City of Glendora

SOUTH HILLS BIKE PARK

December 2025 | Initial Study / Mitigated Negative Declaration

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City of Glendora

Prepared for:

City of Glendora
Contact: Kelsey Fay, Management Analyst
Recreation & Human Services
116 E Foothill Boulevard
Glendora, California 91741
626.914.8228

Prepared by:

PlaceWorks
Contact: Jorge Estrada, Senior Associate II
3 MacArthur Place, Suite 1100
Santa Ana, California 92707
714.966.9220
www.placeworks.com

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ENVIRONMENTAL CHECKLIST

PROJECT INFORMATION

Project Title: South Hills Bike Park

Lead Agency Name and Address:
City of Glendora
Recreation & Human Services
116 E Foothill Boulevard
Glendora, CA 91741

Contact Person and Phone Number:
Kelsey Fay, Management Analyst
626.914.8228

Project Location: The project site is composed of the South Hills Wilderness area of the city, known as South Hills Park, which is generally bounded by Big Dalton Wash and State Route 66 (SR-66) on the north, Interstate 210 (I-210) on the south, Glendora Avenue on the west, and the Metro A Line light rail tracks on the east.

Project Sponsor's Name and Address:
City of Glendora
Recreation & Human Services
116 E Foothill Boulevard
Glendora, CA 91741

General Plan Designation: Conservation Open Space (COS), Hillside Very Low Density (HVLD), Open Space (OS), and High Density Residential (HD)

Zoning: Single-Family Estate (E-7), Planned Redevelopment (PR), and Open Space Natural (OSN)

Description of Project:
The proposed project is the development of a formalized bike park and an improved system of connecting trails throughout the project site. Plans for the proposed project include a bike park core area, downhill bike-only trails, a multidirectional "pedal up" trail, a longer "cross-country" style multiuse and bi-directional trail that is planned to ring the project site, bicycle pump

tracks, mountain bike jump trails, trail head improvements, staging and seating areas, a restroom facility, a regraded access road off of Glendora Avenue, and improved parking areas.

Surrounding Land Uses and Setting:
The project site is bounded by residential uses to the north, beyond the Big Dalton Wash; residential uses to the south, beyond I-210; residential uses and open space to the east; and residential uses to the west, beyond Glendora Avenue.

Other Public Agencies Whose Approval Is Required (e.g., Permits, Financing Approval, or Participating Agreement):
National Park Service

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.?

The City of Glendora prepared letters addressed to each Native American Tribe from the Native American Heritage Commission Tribal Consultation List. Outreach letters were sent to tribal representatives initiating consultation with tribes pursuant to Assembly Bill (AB) 52.

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.

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

DETERMINATION

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

12/2/25
Date

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1. INTRODUCTION

1.1 OVERVIEW

The proposed project includes the development of a formalized bike park and an improved system of connecting trails throughout the project site, which is the South Hills Wilderness area of Glendora known as South Hills Park. Plans for the proposed project include a bike park core area, downhill bike-only trails, a multidirectional “pedal up” trail, a longer “cross-country” style multiuse and bi-directional trail that is planned to ring the project site, bicycle pump tracks, mountain bike jump trails, trail head improvements, staging and seating areas, a restroom facility, a regraded access road off of Glendora Avenue, and improved parking areas.

In compliance with the California Environmental Quality Act (CEQA), the City of Glendora (City), as lead agency, is preparing the environmental documentation for the proposed project to determine whether approval of the requested discretionary actions and subsequent development would have a significant impact on the environment. As defined by Section 15063 of the CEQA Guidelines, an Initial Study is prepared primarily to provide the lead agency with the information to use as the basis for determining whether an environmental impact report (EIR), negative declaration, or mitigated negative declaration (MND) would provide the necessary environmental documentation and clearance for the proposed project.

1.2 CALIFORNIA ENVIRONMENTAL QUALITY ACT

The environmental compliance process is governed by CEQA and the CEQA Guidelines (Public Resources Code [PRC], Section 21000 et seq.; California Code of Regulations [CCR], Title 14, Sections 15000 et seq.). CEQA was enacted in 1970 by the California Legislature to disclose to decision-makers and the public the significant environmental effects of projects and to identify ways to avoid or reduce the environmental effects through feasible alternatives or mitigation measures. Compliance with CEQA applies to California government agencies at all levels: local, regional, and state agencies, boards, commissions, and special districts (such as school districts and water districts). The City of Glendora is the lead agency for the proposed project and is therefore required to conduct an environmental review to analyze the potential environmental effects associated with the proposed project.

PRC Section 21080(a) states that analysis of a project’s environmental impact is required for any “discretionary projects proposed to be carried out or approved by public agencies….” In this case, the City has determined that an Initial Study is required to determine whether there is

substantial evidence that construction and operation of the proposed project would result in environmental impacts.

A "project" means the whole of an action that has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that is any of the following:

- An activity directly undertaken by any public agency including but not limited to public works construction and related activities clearing or grading of land, improvements to existing public structures, enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code Sections 65100 to 65700.
- An activity undertaken by a person which is supported in whole or in part through public agency contacts, grants, subsidies, loans, or other forms of assistance from one or more public agencies.
- An activity involving the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies. (14 CCR Section 15378[a]).

The proposed discretionary actions by the City constitute a "project" because the activity would result in a direct physical change in the environment and would be undertaken by a public agency. All "projects" in the State of California are required to undergo an environmental review to determine the environmental impacts associated with implementation of the project.

1.3 INITIAL STUDY

The purpose of the Initial Study is to 1) provide the lead agency with information to use as the basis for deciding the proper type of CEQA document to prepare; 2) enable the lead agency to modify a project, mitigating adverse impacts before an Environmental Impact Report (EIR) is prepared, thereby enabling the project to qualify for a negative declaration; 3) assist in the preparation of an EIR, if one is required; 4) facilitate environmental assessment early in the design of a project; 5) provide documentation of the factual basis for the findings in a Mitigated Negative Declaration (MND) or Negative Declaration (ND); 6) eliminate unnecessary EIRs; and 7) determine if a project is covered under a previously prepared EIR. When an Initial Study identifies the potential for immitigable significant environmental impacts, the lead agency must prepare an EIR (14 CCR Section 15064); however, if all impacts are found to be less than significant or can be mitigated to a less-than-significant level, the lead agency can prepare an ND or an MND that incorporates mitigation measures into the project (14 CCR Section 15070).

1.4 MITIGATED NEGATIVE DECLARATION

The MND includes information necessary for agencies to meet statutory responsibilities related to the proposed project. State and local agencies will use the MND when considering any permit or other approvals necessary to implement the project. A list of the environmental topics that have been identified for study in the MND is provided in this Initial Study.

One of the primary objectives of CEQA is to enhance public participation in the planning process; public involvement is an essential feature of CEQA. Community members are encouraged to participate in the environmental review process, request to be notified, monitor newspapers for formal announcements, and submit substantive comments at every possible opportunity afforded by the Lead Agency. The environmental review process provides several opportunities for the public to participate through public notice and public review of CEQA documents and at public meetings.

1.5 LEVELS OF SIGNIFICANCE

The following terminology is used to describe the level of significance of impacts. Although the criteria for determining significance are different for each topic area, the environmental analysis applies a uniform classification of the impacts based on definitions consistent with CEQA and the CEQA Guidelines:

- **No impact.** The project would result in no adverse effect on the environment.
- **Less than significant.** The project would not exceed the established significance criteria.
- **Less than significant with mitigation incorporated.** The project would exceed the established significance criteria without mitigation measures, but one or more mitigation measures would reduce the impact to a less-than-significant level successfully.
- **Potentially significant.** The project would exceed the established significance criteria, and either no feasible mitigation measures are available to reduce the impact to a less-than-significant level, or more analysis is needed to determine if feasible mitigation measures are available to reduce the impact to a less-than-significant level. If any impact is identified as potentially significant, an EIR is required.
- **Mitigation measures.** If, after incorporation and implementation of federal, state, and local regulations, there are still significant environmental impacts, then feasible and project-specific mitigation measures are required to reduce impacts to less-than-significant levels. Mitigation measures must further reduce significant environmental impacts above and

beyond compliance with federal, State, and local laws and regulations. Mitigation under CEQA Guidelines Section 15370 includes:

- Avoiding the impact altogether by not taking a certain action or parts of an action.
- Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
- Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.
- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
- Compensating for the impact by replacing or providing substitute resources or environments.

2. PROJECT DESCRIPTION

2.1 PROJECT LOCATION

2.1.1 Regional Setting

The 318-acre project site is in the southern end of the City of Glendora, which is in the southeastern portion of Los Angeles County (see Figures 1, *Regional Location*, and 2, *Local Vicinity*). As shown in Figure 1, Glendora is bounded by the San Bernardino Mountains to the north; City of Covina, City of San Dimas, and unincorporated Los Angeles County to the south; City of San Dimas to the east; and City of Azusa and unincorporated Los Angeles County to the west. The project site is in a low-lying foothill area south of the San Gabriel Mountains. Regional access to the project site is provided via I-210 and SR-66.

2.1.2 Local Setting

The project site is the South Hills Wilderness area of the city known as South Hills Park, which is a public-access park owned and maintained by the City and made up of 19 parcels (APNs 8644-013-905, 8644-013-906, 8644-014-901, 8644-014-902, 8644-014-904, 8644-014-905, 8644-014-907, 8644-014-909, 8644-014-910, 8644-014-911, 8644-015-914, 8644-015-915, 8644-027-900, 8644-027-901, 8644-027-902, 8644-027-905, 8644-027-906, 8644-027-908, 8644-027-913). As shown in Figure 3, *Aerial Photograph*, the project site is generally bounded by Big Dalton Wash and State Route 66 (SR-66) on the north, Interstate 210 (I-210) on the south, Glendora Avenue on the west, and the Metro A Line light rail tracks on the east. Local access to the project site is via Glendora Avenue, Mauna Loa Avenue, and Bonnie Cove Avenue.

2.2 ENVIRONMENTAL SETTING

2.2.1 Existing Land Use

The project site encompasses the South Hills Wilderness area, which has several dirt trails/roads, trailheads, and parking lots (paved and unpaved) that serve hikers, bikers, and equestrian users; a recreation area with a playground, benches, tables, and restrooms; a dog park; and dirt roads that provide maintenance access for existing overhead power lines and the City's water reservoirs. The project site is home to numerous trails—multiuse (hikers, bikers, and equestrian users) and hiking-only trails. Names of the multiuse trails include Alosta Canyon

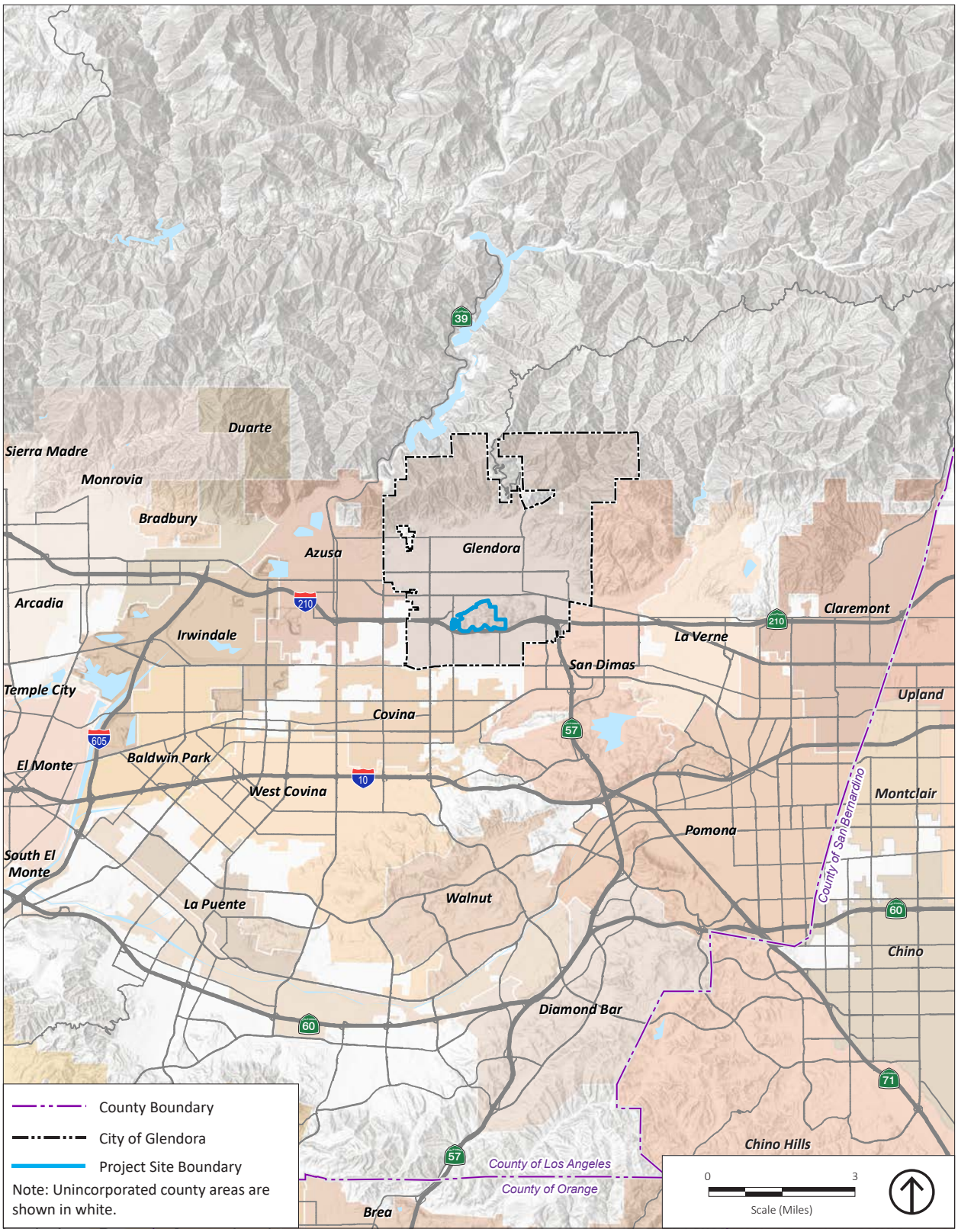
Trail, Big Dalton Wash Trail, Bonnie Cove East Trail, Bonnie Cove Trail, Bonnie Cove West Trail, East View South Fork Trail, North Spur Trail, and South Hills Backbone Trail. Names of the hiking-only trails include Alosta Canyon South Fork Trail, East View North Fork Trail, Elderberry Loop, Elderberry Trail, Mustard Trail, Toyon Trail, Walnut Trail, and Wild Iris Trail. There is also a popular viewing point on-site known as Scout Point Observation Circle, which provides panoramic views of the city and San Gabriel Mountains and foothills.

Portions of the project site are secured with chain-link fencing and gates. The Boulder Dam–Los Angeles 287.5-kV transmission line runs east-west through the project site. The transmission line consists of 130-foot-tall steel lattice towers in a 160-foot-wide Los Angeles Department of Water and Power easement that traverses the entire southern part of the project site from east to west.

There are two primary points of entry into the project site: one from Mauna Loa Avenue on the northern end and the other from Bonnie Cove Avenue along the southern end, with each having a trailhead. The Mauna Lao Avenue entry point is open and not secured with any type of fencing or gates. The Bonnie Cover Avenue entry point is secured with chain-link fencing and gates. Additional (secondary) trailheads into the project site are at the parking lot of the senior housing development (Heritage Oak Senior Apartment) near the northwestern end of the project site at the intersection of Glendora Avenue and Big Dalton Wash and along Elwood Avenue near the Elwood Avenue and Stonehedge Drive intersection, which is near the northeastern boundary of the project site.

The project site can be characterized as mountainous, with moderate and steep rocky slopes throughout the site. Multiple valleys are spread across the hills, and peaks are fairly uniform. There are also fairly level areas that resemble terraces. There are makeshift features such as trails and small jumps that have been created over time by mountain bike users that frequent the project site. The surface elevation of the project site ranges from approximately 715 to 1,215 feet above mean sea level.

The project site consists of a mix of sporadic and dense vegetation, with a variety of native and nonnative ground cover, shrubs, and trees. Tree types/communities throughout the project are dominated by California walnut, with coast live oak sparsely distributed throughout the site. Shrub types include mule fat, wild rose, and various willow species. Common coastal sage scrub species like California sagebrush, black sage, California buckwheat, and chaparral yucca are all present throughout the project site. There are also several unnamed drainage features throughout the project site. Refer to Section 3.IV, *Biological Resources*, for a detailed description of the biological resources found on-site.



Source: Generated using ArcMap 2025.

Figure 1
Regional Location

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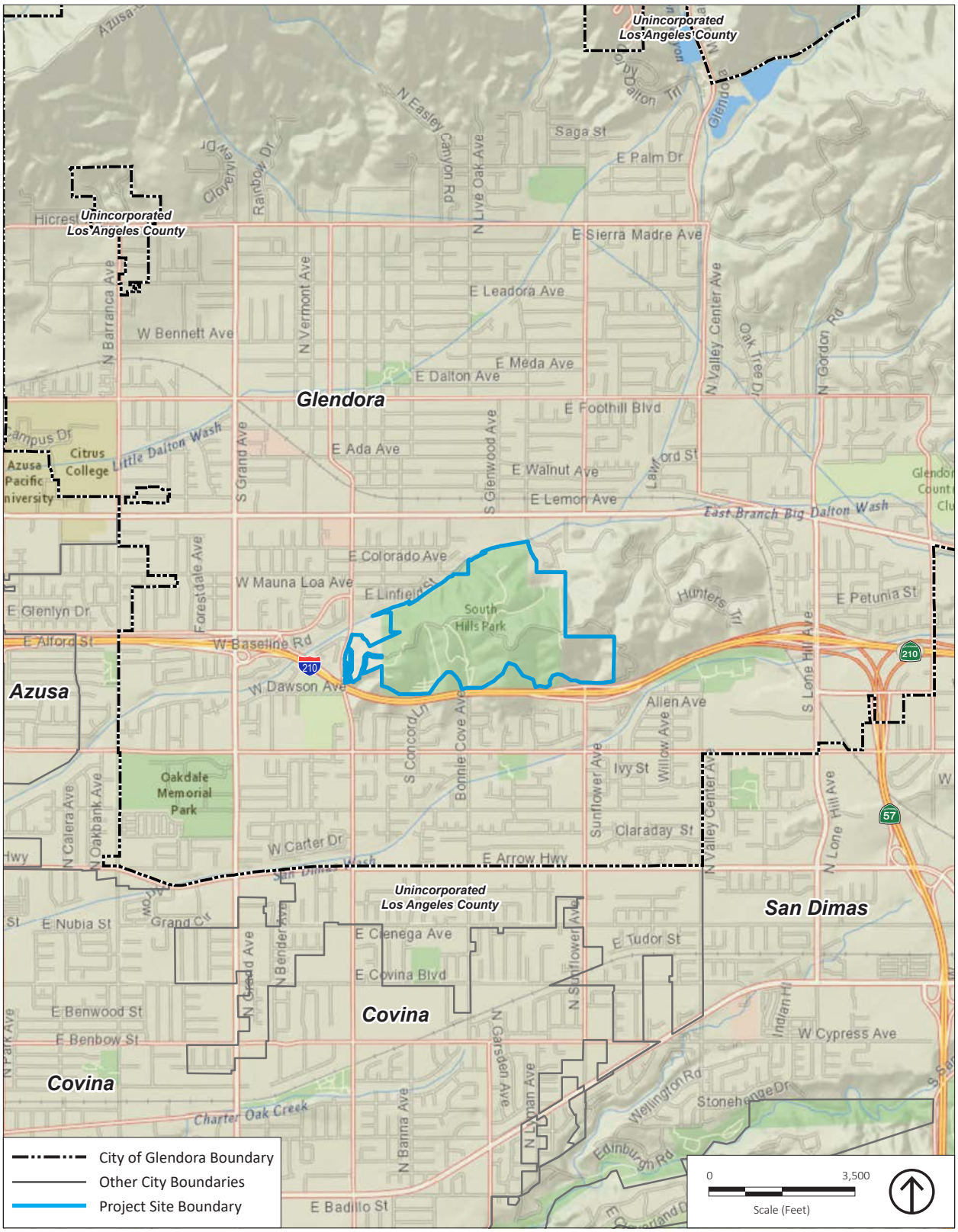

Source: Generated using ArcMap 2025.

Figure 2
Local Vicinity

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Source: Nearmap 2025.

Figure 3
Aerial Photograph

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2.2.2 Existing Zoning and General Plan

The regulatory plans that govern development and use of the project site are the City of Glendora General Plan, known as "Community Plan 2025," and Zoning Ordinance (Title 21, Zoning, of the Glendora Municipal Code). The development and design standards and regulations in Title 21 implement the City's General Plan and constitute the zoning regulations that govern development of the project site. Per the City's General Plan, the land use designations that make up the project site include Conservation Open Space (COS), Hillside Very Low Density (HVLD), Open Space (OS), and High Density Residential (HD). Per the City's Zoning Map, the project site is zoned Single-Family Estate (E-7), Planned Redevelopment (PR), and Open Space Natural (OSN).

2.2.3 Surrounding Land Use

As shown in Figure 3, *Aerial Photograph*, the project site is bounded by residential uses to the north, beyond the Big Dalton Wash; residential uses to the south, beyond I-210; residential uses and open space to the east; and residential uses to the west, beyond Glendora Avenue.

2.3 PROJECT CHARACTERISTICS

Following is a detailed description of the proposed project and the various development features/elements and improvements that will be implemented as a part of the project.

2.3.1 Proposed Land Use and On-Site Improvements

The City is the lead agency and project applicant for the proposed South Hills Bike Park project (proposed project), which is a City-initiated project that came to fruition as a result of an extensive public outreach and community engagement effort by and between the City and residents of Glendora, as well as stakeholders and groups that utilize the existing area. The proposed project includes the development of a formalized bike park and an improved system of connecting trails throughout the project site (see Figure 4, *Conceptual Bike Park and Trails Plan*). Plans for the proposed project include a bike park core area, downhill bike-only trails, a multi-directional "pedal up" trail, a longer "cross-country" style multi-use and bi-directional trail that is planned to ring the project site, bicycle pump tracks, mountain bike jump trails, trail head improvements, staging and seating areas, a restroom facility, a regraded access road off of Glendora Avenue, and improved parking areas, which are described in more detail below.

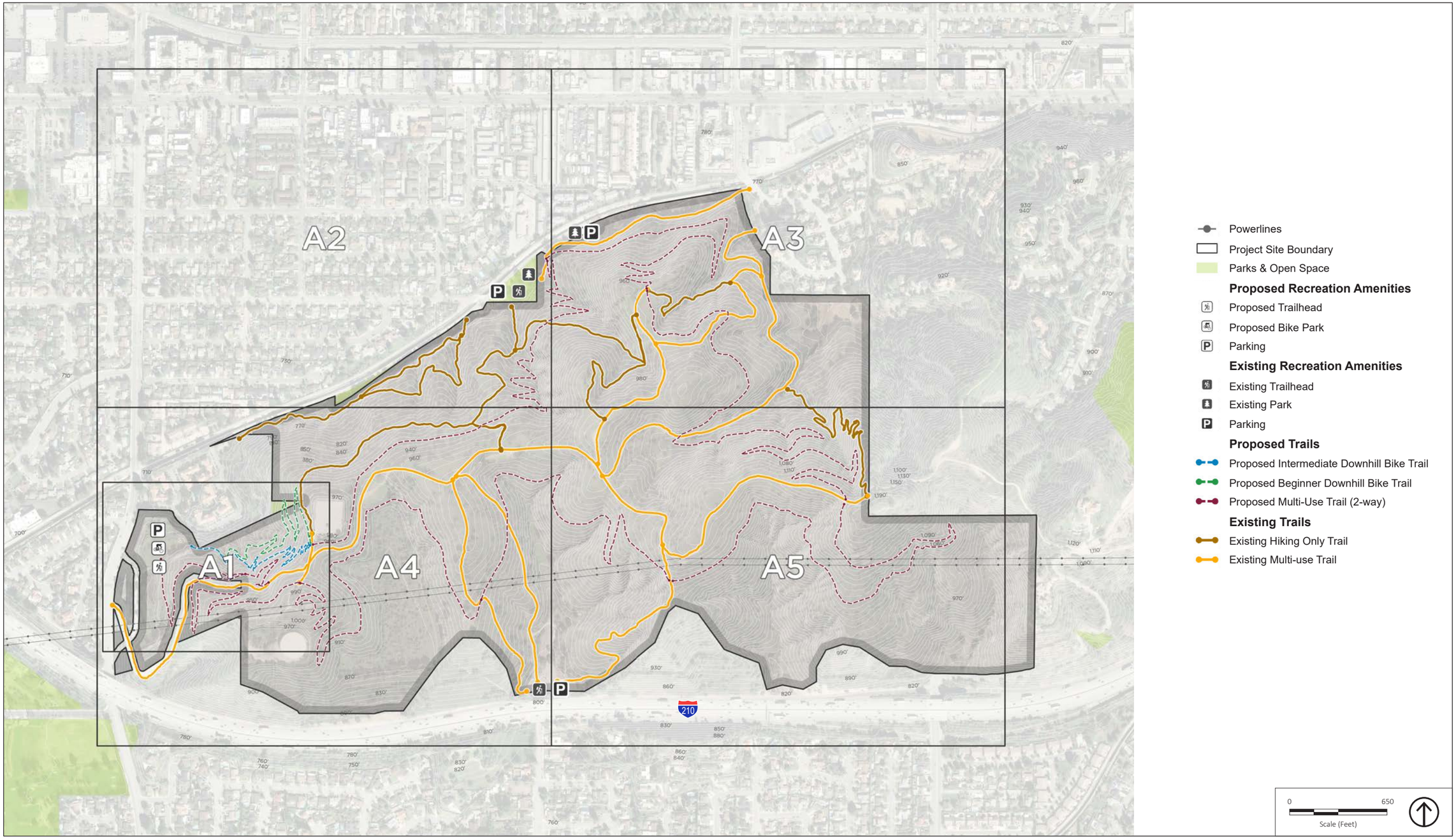
Although the proposed project may draw visitors from outside the city, it is mainly intended as a local-serving recreational opportunity for residents of Glendora. It is intended for nonmotorized bicycles (peddled) and not for motorized bicycles (e.g., gas and electric).

Regarding the existing multi-use and hiking-only trails that exist throughout the project site, the trails would continue to be available for the intended users of the trails. The existing trail locations are shown on Figure 4. The trails would remain in their existing condition, with the exception of some minor improvements (i.e., soil disturbance for the trail connections/crossings) where the proposed trail system would intersect with the existing trails. As shown in Figure 4, this would occur at multiple trail-crossing points.

Bike Park Core

The primary core of the bike park is proposed on the west side of the project site on an approximately one-acre undeveloped flat pad that resembles a terrace and is about a quarter of the way between the base and peak of project site. This area has an average slope of about 1.5 percent from east to west. In addition to the bike park core, the undeveloped flat pad would include a number of amenities and improvements, which are listed below. Figure 5, *Bike Park Core*, illustrates the proposed improvements for this area.

