no impact would occur.

#### iv) Parks

**Less Than Significant Impact.** The Project is a recreational improvement project within an existing recreational facility. The Brookside Golf Course is situated within the Central Arroyo Seco which provides for a variety of active and passive recreational opportunities. The nearest public park is the Brookside Park, which is located approximately 0.8 mile south of the Project Site. The Project is not anticipated to increase use at Brookside Park or surrounding recreational features within the Central Arroyo Seco.

Project construction would require the closure of existing driving range and a portion of the Brookside Golf Course, during the eight-month construction period. However, as shown in **Table 16, *Local Golf Courses Near the Project Site***, there are multiple private and public golf courses and driving ranges located near the Project Site, which would be able to accommodate golfers during the Project construction period. Therefore, impacts would be less than significant.

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**Table 16 Local Golf Courses Near the Project Site**

Golf Course	Address	Distance from Project Site
Annandale Golf Club	1 N San Rafael Ave, Pasadena, CA 91105	1 mile
Scholl Canyon Golf Course	3800 E Glenoaks Blvd, Glendale, CA 91206	1.5 mile
Chevy Chase County Club	3067 E Chevy Chase Dr, Glendale, CA 91206	2 miles
Altadena Golf Course	1456 E Mendocino St, Altadena, CA 91001	3 miles
La Cañada-Flintridge Country Club	5500 Godbey Dr, La Cañada Flintridge, CA 91011	3.5 miles
Arroyo Seco Golf Course	1055 Lohman Ln, South Pasadena, CA 91030	3.5 miles
Eaton Canyon Golf Course	1150 Sierra Madre Villa Ave, Pasadena, CA 91107	5 miles
Alhambra Golf Course	630 S Almansor St, Alhambra, CA 91801	6 miles

#### v) Other Public Facilities

**No Impact.** The Project would not result in impacts associated with the provision of other new or physically altered public facilities (e.g., libraries, hospitals, childcare, teen, or senior centers). Physical impacts to public services are usually associated with population growth, which increase the demand for public services and facilities. The Project would not result in population growth. Therefore, no impacts would occur.

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#### 3.16 RECREATION

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XVI. RECREATION.</b>				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			<b>X</b>	
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?			<b>X</b>	

#### Discussion

- a) **Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**

**Less Than Significant Impact.** The Project would reorient and expand the existing driving range and construct a new miniature golf course at the Brookside Golf Course. The proposed expansion of the driving range from 20 hitting bays to approximately 60 hitting bays and the addition of a 36-hole miniature golf course would reduce the E.O. Nay Course from par-70 to par-69. The expanded driving range would serve the existing demand at the Brookside Golf Course and the Project Site would continue to have a championship layout and the course reduction would be designed to improve the pace of play. The miniature golf course would serve existing users of the Brookside Golf Course and Central Arroyo recreational users. Additionally, the Project would not construct any residential units or propose any new commercial uses that could increase the residential or employee population in the area that could utilize existing recreational facilities. Therefore, the Project would not increase the use of any existing parks or recreational facilities located near or adjacent to the Project Site, including the Rose Bowl Stadium, Brookside Park, or any cycling or pedestrian trails and impacts would be less than significant.

- b) **Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

**Less Than Significant Impact.** As described above, the Project would result in orientation and expansion the existing driving range and construction of a new miniature golf course within a portion of Brookside Golf Course. Project construction would require the closure of existing driving range and a portion of the Brookside Golf Course, during the eight-month construction period. However, as shown in Table 15 above, there are multiple private and public golf courses and driving ranges located near the Project Site, which would be able to accommodate golfers during the Project construction period. Therefore, impacts would be less than significant.

