

# Agenda Report

February 2, 2015

**TO:** Honorable Mayor and City Council  
**FROM:** Department of Public Works  
**SUBJECT: PROPOSAL FOR LOWER ARROYO ARCHERY RANGE AND DEAL POINTS FOR NEW AGREEMENT WITH PASADENA ROVING ARCHERS**

## **RECOMMENDATION:**

It is recommended that the City Council:

1. Find that the actions proposed herein are exempt from environmental review pursuant to the California Environmental Quality Act, pursuant to State CEQA Guidelines Section 15301, none of the exceptions to the exemptions set forth in State CEQA Guidelines Section 15300.2 apply, and that there is no reasonable possibility that the actions proposed herein will have a significant effect on the environment due to unusual circumstances;
2. Amend the Pasadena Municipal Code (PMC) to authorize the City Manager to determine where archery is permitted and promulgate rules for archery activities on public lands consistent with those discussed herein;
3. Approve the development of a new license and operating agreement with the Pasadena Roving Archers (PRA) using the deal points contained in this report;
4. Direct the City Manager to work with the Pasadena Roving Archers and residents to pursue the identification of a suitable alternate site for archery activity in order to allow the southern range in the Lower Arroyo to be used for passive recreational uses on weekdays and roving archery on weekends; and
5. Approve a correction of language in the Lower Arroyo Master Plan (LAMP) to remove references to the number of targets in the southern archery range.

## **RECOMMENDATION OF THE RECREATION AND PARKS COMMISSION:**

On December 3, 2013, the Recreation and Parks Commission voted unanimously to support the following Department of Public Works recommendations:

1. Find that the actions proposed herein are exempt from environmental review pursuant to the California Environmental Quality Act, pursuant to State CEQA Guidelines Sections 15301 and 15302 (minor alteration – archery range), Section 15301 (licensing – Pasadena Roving Archers), and 15061(b)(3) (general rule – PMC amendment, rules for archery use and text correction to LAMP);
2. Amend the Pasadena Municipal Code to authorize the City Manager to determine where archery is permitted and promulgate rules for archery activities on public lands consistent with those discussed herein; and
3. Approve a correction of language in the Lower Arroyo Master Plan (LAMP) to remove references to the number of targets in the southern archery range.

At that time, the Recreation and Parks Commission requested additional time to review the proposed deal points.

On February 4, 2014, the Recreation and Parks Commission voted 6 to 1 to approve the agreement deal points recommended by the Department of Public Works with the following amendments:

1. Remove the membership roster requirement, but retain the requirement to provide a participant list to the City;
2. Ensure that the requirement to take and pass a safety training class is thoroughly publicized; and
3. Remove the prohibition of using the Lower Arroyo parking lot during invitational tournaments and include a provision that carpooling and alternative transportation should be encouraged.

#### **RECOMMENDATION OF THE DESIGN COMMISSION:**

On June 24, 2013, the Design Commission reviewed design concepts for archery related signage, natural barriers and target enclosures. The Design Commission requested additional information to allow for a more detailed review of these project elements. Additional information about the design of natural barriers and the Master Signage Plan for the Arroyo Seco will be presented to the Design Commission subsequent to the City Council's action.

#### **EXECUTIVE SUMMARY:**

The area of the Lower Arroyo Seco between the Colorado Street and La Loma Bridges has been used for archery for more than 75 years. Information and ideas about the use of this section of parkland and the City's agreement with the PRA have been presented to the Recreation and Parks Commission on multiple occasions, reviewed by an ad hoc subcommittee developed to assess this specific issue and elicited considerable public

input. During this process various options for use of the subject area were considered. The Recreation and Parks Commission consistently recommended that archery be the only activity allowed within the boundaries of the southern archery range.

On September 16, 2013 this matter was presented to the City Council in a proposal that included four recommendations (Attachment A). The item of greatest interest pertained to the proposal to designate archery as the only activity permitted within the boundaries of the southern archery range. The City Council did not take formal action on the Department of Public Works recommendations, requested additional information related to the proposal and directed the Department of Public Works to present such information to the Recreation and Parks Commission.

The additional information requested by the City Council (Attachment B) was compiled and the item returned to the Recreation and Parks Commission on December 3, 2013 and February 4, 2014. The Recreation and Parks Commission affirmed its support for a proposal that permits archery and prohibits non-archery uses within the designated area. The Commission supported the Department of Public Works recommendation and offered three amendments to the deal proposed for the City's agreement with PRA.