- ADA (Americans with Disabilities Act) accessible walkways that connect to all amenities within the bike park core, including parking, restrooms, shade structures, seating areas, viewing areas, trailhead signage, and bike tracks.
- New asphalt parking area and re-graded access road that would accommodate 24 parking spaces.
- A vault, prefabricated concrete, restroom structure, including two separate stalls that are ADA compliant.
- Split-rail fencing between the bicycle pump tracks and the parking area.
- Trailhead structure and signage.
- Trail directional signage and signage describing degree of difficulty.
- Staging and seating areas.
- A shade pavilion.
- Site furnishings (picnic tables, benches, trash/recycling receptacles, bicycle racks and repair station).
- Gabion basket walls with native stones, as needed for regrading of the road and erosion control.
- Landscaping as needed, including trees, shrubs, and ground cover.



Source: Avid Trails 2024.

Figure 4
Conceptual Bike Park and Trails Plan

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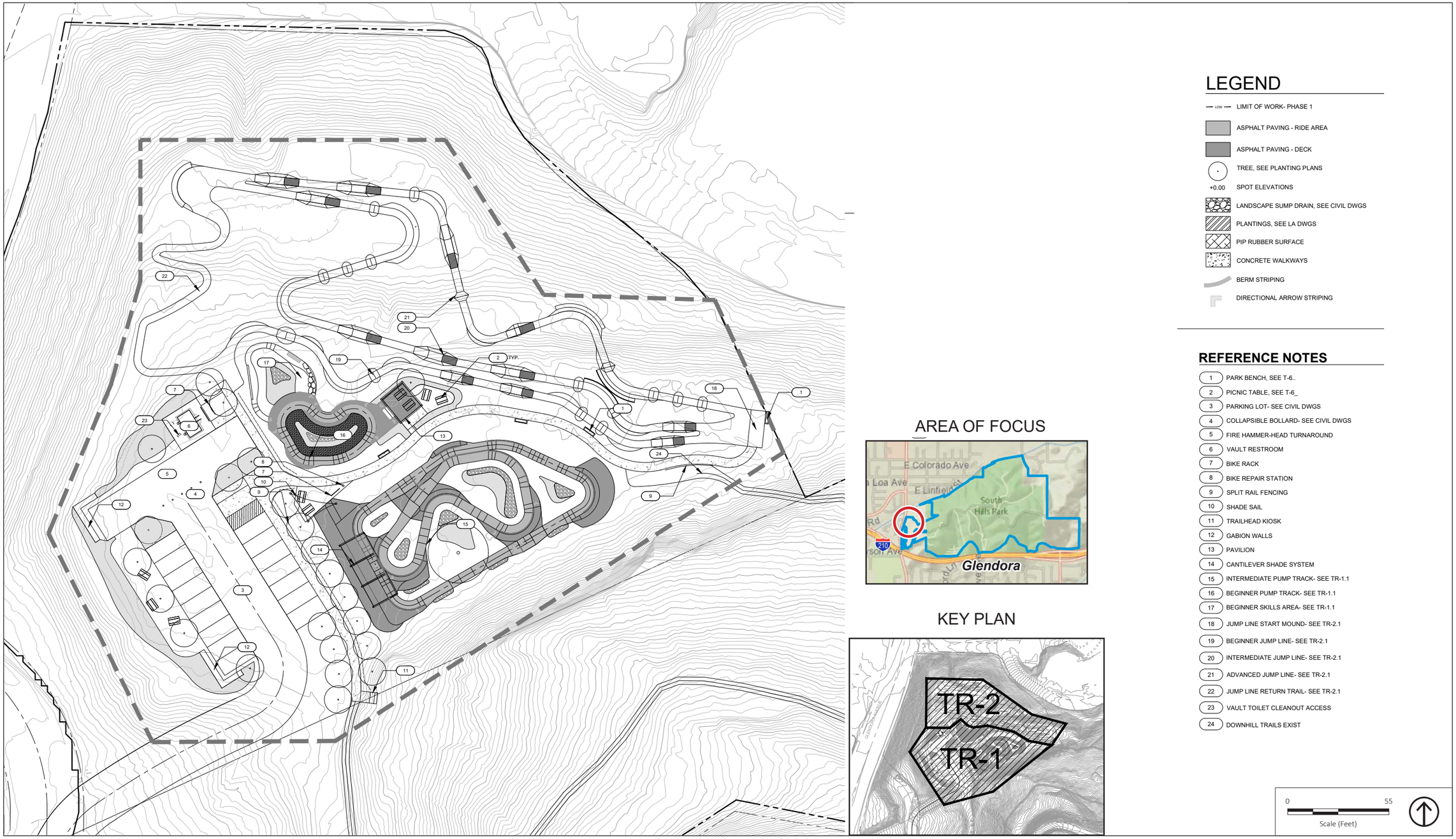

Source: Avid Trails 2024.

Figure 5
Bike Park Core

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Bicycle Pump Tracks

A pump track is a specially designed bike course that features sculpted, bermed corners; rolling mounds; and undulating surfaces. Riders uses their body weight to “pump” up and down the rolling surfaces and can propel themselves without pedaling.

As shown on Figure 5, the bike park core area features two pump tracks to be constructed with an asphalt riding surface and natural infields. A smaller track for beginners is expected to be approximately 1,000 square feet of riding surface. The larger track is for intermediate and advanced riders and is expected to be approximately 5,200 square feet of riding surface.

Drainage from the bicycle pump tracks would be handled using best practice methods to ensure that water drains from the infields and daylights into native planting areas.

Mountain Bike Jump Trails

The proposed project includes mountain bike jump trails (see Figure 4), which are designed for all ages and abilities via three distinctly different progressive riding trails (easy/beginner, intermediate, and advanced). The trails would be constructed with a native soil surface, and some areas may include a soil stabilizer to reduce dust and erosion and jump faces constructed of aluminum and timber for low maintenance. Each trail would be clearly marked and would end with a return trail access back to the start. Each trail would include rollers, berms, and a variety of skills features.

Trail Head and Multiuse Climbing Trail

As shown on Figure 5, a trailhead kiosk is planned for an area near the proposed parking lot near the bike park core. It would feature a trail map of the entire South Hills Park trail system and posted rules for the park. The trailhead would serve as the start of the climbing trail, a four-foot six-inch wide multi-use, bi-directional trail (see Figure 4) that would be constructed with a compacted native soil surface. It would be designed for mountain bikers and hikers and would serve as the primary connection to the downhill trails as well as the greater trail system throughout the project site.

The multiuse climbing trail would be constructed by professional trail builders in accordance with the specifications stipulated in the Trail Design Parameters of the National Forest Service to Trail Class 3 (reference FSH2309.18, Section 23.13, Exhibit 01), with minimum disturbance and impact to the existing landscape of the project site.

Mountain Bike Downhill Trails

At the top of the climbing trail, two downhill-only trails are proposed to be built specifically for mountain bikes. There would be one beginner and an intermediate/advanced downhill trail (see Figure 4). The trails, which would lead into the bike park core on the western end of the project site, include clear and appropriate signage that notes directional use, skill level, and trail name. The two trails would be closed to hikers and equestrians and would include proper signage to inform trail users.

The beginner trail would include a smooth trail tread with rollers and bermed corners designed for users of all skill abilities. The intermediate/advanced trail would be slightly steeper and include berms, rollers, and jumps constructed to a larger scale and may include rock armoring for erosion control.

As with the multiuse trail, the downhill trails would be constructed by professional trail builders in accordance with the specifications stipulated in the Trail Design Parameters of the National Forest Service to Trail Class 3 (reference FSH2309.18, Section 23.13, Exhibit 01), with minimum disturbance and impact to the existing landscape of the project site.

Multiuse Cross-Country Trail

As described in Section 1.4.1, *Existing Land Use*, the existing trails throughout the project site consist mostly of dirt maintenance roads that are very steep (sometimes greater than 25 percent), and there are very few purpose-built trails created to modern trail-building specifications. The proposed project includes a five-mile cross-country-style loop trail that would ring the project site (see Figure 4). The proposed trail would follow natural contours and aims for a running grade of 5 to 7 percent, which would provide for a better hiking and biking experience.

The cross-country trail would be a multiuse (hike and bike), bi-directional trail, approximately 48 inches wide, and constructed with a compacted native soil surface. Because of the narrow width and inclusion of bikes, it is likely that equestrians would not be permitted on this trail.

As with the multiuse climbing trail, the cross-country trail would be constructed by professional trail builders in accordance with the specifications stipulated in the Trail Design Parameters of the National Forest Service to Trail Class 3 (reference FSH2309.18, Section 23.13, Exhibit 01), with minimum disturbance and impact to the existing landscape of the project site.

Project Site Materials and Design

All pump tracks would be constructed out of a roadway base and asphalt surfacing. All trails and jump lines would be soil base treads and would include bike park features. All ADA pathway paving would be concrete, and drive aisle paving would be asphalt per roadway specifications. All fencing would be split rail and walls would be gabion[1] with native stone.

Construction of the bike park and trails would include protection and retention of existing vegetation and minimizing disturbance to the existing hillside topography to maintain the existing drainage patterns. The preservation of existing vegetation throughout the project site would minimize impacts to existing trees, shrubs, and grasses, which would, in effect, protect the soil on the hillside from erosion and provide stabilization in areas that are susceptible to potential erosion. The sloped topography conditions would provide long-term stormwater benefits with sufficient runoff and increased absorption.

Earthwork for the proposed project is expected to consist of site preparations, miscellaneous cutting and filling (about 5 feet or less) to achieve the desired site elevations and bike path contours, and removal and compaction of existing unsuitable site soils. Earthwork may also include trimming some of the existing slopes for stability purposes.

Access Road and Parking

The proposed project includes the provision of a regraded access road that would lead to the bike park core and parking area. The dirt access road that leads to the currently undeveloped pad that makes up the proposed bike park core and parking area is accessed from a secured (chain-link fence gate) driveway along Glendora Avenue. The regraded access road would be designed to meet the design requirements for the City of Glendora and Los Angeles County Fire Department fire and emergency vehicle accessibility.

The proposed parking lot at the western end of the project site, which would serve as the main parking area for the bike park core, would include a total of 17 parking spaces with 1 handicap-accessible space. The parking stalls would include precast concrete wheel stops. Also, 7 parallel parking spaces would be provided on the west side of the regraded access road. A total of 24 new parking spaces would be provided.

There are three existing parking areas that will continue to serve the users of the project site. As shown on Figure 4, *Conceptual Bike Park and Trails Plan*, the existing parking areas are at established trailheads at South Hills Park and Centennial Heritage Park (north end of the project

[1] A gabion is a wirework container filled with rock, broken concrete, or other material, used in the construction of dams, retaining walls, etc.

site) and Bonnie Cove (south end of the project site). There are no improvements proposed for the Bonnie Cove trailhead and parking area at this time.

2.3.2 Operational Characteristics: Park Program, Use, and Hours

The bike park and trails of the project site would operate similar to many of City's parks and wilderness areas, with limited staff and no staff on-site on a daily basis. Service will be provided on a daily basis to remove trash and clean the restrooms. Staff from the City's parks division would check the bike park and trails twice per week to ensure that site conditions, amenities, and facilities are up to City standards. It is anticipated that City staff/contractors would visit the project site up to nine times per week. Hours of operation for the bike park and trails would be the same as other wilderness areas in the city, dawn to dusk daily. Therefore, no lighting would be provided in any area of the bike park or trails.

2.3.3 Utility and Service Systems

No water, wastewater, electrical or natural gas services would be needed to serve the proposed project's recreational improvements and amenities. The vault restroom proposed in the bike park core area would include upgraded portable-style stalls and would be emptied on a regular basis (not septic). Vault restrooms typically come with a 750-gallon, high-density polyethylene (HDPE) vault that accommodates about 16,000 to 18,000 uses before needing to be pumped out. The pumping process is the same as is used with traditional port-o-johns. The 750-gallon HDPE vaults are installed over a compacted base with a cast-in-place concrete footing. The vault is then completely encapsulated in poured-in-place concrete.

Solid waste and recycling generated by the proposed uses on-site would be collected and hauled away by a contracted service provider and transported to the waste collection and disposal facilities serving Glendora. Solid waste and recycling receptacles would be placed near proposed restrooms and staging areas. Solid waste would be collected and hauled away on a daily basis.

2.3.4 Project Phasing and Construction

Construction of the proposed project is anticipated over a period of approximately 11 months, commencing in January 2026 and ending in December 2026. Construction activities are anticipated to disturb approximately 4.25 acres of the 318-acre project site. Demolition of existing improvements would be limited to soil disturbance; clearing, stripping, and grubbing of existing vegetation, consisting of mostly shrubs; and removal of boulders and rocks.

No soil export or import is anticipated; however, it is anticipated that about 778 tons of debris would be hauled off-site. Construction staging areas, including earth stockpiling, storage of equipment and supplies, and related activities would be confined within the boundaries of the project site; specifically, in the flat pad area in the western end of the project that would be developed with the bike park core and parking area. The anticipated types of construction equipment used during construction activities would include mini excavators, drum rollers, loaders, trail dozers, and haul vehicles. Much of the trail improvement work would be done with hand tools. The anticipated types and quantities of construction equipment are further summarized in Section 3.III, *Air Quality*.

2.4 REQUIRED PERMITS AND APPROVALS

2.4.1 Discretionary Actions and Approvals

Under CEQA Guidelines Section 15357, a discretionary action means a project that calls for an exercise of judgment or deliberation when the public agency (for the proposed project, the public agency is the City of Glendora) decides to approve or disapprove a particular activity, as distinguished from situations where the public agency or body merely has to determine whether there has been conformity with applicable statutes, ordinances, regulations, or other fixed standards. Glendora is the lead agency under CEQA and has the principal approval authority over the proposed project. Following is a list of the discretionary actions and approvals required for implementation of the proposed project.

- Adoption of a Mitigated Negative Declaration and Mitigation Monitoring and Reporting Program
- Approval of Project No. PLN25-5031.

2.4.2 Incorporation by Reference

The information in this Initial Study is based, in part, on the following documents that include the project site or provide information addressing the general project area or use.

- **Glendora General Plan/Community Plan 2025.** The General Plan is a policy document designed to provide long-range guidance and direction for decisions affecting the future character of Glendora. It represents the blueprint and official statement of the community's physical development as well as its economic, social, and environmental goals. The General Plan was used throughout this Initial Study as the fundamental planning document governing development on the project site.

- **Glendora Zoning Ordinance.** The Glendora Zoning Ordinance (Title 21 of the Glendora Municipal Code) is the regulating tool that the City uses to implement the General Plan and establishes the basic regulations under which land in the city is developed and utilized. This includes but is not limited to regulations and controls for the design and improvement of development sites, allowable uses, building setback and height requirements, and other development standards. The basic intent of the ordinance is to promote and protect the public health, safety, convenience, and welfare of present and future citizens of Glendora. The Glendora Zoning Ordinance was used throughout this Initial Study as the fundamental regulatory document governing development on the project site.

3. ENVIRONMENTAL EVALUATION

This section includes a checklist for each environmental topic, evaluates the significance criteria in the checklists, and, if necessary, provides mitigation measures to reduce potential impacts.

I. AESTHETICS

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

Issues	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
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?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

DISCUSSION

a) Would the project have a substantial adverse effect on a scenic vista?

For purposes of determining significance under CEQA, a scenic vista is generally considered a viewpoint that provides expansive views of a highly valued landscape for the benefit of the

general public. Some scenic vistas are officially designated by public agencies. Vistas provide visual access or panoramic views to a large geographic area and are generally located at a point where surrounding views are greater than one mile away. Panoramic views are usually associated with vantage points over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views might include an urban skyline, valley, mountain range, a large open space area, the ocean, or other water bodies. A substantial adverse effect to a scenic vista is one that degrades the view from such a designated view spot.

Parts of Glendora are considered scenic, including undeveloped hillsides, open spaces, and ridgelines of the San Gabriel Mountains in the City's northern boundary and beyond, which provide a backdrop to the City's urban environment. The foothills of the San Gabriel Mountains are approximately two miles north of the project site. Because of their proximity and substantial height (up to 10,000 feet above mean sea level), views of these mountains are prominent from many vantage points in the city. Views are most prominent from certain roadways and in certain locations from places of work and residences.

Views of the San Gabriel Mountains are available to individuals who hike, bike, and walk along the existing trails throughout the project site. The extent of the views provided depends on the location of the trail within the hillside areas and whether or not any obstructions are present (e.g., mature trees, tall shrubs, hillsides). Views of the San Gabriel Mountains from the existing trails, where available, would not be obstructed as a result of the proposed project because no structures or vertical elements are proposed along the trail paths. Also, the provision of new trails through the project site under the proposed project would provide additional viewing opportunities of the San Gabriel Mountains.

Additionally, the project site consists of the South Hills Wilderness area, which can be characterized as mountainous, with moderate and steep rocky slopes throughout the site. Multiple valleys are spread across the hills, with peaks being fairly uniform. There are also fairly level areas that resemble terraces. The project site consists of a mix of sporadic and dense vegetation, which includes a variation of native and non-native ground cover, shrubs, and trees. As it exists, the project site is considered a visual resource to residents of the city as well as passerby along the major freeway (I-210) and roadways that provide scenic views of the project site. Development of the new trails under the proposed project would not alter the visual character of the project site as the trails are all surface level improvements with no structures or vertical elements proposed. Also, the proposed design and materials of the trails would help them blend into the natural features of the project site.

Furthermore, the proposed bike park core area would be on an approximately one-acre, undeveloped flat pad that resembles a terrace approximately a quarter of the way between the base and peak of project site, on the westernmost end of the site (see Figure 4, *Conceptual Bike*

Park and Trails Plan). The location of the bike park core area, which would include a small restroom structure and bike courses, would not be visible to surrounding residents or passersby along the major freeway (I-210) and roadways that provide scenic views of the project site due to the proposed location and elevation of the bike core area, as well as intervening development and vegetation that greatly impede views of this area of the project site.

Based on the preceding, impacts to scenic vistas would be less than significant, and no mitigation measures are necessary.

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Scenic highways are a unique component of the regions circulation system as they traverse areas of scenic or aesthetic value. Per Caltrans, a highway may be designated as scenic depending on how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes upon the traveler's enjoyment of the view (Caltrans 2018).

The project site is in a highly urbanized area of the City and is not on or near a state-designated or -eligible scenic highway, as designated on the California Scenic Highway Mapping System of the California Department of Transportation (Caltrans 2018). The nearest eligible highway is Route 39, which is located 3.3 miles west of the project site. Due to the distance, topography, and intervening development, the proposed project would not impact scenic resources within this eligible scenic highway. Furthermore, the project site does not contain any historic buildings or rock outcroppings. Therefore, no impacts related to scenic resources within a scenic highway would occur and no mitigation measures are necessary.

c) In nonurbanized areas, would the project 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?

The assessment of aesthetic impacts is subjective by nature. Aesthetics generally refers to the identification of visual resources and their quality, as well as an overall visual perception of the environment. A project is generally considered to have a significant aesthetic impact if it substantially changes the character or quality of the project site such that the site becomes visually incompatible with or visually unexpected in its surroundings.

The project site is in an urbanized area of the City, and therefore, consistency with applicable zoning and other regulations governing scenic quality are used to determine potential impacts. The project site encompasses the South Hills Wilderness area of the city known as South Hills

Park (see Figure 3, *Aerial Photograph*), which is a public-access park. The project site contains several dirt trails/roads, trailheads, and parking lots (paved and unpaved) that serve hikers, bikers, and equestrian users. The project site can be characterized as mountainous, with moderate and steep rocky slopes occurring throughout the site. Multiple valleys are spread across the hills with peaks being fairly uniform. There are also fairly level areas that resemble terraces. The project site consists of a mix of sporadic and dense vegetation, which includes a variation of native and nonnative ground cover, shrubs, and trees.

Following is a discussion of the potential impact on the visual character or quality of the project site and its surroundings resulting from the construction and operational phases of the proposed project.

Project Construction Phase

Project implementation would result in construction activities that would temporarily change the visual character of certain areas of the project site and its surroundings. Construction activities would involve site clearing, grading, building, and site improvements. Construction staging areas, including earth stockpiling, storage of equipment and supplies, and related activities would contribute to a generally “disturbed site,” which may be perceived by some as a visual impact.

However, these effects would be typical of any site in the city that undergoes development or redevelopment. Project development would involve clearing, grading and earthwork, and construction activities. Overall construction is estimated to take approximately 11 months, commencing in January 2026 and ending in December 2026. Construction activities are anticipated to disturb approximately 4.25 acres of the 318-acre project site. Construction activities may be visible during the site preparation and construction phases; however, they would be temporary and would cease upon completion. Construction would be consistent with the hours of construction stipulated in Section 9.44.110, Construction of Buildings and Projects, of the Glendora Municipal Code. Per Section 9.44.110, construction hours are limited to between the hours of 7:00 am and 9:00 pm.

Also, construction staging areas, including earth stockpiling, storage of equipment and supplies, and related activities would occur on the flat pad area in the western end of the project site that would be developed with the bike park core and parking area. Further, where necessary, construction fencing would be erected to help shield the construction areas and would also be temporary. Specifically, the typical fencing to be provided (i.e., chain-link fencing with mesh fabric or similar screening material) would screen off-site views of the construction areas, including the screening of stockpiles, graded areas, construction equipment, and building materials.

Therefore, project-related construction activities would not have a significant effect on the existing visual character or quality of the site and its surroundings or conflict with applicable zoning and other regulations governing scenic quality. Construction impacts related to a conflict with applicable zoning and other regulations governing scenic quality would be less than significant and no mitigation measures are necessary.

Project Operation Phase

Plans for the proposed project include a bike park core area, downhill bike-only trails, a multi-directional "pedal up" trail, a longer "cross-country" style multi-use and bi-directional trail that is planned to ring the project site, bicycle pump tracks, mountain bike jump trails, trail head improvements, staging and seating areas, a restroom facility, a re-graded access road off of Glendora Avenue, and improved parking areas. The primary core of the bike park is proposed on the west side of the project site on an approximately one-acre undeveloped flat pad that resembles a terrace approximately a quarter of the way in between the base and peak of project site.

The proposed project would be developed in accordance with the provisions of the Glendora Zoning Ordinance (Title 21 of the Glendora Municipal Code). For example, the uses and improvements under the proposed project would be in accordance with the allowed uses under the proposed Open Space Natural zoning designation of the project site. As outlined in Section 21.06.050, Open Space-Natural Zone (OSN), of the Zoning Ordinance, permitted uses for properties located in an OSN zone shall be left in its natural, wilderness state except for the following uses: riding and hiking trails, picnic and playground areas, flood control structures and facilities, and utility substations and related equipment and structures. As noted above, the proposed project includes the development of a bike park core area and various hiking trails, which are permitted and in line with the uses of the OSN zone. Also, the majority of the project site would remain in its existing natural state; construction activities are anticipated to disturb approximately 4.25 acres of the 318-acre project site.

As also outlined in Section 21.06.050 of the Zoning Ordinance, development standards for the OSN zone shall be determined on a site-by-site basis. Consideration shall be given to surrounding properties and developments in order to blend the development with, and to keep it consistent with, the surrounding area. Factors to be considered for determination of standards shall be topography, water drainage, circulation, use of site, and any other environmental factors related to the site. In coordination with its design consultant, the City has carefully considered the surrounding land uses as well as the existing project site features, terrain, topography, and natural features and resources in its design of the proposed project. The uses, features, and improvements of the proposed project would be designed and constructed to blend in with and be complementary to the existing uses and conditions of the project site and its surroundings.

Additionally, the proposed trail system would be constructed by professional trail builders in accordance with the specifications stipulated in the Trail Design Parameters of the National Forest Service to Trail Class 3 (reference FSH2309.18, Section 23.13, Exhibit 01), with minimum disturbance and impact to the existing landscape of the project site, thereby minimizing any visual changes.

Overall, development of the proposed project would complement and be compatible with the visual character and zoning requirements of the project site and its surroundings through new park and recreational improvements. The proposed restroom building, hardscape and landscape elements and design would ensure that development of the proposed project is not detrimental to the visual character or quality of the surrounding area or uses.

Based on the preceding, the proposed project would not conflict with applicable zoning or regulations governing scenic quality, nor would it substantially degrade the visual character or quality of the project site and its surroundings. Therefore, operational impacts related to conflicts with applicable zoning and other regulations governing scenic quality would be less than significant and no mitigation measures are necessary.

d) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Lighting effects are associated with the use of artificial light during the evening hours. There are two primary sources of light—light emanating from building interiors passing through windows and openings, and light from exterior sources (i.e., street lighting, architectural building illumination, security lighting, parking lot lighting, landscape lighting, and signage). Excessive light and/or glare can impair vision, cause a nuisance, affect sleep patterns, and generate safety hazards when experienced by drivers. Uses such as residences, elderly care facilities, schools, and hotels are considered light sensitive, since occupants have expectations of privacy during evening hours and may be subject to disturbance by bright light sources. Light spill or trespass is considered a nuisance and is typically defined as the presence of unwanted light on properties adjacent to the property being illuminated. Increased light and glare can also have negative effects on wildlife species, including impacts related to increased bird strikes from glare, and disruptions to normal migration, nesting, feeding, and other biological processes from increased lighting. With respect to lighting, the degree of illumination may vary widely depending on the amount of light generated, height of the light source, presence of barriers or obstructions, type of light source, and weather conditions.

Glare is primarily a daytime occurrence caused by the reflection of sunlight or artificial light on surfaces of buildings or objects, including highly polished surfaces such as glass windows or reflective materials and, to a lesser degree, from broad expanses of light-colored surfaces. Perceived glare is the unwanted and potentially objectionable sensation experienced by a person as they look directly into the light source of a luminaire. Daytime glare generation is

common in urban areas and is typically associated with buildings with exterior façades largely or entirely composed of highly reflective glass. Daytime glare can also be generated by light reflecting off passing or parked cars. Glare is produced during evening and nighttime hours by the reflection of artificial light sources such as automobile headlights. Glare generation is typically related to either moving vehicles or sun angles, although glare resulting from reflected sunlight can occur regularly at certain times of the day and year. Excessive glare not only impedes visibility but also increases the ambient heat reflectivity in a given area. Glare-sensitive uses include residences, hotels, transportation corridors, and aircraft landing corridors.

Following is a discussion of the potential light and glare impacts resulting from implementation of the proposed project.

Project Construction Phase

Construction activities that would occur within the confines of project site, specifically, within the proposed areas of improvement. Although some construction activities could occur during the early evening hours (possibly within the bike park core area only), construction activities for the most part would be limited to daytime hours. With the exception of the possible illumination of the construction staging area during nighttime hours for safety and security purposes, no other nighttime lighting would be needed. Any nighttime lighting needed during the construction phase would be temporary and removed upon completion of the construction phase. Additionally, construction activities are not anticipated to result in flat, shiny surfaces that would reflect sunlight or cause other natural glare. Therefore, no short-term, construction-related impacts associated with light and glare would occur. Impacts would be less than significant and no mitigation measures are necessary.

Project Operation Phase

The proposed project would not result in new source of light or glare that would adversely affect views in the surrounding area. The proposed project involves improvements to recreational bike trails and park facilities, which are typically used during daylight hours. Hours of operation for the proposed project would be similar to other wilderness parks in the city, from dusk to dawn. Therefore, no sources of nighttime lighting would be included with the proposed project. Additionally, none of the project elements or improvements would include surfaces that would reflect sunlight or cause other natural glare. Therefore, impacts would be less than significant and no mitigation measures are necessary.

II. AGRICULTURE AND FORESTRY RESOURCES

Would the project:

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
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))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
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?	☐	☐	☐	☒

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.

DISCUSSION

a) Would the project 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?

