
Los Angeles Regional Water Quality Control Board

July 24, 2026

Kelsey Fay
Senior Management Analyst
City of Glendora
Recreation & Human Services Department
116 E Foothill Boulevard
Glendora, California 91741

Dear Kelsey Fay:

RESPONSE TO NOTICE OF INTENT TO ADOPT A RECIRCULATED MITIGATED NEGATIVE DECLARATION FOR SOUTH HILLS BIKE PARK (SCH NUMBER 2025120441)

Thank you for the opportunity to comment on the City of Glendora, Recreation & Human Services Department's Recirculated Initial Study/Mitigated Negative Declaration (IS/MND) for the South Hills Bike Park Project (project). The proposed project includes the development of a bike park, along with improving the existing, connected trails within South Hills Park. The project would include the construction of a bike park, a parking lot with the main lot having spots for 17 vehicles and seven parallel parking spots on the west side of the access road, a cross-country trail, a trailhead, and a regraded access road. The project is intended to serve as a local recreational opportunity for residents of the city but would also draw visitors from outside the city.

The goal of the Los Angeles Regional Water Quality Control Board (Los Angeles Water Board) is to protect beneficial uses within the Los Angeles Region, consistent with the Federal Clean Water Act (CWA) and the State of California's Porter-Cologne Water Quality Control Act, which require careful consideration of projects which may result in adverse impacts to water quality and beneficial uses of waters of the State.

In consideration of the Los Angeles Water Board's objectives, we have the following comments on the IS/MND:

1. Impacts to Waters of the State

The preliminary jurisdictional determination (PJD) describes site SW-1B as containing some facultative species, displaying hydric soils conditions just 7-to-12-inches below surface, and not displaying hydrology indicators. While this does not meet the U.S Army Corp of Engineers' (USACOE's) three parameter identification for wetlands, the wetland delineation was conducted in a fairly dry year and during a dryer part of the year. The delineation timing may have missed a critical period to observe ephemeral wetlands and adjusting the field visit to a more normal year and time may yield different results.

In addition, Section 3.IV.c of the IS/MND and section 5.3 of PJD mentioned that "...none of the 14 features analyzed were determined to be wetlands and no waters subject to USACE, RWQCB, or CDFW streambed jurisdiction were identified." This was based on the

DAVID NAHAI, CHAIR | SUSANA ARREDONDO, EXECUTIVE OFFICER

assumption that USACOE jurisdiction matched those of Los Angeles Water Board. USACOE jurisdiction no longer includes ephemeral drainages, however Los Angeles Water Board's wetland and waters jurisdiction expands beyond the ordinary high water mark and includes ephemeral drainages. Please revise the IS/MND and associated documents to reflect this fact.

As such, the Los Angeles Water Board also disagrees that the project, as presented, would result in a Less than Significant Impact with Mitigation Incorporated to riparian habitat, because the proposed project may result in temporary and permanent impact to waters of the state.

Please:

- a. Specify the cause, nature, and magnitude of all proposed impacts.
- b. Quantify impacts as definitively as feasible. Factors affecting the reliability of the results should be identified and characterized.
- c. Identify whether impacts will be temporary or permanent.

2. Avoidance and Minimization Analysis

The Los Angeles Water Board believes avoidance is the best strategy for managing potential water quality impacts. As such, the Los Angeles Water Board strongly discourages temporary or permanent impacts to waters of the state when avoidable, and requests for impacts to be minimized when avoidance is not possible. Please present an analysis of alternatives considered to minimize impacts to waters of the State to the maximum extent possible and demonstrate how the chosen alternative is the Least Environmentally Damaging Practicable Alternative. Moving forward, with this project would most likely require a CWQ Section 401 Water Quality Certification, and issuance of a Certification may be denied should the project not meet this criterion.

3. Mitigation

The project, as presented, may temporarily or permanently impact the ephemeral drainages within the project boundary. The IS/MND should propose compensatory mitigation for the potential permanent significant impacts to water quality and beneficial uses related to the placement or construction of the trail crossing and other structures within waters of the state. The compensatory mitigation must ensure that there is no net loss of the overall abundance, diversity, and condition of aquatic resources, based on the watershed profile. Final compensatory mitigation is subject to approval by the Los Angeles Water Board during the CWA Section 401 Water Quality Certification permitting process.

Again, thank you for this chance to comment. We welcome the opportunity to work with you and the project proponent to make this project an example of environmental sustainability in California. For clarification of any comments or for other assistance, please contact Man Voong at (213) 576-6690 or at Man.Voong@waterboards.ca.gov.

Sincerely,

Celine Gallon 
Digitally signed by Celine Gallon
Date: 2026.07.24 11:38:28 -07'00'
Water Boards

Céline Gallon, Ph.D.

Environmental Program Manager
Regional Programs

Cc:
Victoria Tang, Environmental Program Manager
California Department of Fish and Wildlife

Wetlands Regulatory Office
U.S. Environmental Protection Agency, Region 9

Office of Land Use and Climate Innovation
State Clearing House