The current proposal includes a new recommendation that the single use concept be reevaluated upon the City's identification of an alternate location suitable for archery activity. Upon identification of a suitable alternate location, a plan to allow passive recreational use of the range area on weekdays would be developed in conjunction with all appropriate departments for consideration by the Recreation and Parks Commission and the City Council. In addition to providing for passive recreation in the subject area, the identification of an alternate location could allow the City to account for the growth of archery and help mitigate the impacts of weekend archery activities in the Lower Arroyo.

The proposal incorporates input from various City Departments including: City Attorney; City Manager; Finance (Risk Management); Human Services and Recreation; Police; and Public Works regarding safety concerns and risk management. The recommendations contained in the proposal are consistent with the recommendations and input received from these departments. The Pasadena Police Department will receive and investigate reports of arrow intrusions on private property. Representatives from the Pasadena Police and Public Works Departments will be in regular communication to review this information and determine whether modifications to the archery range are necessary.

### **BACKGROUND:**

The Lower Arroyo Seco consists of approximately 150 acres and includes an Archery Range which is located on the west side of the Los Angeles County flood control basin between the Colorado Street and La Loma Bridges. The range is a public facility included in the LAMP, adopted by City Council in 2003, and is divided into northern and southern sections, each with different permitted uses. The PRA, a non-profit organization that uses the range for archery events and activities, utilizes both sections of the range for organized archery activities pursuant to a City-approved use schedule. The southern

range, which consists of approximately 7.5 acres, is currently open to the public when not reserved for PRA use. Use of the northern range for archery activity is limited to a maximum of 13 PRA events annually. That area represents approximately four acres.

Information about the types of uses occurring in this area, safety concerns, potential changes to the use of this section of parkland and the City's agreement with the PRA have been presented to the Recreation and Parks Commission on multiple occasions, reviewed by an ad hoc subcommittee developed to assess this specific issue, elicited considerable public input and were presented to the City Council on September 16, 2013.

#### *Recreation and Parks Commission Review*

At the November 1, 2011 meeting of the Recreation and Parks Commission, the Department of Public Works presented a report regarding the use of the range and deal points for an agreement with PRA (Attachment C). The joint use plan presented in that report sought to allow the southern range to be used for archery and non-archery activities. The plan permitted archery according to the following schedule: public archery would be permitted on weekdays between 12:00 p.m. and 6:00 p.m. (or dusk, if earlier) unless reserved by City permit or agreement and PRA would be permitted to use the area for archery events on weekends and one weekday. At all other times archery would be prohibited and the area would be available for passive recreation. The Commission voted against the recommended joint use proposal. In addition to voting on the Department of Public Works recommendations, the Commission developed and supported a separate motion to recommend that the southern archery range remains a single use facility for archery only.

At the May 21, 2013 meeting of the Recreation and Parks Commission, the Department of Public Works submitted an alternate proposal for consideration (Attachment D). The joint use plan presented in the report included dividing the southern archery range into two areas with different uses. One area, Area A (existing targets 1-19), was proposed as a full-time archery range that would be available for archery activity during all park hours. A second area, Area B (existing targets 20-28), was proposed to be available for archery activity on Sundays from 8:00 a.m. until 1:00 p.m. Area B was to be available for passive recreation at all other times. The proposal also included a provision for indoor archery activities at the Rosemont Pavilion for a maximum of six months per year.

The Commission voted unanimously not to support the Department of Public Works recommendation and recommended that the City Council:

1. Ensure that public access to the southern archery range continues; and
2. Direct the Department of Public Works to work with the PRA to reach an agreement that would include the following as key elements:
  - a. Maintain use of the entire existing southern archery range for archery purposes;

- b. Install and maintain hard barriers (consisting of rocks and natural plantings) to prevent access to the archery range for uses other than archery;
- c. Permanent signage should be developed and installed;
- d. Eliminate proposed requirement for a photo credential;
- e. Safety training and on-site monitoring should be provided;
- f. Analyze project adequately for any environmental impacts; and
- g. Implement additional safety measures consistent with the Pasadena Police Department recommendations to ensure safety of the archery range when not being operated by PRA.

At the December 3, 2013 meeting of the Recreation and Parks Commission, the Department of Public Works presented a proposal that would permit only archery activity within the subject area (Attachment E). The Commission affirmed its support for that concept, voting unanimously to support three of the four recommendations presented. The Commission requested additional time to review the proposed deal points.

