
APPENDIX I: INITIAL STUDY COMMENT LETTERS AND RESPONSES



June 2026 | Response to Comments Received on the Public Draft Initial Study/
Mitigated Negative Declaration

SOUTH HILLS BIKE PARK

City of Glendora

Prepared for:

City of Glendora

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1. Response to Comments

The following is a list of agencies that submitted comments on the public draft Initial Study/Mitigated Negative Declaration for the South Hills Bike Park project during the public review period, which extended from December 11, 2025 to January 9, 2026. Comment letters and specific comments are given letters and numbers for reference purposes.

Number Reference	Commenting Agency/Person	Date of Comment	Page No.
Agencies			
A1	California Department of Fish & Wildlife	December 24, 2026	3
A2	California Department of Parks and Recreation	December 29, 2026	21

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Response to Comments

LETTER A1 – California Department of Fish & Wildlife (9 pages)

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State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



A1

December 24, 2025

Megan Stone
City of Glendora
116 E Foothill Boulevard
City of Glendora, CA 91741
MStone@cityofglendora.gov

**Subject: Mitigated Negative Declaration for the South Hills Bike Park Project, SCH
No. 2025120441, Los Angeles County, CA**

Dear Megan Stone:

The California Department of Fish and Wildlife (CDFW) reviewed the Mitigated Negative Declaration (MND) from City of Glendora for the South Hills Bike Park (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines¹.

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Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Fish & G. Code, § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW may also act as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

Conserving California's Wildlife Since 1870

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regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law² of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.) or the Native Plant Protection Act (NPPA; Fish & G. Code, § 1900 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

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PROJECT DESCRIPTION SUMMARY

Proponent: City of Glendora

Objective: The Project is the development of a formalized bike park and an improved system of connecting trails throughout the 318 acre project site. Plans for the proposed project also include staging and seating areas, a restroom facility, a regraded access road off of Glendora Avenue, and improved parking areas.

Location: The site covers 318 acres in the City of Glendora, Los Angeles County, CA and is located north of Interstate 210, east of South Glendora Avenue, and south of Big Dalton Wash.

Biological Setting: 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 multiuse trails. The project site can be characterized as mountainous, with moderate and steep rocky slopes throughout the site. 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 and multiple throughout the project site.

A biological reconnaissance-level survey was conducted in October 2024. One special-status plant species was present within the project site: Southern California black walnut (*Juglans californica*; California Species of Special Concern (SSC)). Other special status plant species considered to have moderate or high potential for occurrence within the project site include

² "Take" is defined in Section 86 of the Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill."

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Special status wildlife observed during the survey include coastal California gnatcatcher (*Polioptila californica californica*; Endangered Species Act (ESA) – threatened, SSC) and Cooper's hawk (*Accipiter cooperii*; SSC).

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Other wildlife species considered to have moderate or high potential for occurrence within the project site include Crotch's bumble bee (*Bombus crotchii*; California Endangered Species Act (CESA) – candidate), Coastal Whiptail (*Aspidoscelis tigris stejnegeri*; SSC), Blainville's horned lizard (*Phrynosoma blainvillii*; SSC); and the hoary bat (*Lasiurus cinereus*). The MND contains measures to address impacts to walnut trees, nesting birds, stream features, and erosion control.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist City of Glendora in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Additional comments or other suggestions may also be included to improve the document.

COMMENT # 1: Crotch's Bumble Bee

Issue: The Project may impact suitable habitat for Crotch's bumble bee

Specific impact: The Project may result in temporal or permanent loss of suitable nesting and foraging habitat for Crotch's bumble bee. Project ground-disturbing activities may cause death or injury of adults, eggs, and larva; burrow collapse; nest abandonment; and reduced nest success.

Why impact would occur: The MND states that Crotch's bumble bee has a moderate potential to occur on site. Despite that, no protocol surveys have been conducted or proposed in the MND. Crotch's bumble bee primarily nest in late February through late October underground in abandoned small mammal burrows but may also nest under perennial bunch grasses or thatched annual grasses, under-brush piles, in old bird nests, and in dead trees or hollow logs (Williams et al. 2014; Hatfield et al. 2018). Overwintering sites utilized by Crotch's bumble bee mated queens include soft, disturbed soil (Goulson 2010), or under leaf litter or other debris (Williams et al. 2014). Ground disturbance and vegetation removal associated with Project implementation during the breeding season could result in the incidental loss of breeding success or otherwise lead to nest abandonment in areas adjacent to the Project site. Without sufficient avoidance, minimization, or mitigation measures, the trail construction activities may result in undisclosed and unmitigated temporal or permanent loss of colonies, and suitable nesting and foraging habitat.