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#### 3.17 TRANSPORTATION

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XVII. TRANSPORTATION. Would the project:</b>				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			<b>X</b>	
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?				<b>X</b>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				<b>X</b>
d) Result in inadequate emergency access?				<b>X</b>

#### Discussion

The purpose of the proposed project is to realize the existing capacity of the Brookside Golf Complex by increasing memberships and returning to historically higher levels of patronage use through the expansion of services to a broader range of visitors including families. However, a trip generation and transportation analysis review was conducted. Information in this discussion is based on the City of Pasadena Department of Transportation's (DOT) review of the Project, which can be found in Appendix F to this Initial Study/MND. DOT has reviewed the Project and its potential traffic generation and determined a traffic study is not required pursuant to the City's Transportation Impact Analysis Current Practice and Guidelines (TIA Guidelines). DOT determined that, because the Project would not result in additional employees or a change in the service population, there would be no significant impact to any of the City's five transportation thresholds.

#### Would the Project:

- a) **Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?**

The Mobility Element of the City's General Plan sets forth goals and policies to improve overall transportation in Pasadena. The TIA Guidelines were developed, in turn, to ensure that transportation system improvements necessary to support new development, while maintaining quality of life within the community, are identified prior to project approval and funded prior to construction (Pasadena 2015c). In determining the Project is below the threshold of requiring a traffic study, the City DOT has concluded the Project would not have a significant impact on the surrounding circulation system nor would it conflict with Mobility Element policies addressing the circulation system.

**Less Than Significant Impact.** The City has set forth policies for public transit, bicycle, and pedestrian facilities in its General Plan. Objective 2 of the Mobility Element is to "Encourage walking, biking, transit and other alternatives to motor vehicles." This objective is supported by policies including the following: "Continue

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to strengthen the marketing and promotion of non-auto transportation to residents, employees and visitors,” “Ensure that secure and convenient bicycle parking is available at destinations,” and “Provide convenient, safe and accessible transit stops” (City of Pasadena 2015b).

Project-related construction activities would generate temporary vehicle trips from construction equipment and construction crews coming to the Project Site. However, construction activities would be consistent with all other Rose Bowl construction and production delivery, and any construction vehicles entering the area would use the Mountain/Seco exit off I-210 for ingress and egress. The Project would not require road or sidewalk closures during construction, and parking for the estimated maximum of 80 construction workers required would be provided in the primary serving lots (1A and B) and would also be supplemented by additional parking in the various lots surrounding the Rose Bowl, as necessary. Construction-related traffic would be restricted to the hours of 9:00 a.m. to 9:00 p.m. to limit peak hour traffic conflict along the local street network. Thus, construction of the Project would not conflict with a program plan, ordinance or policy addressing the circulation systems.

Regarding operation, the reoriented and expanded driving range and miniature golf course would be accessed via existing adjacent parking lots and Brookside Golf Course pathways as during existing conditions. No changes to the existing circulation system, including the Rose Bowl Recreational Loop or equestrian trails would occur. The Project would be developed entirely within the Brookside Golf Course and would not impede the City’s policies with respect to mobility. Therefore, impacts would be less than significant.

**b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?**

**No Impact.** CEQA Guidelines Section 15064.3(b)(1) describes specific considerations for evaluating a project’s transportation impacts using VMT for land use projects. City’s TIA Guidelines were prepared to reflect the requirements of Senate Bill 743. As discussed above, Pasadena DOT determined a traffic study is not required for the Project, as the Project would not have a significant impact on the surrounding circulation system and would not conflict with the Mobility Element policies pertaining to circulation system. As such, the Project would not conflict with or be inconsistent with Section 15064.3(b)(1) of the State CEQA Guidelines or the City’s transportation plans and policies. There would be no impact.

**c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

**No Impact.** The Project does not result in any new roadway features or alignments or otherwise alter the geometric design of an existing roadway. No access would change during Project construction or operation. As such, the project would not increase in hazards due to a geometric design feature or incompatible use. Therefore, no impacts would occur.