At the February 4, 2014 meeting, the Recreation and Parks commission voted 6 to 1 to approve the agreement deal points recommended by the Department of Public Works with the following amendments:

1. Remove the membership roster requirement, but retain the requirement to provide a participant list to the City;
2. Ensure that the requirement to take and pass a safety training class is thoroughly publicized; and
3. Remove the prohibition of using the Lower Arroyo parking lot during invitational tournaments and include a provision that carpooling and alternative transportation should be encouraged.

#### *City Council Review*

On September 16, 2013, the Department of Public Works presented a single-use plan to the City Council (Attachment A). The report included the following recommendations:

1. Find that the actions proposed herein are exempt from environmental review pursuant to the California Environmental Quality Act, pursuant to State CEQA Guidelines Sections 15301 and 15302 (minor alteration – archery range), Section 15301 (licensing – Pasadena Roving Archers), and 15061(b)(3) (general rule – PMC amendment, rules for archery use and text correction to LAMP);

2. Amend the Pasadena Municipal Code to authorize the City Manager to determine where archery is permitted and promulgate rules for archery activities on public lands consistent with those discussed herein;
3. Support the development of a new license and operating agreement with the Pasadena Roving Archers (PRA) using the deal points contained in this report; and
4. Approve a correction of language in the Lower Arroyo Master Plan (LAMP) to remove references to the number of targets in the southern archery range.

The single use proposal included a recommendation to prohibit non-archery uses within the boundaries of the southern archery range at all times and establish deal points for a new agreement with PRA. The City Council did not take formal action on the Department of Public Works recommendation, requested additional information and directed the Department to present such information to the Recreation and Parks Commission. The additional information requested by the City Council was compiled (Attachment B) and the item returned to the Recreation and Parks Commission on December 3, 2013 and February 4, 2014.

#### *Current Proposal*

The City reviewed existing conditions and potential alternative uses of the subject area. A matrix which lists the options reviewed is included as Attachment F. Based on safety and risk management considerations and information obtained about existing uses, the Department of Public Works with the concurrence of City Departments including: City Attorney; City Manager; Finance (Risk Management); Human Services and Recreation; and Police, is recommending a plan which allows only archery activity within the subject area.

Based on existing site conditions, a single use plan will mitigate risk within and immediately adjacent to the archery range and allow for the continuation of archery activity at the Lower Arroyo archery range. Attachment G provides data obtained from a survey of activity in and adjacent to the subject area. The data indicates that non-archery use of the range was the least commonly observed activity. The data demonstrates that two City trails proximate to the archery range are used extensively for passive recreation.

It is further recommended that this plan be re-evaluated upon identification of an alternate location suitable for archery activity. Based on public comment received throughout this process, there is interest in using the southern range for passive recreation. The Department of Public Works will work with PRA and residents in an effort to identify an alternate location for archery activities, allowing passive recreational use of the range area and mitigating impacts from weekend archery activity. If an alternate location is identified for this purpose, the southern range could be used for passive recreational purposes on weekdays and the City could account for the growth in the popularity of archery by providing two locations for weekend archery activity. The Human Services and Recreation Department would retain the right to permit the range for archery related

activities. All appropriate City departments would review any such proposal to ensure proper safeguards are developed before such use would be allowed.

The former outdoor Pasadena Police Department shooting range, also known as the "B" range, is one site that is being considered for possible archery use. The City obtained a grant from the Department of Toxic and Substance Control (DTSC) to conduct an assessment of the "B" range's site conditions and subsequently included a project which involves the remediation of soil contamination at the B range in the FY 2015-FY 2019 Capital Improvement Program. The assessment has been completed and the City is now working with DTSC to develop a plan for work that would be needed to render the site suitable for future use.

#### *Proposed Changes for Use of Archery Ranges*

The northern and southern ranges are divided by the site of the former archery clubhouse building. This facility, which was destroyed by a fire in the spring of 2002, was located north of the pedestrian bridge that leads from the parking lot to the west side of the Arroyo Seco. The current proposal, illustrated by Attachment H, calls for the continued use of the southern range for archery activities only and involves the following:

1. Prohibition of all non-archery other uses within the range;
2. Removal of the unofficial path which bisects the interior of the range;
3. Establishment of a mandatory safety and training program and requirement for associated credentials;
4. Relocation of approximately 150 linear feet of trail to relocate target 14 onto public property and maintain regulation shooting distances;
5. Establishment, codification and posting of rules for use of the archery range;
6. Installation of natural barrier, consisting of rocks and plants to separate archery and other park uses; and
7. Necessary amendments to the PMC to authorize the City Manager to identify where archery is permitted.