The project site is not mapped as farmland. According to the California Department of Conservation Important Farmland Map, the project site is designated as "Other Land," and the surrounding area is designated as "Urban and Built-Up Land" (DOC 2024). The project site is not identified as or located adjacent to an area designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The project site is not suitable for grazing or crop production. Additionally, the City does not contain any agriculturally designated land (City of Glendora 2021). Therefore, project development would not convert mapped farmland to nonagricultural use. No impact would occur and nor mitigation measures are necessary.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

Williamson Act contracts restrict the use of privately owned land to agriculture and compatible open space uses under contract with local governments; in exchange, the land is taxed based on actual use rather than potential market value. The project site is not zoned for agricultural use. The project site is zoned PR (Planned Redevelopment), E-7-200,000 (Single-Family Estate), and OSN (Open Space- Natural). The project site's zoning designations do not permit agricultural uses. The project site is also in an urbanized area of the city—it does not contain farmland or other agricultural uses and is not adjacent to or in proximity of such uses. Project implementation would not conflict with zoning for agricultural uses or a Williamson Act contract. Therefore, no impact would occur, and no mitigation measures are necessary.

c) Would the project 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))?

The proposed project would not conflict with existing zoning for forest land, timberland, or timberland production. Forest land is defined as "land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits" (California Public Resources Code § 12220[g]). Timberland is defined as "land…which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees" (California Public Resources Code § 4526).

The project site is not designated or zoned for forest or timber land or used for forestry. As noted above, the project site is zoned PR (Planned Redevelopment), E-7-200,000 (Single-Family Estate), and OSN (Open Space- Natural). The project site does not meet the definition of lands designated as forestland or timberland as defined by PRC Sections 12220(g), 4526, and 51104(g). Additionally, the Glendora General Plan and Municipal Code do not provide for any forest land preservation in the city, as none exist. Furthermore, the existing ornamental and native trees on the project site are not cultivated for forest resources. Therefore, no impact would occur and no mitigation measures are necessary.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

See response to Section 3.II.c. As substantiated in this section, no impact would occur and no mitigation measures are necessary.

e) Would the project 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?

See responses to Sections 3.II.a, 3.II.b, and 3.II.c. The project site does not contain farmland or other agricultural uses and is not adjacent to or in proximity to such uses. As substantiated in these sections, no impact would occur, and no mitigation measures are necessary.

III. AIR QUALITY

Would the project:

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
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?	☐	☐	☒	☐

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

This section addresses the impacts of the proposed 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 A.

The primary air pollutants of concern for which ambient air quality standards (AAQS) have been established are ozone (O_3), carbon monoxide (CO), coarse inhalable particulate matter (PM_{10}), fine inhalable particulate matter ($PM_{2.5}$), sulfur dioxide (SO_2), nitrogen dioxide (NO_2), 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_3, and $PM_{2.5}$ under the California and National AAQS, and nonattainment for PM_{10} under the California AAQS (CARB 2025).

Furthermore, the South Coast AQMD has identified regional thresholds of significance for criteria pollutant emissions and criteria air pollutant precursors, including VOC, CO, NO_X, SO_X, PM_{10}, and $PM_{2.5}$. 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.

DISCUSSION

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

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. The proposed project would serve as an improved recreational bike park and park facilities for the existing residents of Glendora and would not result in direct and/or indirect population growth. Based on its scope and nature, the proposed project would not substantially affect housing, employment, or population projections within the region.

Additionally, as demonstrated in Section 3.III.b, the regional emissions that would be generated by the operational phase of the proposed 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 proposed project would not affect the regional emissions inventory or conflict with strategies in the 2022 AQMP. Impacts would be less than significant, and no mitigation measures are necessary.

b) Would the project 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?

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

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 volatile organic compounds (VOCs) from paints.

Construction activities for the proposed project are anticipated to disturb approximately 4.25 acres on the project site. The proposed project would involve asphalt demolition, site preparation, rough grading, sidewalk paving, building construction (vault restroom and shade structure), jump line trails, multi-use trails and downhill trails, asphalt paving, architectural coating, and finishing/landscaping. Overall construction is anticipated to start in January 2026 and finish in December 2026. Construction emissions were estimated using the California Emissions Estimator Model (CalEEMod), Version 2022.1, and are based on the preliminary construction duration provided by the City.

Table 1 shows that maximum daily emissions for VOC, NO_X, CO, SO_2, PM_{10}, and $PM_{2.5}$ from construction-related activities would be less than their respective South Coast AQMD regional significance threshold values. Therefore, air quality impacts from project-related construction activities would be less than significant and no mitigation measures are necessary.

Table 1 Maximum Daily Regional Construction Emissions

Construction Phase	Pollutants (lbs/day)[1, 2]					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Year 2026						
Asphalt Demolition, Site Preparation, and Asphalt Paving	7	63	65	<1	13	7
Rough Grading	1	15	10	<1	5	2
Rough Grading and Vault Restroom	1	17	12	<1	5	2
Rough Grading, Vault Restroom, and Architectural Coating	4	18	14	<1	5	2
Architectural Coating	3	1	1	<1	<1	<1
Sidewalk Paving and Jump Line Trails	<1	3	4	<1	<1	<1
Jump Line Trails	<1	2	2	<1	<1	<1
Multi-use Trails and Downhill Trails	2	18	16	<1	6	3
Multi-use Trails and Downhill Trails and Shade Structure	2	20	19	<1	6	3
Multi-use Trails and Downhill Trails and Finishing/Landscaping	2	19	17	<1	6	3
Maximum Daily Construction Emissions						
Maximum Daily Emissions	7	63	65	<1	13	7
South Coast AQMD Regional Construction Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Significant?	No	No	No	No	No	No

Source: CalEEMod Version 2022.1. South Coast AQMD 2023.

Notes: lbs/day = pounds per day

Table 1 Maximum Daily Regional Construction Emissions

Construction Phase	Pollutants (lbs/day)[1, 2]					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$

1. Based on the preliminary information provided by the City. 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.
2. 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 25 miles per hour on unpaved surfaces, and street sweeping with Rule 1186–compliant sweepers.

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). As described in the Vehicle Miles Traveled Screening Analysis prepared for the proposed project (Appendix G), the trip generation of the proposed project based on park acreage would be low for an active park, and therefore the trip generation was calculated based on the number of employees expected to be at the park each day. As demonstrated in the Vehicle Miles Traveled Screening Analysis, the proposed project would not have a significant impact on vehicle miles traveled (VMT) based on the City's land use development screening thresholds for Small Project Size and Community Serving Projects. The proposed project would generate 60 daily trips, which is below the 250 Small Project Size daily threshold, and would be a community-serving project for residents of Glendora. Therefore, the operation of the proposed project would not generate substantial new trips to the project site and would address the city's limited access to dedicated bike parks.

As shown in Table 2, it is anticipated that operation of the proposed 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 proposed project would be less than significant and no mitigation measures are necessary.

Table 2 Maximum Daily Regional Operation Emissions

Source	Maximum Daily Emissions (lbs/Day)					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Max Daily Emissions						
Mobile	<1	<1	2	<1	<1	<1
Area	<1	<1	<1	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Total	<1	<1	2	<1	<1	<1
South Coast AQMD Regional Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceeds Threshold?	No	No	No	No	No	No

Source: CalEEModVersion 2022.1.

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

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

The proposed 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 off-site sensitive receptors are the residences surrounding the project site on all sides.

Air pollutant emissions generated by construction activities would cause temporary increases in air pollutant concentrations. Table 3 shows the maximum daily construction emissions (pounds per day) generated during on-site construction activities compared with the South Coast AQMD's screening-level LSTs for sensitive receptors within 82 feet (25 meters) for NO_X, CO, PM_{10} and $PM_{2.5}$ in SRA 9: East San Gabriel Valley. As shown in Table 3, construction of the proposed project would generate construction-related on-site emissions that would exceed the screening-level LSTs for PM_{10} and $PM_{2.5}$. Thus, project-related construction activities would have the

potential to expose sensitive receptors to substantial pollutant concentrations, and localized air quality impacts from construction activities may be potentially significant.

Table 3 Unmitigated Localized Construction Emissions

Construction Activity	Pollutants(lbs/day)[1]			
	NO_X	CO	PM_{10}[2]	$PM_{2.5}$[2]
South Coast AQMD ≤1.00 Acre LST	**89**	**623**	**5.00**	**3.00**
Rough Grading	9	8	3.12	1.70
Rough Grading and Vault Restroom	10	10	3.16	1.74
Rough Grading, Vault Restroom, and Architectural Coating	11	11	3.18	1.76
Architectural Coating	1	1	0.02	0.02
Sidewalk Paving and Jump Line Trails	3	4	0.16	0.10
Jump Line Trails	2	2	0.12	0.06
Multi-use Trails and Downhill Trails	18	16	**5.97**	**3.36**
Multi-use Trails and Downhill Trails and Shade Structure	20	18	**6.01**	**3.40**
Multi-use Trails and Downhill Trails and Finishing/Landscaping	18	16	5.97	3.36
Exceeds LST?	No	No	**Yes**	**Yes**
South Coast AQMD 4.25-Acre LST	**184**	**1,538**	**12.24**	**7.25**
Asphalt Demolition, Site Preparation, and Asphalt Paving	61	63	12.09	6.47
Exceeds LST?	No	No	No	No

Source: CalEEMod Version 2022.1. South Coast AQMD 2008, 2011, and 2023.

Notes: In accordance with South Coast AQMD methodology, only on-site stationary sources and mobile equipment are included in the analysis. Screening level LSTs are based on receptors within 82 feet (25 meters) for NO_X, CO, PM_{10} and $PM_{2.5}$ in SRA 9.

1. 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.
2. 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 25 miles per hour on unpaved surfaces, and street sweeping with Rule 1186–compliant sweepers.

As demonstrated in Table 4, construction of the proposed project would not generate construction-related on-site emissions that would exceed the screening-level LSTs for PM_{10} and $PM_{2.5}$ with implementation of Mitigation Measure AQ-1. Accordingly, localized construction

impacts would be reduced to a level of less than significant. Compliance with Mitigation Measure AQ-1 would be ensured through the City's development review process.

Table 4 Mitigated Localized Construction Emissions

Construction Activity	Pollutants(lbs/day)[1]			
	NO_X	CO	PM_{10}[2]	$PM_{2.5}$[2]
South Coast AQMD ≤1.00 Acre LST	**89**	**623**	**5.00**	**3.00**
Rough Grading	9	8	2.26	1.26
Rough Grading and Vault Restroom	10	10	2.30	1.30
Rough Grading, Vault Restroom, and Architectural Coating	11	11	2.32	1.32
Architectural Coating	1	1	0.02	0.02
Sidewalk Paving and Jump Line Trails	3	4	0.16	0.10
Jump Line Trails	2	2	0.12	0.06
Multi-use Trails and Downhill Trails	18	16	4.27	2.48
Multi-use Trails and Downhill Trails and Shade Structure	20	18	4.31	2.52
Multi-use Trails and Downhill Trails and Finishing/Landscaping	18	16	4.27	2.48
Exceeds LST?	No	No	No	No
South Coast AQMD 4.25-Acre LST	**184**	**1,538**	**12.24**	**7.25**
Asphalt Demolition, Site Preparation, and Asphalt Paving	61	63	9.53	5.16
Exceeds LST?	No	No	No	No

Source: CalEEMod Version 2022.1. South Coast AQMD 2008, 2011, and 2023.

Notes: In accordance with South Coast AQMD methodology, only on-site stationary sources and mobile equipment are included in the analysis. Screening level LSTs are based on receptors within 82 feet (25 meters) for NO_X, CO, PM_{10} and $PM_{2.5}$ in SRA 9.

1. 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.

2. 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 25 miles per hour on unpaved surfaces, and street sweeping with Rule 1186–compliant sweepers. Incorporates Mitigation Measure AQ-1, which requires dust control measure of watering the site 3x per day.

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. Construction of the proposed project is anticipated to be completed in approximately 11 months, which would limit the exposure to on- and off-site receptors. Thus, construction emissions would not pose a health risk to onsite and off-site receptors, and project-related construction health impacts would be less than significant. No mitigation measures are necessary.

Operation LSTs

Because the installation and use of stationary source equipment are not proposed as part of the project, operation of the proposed project would not generate substantial emissions from on-site 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 on-site and would require a permit from South Coast AQMD. The proposed project does not fall within these categories of uses. Furthermore, the proposed vault restroom would not use standard on-site mechanical equipment (e.g., heating, ventilation, and air conditioning) and therefore would not generate air pollutant emissions. Localized air quality impacts related to operation-related emissions would be less than significant, and no mitigation measures are necessary.

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. Since South Coast AQMD does not currently have an adopted CO hotspot screening criteria, this analysis uses Bay Area Air District's recommended threshold. Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection to 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 (Bay Area Air

District 2023). Based on the Vehicle Miles Traveled Screening Analysis prepared for the proposed project (Appendix G), the proposed project would generate five AM and seven PM peak-hour trips, which is less than the 50 peak-hour trip threshold, and therefore intersections or roadway segments did not need to be studied. Consequently, buildout of the proposed project would not generate traffic volumes that would exceed Air District's recommended hourly screening criteria. Thus, the proposed project would not introduce new vehicle trips which may result in a CO hotspot when combined with existing traffic volumes and impacts would be less than significant.

> **Mitigation Measure AIR-1:** To reduce impacts related to localized on-site emissions, the City of Glendora Planning Division shall implement the following fugitive dust control measure that exceeds South Coast Air Quality Management District's Rule 403.
>
> - Applying water three times a day to active soil-disturbing activities.
>
> This identified measure shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City's Planning Division.

d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

The proposed 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 proposed project would include the construction of a new bike park and the expansion of existing trails and park facilities. The proposed project 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. Therefore, odor impacts would be less than significant and no mitigation measures are necessary.

IV. BIOLOGICAL RESOURCES

Would the project:

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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) 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?	☐	☒	☐	☐
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?	☐	☐	☒	☐
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?	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

The analysis in this section is based partly on the following technical studies, which are included in the appendices of this Initial Study.

- *Biological Resources Evaluation*, HANA Resources, Inc., August 2025. (Appendix B)
- *Preliminary Jurisdictional Delineation Report*, HANA Resources, Inc., August 2025. (Appendix C)

DISCUSSION

a) Would the project 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?

The project site comprises the South Hills Wilderness area known as South Hills Park, which is a public-access park. The project site can be characterized as mountainous, with moderate and steep rocky slopes throughout the site. Multiple valleys are spread across the hills, and peaks are fairly uniform. There are also fairly level areas that resemble terraces. The project site consists of a mix of sporadic and dense vegetation, which includes a variation of native and non-native ground cover, shrubs, and trees.

Sensitive biological resources are habitats or individual species that have special recognition by federal, state, or local conservation agencies and organizations as endangered, threatened, or rare. As a part of the Biological Resources Evaluation conducted for the project site (Appendix B), qualified biologists conducted literature review and field surveys (total of three surveys on consecutive days) of the project site to assist with identifying any potential for occurrence of sensitive species, vegetation communities, or habitats to support sensitive wildlife species. The field surveys consisted of vegetation mapping and plant identification, as well as opportunistic bird and wildlife observations. A comprehensive list of the plant and wildlife species observed during the surveys is presented in Appendix C of the Biological

Resources Evaluation (Appendix B to this Initial Study). Following is a summary of the analysis, findings and recommendations provided in the Biological Resources Evaluation.

Vegetation Communities

Sensitive natural communities are communities that are of limited distribution statewide or within a county or region and are often vulnerable. These communities may or may not contain special-status plants or their habitat.

The literature review conducted for the project site resulted in a list of six sensitive natural vegetation communities that have been known to occur within the project site and surrounding five miles. Based on the site surveys conducted for the project site, five vegetation communities were determined to occur within the confines of the project site: California Walnut Woodland, Chaparral Sage Scrub, Mesic North Slope Chaparral, Mixed Woodland, and Oak Stand. Of the six sensitive vegetation communities identified in the literature review, one (South Coast Live Oak Riparian Forest) had high potential to occur on-site, and four had low potential. California Walnut Woodland, which is a sensitive vegetation community, is present on-site, mainly along the northern slope. However, walnut woodland was present in low quantity and quality, largely occurring as small patches within or adjacent to coast live oak woodlands. Additionally, implementation of the proposed project includes plans to protect and retain existing vegetation throughout the project site, which includes the protection of trees, including those that could occur within the South Coast Live Oak Riparian Forest (which was not identified on-site during the site surveys conducted, but has the high potential to occur) and those that occur within the California Walnut Woodland. Furthermore, improvements within or near walnut woodlands and South Coast Live Oak Riparian Forest (if found on-site) would have low impacts, limited to trail improvements. Given the limited ground-disturbing impacts associated with trail improvements in these areas of the project site and the proposed project's goal to protect and retain trees on-site, impacts to California Walnut Woodland and South Coast Live Oak Riparian Forest would be less than significant and no mitigation measures are necessary.

Plant Species

The literature review conducted for the project site resulted in a list of 29 special-status plant species that have been known to occur within the project site and surrounding five miles. Based on the site surveys conducted for the project site, 50 plant species were observed within the confines of the project site. Of the 29 special-status species found from the literature review, 2 have a high potential for occurrence within the project site, 4 have a moderate potential, and 14 have a low potential. One special-status plant species was present within the project site: Southern California black walnut (*Juglans californica*). This special-status plant species was primarily encountered in the riparian corridors as well as along the Walnut Trail going across the northern portion of the project site.

Focused surveys are required for any federal and/or state listed endangered species with potential to occur on a development site when the species is in bloom to ensure it is both evident and identifiable during the survey. However, due to the project site being in an urbanized area of the city, lack of suitable habitat for protected species, and limited species occurrences in the area, focused surveys for the sensitive plans species with the potential to occur on-site are not required.

While protected species were not detected during site surveys conducted and focused surveys are not required, the project site supports individuals and native stands of Southern California black walnut, a CRPR 4.2[2] species considered of limited distribution and moderate threat. While not legally protected under federal or state endangered species acts, this species warrants conservation consideration under CEQA. Therefore, to avoid or minimize potential impacts to Southern California black walnut associated with construction of trail improvements in this area, Mitigation Measures BIO-1 is required. With implementation of Mitigation Measure BIO-1, impacts to Southern California black walnut would be reduced to a level of less than significant through ensuring no indirect impacts during construction and maintaining a no-net-loss of trees.

Wildlife Species

The literature review conducted for the project site resulted in a list of 27 special-status wildlife species that have been known to occur within the project site and surrounding five miles. Based on the site surveys conducted for the project site, a total of 43 wildlife species were observed within the confines of the project site: 37 bird species, 1 reptile species, and 4 mammal species. Of the 27 special-status species found from the literature review, 3 were observed on-site. One is a listed bird species, coastal California gnatcatcher (*Polioptila californica californica*), and two are sensitive bird species: Cooper's hawk (*Accipiter cooperii)* and Southern California rufous-crowned Sparrow (*Aimophila ruficeps canescens*). Three sensitive species were considered to have high potential for occurrence within the project site; this includes the merlin (*Falco columbaris)*, San Diegan Whiptail (*Falco columbaris)*, and San Gabriel chestnut snail (*Glyptostoma gabrielense)*. Five sensitive species were considered to have moderate potential; this includes two listed bird species, the bald eagle and the golden eagle; the crotch bumble bee; the Blainville's horned lizard; and the hoary bat.

In addition to compliance with the Migratory Bird Treaty Act (MBTA) to protect sensitive bird species, additional measures are required to be implemented to protect nesting birds that may utilize coastal sage scrub or other native vegetation on-site. Mitigation Measure BIO-2 includes these additional measures. With adherence to the MBTA and implementation of Mitigation Measure BIO-2, impacts to migratory and sensitive bird species would be reduced to a level of

[2] California Rare Plant Ranks (CRPR) are a ranking system to define and categorize rarity in the California flora. The CRPRs range from presumed extinct species (CRPR 1A) to limited distribution/watchlist species (CRPR 4).

less than significant through preconstruction surveys, nest protection measures to ensure avoidance, and compliance reporting. Additionally, implementation of the proposed project includes plans to protect and retain existing vegetation throughout the project site, which would in turn minimize impacts to sensitive bird species.

To reduce potential impacts to sensitive non-avian species (noted above) that have high and moderate potential to occur on-site (these were not identified during the site surveys conducted but determined to potentially occur on-site), implementation of the proposed project includes plans to protect and retain existing vegetation throughout the project site, which would in turn minimize impacts to sensitive non-avian species. Additionally, trail improvements under the proposed project would be low impact because these would be ground level disturbances and require minimal removal of vegetation. Once developed, the trails could also be used by non-avian species to move across the project site. Given the limited ground-disturbing impacts associated with trail improvements and the proposed project's goal to protect and retain site vegetation, impacts to sensitive non-avian species would be less than significant and no mitigation measures are necessary.

Furthermore, increased light and glare can also have negative effects on wildlife species, including impacts related to increased bird strikes from glare, and disruptions to normal migration, nesting, feeding, and other biological processes from increased lighting. As noted earlier in this Initial Study, no sources of nighttime lighting would be included with the proposed project. Additionally, none of the project elements or improvements would include surfaces that would reflect sunlight or cause other natural glare. Therefore, no impact to wildlife would occur as a result of light and glare.

> **Mitigation Measure BIO-1**. To the extent feasible, walnut trees shall be avoided through micro-siting of trails and infrastructure, with a minimum 10-foot buffer maintained from the dripline of each tree to prevent root zone disturbance. If avoidance of any walnut trees is determined not feasible, impacts shall be documented and mitigated through on-site replacement or habitat enhancement at a minimum 2:1 ratio, in coordination with the City of Glendora and consulting biologist. Success shall be measured as healthy growth of replacement trees or through accomplishing 80 percent native vegetation cover and less than 5 percent invasive species cover for habitat enhancement over a period of two to three years.
>
> **Mitigation Measure BIO-2.** To avoid impacts to nesting birds within or adjacent to the project site and to comply with the California Department of Fish and Game Code Sections 3503 and 3513 and the Migratory Bird Treaty Act, any site clearing and ground-disturbing activities should occur in the non-nesting (or non-breeding) season for birds (generally, September 1 to January 31). If this avoidance schedule is not feasible, prior to the commencement of any proposed actions (e.g., site clearing, grading) during the

breeding/nesting season, a qualified monitoring biologist contracted by the City of Glendora shall conduct a preconstruction survey(s) to identify any active nests in and adjacent to the proposed areas of improvement no more than 14 days and a minimum of 3 days prior to initiation of the action. If the biologist does not find any active nests that would be potentially impacted, the proposed action may proceed. Additionally, if the avoidance schedule is not feasible, the monitoring biologist shall be present during the proposed trail construction activities to ensure nesting birds are not affected.

If the biologist finds an active nest within or directly adjacent to the action area (within 100 feet) and determines that the nest may be impacted, the biologist shall delineate an appropriate buffer zone around the nest using temporary plastic fencing or other suitable materials, such as barricade tape and traffic cones. The buffer zone shall be determined by the biologist in consultation with applicable resource agencies (e.g., California Department of Fish and Wildlife, US Fish and Wildlife), in consideration of species' sensitivity and existing nest site conditions, and in coordination with the construction contractor. The qualified biologist shall serve as a construction monitor when construction activities occur near active nest areas to ensure that no inadvertent impacts on these nests occur. Only specified activities (if any) approved by the qualified biologist in coordination with the construction contractor shall take place within the buffer zone until the nest is vacated. Activities that may be prohibited within the buffer zone by the biologist may include but not be limited to grading and tree clearing. Once the nest is no longer active and upon final determination by the biologist, the proposed action may proceed within the buffer zone. The monitoring biologist shall prepare a survey report summarizing his/her findings and recommendations of the preconstruction survey. Any active nests observed during the survey shall be mapped on a current aerial photograph, including documentation of GPS coordinates, and included in the survey report. The completed survey report shall be submitted to the City of Glendora Planning Department prior to the commencement of construction-related activities that have the potential to disturb any active nests during the nesting season.

b) Would the project 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?

Sensitive natural communities are communities that are considered rare in the region by regulatory agencies; known to provide habitat for sensitive animal or plant species; or known to be important wildlife corridors. Riparian habitats are those occurring along the banks of rivers and streams. Following is a discussion of the potential impacts to riparian habitats and sensitive natural communities as a result of development of the proposed project.

Riparian Habitats

Potential impacts to South Coast Live Oak Riparian Forest, a sensitive natural riparian community that has a high potential to exist on-site, are addressed in Section 3.IV.a. As substantiated in this section, impacts to this riparian community were determined to be less than significant.

Impacts on aquatic features on-site, which could serve as riparian habitats, are discussed below in Section 3.IV.c. As substantiated in that section, to avoid or minimize potential impacts to aquatic/riparian features within the project site, mitigation measures are required for implementation throughout project design and construction. These measures are included as Mitigation Measures BIO-3 and BIO-4. With implementation of Mitigation Measures BIO-3 and BIO-4, impacts to aquatic features would be reduced to a level of less than significant and no additional mitigation measures are necessary.

Sensitive Natural Communities

Impacts to sensitive natural communities are discussed in Section 3.IV.a. As noted in that section, California Walnut Woodland, which is a sensitive vegetation community, is present on-site and mainly found along the northern slope. As substantiated in Section 3.IV.a, impacts to California Walnut Woodland would be less than significant with implementation of Mitigation Measure BIO-1.

c) Would the project 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?

As a part of the Biological Resources Evaluation conducted for the project site (Appendix B), the project site boundary and a 500-foot buffer were referenced online to determine the presence or absence of wetlands through the U.S. Fish and Wildlife Services (USFWS) Natural Wetland Inventory (NWI) Wetland Mapper and the Environmental Protection Agency (USEPA) and US Geologic Survey (USGS) joint National Hydrology Dataset Plus (NHDPlus). USFWS is the principal federal agency tasked with monitoring and providing information on the extent, status, characteristics, and functions of wetlands, deepwater, and other aquatic habitats. The NWI follows the national standard definition of wetlands as outlined in Cowardin et al. (2013). Wetlands are categorized based on landscape, substrate, vegetation cover, and hydrologic regime, which is known as the Cowardin system. The NHDPlus is a joint product of EPA and USGS and is part of the national data repository with differing conventions and classifications than NWI. Both sources were utilized to ensure accurate identification of potential wetlands on the project site. Upon a review of the USFWS NWI Wetland Mapper and the EPA/USGS NHDPlus it was determined that multiple nameless wetlands occurred within the project site.

Given the presence of wetlands, a Preliminary Jurisdictional Delineation (PJD) was conducted for the project site (Appendix C). As a part of the PJD, qualified biologists conducted literature review and field surveys of the potential jurisdictional resources in the project site and within a zone 50 feet outside of the proposed trail system. The survey was conducted to determine the presence and extent of wetlands, waters, and habitats that are potentially subject to the jurisdictional authority of the US Army Core of Engineers (USACE), California Department of Fish and Wildlife (CDFW), and Regional Water Quality Control Board (RWQCB). A total of 5.39 acres of potential USACE-defined and -protected wetlands and waters of the United States were identified within the project site. Specifically, a total of nine potential wetlands and five streams were investigated and are described in detail in the PJD. As substantiated in the PJD, none of the 14 features analyzed were determined to be wetlands; therefore, impacts to jurisdictional water features would not occur (Appendix C).