**d) Result in inadequate emergency access?**

**No Impact.** The City of Pasadena maintains a citywide EOP which goes into effect at the onset of a major disaster (e.g., a major earthquake). The Fire Marshall maintains the disaster plan. In case of a disaster, the Fire

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Marshall is responsible for implementing the plan, and the Pasadena Police Department devises evacuation routes based on the specific circumstance of the emergency (City of Pasadena, 2011).

According to the City's General Plan Safety Element, the Project Site is located within a dam inundation zone (City of Pasadena, 2002). The Devil's Gate Reservoir is located 1.4 miles north of the Project Site and could cause catastrophic damage to the Arroyo Seco, specifically the Project Site and the Rose Bowl, which is located just south of the Project Site.

Although the City's EOP does not currently provide specific evacuation routes in the case of a dam failure, Chapter 2, Operations Section, identifies different agency responsibilities and the coordination and operations needed to protect life and property (City of Pasadena, 2011). However, the Rose Bowl, which is located immediately south of the Project Site, provides emergency evacuation routes which would be utilized by all public safety emergency vehicles to provide access to the entire Central Arroyo area, including the Project Site (RBOC, 2013). Additionally, the RBOC would be required to submit a Hazardous Materials Business Plan, which would include the establishment of an emergency evacuation plan (PFD, 2013).

Project construction would occur within the boundaries of the Project Site. Project construction would require the closure of existing driving range and a portion of the Brookside Golf Course; however, all other areas within the Brookside Golf Course would remain operational during construction. No road or sidewalk closures would be required. Further, the proposed haul route would not interfere with any emergency access routes mentioned within the Rose Bowl Evacuation Plan. As such, the Project would not result in inadequate emergency access. Therefore, no impacts would occur.

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#### 3.18 TRIBAL CULTURAL RESOURCES

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XVIII. TRIBAL CULTURAL RESOURCES.</b>				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or		<b>X</b>		
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.			<b>X</b>	

#### Discussion

a) **Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**

i) **Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources. Code Section 5020.1(k), or**

**Less than Significant with Mitigation Incorporated.** Assembly Bill 52 (AB 52) requires meaningful consultation with California Native American tribes on potential impacts to tribal cultural resources, as defined in PRC Section 21074. Tribal cultural resources are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either eligible or listed in the California Register of Historical Resources or local register of historical resources.

As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation. Consultation concludes when either 1): the parties agree to



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mitigation measures to avoid a significant effect on a tribal cultural resource, or 2) a party, acting in good faith and after reasonable effort, concludes mutual agreement cannot be reached.

The RBOC provided request for consultation letters to the Gabrieleño Band of Mission Indians, Kizh Nation (Kizh) and the Gabrieleño Tongva Tribe on June 11, 2021. Response and request for consultation was received by the Gabrieleño Band of Mission Indians, Kizh Nation on June 15, 2021. Consultation via phone between the RBOC and Kizh occurred on September 30, 2021, and consultation between both parties mutually closed on December 20, 2022.

As described above in Section V, *Cultural Resources*, the Project Site is within the Pasadena Arroyo Park and Recreation District (NRHP #08000579) under Criterion A in the areas of entertainment and recreation for its association with the development of Pasadena as a recreational mecca. The site has not been evaluated for listing on the California Register for tribal cultural resources.

Based on the consultation with the Kizh, there are no known tribal cultural resources within the Project Site and no tribal cultural resources listed or eligible for listing in the California Register of Historical Resources (CRHR) or other local register of historical resources. However, given the sensitivity of the area to encounter resources during ground disturbing activity as expressed by the tribe during consultation, impacts related to the potential discovery of resources that could be identified as tribal cultural resources, are considered potentially significant. Through the consultation process, the following Mitigation Measures MM-TCR-1, TCR-2, and TCR-3 would reduce impacts to less than significant.