An unofficial path which bisects the archery shooting lanes garnered significant public comment and served as a main point of discussion. Noted by the red line on Attachment H, this path is not included as an approved trail in the LAMP. The path consists of approximately 1,630 linear feet and is not included in the 131,649 linear feet of established City trails within the Arroyo Seco. This path has developed over time based passive recreation use and archery range maintenance activities. Under the current proposal, this path would be eliminated to discourage unauthorized use of this area.

Use of all range areas will require that archers prominently display City-issued credentials, reflecting completion of a PRA-provided safety training class or competency exam. Archers will be required to immediately produce a photographic identification upon the request of a Police Officer, Park Safety Specialist, Park Ranger or other City officials with enforcement powers. The City will issue credentials no less than 15 calendar days after completion of the safety training class or competency exam. Credentials shall be valid for a period of three years. Renewal will be contingent upon successful completion of the safety training class or competency exam.

Periodic patrols of both archery ranges will be conducted by Police Officers, Park Safety Specialists, Park Rangers or other City officials with enforcement powers. Persons not displaying credentials while using the range and those violating range rules will be subject to citation. Penalties for violations of established range rules will be subject to PMC 1.24. The level of penalty administered will depend on the type of violation and will be subject to the discretion of the enforcement official. PMC 1.24 allows violations to be treated as infractions, misdemeanors or felonies. Experienced, visiting archers participating in PRA tournaments and students, under the supervision of instructors certified by USA Archery or other nationally recognized archery organizations, will be exempt from this requirement.

The proposal includes a realignment of approximately 150 linear feet of the hiking trail on the eastern border of the range, as illustrated by the blue dotted line on Attachment H. This realignment is necessary to allow target 14, which was removed from use after a land survey determined that it was situated on private property, to be located on public property and accommodate regulation-shooting distances. All targets will be located on public property and situated to enhance safety and minimize encroachment onto private property. Between January 1, 2010 and November 30, 2014, the Pasadena Police Department responded to 61 calls for service related to the archery range or surrounding area. Thirty-five of these calls were citizen initiated and the remaining 26 were initiated by a Police Officer. None of the calls for service pertain to conflicts between archery and non-archery activities. The Pasadena Police Department will receive and investigate reports of arrow intrusions on private property. Representatives from the Police and Public Works Departments will be in regular communication to review this information and determine whether modifications to the archery range are necessary. Three bow hangers will be relocated to the west side of the hiking trail.

Sections of the LAMP that pertain to the archery range call for the development of permanent signage and natural barriers. The Arroyo Seco Design Guidelines (ASDG) state that permanent physical barriers and a signage program, which are intended to improve safety by keeping archery and non-archery uses separated, shall be reviewed by the Recreation and Parks and Design commissions. Habitat restoration which will allow for the development of natural barriers and the development of an Arroyo Seco signage program are current Capital Improvement Program projects.

Permanent signage will be used to inform the public of the existence of this full-time archery area and advise park users of regulations associated with this area. The

proposal includes three sign types: directional; regulatory; and a map of the range. Attachment I provides examples of the proposed directional and regulatory signs. A small number of signs would be added to the existing directional signs, as necessary, to ensure that adequate notice of the archery range boundary is provided to all park users. These signs are mounted on wood posts along the western edge of the hiking trail that borders the full time archery range. Regulatory signs would be located at entry points to the southern range and a sign displaying a map of the range would be centrally located, in the area between the pedestrian bridge and archery practice area.

A natural barrier consisting of boulders and plantings will be located along the edge of the southern archery range and will provide a barrier between archery and other park uses. The barrier will be comprised of Arroyo stones and/or boulders and appropriate native plantings as described in the LAMP, ASDG, and Arroyo Seco Public Lands Ordinance. Attachment J represents an exhibit from page 4-11 of the LAMP which contains a cross section of the approved barrier type, also known as a landscape buffer, between the archery range and hiking trail.

The proposal requires amendments to the PMC. The PMC would be amended in the following manner:

1. Authorize the City Manager, in consultation with appropriate City departments, to determine where archery activity is permitted;
2. Include the requirement that all persons wishing to use a City-designated archery range complete the City-approved safety and training program or competency exam and prominently display credentials when using the range; and
3. Enumerate range rules and note that violations will be subject to penalties included in Section 1.24 of the PMC.