While the PJD determined that no jurisdictional wetland features exist within the project site, all aquatic features should be treated as potentially subject to the Clean Water Act and California Porter-Cologne Water Quality Control Act. Therefore, to avoid or minimize potential impacts to aquatic features within the project site, a variety of conservation measures are required for implementation throughout project design, construction, and post-construction maintenance. These measures are included as Mitigation Measures BIO-3 and BIO-4. With implementation of Mitigation Measures BIO-3 and BIO-4, impacts to aquatic features would be reduced to a level of less than significant.

> **Mitigation Measure BIO-3.** Aquatic features, including potential ephemeral drainages and wetland polygons identified during the delineation survey conducted as a part of the Preliminary Jurisdictional Delineation (dated August 2025), shall be avoided or minimally disturbed to the extent feasible through careful trail alignment and siting of infrastructure. During construction, trail crossings shall utilize low impact design methods through trail alignment along the narrowest portion of the streambed and use of elevated stream crossings (i.e., small-span bridge, elevated puncheon) to avoid in-channel grading. If elevated stream crossings cannot be implemented, the natural grade and slope of the streambed shall be maintained during construction to avoid alteration of hydrology. Use of native cobble or armored rock can be used for bank stabilization and to prevent channel incision.
>
> Construction activities within or adjacent to potential aquatic resources shall be scheduled during the dry season (typically May through October) to reduce the risk of hydrologic disruption and erosion. If work must occur outside of the dry season (November through April), enhanced sediment and erosion controls shall be used (e.g., two rows of silt fencing or wattles, sediment trap). In-channel work shall also be limited to low-water or dry conditions. A qualified biologist shall be present for all in-

channel or adjacent work to inspect erosion controls, ensure permit compliance, and stop work if necessary.

Mitigation Measure BIO-4. Erosion control measures and stormwater best management practices shall be incorporated into construction plans, particularly along slopes that drain toward mapped aquatic features. These may include straw wattles, silt fencing, or stabilized construction entrances to prevent sediment transport. Disturbed soils shall be stabilized as soon as practicable following construction through native seed mixes, erosion control blankets, or equivalent methods as approved by agencies.

To ensure compliance, a qualified biologist shall conduct monitoring at least once per week during active construction within or adjacent to aquatic features, and within 24 hours following any rainfall event. Monitoring shall include inspection of all erosion and sediment control measures, photo documentation of work areas, and verification of adherence to avoidance and minimization measures. A weekly monitoring report summarizing site conditions, compliance status, and any corrective actions taken shall be submitted to the City and maintained in the project file. The qualified biologist shall have the authority to halt work if non-compliance is observed until corrective measures are implemented.

d) Would the project 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?

As noted above, the project site encompasses the South Hills Wilderness area, which can be characterized as mountainous, with moderate and steep rocky slopes occurring throughout the site. Multiple valleys are spread across the hills, and peaks are fairly uniform. There are also fairly level areas that resemble terraces. The project site consists of a mix of sporadic and dense vegetation, which includes a variation of native and non-native ground cover, shrubs, and trees.

Wildlife movement corridors link habitats together that are otherwise separated by rugged terrain, changes in vegetation, or human disturbances. As shown in Figure 3, *Aerial Photograph*, the project site is surrounded by development and major infrastructure improvements (e.g., SR-210) on all sides. There is also no direct open space connection between the project site and the wilderness areas of the San Gabriel Mountains (which contain and serve as wildlife corridors) to the north and northeast; the project site and mountains are separated by extensive development. Therefore, implementation of the proposed project would not affect or impede any wildlife movement or corridors in the San Gabriel Mountains. Additionally, implementation of the proposed project would not impede the movement of wildlife through the project site, whose site conditions and features allow for wildlife movement. It is also worth noting that the proposed project involves creation of additional low-impact trails that may further improve on-site movement potential for wildlife. The proposed project is also a

continuation of existing recreational uses on-site (e.g., hiking and biking), and no nighttime lighting is proposed, thereby reducing potential impacts to wildlife using the site during the night hours. Furthermore, the main bike park core area (which would be the main activity area of the proposed project) would be placed on the western end of the project site, on an approximately one-acre undeveloped flat pad that resembles a terrace; closest to the main access road and existing residential development. Therefore, implementation of the proposed project would not impede the use of wildlife corridors.

Wildlife nursery sites are areas that provide essential habitat for the breeding, nesting, and rearing of young. While the project site contains habitat that can be used for breeding and rearing of young, the site is dominated by non-native vegetation and subject to anthropogenic disturbances as a popular hiking and biking area for locals. Further, no large tracts of native vegetation or specialized features (e.g., rookeries, bat maternity roosts, or communal denning sites) are present on-site. The proposed improvements are low impact and largely occur in areas that are most dense with non-native vegetation. Furthermore, impacts to key species like oaks (Quercus spp.) would be avoided. The creation of additional low-impact trails would also improve the capacity for non-native vegetation management and habitat restoration. Therefore, implementation of the proposed project would not impede the use of native wildlife nursery sites.

Implementation of the proposed project would result in the removal of or impact to existing vegetation onsite, which could result in direct and/or indirect impacts to nesting birds, including the loss of nests, eggs, and fledglings if ground-disturbing activities occur during the nesting season (generally February 15 through August 31). To minimize impacts, vegetation clearing, or ground disturbing activities should be conducted during the non-breeding (or non-nesting) season (generally, September 1 to January 31) in order to limit impacts to nesting birds. If vegetation clearing or ground disturbing activities need to take place during breeding season (February 1 through August 31), in order to remain in compliance with the Migratory Bird Treaty Act, a pre-construction nesting bird survey(s) will be required. The last survey day should be conducted a minimum of three days prior to the start of work. If construction (including any ground-disturbing activities) occurs during the nesting season, a nesting bird survey must be conducted by a qualified biologist prior to grading activities, as outlined in Mitigation Measure BIO-2.

Adherence to the MBTA regulations and implementation of Mitigation Measure BIO-2 would ensure that if construction activities occur during the breeding season, appropriate measures would be taken to avoid impacts to nesting birds, if any are encountered. Compliance with the MBTA requirements and Mitigation Measure BIO-2 would be ensured through the City's development review process. Therefore, with implementation of Mitigation Measure BIO-2 impacts to migratory birds would be reduced to a level of less than significant.

e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

The project site consists of a mix of sporadic and dense vegetation, which includes a variation of native and non-native ground cover, shrubs, and trees. Tree types/communities throughout the project site are dominated by California walnut (*Juglans californica* var. *californica*), with coast live oak (*Quercus agrifolia*) sparsely distributed throughout the site. Both of these tree species are native to California. Implementation of the proposed project, specifically the new trails proposed throughout the project site, could result in the disturbance or impact of trees, including the California walnut.

The City's Tree Preservation Ordinance (Title 16, Trees, of the Glendora Municipal Code) and Urban Forestry Manual outline provisions and guidelines for tree removal, replacement, installation, preservation, and maintenance; this is especially important when considering native and special status tree species. The provisions of Title 16 apply to trees on City-owned properties, parkways, and public street rights-of-way and easements. The provisions of the Urban Forestry Manual apply to the management and care of all trees on City-owned property and within the City's parkway areas, and in some cases regarding California native species and new developments/private property (City of Glendora 2003).

Construction of the bike park and trails would include protection and retention of existing vegetation, including trees. However, in the unlikely event that tree removal is required, whether native or nonnative, the City requires replacement of these trees in accordance with the provisions of the Urban Forestry Manual. Removal of any trees is required to be preceded by authorization from the City, and they must be replaced with an approved species in an approved-size container based on the diameter of the stem of the tree removed.

Additionally, Mitigation Measure BIO-1 outlines measures to avoid impacts to the California walnut, which is native to California and a species considered of limited distribution and moderate threat. As stated in the mitigation measure, if removal of any walnut trees is determined to be unavoidable, impacts should be documented and mitigated through on-site replacement or habitat enhancement at a minimum 2:1 ratio, which would ensure a no-net-loss of trees.

With adherence to the recommendations of the Urban Forestry Manual and Mitigation Measure BIO-1, impacts would be less than significant and no additional mitigation measures are necessary.

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

There are no adopted habitat conservation plans, natural community conservation plans, or other approved local, regional, or state habitat conservation plans that govern the City or project site (CDFW 2023; USFWS 2025). Therefore, no impact would occur and no mitigation measures are necessary.

V. CULTURAL RESOURCES

Would the project:

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

The analysis in this section is based partly on the following technical study, which is included as Appendix D to this Initial Study.

- *Cultural Resources Assessment*, Duke Cultural Resources Management, LLC, November 2024.

DISCUSSION

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?

Section 15064.5 defines historic resources as resources listed or determined to be eligible for listing by the State Historical Resources Commission, a local register of historical resources, or

the lead agency. Generally, a resource is considered "historically significant" if it meets one of the following criteria:

- **i) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;**
- **ii) Is associated with the lives of persons important in our past;**
- **iii) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values;**
- **iv) Has yielded, or may be likely to yield, information important in prehistory or history.**

The project site comprises the South Hills Wilderness area of the City known as South Hills Park (see Figure 3, *Aerial Photograph*), which is a public-access passive park. The project site contains several dirt trails/roads, trailheads, and parking lots (paved and unpaved) that serve hikers, bikers, and equestrian users. The project site can be characterized as mountainous, with moderate and steep rocky slopes occurring throughout the site. Multiple valleys are spread across the hills with peaks being fairly uniform. There are also fairly level areas that resemble terraces. The project site consists of a mix of sporadic and dense vegetation, which includes a variation of native and nonnative ground cover, shrubs, and trees.

As a part of the cultural and historical resources assessment conducted for the project site (Appendix D), a records search was conducted at the South Central Coastal Information Center (SCCIC) that included the project site and up to a half-mile radius of the site, a Sacred Lands File search from the Native American Heritage Commission (NAHC), a field survey of the project site, and a research of published resources. The record search identified one historic property running east-west through the project site (P-19-188983), and no additional cultural resources within the project site. The Boulder Dam–Los Angeles 287.5-kV Transmission Line associated with P-19-188983 runs east-west through the project site. The transmission line consists of 130-foot-tall, steel-lattice towers within a 160-foot-wide Los Angeles Department of Water and Power easement that traverses the entire southern length of the project site. The towers and transmission lines would remain in their existing conditions, and no improvements to or modification of the towers or transmission lines would occur as a result of the proposed project. Any proposed improvements near the towers would be limited to the provision of new trails.

The field survey did not identify any historical resources within the project site. Furthermore, analysis indicates that the proposed project would have no effect on historic properties and that the project site has a low sensitivity for undiscovered prehistoric or historical period cultural resources (Appendix D).

Based on the preceding, impacts to historical resources would be less than significant, and no mitigation measures are necessary.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?

Archaeological resources are prehistoric or historic evidence of past human activities, including structural ruins and buried resources. The project site is comprised of the South Hills Wilderness area of the City known as South Hills Park (see Figure 3, *Aerial Photograph*), which is a public-access park. The majority of the project site is undeveloped and in its natural condition consisting of slopes, hills, valleys, and vegetation. As noted above, as a part of the cultural and historical resources assessment conducted for the project site (Appendix D), a records search at the SCCIC was conducted that included the project site, and a field survey was conducted of the project site. Neither the records search nor field survey conducted identified any cultural resources within the project site. Additionally, analysis indicates that the project site has a low sensitivity for undiscovered prehistoric or historical period cultural resources (Appendix D).

Furthermore, earthwork for the proposed project is expected to consist of site preparations, miscellaneous cutting and filling (on the order of 5 feet or less) to achieve the desired site elevations and bike path contours, and removal and compaction of existing unsuitable site soils. Earthwork may also include trimming some of the existing slopes for stability purposes. Therefore, the amount of ground-disturbing activities would not be significant.

However, while unlikely and due to the limited amount of ground disturbance associated with construction of the proposed project, the presence of subsurface archaeological resources to occur within the project site remains possible, and these could be affected by ground-disturbing activities (e.g., grading) associated with the proposed project. Therefore, potential impacts to archaeological resources could occur as a result of project-related construction activities. However, with implementation of Mitigation Measure CUL-1, impacts to archeological resources would be reduced to a less than significant level. Compliance with Mitigation Measure CUL-1 would be ensured through the City's development review process.

> **Mitigation Measure CUL-1:** Prior to the issuance of grading permits, the City of Glendora shall have retained the services of a qualified archaeologist who meets the Secretary of the Interior's Professional Qualifications for Archaeology as defined at 36 CFR Part 61, Appendix A (Professional Archaeologist). The archaeological consultant shall be on call during all grading and other significant ground-disturbing activities. In the event that archaeological resources are discovered during ground-disturbing activities, all such activity shall cease in the immediate area of the find, and the professional archaeological monitor shall have the authority to halt any activities adversely impacting potentially significant cultural resources until they can be formally evaluated. Suspension of ground disturbances in the vicinity of the discovery shall not be lifted until the archaeological

monitor has evaluated the discovery to assess whether it is classified as a significant cultural resource pursuant to the CEQA (California Environmental Quality Act) definition of historical (State CEQA Guidelines 15064.5[a]) and/or unique archaeological resource (Public Resources Code 21083.2[g]). If the resource is classified as a significant cultural resource, the qualified archaeologist shall make recommendations on the treatment and disposition of the deposits. For example, if archaeological resources are recovered, they shall be offered to a repository with a retrievable collection system and an educational and research interest in the materials such as the Los Angeles County Museum of Natural History, or any other local museum such as the Glendora Historical Society Museum or repository willing to and capable of accepting and housing the resource. If no museum or repository willing to accept the resource is found, the resource shall be considered the property of the City and may be stored, disposed of, transferred, exchanged, or otherwise handled by the City at its discretion. The final recommendations on the treatment and disposition of the deposits shall be developed in accordance with all applicable provisions of California Public Resource Code Section 21083.2 and State CEQA Guidelines Sections 15064.5 and 15126.4. The City shall follow all recommendations made by the archaeologist. The archaeologist shall prepare a final report describing all identified and curated resources (if any are found) and submit the report to the City.

In addition, if a resource is discovered during ground-disturbing activities and the professional archaeological monitor determines that it could potentially be a paleontological resource, the archaeological monitor shall inform the construction contractor and make the determination if a professional paleontological monitor is required to analyze the resource.

c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

There are no known human remains on or near the project site. The project site is in an urbanized area of the city and consists of the South Hills Wilderness area known as South Hills Park (see Figure 3, *Aerial Photograph*), which is a public-access park. The majority of the project site is undeveloped and in its natural condition consisting of slopes, hills, valleys, and vegetation. Although mostly undeveloped, the likelihood that human remains may be discovered during ground-disturbing activities is considered extremely low. However, development of the proposed project could have the potential to disturb previously undiscovered subsurface human remains, if any exist.

In the unlikely event that human remains are uncovered during ground-disturbing activities, California Health and Safety Code Section 7050.5 requires that disturbance of the site shall remain halted until the Los Angeles County Coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the 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 Section 5097.98 of the California Public Resources Code. The coroner is required to make a 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 or has reason to believe the human remains are those of a Native American, he or she shall contact, by telephone within 24 hours, the NAHC so that the NAHC can contact the Most Likely Descendant (MLD). The MLD shall be provided with access to the discovery and will provide recommendations or preferences for treatment of the remains within 48 hours of accessing the discovery site. Disposition of human remains and any associated grave goods, if encountered, shall be treated in accordance with procedures and requirements in Sections 5097.94 and 5097.98 of the Public Resources Code; Section 7050.5 of the California Health and Safety Code; and CEQA Guidelines Section 15064.5

Compliance with existing law regarding the discovery of human remains would reduce potential impacts to human remains to less than significant levels. No mitigation measures are necessary.

VI. ENERGY

Would the project:

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

DISCUSSION

a) Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

The following discusses the potential energy demands from short-term construction and long-term operational energy consumption associated with the proposed project.

Short-Term Construction Impacts

Electrical Energy

Electricity use during construction of the proposed project would vary during different phases of construction. Construction of the proposed project would not require electricity to power most construction equipment. Later construction phases could result in the use of electricity-powered equipment for interior construction and architectural coatings. 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. Impacts would be less than significant and no mitigation measures are necessary.

Natural Gas Energy

It is not anticipated that construction equipment used for the proposed project would be powered by natural gas, and no natural gas demand is anticipated during construction. Therefore, impacts related to natural gas would be less than significant and no mitigation measures are necessary.

Transportation Energy

Transportation energy use during construction would come from the transport and use of construction equipment, delivery vehicles and haul trucks, and construction employee vehicles. In addition, transportation energy demand would come from use of off-road construction equipment. It is anticipated that the majority of off-road construction equipment, such as those used during asphalt demolition and rough grading, would be gas or diesel powered.

The use of energy resources by vehicles and equipment would fluctuate according to the phase of construction and would be temporary. In addition, all construction equipment would cease operating upon completion of proposed project construction. Thus, impacts related to

transportation energy use during construction would be temporary and would not require expanded energy supplies or the construction of new infrastructure.

Moreover, to limit wasteful and unnecessary energy consumption, the construction contractors are anticipated to minimize nonessential idling of construction equipment during construction, in accordance with Section 2449 of the CCR, Title 13, Article 4.8, Chapter 9. Construction trips would also not result in unnecessary use of energy since the project site is centrally located in an urbanized area of the City served by numerous regional freeway systems (e.g., I-210 and SR-57) that provide the most direct routes from various areas of the region. Thus, energy use during construction of the proposed project would not be considered inefficient, wasteful, or unnecessary. Impacts would be less than significant and no mitigation measures are necessary.

Long-Term Impacts During Operation

Electrical and Natural Gas Energy

Operation of the proposed project would not generate new demand for electricity or natural gas. Hours of operation for the bike park and trails would be the same as other wilderness areas in the city, dawn to dusk daily. Therefore, no lighting in any area of the bike park or trails will be provided. Also, no services or infrastructure that require electrical or natural gas is proposed or required. Therefore, no impact related to electrical or natural gas energy would occur and no mitigation measures are necessary.

Transportation Energy

Buildout of the proposed project would consume transportation energy during operations from the use of motor vehicles associated with visitors to the project site. The efficiency of these motor vehicles is unknown, such as the average miles per gallon. Transportation energy use is the result of vehicle trip generation and travel distance activity and the type of vehicle utilized.

As described in the Vehicle Miles Traveled Screening Analysis prepared for the proposed project (Appendix G), the trip generation of the proposed project based on park acreage would be low for an active park, and as such trip generation was calculated based on the number of employees expected to be at the park each day. As demonstrated in the Vehicle Miles Traveled Screening Analysis, the proposed project would not have a significant impact on VMT based on the City's land use development screening thresholds for Small Project Size and Community-Serving Projects. The proposed project would generate 60 daily trips, which is below the 250 Small Project Size daily threshold, and would be a community-serving project for Glendora residents. Therefore, operation of the proposed project would not generate substantial new trips to the project site and would address the City's limited access to dedicated bike parks.

Moreover, fuel efficiency of vehicles after buildout of the proposed project would on average improve compared to vehicle fuel efficiencies experienced under existing conditions, resulting in a lower per capita fuel consumption, assuming travel distances, travel modes, and trip rates remain the same. The improvement in fuel efficiency would be attributable to the statewide fuel reduction strategies and regulatory compliances (e.g., Corporate Average Fuel Economy [CAFE] standards), resulting in new cars that are more fuel efficient and the attrition of older, less fuel-efficient vehicles. The CAFE standards are not directly applicable to land use development projects, but to car manufacturers. Thus, the park employees and visitors do not have direct control in determining the fuel efficiency of vehicles that are manufactured and available. However, compliance with the CAFE standards by car manufacturers would ensure that vehicles produced in future years have greater fuel efficiency and would generally result in an overall benefit of reducing fuel usage by providing more fuel-efficient vehicle options.

Therefore, impacts would be less than significant with respect to operation-related fuel usage and no mitigation measures are necessary.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

The State's electricity grid is transitioning to renewable and carbon-free energy under California's Renewable Energy Program. Eligible renewable sources of electricity include wind, small hydropower, solar, geothermal, biomass, and biogas. Other carbon-free sources not considered "eligible renewable" include nuclear and large hydropower. Electricity production from eligible renewable and carbon-free sources is generally considered carbon neutral. The Renewables Portfolio Standard (RPS) goals have been periodically updated since adoption of SB 1078 in 2002. In general, California has RPS requirements of 50 percent by 2026, 52 percent by 2027, 60 percent by 2030, 90 percent by 2035, 95 percent by 2040, and 100 percent by 2045.

The statewide RPS requirements do not directly apply to individual development projects, but to utilities and energy providers such as SCE, whose compliance with RPS requirements would contribute to the State objective of transitioning to renewable and carbon-free energy. The land uses accommodated by the proposed project would not change the vault restroom would not require electricity to operate. Therefore, development of the proposed project would not conflict with or obstruct implementation of California's RPS Program, and impacts would be less than significant. No mitigation measures are necessary.

VII. GEOLOGY AND SOILS

Would the project:

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

The analysis in this section is based partly on the following technical study, which is included as Appendix E to this Initial Study.

- *Limited Geotechnical Investigation*, Geocon, January 2025.

DISCUSSION

a) Would the project 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?

The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. Fault rupture generally occurs within 50 feet of an active fault line and is limited to the immediate area of the fault zone where the fault breaks along the surface.

The project site is not within or near an established Alquist-Priolo Earthquake Fault Zone (CGS 2015a). Additionally, there are no mapped active faults—a fault that has ruptured during Holocene time (the last 11,700 years)—on or within 0.25 mile of the project site. The nearest known active faults to the project site are the Upper Duarte fault, approximately two miles to the north, and the Walnut Creek Fault, approximately two miles to the south (CGS 2015b). Due to the distance to the active faults, the potential for surface rupture of a fault on-site is considered very low. Therefore, development of the proposed project would not subject people or structures to hazards arising from surface rupture of a known active fault. Impacts related to earthquake fault zones would be less than significant and no mitigation measures are necessary.

ii) Strong seismic ground shaking?

The most significant geologic hazard to the design life of the proposed project is the potential for moderate to strong ground shaking resulting from earthquakes generated on the faults in seismically active southern California. The type and magnitude of seismic hazards affecting the project site and off-site improvement areas are dependent on the distance to causative faults, the intensity, and the magnitude of the seismic event.

As with other areas in southern California, it is anticipated that the project site will likely be subject to strong ground shaking due to earthquakes on nearby faults. As noted above, the active portion of the Upper Duarte fault is approximately two miles north of the project site and the Walnut Creek Fault is approximately two miles to the south. These

faults, as well as others in the region, are considered capable of producing strong shaking at the project site, thereby exposing people or structures on the site to potential substantial adverse effects, including the risk of loss, injury, or death. The intensity of ground shaking on the project site would depend on the magnitude of the earthquake, distance to the epicenter, and the geology of the area between the epicenter and the project site.

However, the project site is not at a greater risk of seismic activity or impacts than other sites in southern California. Seismic shaking is a risk throughout southern California. Additionally, the state regulates development in California through a variety of tools that reduce hazards from earthquakes and other geologic hazards. The California Building Code (CBC) (CCR, Title 24, Part 2), adopted by reference in Chapter 19.02 of the Glendora Municipal Code, contains provisions to safeguard against major structural failures or loss of life caused by earthquakes or other geologic hazards. The CBC contains provisions for earthquake safety based on factors including occupancy type, the types of soil and rock on-site, and the strength of ground motion with specified probability of occurring at the site. Development of the proposed project (specifically, construction of the restroom vault structure, which is the only vertical structure proposed) would be required to adhere to the provisions of the CBC, which are enforced by the City's Building and Safety Division during the building plan check and development review process. Compliance with the requirements of the CBC for structural safety during a seismic event would reduce hazards from strong seismic ground shaking.

Furthermore, incorporation of the recommended design parameters from the limited geotechnical investigation prepared for the proposed project (Appendix E), such as excavation and proper compaction of existing earth materials and sloping and/or shoring measures, would also reduce hazards from strong seismic ground shaking. Compliance with the recommended design parameters would be ensured through the City's building plan check and development review process.

Compliance with the provisions of the CBC and implementation of the recommended design parameters outlined in the geotechnical investigation would reduce impacts resulting from strong seismic ground shaking. Therefore, impacts related to seismic ground shaking would be less than significant and no mitigation measures are necessary.

iii) Seismic-related ground failure, including liquefaction?

Liquefaction is a phenomenon that occurs when soil undergoes a transformation from a solid state to a liquefied condition. It refers to loose, saturated sand or silt deposits that behave as a liquid and lose their load-supporting capability when strongly shaken. Loose granular soils and silts that are saturated by relatively shallow groundwater are susceptible to liquefaction. When subjected to seismic ground shaking, affected soils lose strength

during liquefaction and foundation failure can occur. According to the California Geologic Survey, the project site is not in a liquefaction zone. The closest liquefaction zone is approximately 1.5 miles to the southeast (CGS 2015a). Therefore, impacts related to liquefaction would be less than significant and no mitigation measures are necessary.

iv) Landslides?

Landslides are the downslope movement of geologic materials. Slope failures in the form of landslides are common during strong seismic shaking in areas of steep hills. Quaternary-age landslide deposits are mapped on the northern portion of the project site and off-site to the east. However, the mapped landslides are queried, indicating that their existence is uncertain. Additionally, landslide deposits were not encountered in explorations or observed on the project site during the geotechnical investigation prepared for the project site (Appendix E). No historic landslides were observed within the project site. Based on the surficial site observations, downhole observations, and review of historical aerial photographs and published geologic maps undertaken as a part of the geotechnical investigation, landslides do not exist within the proposed bike park core area, and the potential for mapped landslide deposits on the northern end of the project site to affect the proposed project is considered low (Appendix E). Therefore, impacts related to landslides would be less than significant and no mitigation measures are necessary.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Erosion is the movement of rock and soil from place to place and is a natural process. Common agents of erosion in the project region include wind and flowing water. Significant erosion typically occurs on steep slopes where stormwater and high winds can carry topsoil down hillsides. Erosion can be increased greatly by earth-moving activities if erosion control measures are not used. Following is a discussion of the potential erosion impacts resulting from the proposed project's construction and operational phases.

Construction

As stated in the limited geotechnical investigation prepared for the project site, earthwork for the proposed project is expected to consist of site preparations, miscellaneous cutting and filling (five feet or less) to achieve the desired site elevations and bike path contours, and removal and compaction of existing unsuitable site soils. Earthwork may also include trimming some of the existing slopes for stability purposes (Appendix E). Project development would involve grading and construction activities that would disturb soil and leave exposed soil on the ground surface. Common means of soil erosion from construction sites include water, wind, and being tracked off-site by vehicles. These activities could result in soil erosion. Additionally, natural processes, such as wind and rain, could further lead to soil erosion during construction.

However, construction of the bike park and trails would include protection and retention of existing vegetation and minimize disturbance to the existing hillside topography within the areas of disturbance to maintain the existing drainage patterns. The preservation of existing vegetation throughout the project site would minimize impacts to existing trees, shrubs, and grasses, which would in effect protect the soil on the hillside from erosion and provide stabilization in areas that are susceptible to potential erosion.

Additionally, development on the project site is subject to local and state codes and requirements for erosion control and grading during construction. For example, project development is required to comply with standard regulations, including South Coast Air Quality Management District Rules 402 and 403, which would reduce construction erosion impacts. Rule 403 requires that fugitive dust be controlled with best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emissions source. Rule 402 requires dust suppression techniques be implemented to prevent dust and soil erosion from creating a nuisance off-site. For example, as outlined in Table 1 of Rule 403 (Best Available Control Measures), control measures to reduce erosion during grading and construction activities include stabilizing backfilling materials when not actively handling, stabilizing soils during clearing and grubbing activities, and stabilizing soils during and after cut-and-fill activities.