- MM-TCR-1.** A. The RBOC and/or its contractor shall retain a Native American monitor from or approved by the Gabrieleño band of Mission Indians – Kizh Nation (Kizh or Tribe). The monitor shall be retained prior to the commencement of any ground disturbing activity at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). Ground disturbing work shall include but is not limited to demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.
- B. A copy of the executed monitoring agreement shall be provided to the lead agency prior to the earlier of the commencement of any ground-disturbing activity for the project, or the issuance of any permit necessary to commence a ground-disturbing activity.
- C. The monitor shall complete daily monitoring logs that will provide descriptions of the relevant ground disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs shall identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or “TCR”), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs shall be provided to the RBOC agency upon written request.

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D. Onsite tribal monitoring for the project shall conclude upon the latter of the following: (1) written confirmation to the Kizh from a designated project point of contact that all ground-disturbing activities and all phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the RBOC that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact TCRs.

E. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

F. The RBOC and/or its contractor shall provide the Tribe with a minimum of 30 days advance written notice of the commencement of any project ground-disturbing activity so that the Tribe has sufficient time to secure and schedule a monitor for the project.

G. The RBOC and/or its contractor shall hold at least one (1) pre-construction sensitivity/educational meeting prior to the commencement of any ground-disturbing activities, where at a senior member of the Tribe will inform and educate the project's construction and managerial crew and staff members (including any project subcontractors and consultants) about the mitigation measures and compliance obligations, as well as places of significance located on the project site (if any), the appearance of potential TCRs, and other informational and operational guidance to aid in the project's compliance with the TCR mitigation measures.

**MM-TCR-2.** A. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.

B. Health and Safety Code Section 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and all ground-disturbing activities shall immediately halt and shall remain halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe they are Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission, and Public Resources Code Section 5097.98 shall be followed.

C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).

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D. Construction activities may resume in other parts of the project site at a minimum of 200 feet away from discovered human remains and/or burial goods, if the Kizh determines in its sole discretion that resuming construction activities at that distance is acceptable and provides the project manager express consent of that determination (along with any other mitigation measures the Kizh monitor and/or archaeologist deems necessary). (CEQA Guidelines Section 15064.5(f).)

E. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. Any historic archaeological material that is not Native American in origin (non-TCR) shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes.

F. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

**MM-TCR-3.** A. If determined to be the Most Likely Descendant (“MLD”), the Koo-nas-gna Burial Policy shall be implemented. To the Tribe, the term “human remains” encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the preparation of the soil for burial, the burial of funerary objects with the deceased, and the ceremonial burning of human remains.

B. If the discovery of human remains includes four (4) or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be created.

C. The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later, as well as other items made exclusively for burial purposes or to contain human remains. Cremations shall either be removed in bulk or by means necessary to ensure complete recovery of all sacred materials.

D. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains shall be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to divert the project while keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials shall be removed.

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E. In the event preservation in place is not possible despite good faith efforts by the RBOC, before ground-disturbing activities may resume on the project site, the landowner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects. The site of reburial/repatriation shall be agreed upon by the Tribe and the RBOC and shall be protected in perpetuity.

F. Each occurrence of human remains and associated funerary objects shall be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items shall be retained and shall be reburied within six months of recovery. The site of reburial/repatriation shall be on the project site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

G. The Tribe shall work closely with the project's qualified archaeologist (see MM-CUL-2) to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be prepared and shall include (at a minimum) detailed descriptive notes and sketches. All data recovery data recovery-related forms of documentation shall be approved in advance by the Tribe. If any data recovery is performed, once complete, a final report shall be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.

- ii) **A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

**Less Than Significant Impact.** As described above, tribal consultation did not result in the determination that a tribal cultural resource is present within the Project Site. However, the RBOC, as the lead agency, did consider the significance of information shared by the tribe during consultation. Mitigation Measures MM-TCR-1 through TCR-3 would reduce any potential impacts related to the potential discovery of resources that could be identified as tribal cultural resources, to less than significant.