#### *Northern Range*

The LAMP states that the targets in the northern range will be removed, the number of shooting lanes will be reduced and that this range will be authorized for no more than 13 uses per year. This range is only used in connection with PRA scheduled events and when in use consists of 14 temporary targets. When authorized for PRA use, PRA will be required to provide an on-site monitor and temporary signage. The proposal does not recommend any changes for this area.

#### *Correction to Language in the LAMP*

Discussions about the configuration and use of the southern archery range have highlighted confusion regarding the number of allowable targets in the southern range. Page 4-9 of the LAMP states that the layout of the southern range shall remain the same and references 14 as the number of targets in the southern range.

The reference to 14 targets describes the number of targets studied for the northern range and its inclusion within the section related to the southern range appears to have

been made in error. Section 2.3.4.6.2 of the Arroyo Seco Master Plan Master Environmental Impact Report (MEIR) references 14 targets in the northern range. The MEIR indicates that the southern range shall consist of the same elements as the northern range but does not specify the number of targets.

During the June 2, 2003 City Council meeting, a memorandum from the City Manager regarding a reduction in the space and use of the northern archery range, and map of the northern and southern archery ranges was distributed (Attachment K). The map attached to the memorandum, which includes 28 targets in the southern archery range, represents the map that was attached to the City's agreement with PRA, and represents the existing condition at the time the LAMP was adopted. Additionally, aerial photographs from 2003 and 2011 (Attachment L) demonstrate that the configuration of the southern archery range has not substantively changed since the adoption of the LAMP.

For these reasons and based on the recollection of staff members involved in the development of the LAMP, it is believed the reference to 14 targets was intended to describe the reduction in targets at the northern range and was erroneously listed as the number of targets in the southern range. It is therefore recommended that the number "14" be deleted from references to the southern range found in the LAMP.

*Deal Points for License and Operating Agreement with PRA*

Various options for administering the use of the archery range are listed in Attachment M. The proposal seeks to utilize a license and operating agreement to manage PRA's use of the range and contains deal points for use in an agreement between the City and PRA (Attachment N). The agreement shall govern PRA-sponsored activities in the Lower Arroyo archery range. Private, commercial or other organized activities not covered by this agreement are subject to separate permits or fee agreements.

The agreement term is proposed as a one-year agreement with four one-year renewable options at the discretion of the City Manager. An assessment of the effectiveness of the new agreement will be presented to the Recreation and Parks Commission approximately six and 12 months after the agreement is executed.

During the current agreement review process, PRA has been allowed to operate under the terms of an expired agreement. If the City Council does not approve the deal points for a new agreement at the February 2, 2015 meeting, Department of Public Works will secure an interim agreement with PRA based on the terms and conditions included in prior agreements. Such agreement would be effective until the City Council approves deal points for a new agreement between the City and PRA.

### **COUNCIL POLICY CONSIDERATION:**

This project is consistent with the City Council's goals to improve, maintain and enhance public facilities and infrastructure and ensure public safety. The proposal requires the implementation of projects within the Lower Arroyo Seco Master Plan.

### **ENVIRONMENTAL ANALYSIS:**

The actions proposed herein fit within the categorical exemption set forth in State CEQA Guidelines Section 15301 (Existing Facilities) (See Attachment P). These "class 1" exemptions consist of "the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of use beyond that existing at the time of the lead agency's determination. . . . The key consideration is whether the project involves negligible or no expansion of an existing use."

- The minor alteration of the archery range is exempt pursuant to State CEQA Guidelines Section 15301. That section exempts minor maintenance, repair and alterations of existing public structures involving negligible or no expansion of the use. The minor alteration described herein returns the trail system to its intended configuration by removing an informal path through the range, maintains the general area as an archery range, adds directional and regulatory signage, adds one new target, slightly reconfigures a few existing targets, and does not expand the trail system, or substantially expand the area to be used for archery;
- The new agreement with the Pasadena Roving Archers is exempt pursuant to State CEQA Guidelines Section 15301. That section exempts the licensing and minor alteration of existing public structures involving negligible or no expansion of the use. The new agreement does not expand the area that is already being used by the Archers; and
- The proposed amendment to the PMC, rules for archery activities, and correction of the language in the LAMP, are exempt pursuant to State CEQA Guidelines Section 15301. These text corrections do not increase the number of allowable targets beyond the number that was in place at the time the LAMP was adopted.