Furthermore, the Construction General Permit (CGP) issued by the State Water Resources Control Board, effective July 17, 2012, regulates construction activities to minimize water pollution, including sediment risk from construction activities to receiving waters. Project development would be subject to the National Pollution Discharge Elimination System (NPDES) permitting regulations, including the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP), which is further discussed in Section 3.X, *Hydrology and Water Quality*. The proposed project's construction contractor would be required to prepare and implement a SWPPP and associated best management practices (BMP) in compliance with the CGP during grading and construction. For example, types of BMPs that are incorporated in SWPPPs and would help minimize impacts from soil erosion include:

- **Erosion controls.** Cover and/or bind soil surface to prevent soil particles from being detached and transported by water or wind. Erosion control BMPs include mulch, soil binders, and mats.
- **Sediment controls.** Filter out soil particles that have been detached and transported in water. Sediment control BMPs include barriers, and cleaning measures such as street sweeping.
- **Tracking controls.** Tracking control BMPs minimize the tracking of soil off-site by vehicles; for instance, stabilizing construction roadways and entrances/exits.

Adherence to the BMPs in the SWPPP and local and state codes for erosion control and grading during construction would reduce, prevent, or minimize soil erosion from project-related grading and construction activities. Therefore, soil erosion impacts from project-related grading and construction activities would be less than significant and no mitigation measures are necessary.

Operation

After project completion, the project site would be developed with new trail and bike facilities, including restrooms, parking, and other facilities. Upon completion of the proposed project, the potential for soil erosion or the loss of topsoil would be expected to be extremely low as all improvements would be implemented in accordance with the recommended design parameters of the geotechnical investigation prepared for the proposed project (Appendix E), such as excavation and proper compaction of existing earth materials and sloping and/or shoring measures. Incorporation of the recommended design parameters would reduce the potential for erosion to occur during project operation. Compliance with the recommended design parameters would be ensured through the City's building plan check and development review process.

Additionally, construction of the bike park and trails would include protection and retention of existing vegetation and minimize disturbance to the existing hillside topography within the areas of disturbance to maintain the existing drainage patterns. The preservation of existing vegetation throughout the project site would minimize impacts to existing trees, shrubs, and grasses, which protect the soil on the hillside from erosion and provide stabilization in areas that are susceptible to potential erosion. The sloped topography would provide long-term stormwater benefits with sufficient runoff and increased absorption.

Furthermore, implementation of the BMPs specified in the water quality management plan to be prepared for the project site would help ensure that soil erosion would not occur under the proposed project's operation phase. BMP implementation would be ensured through the City's building plan check and development review process.

Therefore, soil erosion impacts from the proposed project's operation phase would be less than significant and no mitigation measures are necessary.

c) Would the project 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?

Hazards from liquefaction are addressed above in Section 3.VII.a.iii, and landslide hazards are addressed previously in Section 3.VII.a.iv. As concluded in these sections, impacts would be less than significant.

Lateral spreading is a phenomenon associated with liquefaction and includes the movement of non-liquefied soil materials. Due to the project site not being in a liquefaction zone, the potential for lateral spreading is considered very low.

The major cause of ground subsidence is the excessive withdrawal of groundwater. Groundwater was not encountered in any of the exploratory borings in the geotechnical investigation prepared for the proposed project. In addition, the underlying bedrock is not considered water bearing (Appendix E). Based on the lack of groundwater found and the depth of proposed construction, static groundwater would not be encountered during project construction and operation and is not expected to impact soil stability.

The results of the slope stability analyses conducted as a part of the geotechnical investigation prepared for the project site (Appendix E) indicate that unstable slope configurations are currently present within the project site. However, incorporation of the recommended design parameters from the geotechnical investigation would reduce impacts related to unstable soils during grading and construction activities and operation. For example, recommended design parameters include slope trimming and for a geotechnical engineer to be contacted once a grading plan becomes available to further evaluate this recommendation and evaluate the stability of the proposed slopes. Compliance with the recommended design parameters would be ensured through the City's building plan check and development review process. Therefore, impacts related to unstable soils would be less than significant, and no mitigation measures are necessary.

d) Would the project 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?

Expansive soils shrink or swell as the moisture content decreases or increases; the shrinking or swelling can shift, crack, or break structures built on such soils. The upper five feet of existing site soils encountered during the geotechnical investigation prepared for the project site (Appendix E) are considered to have a "very low" expansive potential and are classified as "non-expansive" in accordance with the 2022 CBC Section 1803.5.3. Additionally, project development would be implemented in accordance with the recommendations of the geotechnical investigation (Appendix E), such as excavation and proper compaction of existing earth materials. With implementation of the design parameters of the geotechnical investigation, which would be ensured through the City's building plan check and development review process, project development would not subject people or structures to substantial hazards arising from ground subsidence. Therefore, impacts related to expansive soils would be less than significant and no mitigation measures are necessary.

e) Would the project 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?

The proposed project would not involve the installation of septic tanks but would involve the installation of alternative wastewater disposal system. Specifically, the alternative wastewater disposal system would be installation of a prefabricated concrete vault restroom structure near the bike park core area with a 750-gallon vault that would capture and store waste. The vault restrooms typically come with a 750-gallon high-density polyethylene (HDPE) vault for about 16,000 to 18,000 uses before needing to be pumped out. The pumping process is the same as for traditional portable restrooms. The 750-gallon HDPE vaults are installed over a compacted base with a cast-in-place concrete footing. The vault is then completely encapsulated in poured-in-place concrete. Installation of the restroom structure would be in accordance with the recommendations of the geotechnical investigation (Appendix E), such as excavation and proper compaction of existing earth materials and sloping and/or shoring measures. Compliance with the recommended design parameters would be ensured through the City's building plan check and development review process. Therefore, impacts related to alternative wastewater disposal systems would be less than significant and no mitigation measures are necessary.

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Paleontological resources or fossils are remains of ancient plants and animals that can provide scientifically significant information about the history of life on earth. This sensitivity is determined by rock type, history of the geologic unit in producing significant fossils, and fossil localities that are recorded from that unit. Based on the University of California Museum of Paleontology Localities, Los Angeles County contains 27,095 paleontological resources (UCMP 2024). The project site is developed with an existing trail system and facilities; however, many of the proposed areas of disturbance have never been disturbed or developed. Although paleontological resources are not anticipated to be discovered during proposed ground-disturbing activities, it is possible that unknown paleontological resources could be discovered during the proposed project's grading and other ground-disturbing activities. Unknown fossils encountered during excavation would have the potential to be unintentionally damaged. Implementation of Mitigation Measure GEO-1, which outlines precautionary measures and action for an event resulting in the discovery of unknown paleontological resources, would ensure that impacts to unknown paleontological resources are less than significant.

> **Mitigation Measure GEO-1:** In the event that fossils or fossil locality deposits are discovered during ground disturbing activities (e.g., trenching, soil removal), excavations within 50 feet of the fossil locality shall be temporarily halted until removal of the fossil localities. The construction contractor shall notify a qualified paleontologist to investigate its significance. If the fossil locality is determined to be significant by the

qualified paleontologist, the paleontologist shall work with the City to follow accepted professional standards such as further testing for evaluation or data recovery, as necessary. The paleontologist shall notify the appropriate agencies to determine procedures that would be followed before construction is allowed to resume at the location of the find. If the City determines that avoidance is not feasible, the paleontologist shall prepare an excavation plan for mitigating the effect of the project based on the qualities that make the resource important.

VIII. GREENHOUSE GAS EMISSIONS

Would the project:

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

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 emissions is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHGs—water vapor, carbon dioxide (CO_2), methane (CH_4), and ozone (O_3)—that are the likely cause of an increase in global average temperatures observed within the twentieth and twenty-first centuries. Other GHG emissions identified by the IPCC that contribute to global warming to a lesser extent include nitrous oxide (N_2O), sulfur hexafluoride (SF_6), hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons.[3]

Information on manufacturing of cement, steel, and other “life cycle” emissions that would occur as a result of the proposed project are not applicable and are not included in the analysis

3 Water vapor (H_2O) 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.

provided herein.[4] 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.[5] A background discussion on the GHG regulatory setting and GHG modeling can be found in Appendix A to this Initial Study.

DISCUSSION

a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

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 GHG emissions on its own to influence global climate change significantly; hence, the issue of global climate change is, by definition, a cumulative environmental impact.

As described in the Vehicle Miles Traveled (VMT) Screening Analysis prepared for the proposed project (Appendix G to this Initial Study), the proposed project would generate 60 daily trips, which is below the 250 Small Project Size daily threshold, and would be a community-serving project for residents. Therefore, the operation of the proposed project would not generate substantial new trips to the project site and would address the city's limited access to dedicated bike parks. Overall, the proposed project would have a less-than-significant transportation impact and would be screened out of a VMT analysis. Additionally, the proposed project would result in a slight increase in solid waste generation from the vault restroom.

Project-related construction and operation-phase GHG emissions are shown in Table 5. Total 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 proposed project, consistent with South Coast AQMD guidance. Overall, construction and operation of the proposed project would not generate annual emissions that exceed the South Coast AQMD bright-line threshold of 3,000 metric tons of carbon dioxide equivalent ($MTCO_2e$) per year

4 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 life cycle 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).

5 Particulate matter emissions, which include black carbon, are analyzed in Section 3.III, *Air Quality*. 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 2017).

(South Coast AQMD 2010). Therefore, the proposed project's cumulative contribution to GHG emissions would be less than significant and no mitigation measures are necessary.

Table 5 Project-Related Operation GHG Emissions

Source	GHG ($MTCO_2e$/Year)
Mobile	72
Area	<1
Water	<1
Solid Waste	1
Refrigerants	<1
30-Year Construction Amortization[1]	14
Total	87
South Coast AQMD Bright-Line Threshold	3,000 MTCO2e/Yr
Exceeds Bright-Line Threshold?	**No**

Source: CalEEMod, Version 2022.1., Appendix A.

Notes: MTons = metric tons; $MTCO_2e$ = metric ton of carbon dioxide equivalent

[1] Total construction emission are amortized over 30 years per South Coast AQMD Working Group methodology (South Coast AQMD 2010).

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

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

CARB Scoping Plan

CARB's latest Climate Change Scoping Plan (2022) outlines the State's strategies to reduce GHG emissions in accordance with the targets established under AB 32, SB 32, and AB 1279 (CARB 2022). The Scoping Plan is applicable to State agencies and is not directly applicable to cities, counties, or individual projects. Nonetheless, the Scoping Plan has been the primary tool that is used to develop performance-based and efficiency-based CEQA criteria and GHG reduction targets for climate action planning efforts.

Statewide strategies to reduce GHG emissions in the 2022 Climate Change Scoping Plan include implementing SB 100, which expands the RPS to 60 percent by 2030; expanding the Low Carbon Fuel Standards (LCFS) to 18 percent by 2030; implementing the Mobile Source Strategy to

deploy zero-electric vehicle buses and trucks; implementing the Sustainable Freight Action Plan; implementing the Short-Lived Climate Pollutant Reduction Strategy, which reduces methane and hydrofluorocarbons to 40 percent below 2013 levels by 2030 and black carbon emissions to 50 percent below 2013 levels by 2030; continuing to implement SB 375; creating a post-2020 Cap-and-Trade Program; and developing an Integrated Natural and Working Lands Action Plan to secure California's land base as a net carbon sink.

Statewide strategies to reduce GHG emissions include the LCFS, California Energy Efficiency regulations, California Renewable Energy Portfolio standard, changes in the CAFE standards, and other early action measures as necessary to ensure the State is on target to achieve the GHG emissions reduction goals of AB 32, SB 32, and AB 1279. In addition, new developments are required to comply with the current Building Energy Efficiency Standards and CALGreen. The proposed project would comply with these GHG emissions-reduction measures since they are statewide strategies. Therefore, the proposed project would not obstruct implementation of the 2022 Scoping Plan and impacts would be less than significant and no mitigation measures are necessary.

SCAG's Regional Transportation Plan/Sustainable Communities Strategy

SCAG adopted the 2024-2050 RTP/SCS, Connect SoCal, in April 2024. Connect SoCal is a long-term plan for the southern California region that details the development, integrated management, and operation of transportation systems and facilities that will function as an intermodal transportation network for the SCAG metropolitan planning area (SCAG 2024). This plan outlines a forecasted development pattern that demonstrates how the region can sustainably accommodate needed housing and job centers with multimodal mobility options. The overarching vision is to expand alternatives to driving, advance the transition to clean-transportation technologies, promote integrated and safe transit networks, and foster transit-oriented development in compact and mixed-use developments (SCAG 2024). In addition, Connect SoCal is supported by a combination of transportation and land use strategies that outline how the region can achieve California's GHG-emission-reduction goals and federal Clean Air Act requirements. 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 to governments and developers. As mentioned previously, the proposed project would address the city's limited access to dedicated bike parks and may contribute to reducing VMT by providing residents with a closer option to a safe bike park and trails in the city. Therefore, the proposed 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 and no mitigation measures are necessary.

IX. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
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?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

DISCUSSION

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

The term "hazardous material" can be defined in different ways. For purposes of this environmental document, the definition of "hazardous material" is the one outlined in the California Health and Safety Code, Section 25501:

> Hazardous materials that, because of their quantity, concentration, or physical or chemical characteristics, pose a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. Hazardous materials include, but are not limited to, hazardous substances, hazardous waste, and any material that a handler or the unified program agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.

"Hazardous waste" is a subset of hazardous materials, and the definition is essentially the same as in the California Health and Safety Code, Section 25117, and in the CCR, Title 22, Section 66261.2:

> Hazardous wastes are those that, because of their quantity, concentration, or physical, chemical, or infectious characteristics, may either cause, or significantly contribute to an increase in mortality or an increase in serious illness, or pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed.

Hazardous materials can be categorized as hazardous nonradioactive chemical materials, radioactive materials, and biohazardous materials (infectious agents such as microorganisms, bacteria, molds, parasites, viruses, and medical waste).

Exposure of the public or environment to hazardous materials could occur through but not limited to the following means: improper handling or use of hazardous materials or waste, particularly by untrained personnel; transportation accident; environmentally unsound disposal methods; and/or fire, explosion, or other emergencies. The severity of potential effects varies with the activity conducted, the concentration and type of hazardous material or wastes present, and the proximity of sensitive receptors.

Project Construction

Project-related construction activities would involve the use of hazardous materials, including cleansers and degreasers; fluids used in routine maintenance and operation of construction equipment, such as oil and lubricants; fertilizers; pesticides; and architectural coatings, including paints. However, the materials used would not be in such quantities or stored in such a manner as to pose a significant safety hazard. These activities would also be short term or one time in nature and would cease upon completion of the proposed project's construction phase. As standard practice in the construction industry, construction workers are trained in safe handling and hazardous materials use.

Additionally, no demolition of any structures that may involve handling lead-based paint (LBP) and/or asbestos-containing materials (ACM) and that have the potential to expose construction workers and/or the public to ACMs or LBP are proposed.

Furthermore, the use, storage, transport, and disposal of construction-related hazardous materials would be required to conform to existing federal, state and local laws and regulations as set forth by the USEPA, Department of Toxic Substances Control (DTSC), California Occupational Safety and Health Administration (Cal/OSHA), Caltrans, Resource Conservation and Recovery Act, and Los Angeles County Fire Department (LACoFD; the Certified Unified Program Agency for the City of Glendora). Compliance with applicable laws and regulations governing the use, storage, transportation, and disposal of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts. For example, all spills or leakage of petroleum products during construction activities are required to be immediately contained, the hazardous material identified, and the material remediated in compliance with applicable state and local regulations for the cleanup and disposal of that contaminant. All contaminated waste would be required to be collected and disposed of at an appropriately licensed disposal or treatment facility. Also, strict adherence to all emergency response plan requirements set forth by LACoFD would be required through the duration of the project construction phase.

Based on the preceding, hazards to the public or the environment arising from the routine use of hazardous materials during project construction would be less than significant and no mitigation measures are necessary.

Project Operation

The operational activities of the proposed project do not involve the use of unusually hazardous materials that could impact surrounding land uses. Proposed project operations could involve the use of small amounts of hazardous materials, such as cleansers, paints, degreasers, adhesives, sealers, fertilizers, and pesticides for cleaning and maintenance purposes of the bike park and restroom structure. Additionally, bike parks are not typically associated with uses that

use, generate, store, or transport large quantities of hazardous materials; such uses generally include manufacturing, industrial, medical (e.g., hospital), and other similar uses.

Furthermore, the use, storage, transport, and disposal of hazardous materials would be governed by existing federal, state, and local laws and regulations of several agencies, including USEPA, Caltrans, Cal/OSHA, and LACoFD. Compliance with applicable laws and regulations governing the use, storage, transportation, and disposal of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts. The proposed project would also be operated with strict adherence to all emergency response plan requirements set forth by LACoFD.

Therefore, substantial hazards to the public or the environment arising from the routine use, storage, transport, and disposal of hazardous materials during long-term operation of the proposed project would not occur. Impacts would be less than significant, and no mitigation measures are necessary.

b) Would the project 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?

Following is a discussion of the potential hazards impacts that could arise through the accidental release of hazardous materials from the proposed project's construction and operational phases, as well as from existing site materials on-site.

Hazardous Materials Associated with Project Construction and Operation

See response to Section 3.IX.a. As concluded in this section, hazards to the public or the environment arising from the routine use of hazardous materials during the proposed project operation and construction phases would be less than significant. Additionally, the proposed project consists of the development of a recreational park, which would not generate air toxics requiring a South Coast AQMD permit.

Hazardous Materials On-Site

Development of the proposed project includes the construction of a new bike park, including bike trails and a pump track, and the expansion of existing trails and park facilities (e.g., restrooms, trailhead structure and signage, recreational structures). Regulatory requirements would reduce any potential impacts to less-than-significant levels, as concluded in Section 3.IX.a.

Additionally, any site materials demolished (e.g., asphalt, concrete) would either be reused on-site for development of the proposed project's site improvements (e.g., drive aisles, walkways), or hauled off-site to the appropriate disposal or recycling facility and in accordance with all

applicable laws and regulations associated with the transport and disposal of hazardous and nonhazardous materials, referenced previously in Section 3.IX.a. In the event of a hazardous materials spill of greater amount or toxicity than on-site park personnel could safely contain and clean up, assistance would be requested from the LACoFD hazmat team of Fire Station 51 at 231 W. Mountain View Avenue, which is the closest fire station to the project site.

Based on the preceding, it is highly unlikely that development of the proposed project would cause the release of hazardous materials into the environment. Therefore, impacts would be less than significant, and no mitigation measures are necessary.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

The nearest school to the project site is Foothill Christian School at 242 W Baseline Road, approximately 0.2 mile west of the project site. As substantiated in Sections 3.IX.a and 3.IX.b, construction and operation of the proposed project would not emit hazardous substances or hazardous wastes in quantities posing substantial hazards to the public or the environment. Therefore, impacts would be less than significant and no mitigation measures are necessary.

d) Would the project 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?

California Government Code Section 65962.5 requires the compiling of lists of the following types of hazardous materials sites: hazardous waste facilities subject to corrective action; hazardous waste discharges for which the State Water Quality Control Board has issued certain types of orders; public drinking water wells containing detectable levels of organic contaminants; underground storage tanks with reported unauthorized releases; and solid waste disposal facilities from which hazardous waste has migrated. The following databases were reviewed for hazardous material site listings on-site or within one-quarter mile of the project site:

- **GeoTracker**, State Water Resources Control Board (SWRCB 2024)
- **EnviroStor**, Department of Toxic Substances Control (DTSC 2024)
- **EJScreen**, US Environmental Protection Agency (USEPA 2024a)
- **EnviroMapper**, US Environmental Protection Agency (USEPA 2024b)
- **Solid Waste Information System** (SWIS), California Department of Resource Recovery and Recycling (CalRecycle 2019)

Based on the database searches, no open hazardous materials sites were listed on or within one-quarter mile of the project site. Therefore, no impact to the public or environment would occur as a result of the proposed project and no mitigation measures are necessary.

e) For a project 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?

The nearest public-use airport to the project site is Brackett Field Airport approximately 5.1 miles to the southeast. The Airport Land Use Compatibility Plan for Brackett Field Airport, adopted in 2015, sets forth safety zones where land uses are regulated to minimize air crash hazards to people on the ground. The project site is outside of such safety zones (Los Angeles County 2015). Therefore, no impact would occur, and no mitigation measures are necessary.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The Standardized Emergency Management System (SEMS), CCR, Title 19, Division 2, Section 2443, requires compliance with the SEMS to.... “be documented in the areas of planning, training, exercise, and performance." The City of Glendora has prepared a Multi-Hazard Functional Plan (MHFP) for emergency response within the city. The MHFP meets the SEMS requirements of state law. The City also complies with the Los Angeles County Emergency Management Plan.

The City’s MHFP is divided into three parts. Part One – Basic Plan, provides the overall organizational and operational concepts relative to response and recovery, as well as an overview of potential hazards. Part Two – Emergency Organization Functions, provides a description of the emergency response organization and emergency action checklists. Part Three provides the supporting and legal documents to the SEMS MHFP.

The Emergency Services Bureau is responsible for City-wide disaster preparedness, local homeland security requirements, and conducts community relations presentations regarding emergency preparedness. The Emergency Services Bureau is staffed part-time by a patrol lieutenant and support services supervisor who handle the emergency preparedness duties as collateral duties, a part-time patrol sergeant who handles all volunteer services as a collateral duty, and one full-time Records Specialist. The Haz Mat Team responds out of LACoFD Fire Station 51 at 231 W. Mountain View Avenue to incidents reported that involve potentially dangerous spills or releases of various hazardous materials.

During the construction and operation phases, the proposed project would not interfere with any of the daily operations of LACoFD or Glendora Police Department, which support

emergency planning and response efforts of Glendora. All construction activities would be required to be performed per the City's and LACoFD's standards and regulations.

The proposed project would be required to provide the necessary on- and off-site access and circulation for emergency vehicles and services during the construction and operation phases.

The proposed project would also be required to go through the City's development review process and would be required to incorporate all applicable design and safety standards and regulations in the CBC and LACoFD's Fire Code to ensure that project development does not interfere with the provision of local emergency services (provision of adequate access roads to accommodate emergency response vehicles, adequate numbers/locations of fire hydrants, etc.).

Based on the preceding, implementation of the proposed project (both the construction and operational phases) would not impair implementation of or physically interfere with emergency response or evacuation plans. Therefore, no impact would occur, and no mitigation measures are necessary.

g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

A wildland fire hazard area is typically characterized by areas with combustible vegetation, steep terrain, and strong winds. As shown on Figure 3, *Aerial Photograph*, the project site includes the South Hills Wilderness area, which can be characterized as mountainous, with moderate and steep rocky slopes occurring throughout the site. Multiple valleys spread across the hills with peaks being fairly uniform. There are also level areas that resemble terraces. The project site consists of a mix of sporadic and dense vegetation, which includes a variation of native and non-native ground cover, shrubs, and trees. Winds on the project site generally originate from the west from February to June, winds most often occur from the south from June to September, and winds most often occur from the north from October to February (Weather Spark 2025). The windier part of the year lasts from November to May, with winds peaking in December (Weather Spark 2025).

The project site is in a local responsibility area (LRA), where local fire departments or districts have the liability for providing fire protection services. LACoFD currently provides fire protection and emergency medical services to Glendora.

Fire Hazard Severity Zones (FHSZ) are identified as Moderate, High, and Very High. As identified in the latest City of Glendora Fire Hazard Severity Zone Map, the project site is in a Very High FHSZ (City of Glendora 2025).

Development of the bike park core and parking area would result in the removal of existing vegetation from these areas of the project site, which would result in less combustible material

on-site. The improvements proposed for this area of the project site would enhance LACoFD's ability to use the area as a staging area through new hardscape improvements that make it easier for fire-fighting access and maneuvering. Development of the new bike trails throughout the project site would also result in the removal of existing vegetation on-site, further reducing the amount of combustible material. The bike trails would also provide a means for firefighters to access currently inaccessible (or difficult to access) areas of the project site. The proposed project would include the development of new trails in previously undeveloped areas of the project site, which would introduce people to new areas of the project site, increasing the potential for human-caused wildfire ignitions.

However, development of the proposed project would adhere to fire protection regulations and emergency procedures applicable within the city and implement rigorous protocols for emergency response and emergency evacuation, including those outlined in the most current CBC, California Fire Code, California Very High FHSZ Fire Safe Regulations, and LACoFD's Fire Code. Compliance with the applicable codes and regulations would ensure that implementation of the proposed project would not result in increased potential for wildland fires or exacerbate the fire risk in the project site or its surroundings.

The proposed project would also be required to go through the City's development review process and would be required to incorporate all applicable design and safety standards and regulations in the CBC and LACoFD's Fire Code to ensure that project development does not interfere with the provision of local emergency services (provision of adequate access roads to accommodate emergency response vehicles, evacuation from the project site, adequate numbers/locations of fire hydrants, etc.).

Furthermore, the proposed project is intended for non-motorized bicycles (peddled) and not for motorized bicycles (e.g., gas and electric), which would ensure that the possibility of sparks or fuel leaks from motorized vehicles would not occur.

Based on the preceding, impacts related to wildland fires would be less than significant, and no mitigation measures are necessary.

X. HYDROLOGY AND WATER QUALITY

Would the project:

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
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;	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
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	☐	☐	☒	☐
iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

DISCUSSION

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

The project site is in the San Gabriel River Watershed. The watershed drains into the San Gabriel River, which is hydraulically connected to the Los Angeles River through the Whittier Narrows Reservoir during high flows. The river is unlined until it reaches the lower reach near Bellflower where it transitions into a concrete-lined channel before becoming a natural bottom channel once near the Pacific Ocean in the City of Long Beach (Alta 2025).

Under existing conditions, the project site drains in multiple directions with concentration areas along its perimeter. The proposed bike park core area currently drains towards Glendora Avenue through multiple catch basins on the westerly and easterly sides of the street just north of the I-210 overpass. The catch basins are connected to storm drainpipes that discharge to an approximately six-foot-wide rectangular open channel along the northerly right-of-way of I-210. This channel continues northwesterly where it outfalls to Big Dalton Wash. The remainder of the project site drains towards the adjacent senior housing development north of the proposed bike park core area. There are several concrete-lined v-ditches along the hillside that drain to the base of the slope where it joins an open channel that drains to a concrete dissipation structure with a screen at the outlet to filter out debris and trash. The outlet is tied to an underground storm drain system within the vehicular drive lanes of the senior housing development, which continues to convey runoff northerly towards Big Dalton Wash. This storm drain also captures runoff for a portion of the senior housing development via a connection with a curb opening inlet just before it outfalls to Big Dalton Wash (Alta 2025).

Water quality for the project site is regulated by the Los Angeles RWQCB and its Water Quality Control Plan (Basin Plan), which contains water quality standards and identifies beneficial uses (wildlife habitat, agricultural supply, fishing, etc.) for receiving waters along with water quality criteria and standards necessary to support these uses consistent with federal and state water quality laws.

Impacts to water quality from receiving water generally range over three different phases of a development project:

- During the earthwork and construction phase, when the potential for erosion, siltation, and sedimentation would be the greatest.
- Following construction and before the establishment of groundcover when the erosion potential may remain relatively high.