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#### 3.19 UTILITIES AND SERVICE SYSTEMS

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:</b>				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?				<b>X</b>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			<b>X</b>	
c) Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				<b>X</b>
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			<b>X</b>	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?				<b>X</b>

#### Discussion

##### Would the Project:

- a) **Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

**No Impact.** The Project Site is in the City of Pasadena, located with the existing Brookside Golf Course. Construction activities could cause a slight increase in water use (mainly for dust control), but this would be temporary and not result in a substantial increase in water demand. Operation of the Project would be similar to that of existing conditions and similar water-demanding uses are anticipated; as such, water used for irrigation for landscaping would be largely unchanged. The Project would not require the relocation or construction of new water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities. Therefore, no impact would occur.

- b) **Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?**

**Less Than Significant Impact.** The Project does not propose a change of land uses on the Project Site and would continue to operate as an existing golf course. Water use for the Project Site could increase during construction of the Project; however, this would be temporary and not result in a substantial increase in water

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demand. Additionally, PWP is developing the Non-Potable Water Project, which will offset up to 10 percent of the total water consumed by PWP customers by delivering non-potable water sources for public landscape irrigation use in the future (Pasadena Department of Water and Power 2021). Thus, there would be sufficient water supplies to serve the Project for the foreseeable future, including dry and multiple dry years. Therefore, impacts would be less than significant.

- c) **Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

**No Impact.** Wastewater from the City of Pasadena is currently treated at the Monk Hill Treatment Plant in Northwestern Pasadena (Pasadena Department of Water and Power 2021). The Project would not generate an increase in the regional population, or the amount of wastewater treated at the plant. The Project would not affect wastewater treatment capacity. Therefore, no impact would occur.

- d) **Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?**

**Less Than Significant Impact.** The Project may involve an increase in solid waste generation as a result of disposal of construction-related debris including landscaping and concrete present on the Project Site that would be removed as part of the Project's construction activities. This material would be disposed of at a licensed composting and landfill facility. The Project would be required to comply with the City's Construction and Demolition Waste Management Ordinance (PMC Chapter 8.62), which requires that construction projects divert at least 75 percent of waste either through recycling, salvage, or deconstruction (Pasadena Department of Public Works 2021). Thus, the Project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Therefore, impacts would be less than significant.

- e) **Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?**

**No Impact.** As discussed above, construction waste generated from the Project would be required to comply with the City's Construction and Demolition Waste Management Ordinance (PMC Chapter 8.62), which requires that construction projects divert at least 75 percent of waste either through recycling, salvage, or deconstruction (Pasadena Department of Public Works 2021).

Additionally, solid waste generated from operation of the Project would largely consist of typical commercial waste and would be transferred to a permitted landfill facility with capacity to accommodate the minimal amounts of solid waste that would be generated. Thus, the Project would not conflict with federal, state, and local management and reduction statutes and regulations related to solid waste. Therefore, no impacts would occur.

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#### 3.20 WILDFIRE

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XX. WILDFIRE.</b> If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?				<b>X</b>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?			<b>X</b>	
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				<b>X</b>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?			<b>X</b>	

#### Discussion

Wildland fire protection in California is the responsibility of either the local government, state, or the federal government. State Responsibility Areas (SRA) are the areas in the state where the State of California has the primary financial responsibility for the prevention and suppression of wildland fires. SRA are recognized by the Board of Forestry and Fire Protection as areas where Cal Fire is the primary emergency response agency responsible for fire suppression and prevention.

Local responsibility areas (LRA) include incorporated cities, cultivated agriculture lands, and portions of the desert. LRA fire protection is typically provided by city fire departments, fire protection districts, counties, and by CAL FIRE under contract to local government. CAL FIRE uses an extension of the SRA Fire Hazard Severity Zone model, which is a science-based and field-tested model that assigns a hazard score based on the factors that influence fire likelihood and fire behavior, as the basis for evaluating fire hazard in LRAs. The LRA hazard rating reflects flame and ember intrusion from adjacent wildlands and from flammable vegetation in the urban area. The Los Angeles County Fire Department currently provides fire protection and emergency medical services to the City of Pasadena.