None of the exceptions to the exemptions apply (See Attachment P). The exceptions to the exemptions are set forth in State CEQA Guidelines Section 15300.2.

- The actions proposed herein will not have a cumulative impact. There are no other related past, present, or reasonably foreseeable probable future projects that, when considered in combination with the project, would result in a significant cumulative environmental impact. Likewise, the proposed project would not cause a cumulatively considerable incremental effect on a significant cumulative impact.
- There is no reasonable possibility that the actions proposed herein will have a significant effect on the environment due to unusual circumstances. The air quality impacts generated by the work are limited to emissions from a passenger truck or two and/or tractor, and fine particulate matter (dust) raised through hand

digging or minor tractor excavation. There will be no traffic impacts arising from the handful of vehicles necessary to undertake the project. The site does not contain any unique topographic or geographic features, natural water features, or valuable minerals. Removal of vegetation is not potentially significant. Brush and tree work would be conducted in compliance with the Migratory Bird Treaty Act. Additionally, there are no unique aesthetic, land, air, water, minerals, flora, fauna, or noise features at the site that would be significantly affected by the proposed project, and the site will retain its open space character after completion of the project.

- The actions proposed herein will not cause a substantial adverse change in the significance of a historic resource. The Pasadena Arroyo Parks and Recreation District, which includes the Central and Lower Arroyo Seco, is listed in the National Register of Historic Places. The Lower Arroyo contributed to the historical significance of the area as a result of its historic use for recreation. The configuration of the archery range is not identified as a contributing element. In any event, the configuration will not change under this proposal, and instead the informal path will be removed to return the overall Archery range to its intended configuration. Therefore, the projects described herein will not cause a substantial adverse change to the historic significance of this area.

**FISCAL IMPACT:**

The Public Works Department, Parks and Natural Resources Division operating budget (101-765300) contains funding for the maintenance of the Lower Arroyo, including the footprint of the Archery Range. In calendar year 2013, the City received \$4,466 from the Pasadena Roving Archers. This sum represents 35% of the membership fees collected during 2013. Based on the revenue basis in the proposal and anticipated membership and fee increases, it is anticipated that the execution of this agreement will result in an increase in revenue to the City. These funds will also be deposited in the General Fund and be used to offset any additional indirect and support costs.

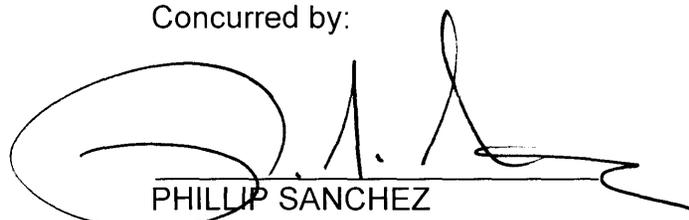
Respectfully submitted,

  
Julie A. Gutierrez  
Assistant City Manager

Prepared by:

  
Charles Peretz  
Public Works Administrator

Concurred by:

  
PHILLIP SANCHEZ  
Chief of Police

Approved by:

  
MICHAEL J. BECK  
City Manager

- Attachment A – September 16, 2013 City Council Agenda Report
- Attachment B – Additional Information Requested by City Council on September 16, 2013
- Attachment C – November 1, 2011 Recreation and Parks Commission Staff Report
- Attachment D – May 21, 2013 Recreation and Parks Commission Staff Report
- Attachment E – December 3, 2013 Recreation and Parks Commission Staff Report
- Attachment F – Matrix of Land Use Alternatives
- Attachment G – Data from Pedestrian Survey Conducted  
September 30-October 13, 2013
- Attachment H – Lower Arroyo Seco Archery Range Exhibit

- Attachment I – Sample of Regulatory and Directional Signs
- Attachment J – Natural Barrier Exhibit from LAMP
- Attachment K – City Manager Memorandum dated June 2, 2003
- Attachment L – Aerial Photographs of the Lower Arroyo Archery Range
- Attachment M – Matrix of Operational Use Alternatives
- Attachment N – Deal Points for Agreement with PRA
- Attachment O – Letter Dated September 16, 2013 from Mr. Christopher Sutton
- Attachment P – Planning and Community Development Department Memorandum  
Regarding Exemption Status of the Proposed Project