- Following project completion, when impacts related to sedimentation would decrease markedly, but those associated with urban runoff would increase.

Following is a discussion of the potential water quality impacts resulting from urban runoff that would be generated during the construction and operational phases of the proposed project.

Project Construction

Construction-related runoff pollutants are typically generated from waste and hazardous materials handling or storage areas, outdoor work areas, material storage areas, and general maintenance areas (e.g., vehicle or equipment fueling and maintenance, including washing). The proposed project's construction phase may cause deterioration in the quality of downstream receiving waters if construction-related sediments or pollutants wash into the existing storm drain system and facilities in the area.

Construction-related activities that are primarily responsible for sediment releases are related to exposing previously stabilized soils to potential mobilization by rainfall/runoff and wind. Such activities include removing vegetation from the site, grading the site, and trenching for infrastructure improvements. Environmental factors that affect erosion include topographic, soil, and rainfall characteristics. Non-sediment-related pollutants that are also of concern during construction relate to non-stormwater flows and generally include construction materials (e.g., paint and stucco); chemicals, liquid products, and petroleum products used in building construction or the maintenance of heavy equipment; and concrete and related cutting or curing residues. Construction-related activities of the proposed project would generate pollutants that could adversely affect the water quality of downstream receiving waters if appropriate and effective stormwater and non-stormwater management measures are not used to keep pollutants out of and remove pollutants from urban runoff.

Construction projects of one acre or more are regulated under the Statewide Construction General Permit (CGP), Order No. 2022-0057-DWQ, issued by the State Water Resources Control Board in 2022. Projects obtain coverage by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) estimating sediment risk from construction activities to receiving waters and specifying BMPs that would be used by the project to minimize pollution of stormwater. Categories of BMPs used in SWPPPs are described in Table 6.

Table 6 Water Quality Protection Construction Best Management Practices

Category	Purpose	Examples
Erosion Controls and Wind Erosion Controls	▪ Use project scheduling and planning to reduce soil or vegetation disturbance (particularly during the rainy season) ▪ Prevent or reduce erosion potential by diverting or controlling drainage ▪ Prepare and stabilize disturbed soil areas	Scheduling, preservation of existing vegetation, hydraulic mulch, hydroseeding, soil binders, straw mulch, geotextile and mats, wood mulching, earth dikes and drainage swales, velocity dissipation devices, slope drains, streambank stabilization, compost blankets, soil preparation/roughening, and non-vegetative stabilization
Sediment Controls	▪ Prevent the mobilization of soil particles through the use of tarping, matting, or other covers.	Silt fence, sediment basin, sediment trap, check dam, fiber rolls, gravel bag berm, street sweeping and vacuuming, sandbag barrier, straw bale barrier, storm drain inlet protection, manufactured linear sediment controls, compost socks and berms, and biofilter bags
Wind Erosion Controls	▪ Apply water or other dust palliatives to prevent or minimize dust nuisance	Dust control soil binders, chemical dust suppressants, covering stockpiles, permanent vegetation, mulching, watering, temporary gravel construction, synthetic covers, and minimization of disturbed area
Non-stormwater 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 minimize non-stormwater discharges and contamination of any such discharges	Water conservation practices, temporary stream crossings, clear water diversions, illicit connection/discharge, potable and irrigation water management, and the proper management of the following operations: paving and grinding, dewatering, vehicle and equipment cleaning, fueling and maintenance, pile driving, concrete curing, concrete finishing, demolition adjacent to water, material over water, and temporary batch plants

Table 6 Water Quality Protection Construction Best Management Practices

Category	Purpose	Examples
Waste Management and Controls (i.e., good housekeeping practices)	▪ Manage materials and wastes to avoid contamination of stormwater	Stockpile management, spill prevention and control, solid waste management, hazardous waste management, contaminated soil management, concrete waste management, sanitary/septic waste management, liquid waste management, and management of material delivery storage and use
Tracking Controls	▪ Minimize the tracking of soil off site by vehicles	Stabilized construction roadways and construction entrances/exits, and entrance/outlet tire wash

Source: Compiled by PlaceWorks from information provided in the California Stormwater Quality Association's (CASQA's Construction BMP Handbook 2015).

The proposed project's construction contractor would be required to prepare and implement a SWPPP and associated BMPs in compliance with the CGP during grading and construction. The SWPPP would specify BMPs, such as those outlined in Table 6, that the construction contractor would implement to protect water quality by eliminating and/or minimizing stormwater pollution prior to and during grading and construction and show the placement of those BMPs. Project construction activities would also be implemented in accordance with the requirements of the adopted 2022 CBC, which is codified in Chapter 19.02, *California Building Code*, of the City of Glendora Code of Ordinances.

Adherence to the BMPs in the SWPPP and the City's Code of Ordinances requirements would reduce, prevent, minimize, and/or treat pollutants and prevent degradation of downstream receiving waters. BMPs identified in the SWPPP would reduce or avoid contamination of stormwater with sediment and other pollutants such as trash and debris; oil, grease, fuels, and other toxic chemicals; paint, concrete, asphalt, bituminous[6] materials, etc.; and nutrients.

Based on the preceding, water quality and waste-discharge impacts from the proposed project's grading and construction activities would be less than significant and no mitigation measures are necessary.

[6] Bituminous = resembling or containing bitumen; bitumen = any of various viscous or solid impure mixtures of hydrocarbons that occur naturally in asphalt, tar, mineral waxes, etc.; used as a road surfacing and roofing material.

Project Operation

The proposed project's operational-related activities (e.g., runoff from parking areas, solid waste storage areas, and landscaped areas) would generate pollutants that could adversely affect the water quality of downstream receiving waters if effective measures are not used to keep pollutants out of and remove pollutants from urban runoff.

Standards governing discharges to stormwater from the project site are regulated by the Los Angeles Regional Municipal Stormwater (MS4) Permit Order No. R4-2021-0105 NPDES Permit No. CAS004004. The City of Glendora has adopted the Los Angeles County Department of Public Works' (LACDPW) Low Impact Development (LID) Standards Manual and all revisions/updates. The LID Standards Manual was adopted in 2014 and provides guidance for the implementation of stormwater quality control measures in new development and redevelopment projects in unincorporated areas of the county with the intention of improving water quality and mitigating potential water quality impacts from stormwater and non-stormwater discharges.

LID is a stormwater management and land development strategy that combines a hydrologically functional site design with pollution prevention measures to compensate for land development impacts on hydrology and water quality. LID techniques mimic the site predevelopment hydrology by using site design techniques that store, infiltrate, evapotranspire, biofilter, or detain runoff close to its source. Source-control BMPs reduce the potential for pollutants to enter runoff and are classified in two categories—structural and nonstructural. Structural source-control BMPs have a physical or structural component, such as inlet trash racks, trash bin covers, and an efficient irrigation system, to prevent pollutants from contacting stormwater runoff. Nonstructural source-control BMPs are procedures or practices used in project operation, such as stormwater training or trash management and litter-control practices.

According to the LID Standards Manual, the bike park core area of the proposed project is a designated project defined as adding more than 10,000 square feet of impervious surface area. Mitigation for designated projects include retaining 100 percent of the stormwater quality design volume (SWQDv)[7] on-site through infiltration, evapotranspiration, stormwater runoff harvest and use, or a combination thereof. The reminder of the proposed project outside of the bike park core area (e.g., proposed trails) is not defined as a designated project and runoff from this area does not need to be retained and mitigated on-site.

[7] The design storm, from which the SWQDv is calculated, is defined as the greater of the 0.75-inch, 24-hour rain event; or the 85th percentile, 24-hour rain event as determined from the Los Angeles County 85th percentile precipitation isoheytal map

Proposed Trails and Access Road

Under the proposed project, the proposed trails would include protection and retention of existing vegetation and minimum disturbance to the existing hillside topography to maintain the existing drainage patterns. As shown on Figure 6, *Conceptual Grading and Drainage Plan*, under proposed conditions, runoff from the proposed trails would drain via gravity into a swale on the eastern boundary of the bike park core area and along the southern portion of the proposed access road. Runoff from the access road would sheet flow into the swale on the southern side of the access road. The swale would lead into a grated catch basin connected to a storm drain that would run beneath the proposed access road. To the west of the proposed access road, the storm drain would connect to a concrete headwall and then be discharged into rip rap to decrease the flow rate of the runoff. This runoff would not be treated by the biofiltration basin.

Bike Park Core and Bicycle Pump Tracks

Runoff from the bicycle pump tracks would be collected using grated catch basins throughout that area. From the catch basins, the runoff would be diverted via a storm drain that would run along the eastern boundary of the bike park core area. Runoff from the eastern side of the bike park core area would sheet flow into a grated catch basin on the eastern boundary of the bike park core area that would be connected to the same storm drain. The storm drain would run beneath the proposed access road and then to a concrete headwall. The concrete headwall would discharge into a proposed swale on the north side of the access road. Runoff from the western side of the bike park core area would sheet flow into a swale on the western boundary of the parking lot that connects to the same swale on the northern side of the proposed access road.

The swale would discharge into a biofiltration basin to the north of the proposed access road that would be designed pursuant to the requirements of the LID Standards Manual. Before being treated by the biofiltration basin, the runoff would encounter rip rap to decrease the flow rate of the runoff. The treated runoff would then flow out of the bioretention basin and into a storm drain that connects to the same storm drain that conveys the runoff from the proposed trails (see Figure 6).

The project developer would be required to prepare and submit a standard urban stormwater mitigation plan (SUSMP), which would include applicable LID requirements in the MS4 permit and LID Standards Manual. The proposed project would be designed to control pollutants, pollutant loads, and runoff volume to the maximum extent feasible by minimizing impervious surface area, and controlling runoff from impervious surfaces through infiltration, evapotranspiration, bioretention, and/or rainfall harvest and use. The final BMPs to be implemented for the proposed project, including the proposed bioretention basin, would be

determined through the City's review of the SUSMP, which would occur during the City's development review and building plan-check process.

The BMPs incorporated into the development of the proposed project would mitigate at a minimum the first flush or the equivalent of the greater between the 85th percentile storm and first 0.75-inch of rainfall for any storm event.[8] The installed BMP systems would be designed with an internal bypass or overflow system to prevent upstream flooding due to large storm events. Furthermore, the SUSMP would include the following information:

- Feasibility of infiltrating captured stormwater at the project site.
- Source-control measure(s) proposed to be implemented.
- Calculation of the volume of stormwater that needs to be treated on the project site.
- Discussion on whether stormwater runoff harvest and use is feasible.
- Stormwater quality control measure(s) proposed to be implemented and sizing calculations.
- Proposed hydromodification controls and calculations (if necessary).[9]
- Proposed maintenance plan (if necessary).

Additionally, implementation of the proposed project would incorporate into the project plans a stormwater mitigation plan, including the BMPs necessary to control stormwater pollution from facility operations as set forth in the SUSMP. Structural or treatment control BMPs in project plans would meet the design standards in the SUSMP and MS4 permit. The project developer would also provide verification of maintenance provisions for treatment and structural control BMPs.

The proposed project would comply with all state, county, and local regulations regarding stormwater runoff during the operational phase, which would ensure that water quality standards and waste discharge requirements would not be exceeded, and surface water and groundwater quality would not be degraded. Therefore, operation of the proposed project would not be expected to violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. Impacts would be less than significant, and no mitigation measures are necessary.

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[8] Stormwater quality control measures are designed to handle the frequent, smaller storm events, or the initial volume of stormwater runoff from larger storm events (typically referred to as first flush events). The first flush of larger storm events is the initial period of the storm where stormwater runoff typically carries the highest concentration and loads of pollutants. Small, frequent storm events represent most of the total annual average precipitation in the county.

[9] Hydromodification means the change in the natural hydrologic processes and runoff characteristics due to land use changes that result in increased stream flows and changes in sediment transport, thus affected water quality in natural waterways.

CONSTRUCTION NOTES

1. CONSTRUCT 4" OVER 11" THICK ASPHALT CONCRETE OVER AGGREGATE BASE IN DRIVE LANES AND 3" OVER 4" THICK ASPHALT CONCRETE OVER AGGREGATE BASE IN PARKING AREAS, OVER COMPACTED SUBGRADE PER GEOTECHNICAL REPORT RECOMMENDATIONS.
2. CONSTRUCT 4" THICK CONCRETE PAVEMENT OVER COMPACTED SUBGRADE PER GEOTECHNICAL REPORT RECOMMENDATIONS
3. CONSTRUCT MASONRY RETAINING WALL PER SPPWC STANDARD PLAN 618-3, TYPE B.
5. INSTALL PARKING WHEEL STOP PER DETAIL 1 ON SHEET 4.
6. PAINT STANDARD PARKING SPACES PER SPPWC STANDARD PLAN 180-0.
7. PAINT ACCESSIBLE PARKING SPACES PER SPPWC STANDARD PLAN 180-0.
8. CONSTRUCT STORM DRAIN LINE PER RECOMMENDATIONS OF THE GEOTECHNICAL REPORT. SIZE PER PLAN.
9. CONSTRUCT CATCH BASIN WITH GRATE PER DETAIL 3 ON SHEET 4. SIZE PER PLAN.
10. CONSTRUCT RIP RAP PER DETAIL 2 ON SHEET 4.
11. VAULT RESTROOM BY OTHERS.
12. PICNIC BENCH BY OTHERS.
13. CANOPY STRUCTURE BY OTHERS.
15. CONSTRUCT CONCRETE HEADWALL.
16. CONSTRUCT BIOFILTRATION BASIN PER LACDPW LID STANDARDS DEVELOPMENT MANUAL APPENDIX E FACT SHEET, BIO-1.
17. CONSTRUCT STANDARD CULVERT PER U.S. DEPARTMENT OF AGRICULTURE FOREST SERVICE STANDARD TRAIL PLAN 921-10-01. SIZE PER PLAN.

NOTES

1. CLEAR AND GRUB EXISTING SITE AS REQUIRED FOR CONSTRUCTION OF PROPOSED IMPROVEMENTS PER RECOMMENDATIONS OF THE GEOTECHNICAL REPORT.
2. FOR OTHER SITE RELATIVE INFORMATION NOT SHOWN, SEE AVID TRAILS PLANS.
3. FOR GRADING OF TRAILS, SEE AVID TRAILS PLANS.

GRADING LEGEND:

- RIGHT OF WAY
- ROADWAY CENTERLINE
- 778 — PROPOSED CONTOUR
- 740 — EXISTING CONTOUR
- DAYLIGHT
- GRADE BREAK
- FLOWLINE
- SD — SD — STORM DRAIN PIPE
- 2.4% — SLOPE
- 746.75 — PROPOSED ELEVATION
- (738.50) — EXISTING ELEVATION
- RETAINING WALL
- ASPHALT PAVING
- CONCRETE PAVING

Source: Alta 2025.

Figure 6
Conceptual Grading and Drainage Plan

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

The project site is in the San Gabriel Valley Groundwater Basin. Currently, no water is provided to the project site, and no water is proposed as part of the proposed project. Glendora's main source of water supply is groundwater pumped from the Main San Gabriel Valley Basin. Other water supplies consist of purchased local groundwater and surface water from the Covina Irrigating Company (CIC) and imported surface water supplies. Imported surface water historically accounted for approximately 8 percent of the city's overall water supplies. Purchased water from CIC historically accounted for less than 1 percent of the city's overall water supplies (Glendora 2021).

The City of Glendora Public Works Department, Water Division (GWD) estimates that water demands in its service area for normal years would increase from approximately 11,090 acre-feet per year (afy) in 2025 to approximately 11,581 afy in 2045. GWD forecasts that it will have sufficient water supplies to meet water demands in its service area for normal, single-dry, and multiple-dry years. Estimates of future population growth in the city's service area were based on growth rate projections obtained from data provided by SCAG, which incorporates demographic trends, existing land use, General Plan land use policies, and input and projections through the year 2045 from the Department of Finance and the US Census Bureau (Glendora 2021). Because the project site does not include development requiring water supply and it does not include water connections, the proposed project's water demands would not substantially deplete groundwater supplies.

Therefore, the proposed project would not substantially interfere with groundwater supplies or recharge. No impact on groundwater supplies would occur and no mitigation measures are necessary.

c) Would the project 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?

Erosion and siltation impacts potentially resulting from alteration of the drainage pattern due to project development would, for the most part, occur during the proposed project's construction phase, which would include site preparation and grading activities. Environmental factors that affect erosion include topographic, soil, wind, and rainfall characteristics. Siltation is most often caused by soil erosion or sediment spill. Following is a discussion of the potential erosion and siltation impacts that could occur during the construction and operational phases of the proposed project.

Project Construction

As discussed previously in Section 3.X.a, the project construction contractor would be required to prepare and implement a SWPPP pursuant to the CGP during grading and construction. The SWPPP would specify erosion- and sediment-control BMPs that the project construction contractor would implement prior to and during grading and construction to minimize erosion and siltation impacts on- and off-site. Erosion-control BMPs are designed to prevent erosion, whereas sediment controls are designed to trap or filter sediment once it has been mobilized. BMPs that could be implemented during the proposed project's construction phase are discussed in detail in Section 3.X.a. For example, BMPs could include, but are not limited to, installation of perimeter silt fences, installation of silt fences around stockpile and covering of stockpiles, and stabilization of disturbed areas where construction ceases for a determined period (e.g., one week) with erosion controls.

Adherence to the BMPs in the SWPPP would reduce, prevent, or minimize soil erosion from project-related grading and construction activities. The construction-phase BMPs would also ensure effective control of not only sediment discharge, but also of pollutants associated with sediments (e.g., nutrients, heavy metals, and certain pesticides). Therefore, project-related construction activities would not result in substantial erosion or siltation on- or off-site. Construction-related impacts would be less than significant, and no mitigation measures are necessary.

Project Operation

As described in Section 3.X.a, the proposed project would have different drainage patterns for different areas of the project site. The proposed trails and access road section of the project site would not be treated by the proposed bioretention basin. Meanwhile, the bike park core and bicycle pump track would be connected to the biofiltration basin that would be designed per the LACDPW's LID Standards Manual.

Project development would not substantially alter the existing drainage pattern of the project site or area and would not alter the course of a stream or a river. Additionally, the proposed project would be implemented in accordance with the requirements of the MS4 permit and the LID Standards Manual. For example, project design and operation would include implementation of BMPs specified in the final SUSMP, which would minimize runoff and soil erosion and siltation into stormwater and thus minimize sedimentation downstream.

Furthermore, project development would be required to comply with the standards of the City of Glendora Municipal Code Chapter 21.03.090 (Urban Runoff Pollution), which requires development projects to implement permanent BMPs on individual sites to reduce pollutants in the stormwater.

Therefore, project development would not substantially alter the existing drainage pattern of the project site or area in a manner that would result in substantial erosion or siltation on- or off-site. Operation-related impacts would be less than significant, and no mitigation measures are necessary.

ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Project implementation is not anticipated to substantially change the drainage pattern on-site. However, development of the proposed project would increase impervious surfaces, compared to existing conditions. Per the requirements of LACDPW, as detailed in the Los Angeles County Hydrology Manual and Los Angeles County Hydraulic Design Manual, development under the proposed project would be required to have site-specific hydrology and hydraulic studies prepared to determine the capacity of the existing and proposed storm drain systems and project impacts on such systems prior to approval of the proposed project by the City. The proposed project would be required to comply with site-specific "allowable discharge rates" as identified by the City, that limit post-project peak-flow discharges compared to existing conditions, thus minimizing the potential for flooding on- or off-site and exceedance of the capacity of existing or planned stormwater drainage systems. The project developer is required to submit hydrology and hydraulic studies to the City for review and approval prior to the commencement of any grading activities.

Additionally, development of the proposed project must be operated in accordance with the Los Angeles County MS4 Permit (Order No. R4-2021-0105, NPDES No. CAS004004) and the City of Glendora Municipal Code Chapter 21.03.090 (Urban Runoff Pollution). The MS4 Permit requires designated projects to retain and treat a specified volume of stormwater runoff on-site, as described in Section 3.X.a.

Therefore, the proposed project would not be anticipated to cause substantial flooding on- or off-site. Project development would also not be anticipated to create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage system. Therefore, impacts would be less than significant, and no mitigation measures are necessary.

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?

The following describes potential impacts of the proposed project related to storm drainage systems and runoff.

Capacity of Stormwater Drainage Systems

Project impacts on the capacity of storm drainage systems would be less than significant, as substantiated in Section 3.X.c.ii. No mitigation measures are necessary.

Polluted Runoff

Project stormwater pollution impacts would be less than significant, as substantiated in Section 3.X.a. No mitigation measures are necessary.

iv) Impede or redirect flood flows?

The project site is in an area mapped by the Federal Emergency Management Agency (FEMA) in Flood Zone X, meaning that the site is not within a 100-year floodplain (FEMA 2025). However, the project site is within the flood inundation area of the Big Dalton Dam (DSOD 2025). This dam is in Big Dalton Canyon, four miles northeast of Glendora, and is owned and operated by the Los Angeles County Flood Control District (Glendora 2025b).

Dams in California are monitored and inspected annually by the California Division of Safety of Dams (DSOD). In addition, dam owners are required to maintain Emergency Action Plans (EAPs) that include procedures for damage assessment and emergency warnings. An EAP identifies potential emergency conditions at a dam and specifies preplanned actions to help minimize property damage and loss of life should those conditions occur. EAPs contain procedures and information that instruct dam owners to issue early warning and notification messages to downstream emergency management authorities. Additionally, the State of California Dam Safety Act requires dam owners to submit inundation maps for those dams whose total failure would cause loss of life or personal injury. Therefore, impacts would be less than significant, and no mitigation measures are necessary.

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

As noted in Section 3.X.c.iv, flooding due to a 100-year storm event or due to dam inundation at the site is unlikely.

A seiche is an oscillating surface wave in a restricted or enclosed body of water, generated by ground motion, usually during an earthquake. Seiches are of concern for water storage facilities because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam, or other artificial body of water. There are no adjacent bodies of water that would pose a flood hazard to the site due to a seiche. The project site is not at risk of inundation by seiche.

Tsunamis are a type of earthquake-induced flooding produced by large-scale sudden disturbances of the sea floor. Tsunami waves interact with the shallow sea floor when approaching a landmass, resulting in an increase in wave height and a destructive wave surge into low-lying coastal areas. The project site is approximately 37 miles inland from the Pacific Ocean. Therefore, the project site is outside the tsunami hazard zone and would not be affected by a tsunami.

Based on the preceding, the proposed project would not release pollutants as the result of floods, tsunami, or seiche. Therefore, no impact would occur, and no mitigation measures are necessary.

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Water quality in Glendora is regulated by the Los Angeles RWQCB and its Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties. The Basin Plan contains water quality standards and identifies beneficial uses (wildlife habitat, agricultural supply, fishing, etc.) for receiving waters along with water quality criteria and standards necessary to support these uses consistent with federal and state water quality laws. As discussed in Section 3.X.a, the proposed project would not violate any water quality standards and will therefore not obstruct the implementation of the Basin Plan. Therefore, no impact would occur, and no mitigation measures are necessary.

Additionally, the project site is in the San Gabriel Valley Main Groundwater Basin. The basin has a Groundwater Quality Management and Remediation Plan as well as a Groundwater Basin Salt and Nutrient Management Plan. As discussed in Sections 3.X.a and 3.X.b, the proposed project would not violate any water quality standards and will not decrease groundwater supplies or interfere substantially with groundwater recharge. Therefore, no impact would occur, and no mitigation measures are necessary.

XI. LAND USE AND PLANNING

Would the project:

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☐	☒
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?	☐	☐	☒	☐

DISCUSSION

a) Would the project physically divide an established community?

The proposed project would not introduce a new land use that would disrupt existing land use patterns, nor would it introduce a physical barrier that would separate land uses that are not already separated. The proposed project would include the construction of a new bike park, including bike trails and a pump track, and the expansion of existing trails and park facilities (restrooms, trailhead structure and signage, recreational structures) within the confines of the project site. Additionally, while there are established residential neighborhoods surrounding the project site, development of the proposed project would not physically divide these communities in any way because the proposed project would be developed within the confines of the project site and would not introduce roadways or other infrastructure improvements that would bisect or transect the residential communities. The proposed project would utilize the existing circulation routes in the surrounding area. Access to the project site would continue to be provided via Glendora Avenue, Mauna Loa Avenue, and Bonnie Cove Avenue. Access to the surrounding uses and properties would also not be interrupted as a result of development of the proposed project since surrounding uses and properties do not have to cross the project site to access any property surrounding the site. Development of the proposed project would not physically change the surrounding street patterns or otherwise impede movement through the surrounding areas. Therefore, no impact would occur, and no mitigation measures are necessary.

b) Would the project 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?

The City enforces numerous goals, policies, and regulations related to the purpose of avoiding or mitigating an environmental effect. The planning and regulatory plans that govern development and use of the project site are the Glendora General Plan and Zoning Ordinance (Title 21 of the Glendora Municipal Code). The development and design standards and regulations contained in the Glendora Zoning Ordinance, which implements the General Plan, constitute the zoning regulations that govern development of the project site.

Per the City's General Plan, the General Plan land use designations that make up the project site include Conservation Open Space (COS), Hillside Very Low Density (HVLD), Open Space (OS), and High Density Residential (HD). Per the City's Zoning Map, the project site is zoned Single-Family Estate (E-7), Planned Redevelopment (PR), and Open Space Natural (OSN).

Although the Single-Family Estate (E-7) zoning designation does not list parks as a permitted use, most Glendora parks (e.g., Finkbiner, George Manooshian, Willow Springs) are zoned residential. Past and recent improvements for these parks have proceeded without issue or the need for a change in land use designation or zoning. For example, Finkbiner Park is currently undergoing a significant improvement project, with no land use or zoning changes recommended or considered. Therefore, as with the aforementioned parks and associated improvements, the improvements to project site under the proposed project can proceed without implementing a change in land use designation or zoning.

Additionally, the proposed project would be developed in accordance with the provisions of the Glendora Zoning Ordinance (Title 21 of the Glendora Municipal Code). For example, the uses and improvements under the proposed project would be developed in accordance with the allowed uses under the proposed Open Space Natural zoning designation of the project site, which comprises a good portion of the project site. As outlined in Section 21.06.050, Open Space-Natural Zone (OSN), of the Zoning Ordinance, permitted uses for properties in an OSN zone shall be left in its natural, wilderness state except for the following uses: riding and hiking trails, picnic and playground areas, flood-control structures and facilities, and utility substations and related equipment and structures. The proposed project includes the development of a bike park core area and various hiking trails, which are permitted and in line with the uses of the OSN zone. Also, most of the project site would remain in its existing natural wilderness state; construction activities are anticipated to disturb approximately 4.25 acres of the 318-acre project site.

As also outlined in Section 21.06.050, development standards for the OSN zone shall be determined on a site-by-site basis. Consideration shall be given to surrounding properties and developments to blend the development with, and to keep it consistent with, the surrounding

area. Factors to be considered for determination of standards shall be topography, water drainage, circulation, use of site, and any other environmental factors related to the site. In coordination with its design consultant, the City has carefully considered the surrounding land uses as well as the existing project site features, terrain, topography, and natural and biological features and resources in its design of the proposed project. For example, construction of the bike park and trails would include protection and retention of existing vegetation and minimize disturbance to the existing hillside topography within the areas of disturbance to maintain the existing drainage patterns. The preservation of existing vegetation throughout the project site would minimize impacts to existing trees, shrubs, and grasses. The uses, features, and improvements of the proposed project would not only be designed and constructed to blend in with and be complementary to the existing uses and conditions of the project site but also of its surroundings.