Evidence impact may be significant: The California Fish and Game Commission accepted a petition to list the Crotch's bumble bee as endangered under CESA, determining the listing "may be warranted" and advancing the species to the candidacy

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stage of the CESA listing process. The Project may substantially reduce and adversely modify habitat as well as reduce and potentially impair the viability of populations of Crotch's bumble bee. The Project may also reduce the number and range of the species without taking into account the likelihood that special status species on adjacent and nearby natural lands may rely upon the habitat that occurs on the proposed Project site. Crotch's bumble bee is listed as an invertebrate of conservation priority under the [California Terrestrial and Vernal Pool Invertebrates of Conservation Priority](#)³ (CDFW 2017).

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Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

Mitigation Measure #1: Crotch's Bumble Bee Surveys - The Project proponent shall retain a qualified biologist with the appropriate handling permits to conduct updated focused surveys. Focused surveys shall follow CDFW's [Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species](#)⁴ (CDFW 2023). Focused surveys shall also be conducted throughout the entire Project site and during the appropriate flying season to ensure no missed detection of Crotch's bumble bee occurs. Survey results, including negative findings, shall be submitted to CDFW and the City prior to implementing Project ground-disturbing activities.

Mitigation Measure #2: Incidental Take Permit - The Project proponent shall coordinate with CDFW and obtain appropriate take authorization from CDFW (pursuant to Fish & Game Code, § 2080 et seq). The Project proponent shall comply with the mitigation measures detailed in the take authorization issued by CDFW. The Project proponent shall provide a copy of a fully executed take authorization to the City prior to implementing Project ground-disturbing activities and vegetation removal.

COMMENT # 2: Impacts to Bat Species

Issue: The Project may impact bat species, including the hoary bat.

Specific impact: Project activities include ground disturbing activities that may disturb areas that provide foraging habitat and therefore have the potential for the direct loss of bats. Indirect impacts to bats and roosts could result from increased noise disturbances, human activity, dust, vegetation clearing, ground-disturbing activities (e.g., staging, mobilizing, and grading), and vibrations caused by heavy equipment.

Why impact would occur: The MND states that hoary bat has a moderate potential to occur on site. Despite that, no protocol surveys have been conducted or proposed in the MND. The removal of sediment and vegetation may potentially result in the loss or

³ <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=157415&inline>

⁴ <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline>

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disturbance of foraging and roosting habitat for bats. Construction activities will temporarily increase the disturbance levels as well as human activity in the Project area. Without focused surveys, Project activities may result in missed detection of bats and adverse impacts. Adverse impacts that may occur to bats include but are not limited to direct injury, direct mortality by heavy machinery, or entrapment. Additionally, without sufficient avoidance, minimization, or mitigation measures, Project activities may result in undisclosed and unmitigated temporal or permanent loss of bats, and suitable nesting and foraging habitat.

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Evidence impact would be significant: Bats are considered non-game mammals and are afforded protection by state law from take and/or harassment, (Fish & G. Code, § 4150; Cal. Code of Regs, § 251.1). Several bat species are considered SSC and meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15065). Unless the City provides alternatives or mitigation measures that would substantially lessen or avoid impacts, take of California Species of Special Concern could require a mandatory finding of significance by the City (CEQA Guidelines, § 15065).

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

Mitigation Measure #3: Bat Surveys - Prior to construction activities, CDFW recommends a qualified bat specialist conduct bat surveys within the Project site (plus a 100-foot buffer as access allows) in order to identify potential habitat that could provide daytime and/or nighttime roost sites, and any maternity roosts. CDFW recommends the use of acoustic recognition technology to maximize detection of bat species to minimize impacts to sensitive bat species. A discussion of survey results, including negative findings shall be provided to the City and CDFW. Depending on the survey results, a qualified bat specialist shall discuss potentially significant effects of the Project on bats and include species specific mitigation measures to reduce impacts to below a level of significance (CEQA Guidelines, § 15125). Surveys, reporting, and preparation of robust mitigation measures by a qualified bat specialist shall be completed and submitted to the City and CDFW prior to any Project-related ground-disturbing activities or vegetation removal at or near locations of habitat for bats.

Mitigation Measure #4: If maternity roosts are found, to the extent feasible, work shall be scheduled between October 1 and February 28, outside of the maternity roosting season when young bats are present but are yet ready to fly out of the roost (March 1 to September 30).

COMMENT # 3: Impacts to Special Status Reptiles

Issue: The Project may impact coastal whiptail and Blainville's horned lizard, species designated as SSC.

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Specific impact: Project construction and activities, directly or through habitat modification, may result in direct injury or mortality (e.g., trampling, crushing), reduced reproductive capacity, population declines, or local extirpation of SSC. Also, loss of foraging, breeding, or nursery habitat for SSC may occur.