Fire Hazard Severity Zones (FHSZ) are identified by Moderate, High and Very High in an SRA, and Very High in an LRA. The nearest FHSZ in the SRA is a Very High FHSZ (VHFHSZ) approximately 2 miles north of the Project Site. The nearest FHSZ in the LRA is a VHFHSZ is located approximately 0.10 mile west of the Project Site, within the residential neighborhoods located along West Drive (CalFire 2023).

### 3. Environmental Analysis

**If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:**

**a) Substantially impair an adopted emergency response plan or emergency evacuation plan?**

**No Impact.** The City of Pasadena maintains a citywide EOP which goes into effect at the onset of a major disaster (e.g., a major earthquake). The Fire Marshall maintains the disaster plan. In case of a disaster, the Fire Marshall is responsible for implementing the plan, and the Pasadena Police Department devises evacuation routes based on the specific circumstance of the emergency (City of Pasadena 2011). According to the City's General Plan Safety Element, the Project Site is located within a dam inundation zone (City of Pasadena 2002). Construction and operation of the Project would be entirely within the developed Brookside Golf Course and would follow the appropriate local procedures and policies, and other applicable federal and state regulations regarding emergency response, and would not interfere with any adopted emergency response or evacuation plan. Therefore, no impacts would occur.

**b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?**

**Less Than Significant Impact.** The Brookside Golf Course varies in topography; however, the majority of the Project Site is developed as an existing golf course and is relatively flat within the Arroyo Seco canyon. The Project would consist of reorienting and expanding the existing driving range and constructing a new miniature golf course within the existing Brookside Golf Course, which would be in use daily and regularly maintained. Landscaping maintenance and irrigation would continue to prevent exacerbated risk of fires at the Project Site; thus, operation of the Project would not result in the increase of potential fire risks. Therefore, impacts would be less than significant.

**c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?**

**No Impact.** The Project Site is in a developed area surrounded by open space and residential properties. The Project would not require the installation of new infrastructure that may exacerbate fire risk. Therefore, no impact would occur.

**d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

**Less Than Significant Impact.** The Project Site is surrounded by open space and residential properties located on the adjacent hills. Although the Project Site is located at the bottom of the hills, the potential for the Project Site to be exposed to runoff, post-fire slope instability, or drainage changes that would expose people or structures to significant risks would be considered low. Furthermore, the proposed project does not include any habitable structures, which would also reduce the risks of exposure. Therefore, impacts would be less than significant.



### 3. Environmental Analysis

#### 3.21 MANDATORY FINDINGS OF SIGNIFICANCE

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>XXI. MANDATORY FINDINGS OF SIGNIFICANCE.</b>				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		<b>X</b>		
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)				<b>X</b>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				<b>X</b>

#### Discussion

As discussed above Section IV, *Biological Resources* and Section V, *Cultural Resources*, development of the Project would have the potential to disturb nesting birds and protected trees on the Project Site as well as impact important archaeological resources. Implementation of mitigation measures would be required to ensure that the Project does not degrade the quality of the environment.

- a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number, or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

As discussed above in Section IV, *Biological Resources* and Section V, *Cultural Resources*, development of the Project would have the potential to disturb nesting birds and protected trees on the Project Site as well as impact important examples of major periods of California history or prehistory. Implementation of mitigation measures would be required to ensure that the Project does not degrade the quality of the environment.

### 3. Environmental Analysis

- b) **Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?**

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 shown in the analysis above, any construction or operational-related impacts would either be less than significant or mitigated to a less than significant level. As demonstrated in this analysis, there would be no long-term significant operational impacts. 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. Therefore, there would be no cumulative impacts and no mitigation is required.

- c) **Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?**

As shown in the above analyses, the Project would not result in environmental effects that could cause substantial adverse effects on human beings, either directly or indirectly. Therefore, there would be no impact.

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