Furthermore, the proposed trail system would be constructed by professional trail builders in accordance with the specifications stipulated in the Trail Design Parameters of the National Forest Service to Trail Class 3 (reference FSH2309.18, Section 23.13, Exhibit 01), with minimum disturbance and impact to the existing landscape of the project site.

Therefore, the proposed project would not conflict with the Glendora General Plan or Zoning Ordinance. No land use impact related to General Plan or zoning consistency would occur and no mitigation measures are necessary.

XII. MINERAL RESOURCES

Would the project:

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

DISCUSSION

a) Would the project 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?

The project site is within the San Gabriel Production-Consumption Region. The project site is not classified as a Mineral Resource Zone 2 (MRZ-2), indicating that the area has not been identified as containing significant mineral deposits based on available geologic information (CGS 2010). The project site is not used for mining and there is no evidence to indicate that it was ever utilized for mining operations based on the review of historical sources. Additionally, the project site is not used for mining and no locally important mineral resource recovery sites are located on or near the site. The nearest mine mapped on the Division of Mine Reclamation Mines Online website is approximately 3.5 miles west of the project site, in the City of Azusa (DMR 2024). Also, no mining sites are designated in the Glendora General Plan.

Furthermore, mining on the project site would be incompatible with the surrounding uses, which consists mostly of residential uses. Mining is also not a permitted use under the project site's General Plan land use or zoning designations of the project site. Furthermore, the project site does not support mineral extraction operations. The nearest mineral resource recovery site is the Cemex Azusa Quarry operations site (1201 W. Gladstone Street) in the City of Azusa, approximately 3.5 miles west of the project site (DMR 2024).

Finally, no oil or energy extraction and/or generation activities exist on the project site. A review of California Geologic Energy Management Division's well finder indicates that there are no oil or energy wells on or adjacent to the project site (CalGEM 2024).

Therefore, no impact on mineral resources or mineral resource recovery sites would occur and no mitigation measures are necessary.

b) Would the project 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?

See response to Section 3.XII.a. As substantiated in this section, no impact would occur, and no mitigation measures are necessary.

XIII. NOISE

Would the project result in:

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
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?	☐	☐	☐	☒

Noise Fundamentals

Noise is defined as unwanted sound and, when overexposed, is 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, federal, state, and local 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. Noise modeling was prepared by PlaceWorks and is summarized herein and included as Appendix F. Additional information on noise and vibration fundamentals and applicable regulations are contained in Appendix F.

Environmental Setting

The noise environment in the vicinity of the project site is primarily influenced by traffic noise from Glendora Avenue and I-210, and residential activities within the project area also contribute to the existing noise environment. Based on the City of Glendora General Plan Noise Element Exhibits N-2 and N-3, General Plan Buildout Noise Contours, the project site is within

the 60 A-weighted decibel (dBA) community noise equivalent level (CNEL) noise contour for Glendora Avenue and within the 65 dBA CNEL noise contour for I-210.

Sensitive Receptors

Certain land uses are particularly sensitive to noise and vibration. The City of Glendora General Plan Noise Element identifies residential uses (e.g., single-family, multifamily, and mobile homes), hospitals, nursing homes, hotels, motels, churches, schools, and libraries as noise sensitive. There are sensitive receptors, including senior housing residences to the north and single-family uses to the west of the project site. The closest noise-sensitive use to the project site is senior housing uses at Heritage Oaks Senior Apartments approximately 120 feet north of the nearest proposed bike core park element (curved wall ride) on the western end of the project site.

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 Land Use and Climate Innovation. 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 (Air District), 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 Glendora Municipal Code

The City of Glendora Municipal Code has ambient base noise levels per designated zone. The ambient base noise levels identified in Section 4.44.040 of the Municipal Code are used as the exterior noise standards, which are summarized in Table 7.

Table 7 Ambient Noise Level, dBA

Zone	Time of Day		
	7:00 am to 7:00 pm (Day)	7:00 pm to 10:00 pm (Evening)	10:00 pm to 7:00 am (Night)
Single Family Residential (R-1, R-A, E-3, E-4, E-5, E-6, E-7)	55	50	45
Multifamily Residential (A-2, R-2, R-3, G-A, M.H.P)	55	55	50
Special Zone (MS)	55	50	45

Source: City of Glendora Municipal Code.

Section 9.44.100, Machinery, Equipment, Fans and Air Conditioning, of the Municipal Code states that it is unlawful for any person to operate any machinery, equipment, pump, fan, or air conditioning apparatus or similar device in any manner as to create noise levels that would exceed the ambient noise level (Table 7) by more than 5 dBA at the receiving property line.

Section 9.44.110, Construction of Buildings and Projects, of the Municipal Code states that it is unlawful for any person within a residential zone, or within a radius of 500 feet therefrom, to operate equipment or perform any outside construction or repair work on buildings, structures or projects or to operate any pile driver, power shovel, pneumatic hammer, derrick, power hoist, or any other construction type device between the hours of 9:00 pm of one day and 7:00 am of the next day.

The City currently does not have any adopted numerical standards, guidelines, or thresholds relative to construction noise levels or ground-borne vibration levels. As such, the Federal Transit Administration (FTA) criterion for construction noise at residential uses of 80 dBA Leq and 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) (FTA 2018) was used to determine impact significance.

DISCUSSION

a) Would the project generate 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, noise ordinance, or applicable standards of other agencies?

Following is a discussion of the proposed project's construction and operation-related impacts.

Construction Noise

Noise generated by on-site construction equipment is based 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 types of equipment and has distinct noise characteristics. Noise levels from construction activities are typically dominated by the loudest three 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 the three loudest pieces 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 what specific activity is being 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 disregarding other attenuation effects from air absorption, ground effects, and shielding effects provided by intervening structures or existing solid walls), the average noise levels at noise-sensitive receptors could vary considerably, because mobile construction equipment would move around the site (site of each development phase) with different equipment mixes, loads, and power requirements.

The expected construction equipment mix was estimated and categorized by construction activity using the Federal Highway Administration Roadway Construction Noise Model (RCNM) (FHWA 2006). Results of the anticipated construction noise levels that would be generated by the proposed project at the nearest noise-sensitive uses are summarized in Table 8. Assuming the nearest sensitive receptor to the center of construction activities, construction-related noise levels would be up to 72 dBA Leq at the closest receptors (multifamily residences to the north), as shown in Table 8. Construction noise levels at receptors further away are estimated to be even less. As demonstrated in Table 8, construction noise levels would not exceed the Federal Transit Administration (FTA) threshold of 80 dBA Leq for residential uses and would occur during the exempt daytime hours (7:00 am to 9:00 pm) per Glendora Municipal Code Section 9.44.110. Therefore, construction noise impacts would be less than significant, and no mitigation measures are necessary.

Table 8 Project-Related Construction Noise Levels, dBA

Construction Activity Phase	Noise Levels in dBA L_{eq}		
	RCNM Reference Noise Level	Senior Housing to the North	Single-Family Residences to the West
Distance in feet	**50**	**525**	**245**
Asphalt Demolition	85	61	68
Distance in feet	**50**	**265**	**250**
Site Preparation	81	57	64
Distance in feet	**50**	**390**	**255**
Rough Grading - Pump Tracks	80	57	63
Distance in feet	**50**	**205**	**235**
Building Construction	77	62	61
Distance in feet	**50**	**170**	**120**
Jump Line Trails	77	66	60
Distance in feet	**50**	**135**	**250**
Multi-Use Trails	82	70	65
Distance in feet	**50**	**180**	**215**
Sidewalk Paving	79	65	63
Distance in feet	**50**	**275**	**210**
Asphalt Paving - Pump Tracks, Parking Lot, Access Road	83	72	71
Distance in feet	**50**	**205**	**235**
Architectural Coating	74	63	61
Exceeds FTA's 80 dBA L_{eq} Threshold?		**No**	**No**

Source: FHWA's RCNM software.

Notes: dBA L_{eq} = Energy-Average (L_{eq}) Sound Levels. Distance measurements were taken using Google Earth (2024) from the acoustical center of the project site (Appendix F to this Initial Study).

Operational Noise

Mobile Noise

A project will normally have a significant effect on the environment related to traffic 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 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 outdoor environment. Noise levels above 65 dBA CNEL are normally unacceptable at sensitive receptor

locations such as residences, and noise environments in these areas would be considered degraded. A doubling of existing traffic volumes due to an increase of proposed project traffic volumes would represent a 3 dBA increase over existing traffic noise levels. Based on this, a significant impact would occur if the following traffic noise increases occur relative to the existing noise environment:

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

For this analysis, a significant traffic noise impact occurs when the thresholds above are exceeded under cumulative conditions (with project) and the contribution of the project to future traffic is calculated to be greater than 3 dBA CNEL.

The proposed project is expected to result in a net increase of five AM and seven PM peak hour trips and a total of 60 daily trips (Appendix G) over existing conditions. City of Glendora 2017 Citywide Traffic Counts show approximately 15,600 to 23,500 daily traffic trips on Glendora Avene between Gladstone Street and Historic Route 66 and between 8,000 and 17,000 daily traffic trips on Baseline between Barranca Avenue and Glendora Avenue. Due to the minimal increase in daily trips, the proposed project would not cause a doubling of existing daily traffic volumes due to daily project traffic volume increases. With the addition of daily project trips due to the proposed project, daily project traffic noise levels would result in a less than 1 dBA increase over existing conditions. Since the proposed project would not result in a 3 dBA increase, impacts would be less than significant, and no mitigation measures are necessary.

Recreational Noise

The proposed project would include a bike park core area, downhill bike-only trails, a multi-directional “pedal up” trail, a longer “cross country” style multi-use and bi-directional trail that is planned to ring the project site, bicycle pump tracks, mountain bike jump trails, trail head improvements, staging and seating areas, a restroom facility, a re-graded access road off of Glendora Avenue, and improved parking areas. Proposed bike park and trails would be a local-serving recreational opportunity for residents of Glendora and would operate similar to many of City’s parks and wilderness areas. The proposed trials would consist of people talking with the proposed bike core park area generating the most noise onsite. Project noise estimates are based on a reference noise level of 63 dBA Leq at 50 feet of 40 children playing (Sacramento County 2011). This noise level would attenuate to 51 dBA Leq at 200 feet at the nearest noise sensitive uses (i.e., senior housing to the north) from the acoustical center of the proposed bike park area, not accounting for intervening topography. At 200 feet from the proposed bike core park area, noise would be 51 dBA Leq at the nearest noise sensitive property line. Therefore, project operational noise would not exceed daytime noise standards of 55 dBA Leq (per Section

4.44.040 of the Glendora Municipal Code) and impacts would be less than significant. No mitigation measures are necessary.

b) Would the project generate excessive groundborne vibration or groundborne noise levels?

Potential vibration impacts associated with recreational-type projects are usually related to the use of heavy construction equipment. Construction can generate varying degrees of ground vibration, depending on the construction procedures and equipment. The use of construction equipment generates vibrations that spread through the ground and diminish with distance from the source. The effect on buildings in the vicinity of 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 levels that can damage structures.

Table 9 summarizes project-related vibration levels for typical construction equipment at a reference distance of 25 feet. As shown in the table, typical construction equipment can generate vibration levels ranging up to 0.21 inches per second (in/sec) PPV at 25 feet. Vibration levels at a distance greater than 75 feet would attenuate to 0.04 in/sec PPV or less.

Table 9 Proposed Project's Vibration Levels

Equipment	Reference Levels at 25 Feet (in/sec PPV)	Senior Housing Receptors at 135 feet[1] (in/sec PPV)	Single-Family Receptors at 120 feet[1](in/sec PPV)
Vibratory Roller	0.21	0.017	0.020
Large Bulldozer	0.089	0.007	0.008
Loaded Trucks	0.076	0.006	0.007
Jackhammer	0.035	0.003	0.003
Small Bulldozer	0.003	0.000	0.000

Source: FTA 2018. See Appendix F for calculations.
Notes: In/sec = inches per second; PPV = peak particle velocity
[1] As measured from the edge of the nearest construction area using Google Earth Pro.

The City of Glendora does not have an established threshold for assessing construction vibration impacts. The FTA's maximum acceptable vibration standard of 0.2 in/sec PPV for nonengineered timber and masonry buildings was applied for assessing vibration impacts from the proposed project's construction-related activities. The nearest structure to the project site's construction activities, the single-family residential use to the west, is approximately 120 feet away from the nearest proposed construction area boundary. At this distance, construction vibration from a

vibratory roller would attenuate to 0.02 in/sec PPV or less. Proposed construction activities would not exceed the FTA vibration standard of 0.2 in/sec PPV for nonengineered timber and masonry buildings. Therefore, impacts from construction vibration would be less than significant and no mitigation measures are necessary.

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?

The project site is approximately 4.5 miles northwest of Brackett Field Airport. The project site is outside of the 60 dBA CNEL noise contour for Brackett Field Airport. Therefore, implementation of the proposed project would not result in increased exposure of people working at or visiting the project site to aircraft noise. No impact would occur, and no mitigation measures are necessary.

XIV. POPULATION AND HOUSING

Would the project:

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

DISCUSSION

a) Would the project 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)?

The proposed project does not include the development of new homes or businesses, which would result in direct and indirect population growth. The proposed project includes the construction of a new bike park, including bike trails and a pump track, and the expansion of existing trails and park facilities (restrooms, trailhead structure, and signage). The project site and proposed uses would also be provided with adequate road access and utilities; the proposed project would include a re-graded access road that would meet the design requirements for LACoFD's fire and emergency vehicle accessibility. Although the proposed project may draw visitors from outside the city, the proposed project is mainly intended as a local-serving recreational opportunity for residents of Glendora. It is expected that a fair number of residents will pedal their bikes to the project site from their respective homes. Additionally, the bike park and trails of the proposed project would operate similar to many of the City's parks and wilderness areas where there will be limited staff, with no staff on-site on a daily basis. Furthermore, the proposed project would not require new infrastructure or extension of existing infrastructure that could indirectly induce population growth nearby. Therefore, impacts would be less than significant, and no mitigation measures are necessary.

b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No housing exists on the project site, which is currently developed with the South Hills Wilderness area. Development of the proposed project would not involve the removal or relocation of any housing and would not displace any people or require the construction of any replacement housing. Therefore, no impact would occur, and no mitigation measures are necessary.

XV. PUBLIC SERVICES

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, to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

Would the project:

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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:				
(i) Fire protection?	☐	☐	☒	☐
(ii) Police protection?	☐	☐	☒	☐
(iii) Schools?	☐	☐	☐	☒
(iv) Parks?	☐	☐	☒	☐
(v) Other public facilities?	☐	☐	☐	☒

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 public services:

i) Fire protection?

LACoFD provides fire protection and emergency services to Glendora (including the project site) from three fire stations: Stations 85, 86, and 151 (City of Glendora 2024b). The nearest fire station to the project site is Station 85 at 231 W650 E. Gladstone Street, approximately 1.3 miles to the southeast. LACoFD also has mutual-aid agreements with other fire departments in the county.

Project implementation could result in a slight increase in calls for fire protection and emergency medical services. However, considering the existing firefighting resources available in and near the city, 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 requires more resources than Station 85 could provide, LACoFD would direct resources to the site from other LACoFD stations nearby and, if needed, would request assistance from other nearby fire departments.

Project implementation is also not anticipated to impede or increase LACoFD's response times to either the project site or the surrounding vicinity. Currently, travel time to the project site from Station 85 is approximately three minutes (Google Maps 2024)—this would remain the same with implementation of the proposed project. Therefore, LACoFD's response time for Station 85 to the project site would be within LACFD's goal of having a fire unit to the site as quickly as possible. The project site is also already served by LACoFD; therefore, the proposed project would not result in an expansion of LACoFD's service area.

Additionally, the City involves LACoFD in the development review process to ensure that the necessary fire prevention and emergency response features are incorporated into development projects. The proposed project would incorporate such design features to minimize the potential demand placed on LACoFD. All site and building improvements proposed under the proposed project would be subject to review and approval by LACoFD.

Furthermore, project development is required to comply with the most current adopted fire codes, building codes, and nationally recognized fire and life safety standards of the City and LACoFD, which impose design standards and requirements that seek to minimize and mitigate fire risk. Compliance with these codes and standards is ensured through the City's and LACoFD's development review and building permit process.

Based on the preceding, the proposed project would not adversely affect LACoFD'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, and no mitigation measures are necessary.

ii) Police protection?

The Glendora Police Department (GPD) provides police service to the city, including the project site. GPD is divided into two divisions consisting of various bureaus. The Administrative Division consists of the Community Relations Bureau, Community Preservation Bureau, and Records Bureau. The Operations Division consists of the Patrol Bureau, Investigations Bureau, Traffic Bureau, Jail Bureau, and Emergency Service Bureau (City of Glendora 2024c). The project site is served by the GPD station at 150 Glendora Avenue, which is approximately 1 mile north of the project site.

Project implementation could result in a slight increase in calls for police protection services. However, considering the existing police resources available in and near the city, project impacts on police services (including response times) are not expected to occur. The project site is already served by GPD; therefore, the proposed project would not result in an expansion of their service area. Additionally, in the event of an emergency at the project site that required more resources than GPD could provide, GPD would request

assistance from other nearby police departments, including the Los Angeles County Sheriff's Department.

Furthermore, the City involves GPD in the development review process to ensure that the necessary police protection features are incorporated into development projects. All site and building improvements proposed under the proposed project would be subject to review and approval by GPD.

Based on the preceding, the proposed project would not adversely affect GPD'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, and no mitigation measures are necessary.

iii) Schools?

The increase in the student generation and the need for new or the expansion of existing school facilities is tied to population growth. No residential development is proposed as a part of the project, and project development is not expected to generate an increase in the student population in the area. The proposed project involves the construction of a new bike park and expansion of existing park and trail infrastructure in the South Hills Wilderness area. Therefore, no impact would occur, and no mitigation measures are necessary.

iv) Parks?

The proposed project would include the construction of a new bike park, including bike trails and a pump track, and the expansion of existing trails and park facilities (restrooms, trailhead structure, and signage) within the South Hills Wilderness area. As the proposed project includes expansion and updates of park facilities and does not propose the demolition or removal of any park services, there would be no anticipated adverse environmental impacts on park facilities. Implementation of the proposed project would draw residents of Glendora to the new project site and would not result in the increased use of other existing parks in the city. Additionally, the potential adverse physical effects on the environment caused by the proposed project have been addressed throughout the entirety of this Initial Study. Therefore, impacts would be less than significant, and no mitigation measures are necessary.

v) Other public facilities?

Other public facilities include libraries and hospitals. The need for new or the expansion of existing public services and facilities is tied to population growth. No residential development is proposed as a part of the proposed project, and project development is

not expected to generate a need for new or additional public services or facilities. The proposed project is intended to serve the existing residents of the city. Therefore, no impact would occur, and no mitigation measures are necessary.

XVI. RECREATION

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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) 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?	☐	☒	☐	☐

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?

The increase in the use of existing parks and recreational facilities and the need for new or the construction or expansion of existing recreational facilities is tied to population growth. No residential development is proposed as a part of the proposed project; therefore, no population growth or increase in the use of existing parks or other recreational facilities would occur.

The proposed project would include the construction of a new bike park, including bike trails and a pump track, and the expansion of existing trails and park facilities (restrooms, trailhead structure, and signage) within the South Hills Wilderness area. Although the proposed project may draw visitors from outside the city, the proposed project is mainly intended as a local-serving recreational opportunity for residents of Glendora. The proposed project would result in an increase in the use of the South Hills Wilderness area; however, it would not do so in a manner that substantial physical deterioration of the wilderness area would occur. The proposed project would provide needed improvements to many of the existing trails that exist within the project site, thereby improving the condition of existing recreational opportunities

on-site for park users. The proposed project would also not result in an increase in the use of other existing neighborhood and regional parks or recreational facilities in the city. Additionally, as noted in Chapter 7, Open Space and Recreation Element, of the Glendora General Plan, the City has a total of 4,911.63 acres of open space and recreational facilities that are available to residents of Glendora (excluding South Hills and Big Dalton Wilderness Parks)

Therefore, impacts would be less than significant, and no mitigation measures are necessary.

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?

The proposed project includes the construction of a new bike park, including bike trails and a pump track, and the expansion of existing trails and park facilities (restrooms, trailhead structure and signage) within the existing South Hills Wilderness area. The proposed project's construction and operation impacts have been considered throughout the discussion of environmental impacts in this Initial Study. As substantiated in the various topical sections of this Initial Study, impacts have either been determined to have no impact, a less-than-significant impact, or a less-than-significant impact with implementation of mitigation. Mitigation measures identified include BIO-1 through BIO-4, CUL-1, GEO-1, and TCR-1 through TCR-3.

XVII. TRANSPORTATION

Would the project:

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3(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)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

The analysis in this section is based in part on the following technical studies, which are included as Appendices G and H to this Initial Study:

- Vehicle Miles Traveled (VMT) Screening Analysis, EPD Solutions, INC., March 14, 2025. (Appendix G)
- Level of Service (LOS) Screening Analysis, EPD Solutions, INC., March 14, 2025. (Appendix H)

DISCUSSION

a) Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Following is a discussion of the proposed project's potential impacts on a program, plan, ordinance, or policy addressing the circulation system and the evaluation was conducted by reviewing City documents related to transportation: the Glendora General Plan Circulation Element.

Impact to Roadway Facilities

The Glendora General Plan Circulation Element maintains that the level of service (LOS) standard for roads and intersections in the city is LOS D or better. To help ensure that LOS D or better is maintained along roadways and at intersections, the City of Glendora's Traffic Impact Analysis Guidelines outline the traffic analysis requirements for new development projects.

A trip generation analysis memorandum was conducted for the proposed project (Appendix H). The purpose of the analysis was to assess the change in vehicle trips that would be generated by the proposed project and to evaluate the potential traffic impacts associated with the proposed project. As stated in the trip generation memorandum, the project is expected to generate 60 net new daily trips, with 5 occurring in the AM peak hour and 7 occurring in the PM peak hour.

According to Section 2.2, Analysis Methodology, in the City of Glendora Traffic Impact Analysis Guidelines, all roadways and intersections where a project adds 50 or more weekday peak-hour trips must be analyzed in a level of service Traffic Impact Assessment (TIA). Based on the weekday peak-hour net trip generation of 7 trips during the AM peak hours, which is less than the 50 peak hour trip threshold, the proposed project would not trigger the need for preparation of a TIA.

Therefore, the minimal increase in trips would not result in a conflict with a program, plan, ordinance, or policy addressing the roadway facilities. Impacts would be less than significant, and no mitigation measures are necessary.

Impact to Alternative Modes of Transportation

The proposed project is intended to enhance non-motorized transportation and recreation, including trail upgrades and wayfinding improvements, which are consistent with the Glendora General Plan Parks, Recreation, and Open Space Element and Circulation Element. The project site is designated for recreational use and supports active transportation objectives, including safe pedestrian and bicycle access. The proposed project would enhance the recreational uses of the project site through the proposed bike park core and trail improvements.

Regarding the existing multiuse and hiking-only trails that exist throughout the project site, the trails would continue to be available for the intended users of the trails. The existing trail locations (not the names) are shown in Figure 4. The trails would remain in their existing condition, except for some minor improvements (i.e., soil disturbance for the trail connections/crossings) where the proposed trail system would intersect with the existing trails. As shown in Figure 4, this would occur at multiple trail-crossing points.

Pedestrian access to the project site via the existing entry points would not be impacted in any way by the proposed project. There are two primary points of entry into the project site: one from Mauna Loa Avenue on the northern end and the other from Bonnie Cove Avenue along the southern end, with each having a trailhead. Additional (secondary) trailheads into the project site are at the parking lot of the senior housing development (Heritage Oak Senior Apartment) near the northwestern end of the project site at the intersection of Glendora Avenue and Big Dalton Wash and along Elwood Avenue near the Elwood Avenue and Stonehedge Drive intersection, which is near the northeastern boundary of the project site. The existing pedestrian trails through the project site would also not be affected as the trails would remain and not be altered.

Also, the proposed project supports regional goals outlined in the SCAG RTP/SCS, particularly those related to mode shift and outdoor recreation access. Although the proposed project may draw visitors from outside the city, the proposed project is mainly intended as a local-serving recreational opportunity for residents of Glendora. It is anticipated that a fair number of residents would access the project site via bicycle from local locations.

Furthermore, the proposed project would not alter or impact any public transit bus routes or facilities. Foothill Transit operates public transit bus routes in the city. Existing bus routes and stops serving the project site would not be impacted or altered in any way as all improvements would occur within the confines of the project site. The routes and stops would remain available for existing and future users of the project site. Also, the routes have adequate capacity to serve bus riders needing to access the project site; it is anticipated that the number of bus riders that would be generated by the proposed project would be low since most people accessing the project site would either bike to the project site or use their personal vehicles. Project

implementation would not require the need for additional Foothill Transit bus routes or stops to serve the proposed project's users.

Conclusion

Based on the preceding, the proposed project would not result in a conflict with a program, plan, ordinance, or policy addressing alternate mode of transportation facilities. Therefore, impacts would be less than significant, and no mitigation measures are necessary.

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

Senate Bill (SB) 743 was signed by Governor Brown in 2013 and required the Governor's Office of Land Use and Climate Innovation to amend the CEQA Guidelines to provide an alternative to LOS for evaluating transportation impacts. SB 743 specified that the new criteria should promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses. The bill also specified that delay-based LOS could no longer be considered an indicator of a significant impact on the environment. In response, CEQA Guidelines Section 15064.3, Determining the Significance of Transportation Impacts, states that VMT was added to the CEQA Guidelines beginning January 1, 2019. CEQA Guidelines Section 15064.3 is the most appropriate measure of transportation impacts and provides lead agencies with the discretion to choose the most appropriate methodology and thresholds for evaluating VMT. CEQA Guidelines Section 15064.3(c) states that the provisions of the section shall apply statewide beginning on July 1, 2020.

The proposed project was evaluated using the City of Glendora CEQA Transportation Methodology Policy, which the City adopted on July 14, 2020, to determine if the proposed project would require a detailed transportation impact analysis. The Screening Analysis section of the City of Glendora CEQA Transportation Methodology Policy provides land use development screening thresholds to identify projects that would be considered to have a less-than-significant transportation impact and would not require a detailed transportation impact analysis. The land use development screening thresholds are provided below:

- **Small Project Size.** Projects that would generate fewer than 250 trips per day. Applications may use the latest version of the Institute of Transportation Engineers (ITE) Trip Generation Manual to calculate the number of trips from their proposed project.

- **Within a Transit Priority Area.** Projects within a half mile of the major transit stops in the City would be screened from analysis unless they have a floor area ratio of less than 0.75, include more parking than required by the City, are inconsistent with the SCAG RTP/SCS, or replace affordable housing units with a smaller number of moderate or high income residential units. The two major transit stops in the city are:

- Metro Gold Line APU/Citrus College Station
- Metro Gold Line Glendora Station

- **Retail Projects.** Retail projects of less than 50,000 square feet. New neighborhood-serving retail typically redistributes shopping trips rather than creating new trips.

- **Affordable Housing.** Portions of developments that include below market-rate housing. Adding affordable housing to transit-rich, infill areas generally improves job-housing balance and access. Therefore, the City will apply a 4 percent reduction in VMT per affordable housing unit.

- **Redevelopment Projects.** To support infill development, the net change in trip generation is the value used to screen for small projects. If the change in the trip production by a redevelopment project exceeds the small project screening threshold, then the project is evaluated for impact analysis based on the applicable residential or non-residential VMT rate methodology.

- **Community-Serving Projects.** Similar to the screening of retail projects, municipal projects such as schools, parks, community centers, libraries and other community-serving uses would be intended for local use and would be presumed to have a less-than-significant impact on transportation based on the discretion of the Community Development Department.

This proposed project would have a less-than-significant impact on VMT based on the land use development screening thresholds for Small Project Size and Community Serving Projects. Based on VMT Screening Analysis prepared for the proposed project (Appendix G), the proposed project is expected to generate 60 daily trips, which is below the 250 Small Project Size daily trips threshold. Therefore, the proposed project is presumed to have a less-than-significant CEQA transportation impact under the Small Project Size screening threshold, and no detailed transportation impact analysis is necessary.

Additionally, the proposed project is intended to provide a safe and inclusive space for bicycle riders of all ages and abilities for residents of Glendora. The proposed project would address the city's limited access to dedicated bike parks. As the proposed project is intended to serve the local community and would not be marketed beyond the city, it meets the screening threshold for Community-Serving Projects.

Based on the preceding, the proposed project would screen out of VMT and is presumed to have a less-than-significant impact on VMT. No mitigation measures are necessary.

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

The proposed project would not increase hazards due to geometric design features or introduce incompatible uses in the area. The improvements are limited to on-site recreational trails and park facilities within the project site and do not include any changes to public streets, intersections, or roadway geometry. The proposed project's internal trails would be designed to accommodate bicycles and pedestrians safely, with appropriate signage, grading, and surfacing for recreational use.

Also, the proposed project includes the provision of a re-graded access road that would lead to the bike park core and parking area. The City and LACoFD have adopted design standards that preclude the construction of any unsafe roadway, circulation, or access design features. Design and construction of the proposed access and circulation improvements would be required to adhere to the City's and LACoFD's established design standards, which are imposed on development projects during the City's development review process. For example, the regraded access road and the drive aisle system of the new parking lot would be designed to meet the minimum width requirements of LACoFD to allow the passing and maneuvering of emergency vehicles. Compliance with the established design standards would ensure that hazards due to design features would not occur and that the placement of the vehicular access and circulation improvements would not create a conflict for motorists, pedestrians, or bicyclists traveling within the project site.

Additionally, the proposed project does not include incompatible uses such as farm equipment. The project site is in an industrialized area of the city and would be developed with a park and recreational type of use that is compatible with the existing uses on-site and with the surrounding uses.

Therefore, impacts would be less than significant, and no mitigation measures are necessary.

d) Would the project result in inadequate emergency access?

The proposed project would not result in inadequate emergency access. The proposed project involves improvements to existing trails and park facilities within the project site and would not alter existing emergency access routes or block access points into and around the project site. No new barriers or restrictions would be introduced that could impede emergency response or evacuation.

The project site and proposed uses would also be provided with adequate vehicular access; the proposed project includes a re-graded access road that would provide direct access to the bike park core area and parking lot. To address emergency and fire access needs, the regraded access road would be required to be designed and constructed in accordance with all applicable

City and LACoFD design standards for emergency access. For example, the re-graded access road and the drive aisle system of the new parking lot would be designed to meet the minimum width requirements of LACoFD to allow the passing and maneuvering of emergency vehicles.

The project site is in an established, developed area with sufficient access for emergency service providers. As outlined above, the proposed project would provide a re-graded access road and parking lot that would serve the project site. These improvements would not hinder emergency access to the project site or the surrounding area.

Additionally, during the development review process, the City would coordinate with LACoFD to ensure that the necessary fire prevention and emergency response features are incorporated into the project site and that adequate circulation and access (e.g., adequate turning radii for fire trucks) are provided within the access and circulation components of the project site.

The proposed project would also be required to incorporate all applicable design and safety requirements as set forth in the most current adopted fire codes, building codes, and nationally recognized fire and life safety standards of the City and LACoFD. Compliance with these standards is ensured through the City's and LACoFD's development review process.

Therefore, impacts on emergency access would be less than significant and no mitigation measures are necessary.

XVIII. TRIBAL CULTURAL RESOURCES

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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	☐	☐	☐	☒

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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 Public Resources Code Section 5024.1(c). In applying the criteria set forth in Public Resources Code Section 5024.1(c), the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

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 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)?

The project site does not contain a known tribal cultural resource that is listed in the California Register of Historical Resource (CRHR) or in a local register of historical resources (NPS 2024; OHP 2025). Public Resources Code Section 5020.1(k) defines local register of historical resources as a list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution. There is also no local ordinance or resolution that identifies the project site containing a tribal cultural resource that also constitutes a historical resource. No impact related to tribal cultural resources that are listed or eligible for listing on the CRHR or local register would occur, and no mitigation measures are necessary.

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

The provisions of CEQA, PRC Sections 21080.3.1 et seq. (also known as AB 52), require 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.

As part of the AB 52 process, a Native American tribe must submit a written request to the relevant lead agency if it wishes to be notified of projects that require CEQA public noticing and are within its traditionally and culturally affiliated geographical area. The lead agency must provide written, formal notification to the tribes that have requested it within 16 days of determining that a project application is complete or deciding to undertake a project. 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 mitigation measures to avoid a significant effect, if one exists, on a tribal cultural resource; or (2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. AB 52 also addresses confidentiality during tribal consultation per PRC Section 21082.3(c).

In accordance with the provisions of AB 52, the City sent letters on March 13, 2025, to the following tribes inviting tribal consultation:

- Cahuilla Band of Indians
- Gabrieleno Band of Mission Indians - Kizh Nation
- Gabrieleno/Tongva San Gabriel Band of Mission Indians
- Gabrielino Tongva Indians of California Tribal Council
- Gabrielino Tongva Indians of California Tribal Council
- Gabrielino/Tongva Nation
- Gabrielino-Tongva Tribe
- Morongo Band of Mission Indians
- Quechan Indian Tribe of the Fort Yuma Reservation
- San Manuel Band of Mission Indians
- Santa Rosa Band of Cahuilla Indians
- Serrano Nation of Mission Indians

- Soboba Band of Luiseno Indians

The 30-day noticing requirement under AB 52 ended on April 14, 2025 (30 days from the date the tribes received the notification letter). Of the 13 tribes notified, 2 (Quechan Indian Tribe of the Fort Yuma Reservation and Kizh Nation) responded via email. The Quechan Indian Tribe of the Fort Yuma Reservation stated that the tribe did not have any comments on the proposed project. The Kizh Nation requested that the same mitigation measure they requested for a recent church expansion project in Glendora be provided for the proposed project.

While not anticipated, there is a potential to encounter buried prehistoric deposits (including tribal cultural resources) on the project site during site excavation and grading activities. The presence of unknown subsurface tribal cultural resources remains possible and could be affected by project-related, ground-disturbing activities associated with excavation and grading. It is possible that subsurface disturbance may uncover undiscovered tribal cultural resources at the project site. Therefore, impacts to tribal cultural resources are potentially significant.

To enable Kizh Nation to protect and preserve their tribal cultural resources and to reduce potential impacts to such resources (if encountered during ground-disturbing activities), mitigation is required. With implementation of Mitigation Measures TCR-1, TCR-2, and TCR-3, which are based on input the City received from Kizh Nation during the consultation efforts, impacts to tribal cultural resources would be reduced to a level of less than significant. Compliance with Mitigation Measures TCR-1, TCR-2, and TCR-3 would be ensured through the City's development review process.

Mitigation Measure TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities

- The project applicant/developer shall retain a Native American monitor from (or approved by) the Gabrieleño Band of Mission Indians – Kizh Nation ("Kizh" or "Tribe"), the direct lineal descendants of the project site. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the project site, at all project locations (i.e., both on- 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 activity" includes, but is not limited to, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.
- A copy of the executed monitoring agreement shall be provided to the City of Glendora prior to the commencement of any ground-disturbing activity for the project, or the issuance of any permit necessary to commence a ground-disturbing activity.

- The project applicant/developer 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.
- The project applicant/developer shall hold at least one preconstruction 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 TCR 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.
- The monitor will 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 will 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 will be provided to the project applicant/developer and City of Glendora upon written request.
- Native American monitoring for the project shall conclude upon the latter of the following: (1) written confirmation from a designated project point of contact to the Tribe that all ground-disturbing activities and all phases that may involve ground-disturbing activities on the project site and at any off-site project location are complete; or (2) written notice by the Tribe to the project applicant/developer and City of Glendora that no future, planned construction activity and/or development/construction phase (known by the Tribe at that time) at the project site and at any off-site project location possesses the potential to impact TCRs.

Mitigation Measure TCR-2: Discovery of TCRs, Human Remains, and/or Grave Goods

- Upon the discovery of a TCR, all construction activities in the immediate vicinity of the discovery (i.e., not less than the surrounding 50 feet) shall cease. The Tribe shall be immediately informed of the discovery, and a Kizh monitor and/or Kizh archaeologist will promptly report to the location of the

discovery to evaluate the TCR and advise the project manager regarding the matter, protocol, and any mitigating requirements. No project construction activities shall resume in the surrounding 50 feet of the discovered TCR unless and until the Tribe has completed its assessment/evaluation/recovery of the discovered TCR and surveyed the surrounding area.

- The Tribe will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate in its sole discretion, and for any purpose the Tribe deems appropriate, including, but not limited to, educational, cultural, and/or historic purposes.
- If Native American human remains and/or grave goods are discovered or recognized on the project site or at any off-site project location, then all construction activities shall immediately cease. Native American "human remains" are defined to include "an inhumation or cremation, and in any state of decomposition or skeletal completeness" (PRC Section 5097.98 (d)(1)). Funerary objects, referred to as "associated grave goods," shall be treated in the same manner and with the same dignity and respect as human remains (PRC Sections 5097.98 (a), (d) (1) and (2)).
- Any discoveries of human skeletal material or human remains shall be immediately reported to the County Coroner (Health & Safety Code Section 7050.5(c); 14 CCR 15064.5(e)(1)(B)), and all ground-disturbing activities on site and in any other area where the presence of human remains and/or grave goods are suspected to be present, shall immediately halt and remain halted until the coroner has determined the nature of the remains (14 CCR Section 15064.5(e)). 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, within 24 hours, the Native American Heritage Commission, and Public Resources Code Section 5097.98 shall be followed.
- Thereafter, construction activities may resume in other parts of the project site at a minimum of 200 feet away from discovered human remains and/or grave goods, if the Tribe 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 Tribal monitor and/or archaeologist deems necessary) (14 CCR Section 15064.5(f).)
- Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or grave goods.
- Any historic archaeological material that is not Native American in origin (non-TCRs) shall be curated at a public, nonprofit 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.

- Any discovery of human remains and/or grave goods discovered and/or recovered shall be kept confidential to prevent further disturbance.

Mitigation Measure TCR-3: Procedures for Burials, Funerary Remains, and Grave Goods

- As the Most Likely Descendant (MLD), the Koo-nas-gna Burial Policy shall be implemented for all discovered Native American human remains and/or grave goods. Tribal traditions include, but are not limited to, the preparation of the soil for burial, the burial of funerary objects and/or the deceased, and the ceremonial burning of human remains.
- If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery, and a separate treatment plan shall be created.
- The prepared soil and cremation soils are to be treated in the same manner as bone fragments that remain intact. Associated “grave goods” (aka, burial goods or 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 will either be removed in bulk or by means necessary to ensure complete recovery of all sacred materials.
- In the case where discovered human remains cannot be fully recovered (and documented) on the same day, the remains will 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 will be removed.
- In the event preservation in place is not possible despite good-faith efforts by the project applicant/developer and/or landowner, 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 landowner and shall be protected in perpetuity.

- Each occurrence of human remains and associated grave goods will be stored using opaque cloth bags. All human remains, grave goods, funerary objects, sacred objects, and objects of cultural patrimony will be removed to a secure container on site if possible. These items will be retained and shall be reburied within six months of recovery.
- The Tribe will work closely with the project applicant's qualified archaeologist 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 Native American Heritage Commission. The Tribe does not authorize any scientific study or the utilization of any invasive and/or destructive diagnostics on human remains.

XIX. UTILITIES AND SERVICE SYSTEMS

Would the project:

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

DISCUSSION

a) Would the project 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?

The proposed project would not require or result in the relocation or construction of new or expanded utility infrastructure that could cause significant environmental impacts. The proposed project consists of various recreational and site improvements throughout the project site such as a bike core area, bike trails, park signage, rest areas, a re-graded access road and parking lot, a restroom building, and other minor site features. No water, wastewater treatment, electric power, natural gas, or telecommunications facilities are proposed as part of the proposed project, and none are needed to serve the proposed project. For wastewater, the vault restroom proposed within the bike park core area would include upgraded portable-style stalls that would require emptying (not septic) on a regular basis; no infrastructure would be required to operate the vault restroom.

The proposed project would also not result in the need for new or expanded drainage facilities. Existing stormwater drainage patterns would be preserved, and trail improvements would include the use of permeable materials to minimize runoff. Construction of the bike park and trails would include protection and retention of existing vegetation and minimize disturbance to

the existing hillside topography within the areas of disturbance to maintain the existing drainage patterns. The sloped topography conditions would provide long-term stormwater benefits with sufficient runoff and increased absorption.

Therefore, impact would be less than significant, and no mitigation measures are necessary.

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

The proposed project would not create new demand for water that would require verification of additional water supplies. The proposed project includes the development of a formalized bike park and an improved system of connecting trails throughout the project site, with no irrigation or potable water facilities required or proposed. No permanent staff or increased long-term operational water use is proposed. Additionally, any temporary water use during construction (e.g., dust suppression) would be minimal and short-term and would not impact regional or local water supply reliability. Furthermore, the City of Glendora is served by Glendora Public Works – Water Division, which has adopted an Urban Water Management Plan consistent with state requirements to ensure adequate water supply during normal, dry, and multiple-dry years. Use of water during the proposed project's construction phase would be temporary and would be consistent with the City's existing water planning and would not affect the ability to serve future development. Therefore, impacts would be less than significant, and no mitigation measures are necessary.

c) Would the project 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?

Wastewater generated by land uses in the city is treated by the Sanitation Districts of Los Angeles County (LACSD). The proposed project would generate wastewater but not in an amount that would impact the capacity of LACSD's water reclamation plants. The water reclamation plants are not in the city's service area. The water reclamation plants serving Glendora include the San Jose Creek Water Reclamation Plant (SJCWRP) and the Joint Water Pollution Control Plant (JWPCP). The SJCWRP has a treatment capacity of about 100 gallons of per day (MGD) (LACSD 2025) and currently processes an average recycled flow of 62.7 MGD. The JWPCP currently processes an average flow of 243.1 MGD and has a total permitted capacity of 400 MGD (LACSD 2025).

For wastewater, the vault restroom proposed within the bike park core area would include upgraded portable-style stalls that would require emptying (not septic) on a regular basis; no infrastructure would be required to operate the vault restroom. The wastewater would be transported off-site by tankers to one of two LACSD water reclamation plants. The amount of wastewater that would be generated is anticipated to be less than 1 percent of LACSD's total

remaining daily treatment capacity at the JWPCP and SJCWRP. There is more than adequate capacity at the two water treatment reclamation plants to serve the proposed project's wastewater treatment needs. Therefore, project development would not require the construction of new or expanded wastewater treatment facilities. Impacts would be less than significant, and no mitigation measures are necessary.

d) Would the project 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?

The City of Glendora is served by Athens Services, which provides waste collection and diversion services. Solid waste from Glendora is typically sent to permitted regional facilities such as the Puente Hills Materials Recovery Facility (MRF) and landfills with adequate remaining capacity. The proposed project is anticipated to generate minor amounts of solid waste during the construction and operation phases and would not exceed local landfill capacity or impair waste reduction goals. Solid waste generated during construction (e.g., packaging, soil, construction materials) would be temporary and managed in compliance with City of Glendora regulations and CALGreen, which requires recycling or salvaging at least 65 percent of construction and demolition debris. Operational waste would be minimal, limited to public trash from park users, similar to existing levels. No food service, permanent facilities, or high-traffic attractions are proposed. Therefore, impacts would be less than significant, and no mitigation measures are necessary.

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

See response to Section 3.XIX.d.

Additionally, the following federal, state, and local laws and regulations govern solid waste disposal, including:

- **USEPA** administers the Resource Conservation and Recovery Act of 1976 and the Solid Waste Disposal Act of 1965, which governs solid waste disposal.
- **AB 341** (Chapter 476, Statutes of 2011) increases the statewide waste diversion goal to 75 percent by 2020, and mandates recycling for commercial and multi-family residential land uses.
- **AB 939** (Integrated Solid Waste Management Act of 1989; PRC Sections 40050 et seq.) required every California city and county to divert 50 percent of its waste from landfills by the year 2000 by such means as recycling, source reduction, and composting. In addition, AB 939 requires each county to prepare a countywide siting element specifying areas for

transformation or disposal sites to provide capacity for solid waste generated in the county that cannot be reduced or recycled for a 15-year period.

- **AB 1327** (California Solid Waste Reuse and Recycling Access Act of 1991) requires local agencies to adopt ordinances mandating the use of recyclable materials in development projects.

Project-related construction and operation phases would be implemented in accordance with all applicable federal, state, and local laws and regulations that govern solid waste disposal. Therefore, no impact would occur, and no mitigation measures are necessary.

XX. WILDFIRE

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

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐

The project site is in a local responsibility area (LRA), where local fire departments or districts have the liability for providing fire protection services. LACoFD currently provides fire protection and emergency medical services to Glendora and the project site. Fire Hazard Severity Zones (FHSZ) are identified as Moderate, High, and Very High. As identified in the latest City of Glendora Fire Hazard Severity Zone Map, the project site is in a Very High Fire Hazard Severity Zone (City of Glendora 2025a).

DISCUSSION

a) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

As noted in Section 3.IX, *Hazards and Hazardous Materials*, of this Initial Study, the City of Glendora has prepared a Multi-Hazard Functional Plan for emergency response within the city. The Emergency Services Bureau, made up of the Glendora Police Department and LACoFD, is responsible for citywide disaster preparedness, local homeland security requirements, and conducts community relations presentations regarding emergency preparedness. The City uses the Genasys Protect platform for evacuation notices and the project site is within Zone GLO-065 (Genasys Protect 2025).

During the construction and operation phases, the proposed project would not interfere with any of the daily operations of LACoFD GPD. All construction activities would be required to be performed per the City's and LACoFD's standards and regulations. The proposed project would be required to provide the necessary on- and off-site access and circulation for emergency vehicles and services during the construction and operation phases. For example, the proposed project includes the provision of a re-graded access road that would lead to the bike park core and parking area. The re-graded access road would improve emergency vehicle access onto the project site. During the operation phase, hours for the bike park and trails would be the same as other wilderness areas in the city, dawn to dusk daily.

As described in Chapter 2, *Project Description*, of this Initial Study, implementation of the proposed project would not alter any existing roadways in the area in a way that could result in emergency evacuation impairment, such as with altering traffic routes. Project implementation would also not require road closures or otherwise affect the functionality of Glendora Avenue, as a public safety access route. Additionally, all improvements would occur within the confines of the project site.

The proposed project would be required to go through the City's development review process and incorporate all applicable design and safety standards in the CBC, California Fire Code, California Very High Fire Hazard Severity Zone Fire Safe Regulations, and LACoFD's Fire Code to ensure that project development does not interfere with the provision of local emergency

services (provision of adequate access roads to accommodate emergency response vehicles, adequate numbers/locations of fire hydrants, etc.).

Based on the preceding, implementation of the proposed project (both the construction and operational phases) would not impair implementation of or physically interfere with emergency response or evacuation plans. Therefore, impacts would be less than significant, and no mitigation measures are necessary.

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

As shown on Figure 3, *Aerial Photograph*, the project site includes the South Hills Wilderness area, which can be characterized as mountainous, with moderate and steep rocky slopes occurring throughout the site. Multiple valleys spread across the hills with peaks being fairly uniform. There are also level areas that resemble terraces. The project site consists of a mix of sporadic and dense vegetation, which includes a variation of native and non-native ground cover, shrubs, and trees. Winds on the project site generally originate from the west from February to June, winds most often occur from the south June September, and winds most often occur from the north from October to February (Weather Spark 2025). The windier part of the year lasts from November to May, with winds peaking in December (Weather Spark 2025).

The proposed project would include a bike park core area, downhill bike-only trails, a multi-directional “pedal up” trail, a longer “cross-country” style multiuse and bi-directional trail, bicycle pump tracks, mountain bike jump trails, trail head improvements, staging and seating areas, a restroom facility, a re-graded access road off of Glendora Avenue, and improved parking areas. The addition of these features to the project site would cause additional visitors and enable greater access to previously inaccessible areas of the project site, potentially increasing the risk of human-caused wildfire ignition.

However, the proposed project would be required to go through the City’s development review process and would be required to incorporate all applicable design and safety standards and regulations in the CBC, California Fire Code, California Very High Fire Hazard Severity Zone Fire Safe Regulations, and LACoFD’s Fire Code to ensure that project development does not exacerbate wildfire risks on-site.

Furthermore, the proposed project is intended for non-motorized bicycles (peddled), which would ensure that the possibility of sparks or fuel leaks from motorized vehicles would not occur.

Therefore, impacts would be less than significant, and no mitigation measures are necessary.

c) Would the project 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?

The proposed project does not include the installation or maintenance of roads, fuel breaks, power lines, or other utilities. The proposed project would include the installation of fire hydrants as emergency water systems. However, as described in Section IV, *Biological Resources*; Section X, *Hydrology and Water Quality*; and Section XIX, *Utilities and Service Systems*; of this Initial Study, the installation would not have a significant impact on biological resources, hydrology, or water utilities.

The proposed project would include re-grading an access road that would lead to the bike park core and parking area. Design and construction of the re-graded access road would be required to adhere to the California Fire Code, City of Glendora Municipal Code, and LACoFD's established design standards for reducing wildfire ignition.

Additionally, paved areas create an opportunity for vehicles to create accidental wildfires, since dragging chains, dragging vehicle parts, worn brakes, and exposed wheel rims have the potential to create sparks on the roadway, which could fall onto dried grasses, shrubs, or trees. However, equipment with an internal combustible engine that uses hydrocarbon fuels, such as construction equipment, landscaping equipment, or vehicles, used on grass- or brush-covered areas within the project site would be required to comply with PRC Section 4442, which requires such engines be equipped with a spark arrester, and that these engines be maintained in effective working order to help prevent fire.

Therefore, impacts would be less than significant, and no mitigation measures are necessary.

d) Would the project 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?

Wildfire can create favorable conditions for other hazards, such as flooding and landslides, during heavy precipitation events.

As discussed in Section VII, *Geology and Soils*, previous landslides have not occurred in the proposed bike park core area and the potential for mapped landslide deposits on the northern end of the project site to affect the proposed project is considered low (Appendix E). The existing trees and vegetation found through the project site are well established and rooted, which stabilize soils and prevent landslides.

Additionally, as discussed in Section 3.X, *Hydrology and Water Quality*, the project site is not within a FEMA-designated 100-year flood zone and there are no nearby water bodies, streams, or other conditions that would result in flooding within the confines of the project site.

Construction of the bike park and trails under the proposed project would include protection and retention of existing vegetation and minimize disturbance to the existing hillside topography within the areas of disturbance to maintain the existing drainage patterns and slope stability. The preservation of existing vegetation throughout the project site would minimize impacts to existing trees, shrubs, and grasses, which would protect the soil on the hillside from erosion and provide stabilization in areas that are susceptible to potential erosion.

Therefore, the proposed project would not expose people or structures to a significant risk of downslope or downstream flooding or landslides and impacts would be less than significant, and no mitigation measures are necessary.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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) 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.)	☐	☐	☒	☐

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

DISCUSSION

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?

The project site is in an urbanized area of the city and includes the South Hills Wilderness area known as South Hills Park (see Figure 3, *Aerial Photograph*), which is a public-access park. The project site contains several dirt trails/roads, trailheads, and parking lots (paved and unpaved) that serve hikers, bikers, and equestrian users. The project site can be characterized as mountainous, with moderate and steep rocky slopes occurring throughout the site. Multiple valleys are spread across the hills with peaks being fairly uniform. There are also level areas that resemble terraces. The project site consists of a mix of sporadic and dense vegetation, which includes a variation of native and non-native ground cover, shrubs, and trees.

As substantiated in Section 3.IV, *Biological Resources,* implementation of the proposed project would result in result in an impact to biological resources. However, with implementation of Mitigation Measures BIO-1 through BIO-4, impacts to biological resources would be reduced to a level of less than significant.

As substantiated in Section 3.V, *Cultural Resources*, no historic resources were identified on the project site. However, project-related ground-disturbing activities (e.g., grading and excavation) have the potential to reveal unknown buried deposits. With implementation of Mitigation Measure CUL-1, impacts to archaeological resources would be reduced to a less-than-significant level.

Furthermore, project-related ground-disturbing activities (e.g., grading and excavation) have the potential to reveal unknown buried paleontological resources. However, as substantiated in

Section 3.VII, *Geology and Soils*, impacts to paleontological resources were deemed to be less than significant with implementation of Mitigation Measure GEO-1.

Finally, as stated in Section 3.XVIII, *Tribal Cultural Resources*, the presence of unknown subsurface TCRs on the site remains possible and could be affected by project-related, ground-disturbing activities associated with excavation and grading at the project site. Therefore, the Kizh Nation provided the City with Mitigation Measures TCR-1, TCR-2, and TCR-3 to reduce the potential impact to TCRs to a less-than-significant level.

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 issues relevant to the proposed project development are confined to the immediate project site. Additionally, the project site is in an area of the city where supporting utility infrastructure (e.g., electricity, natural gas, and drainage) and services (e.g., solid waste collection) currently exist. Project implementation would not require the construction of new or expansion of utility infrastructure for water, sewer, electricity, or natural gas as no such services or facilities are needed to support the proposed project.

Furthermore, impacts related to other topical areas such as air quality, GHG, hydrology and water quality, and traffic would not be cumulatively considerable with development of the proposed project in conjunction with other cumulative projects, as analyzed in this Initial Study.

In consideration of the preceding factors, the proposed project's contribution to cumulative impacts would be rendered less than significant; therefore, project impacts would not be cumulatively considerable.

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

As substantiated in the respective topical sections of this Initial Study, implementation of the proposed project would not result in significant impacts in the areas of air quality, GHG, geology and soils, hazards and hazardous materials, hydrology and water quality, noise, or wildfire, which may cause adverse effects on human beings. Therefore, impacts related to these environmental effects were deemed to be less than significant.

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5. LIST OF PREPARERS

LEAD AGENCY

Kelsey Fay, Management Analyst

PLACEWORKS

Addie Farrell, Principal (Principal-in-Charge)

Jorge Estrada, Senior Associate (Project Manager)

Lance Park, Senior Associate, Air Quality, Energy, and GHG

Jacqueline Protsman Rohr, Senior Associate, Wildfire

Chris Shields, Senior Associate, Noise and Vibration

Dina El Chammas, Senior Engineer, Hydrology and Water Quality

Emily Parks, Associate, Air Quality, Energy, and GHG

Madeline Miller, Associate, Hydrology and Water Quality

Itzeel Padilla, Planner

Natalie Pham, Planner

Cary Nakama, Graphic Artist

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