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Why impact would occur: The MND states that coastal whiptail have a high potential to occur on site and Blainville's horned lizard has a moderate potential to occur on site. Despite that, no protocol surveys have been conducted or proposed in the MND. The MND does not discuss the Project's impact on reptile species. The mitigation measures proposed in the MND does not consider reptile species being present during Project activities. Without appropriate avoidance or minimization measures, impacts to SSC could result from ground-disturbing activities and vegetation removal. Wildlife may be trapped or crushed under structures. Large equipment, equipment and material staging, and vehicle and foot traffic could trample or bury wildlife. SSC could be injured or killed. Impacts on these SSC are more likely to occur because these are cryptic species that are less mobile and seek refuge under structures.

Evidence impact may be significant: A California Species of Special Concern is a species, subspecies, or distinct population of an animal native to California that currently satisfies one or more of the following (not necessarily mutually exclusive) criteria: is extirpated from the State or, in the case of birds, is extirpated in its primary season or breeding role;

- is listed as threatened or endangered under Endangered Species Act (ESA)-, but not CESA-, threatened, or endangered; meets the State definition of threatened or endangered but has not formally been listed;
- is experiencing, or formerly experienced, serious (noncyclical) population declines or range retractions (not reversed) that, if continued or resumed, could qualify it for State threatened or endangered status; and/or
- has naturally small populations exhibiting high susceptibility to risk from any factor(s), that if realized, could lead to declines that would qualify it for CESA threatened or endangered status.

CEQA provides protection not only for CESA-listed species, but for any species including but not limited to SSC that can be shown to meet the criteria for State listing. These SSC meet the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). The MND does not provide mitigation for potential impacts on SSC. Inadequate avoidance, minimization, and mitigation measures for impacts to sensitive or special status species will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species by CDFW.

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Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

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Mitigation Measure #5: Biological Monitor – To avoid direct injury and mortality of any SSC, CDFW recommends the City require the Project Applicant to have a qualified biologist on site to move out of harm's way wildlife of low mobility that would be injured or killed. Wildlife shall be protected, allowed to move away on its own (non-invasive, passive relocation), or relocated to suitable habitat adjacent to the Project site. In areas where any SSC was found, work may only occur in these areas after a qualified biologist has determined it is safe to do so. Even so, the qualified biologist shall advise workers to proceed with caution near flagged areas. A qualified biologist shall be on site daily during initial ground- and habitat-disturbing activities and vegetation removal. Then, the qualified biologist shall be on site weekly or bi-weekly (once every 2 weeks) for the remainder of the Project until the cessation of all ground-disturbing activities to ensure that no wildlife of any kind is harmed.

COMMENT # 4: Impacts to stream features

Issue: The Project will impact streams.

Specific impact: The MND states the Project will impact streams.

Why impact would occur: Grading, excavation, and construction to conduct Project activities will permanently and temporarily impact streams. These activities may also cause deposition or debris and refuse in the area that may end up in the drainages. Project implementation may directly affect water quality downstream. Lastly, these actions may also result in changes to the stream, altering hydrologic and geomorphic processes that may impact plant and wildlife species. CDFW appreciates the implementation of Mitigation Measures BIO-3 to avoid impacts to Waters of the State where possible but recommends the MND include discussion of Fish and Game Code 1602.

Evidence impact would be significant: Fish and Game Code section 1602 requires any person, state or local governmental agency, or public utility to notify CDFW prior to beginning any activity that may do one or more of the following:

- Divert or obstruct the natural flow of any river, stream, or lake;
- Change the bed, channel, or bank of any river, stream, or lake;
- Use material from any river, stream, or lake; or
- Deposit or dispose of material into any river, stream, or lake.

The Project may adversely affect the existing hydrology pattern of the Project site. This may occur through the alteration of flows in the stream, which absent specific mitigation, could result in substantial erosion or siltation on or off site of the Project. In addition,

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associated riparian plant communities are present downstream of the Project site. Accordingly, the Project may substantially adversely affect the existing stream pattern and geomorphologic processes of the Project site through the alteration of drainages on site. Direct filling of drainages would impact sensitive vegetation communities and wildlife habitat downstream.

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Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

Mitigation Measure #6: The Project applicant (or "entity") must provide notification to CDFW pursuant to Fish and Game Code, section 1600 et seq. Based on this notification and other information, CDFW determines whether a Lake and Streambed Alteration (LSA) Agreement with the applicant is required prior to conducting the proposed activities. Please visit CDFW's [Lake and Streambed Alteration Program](#)⁵ webpage for information about LSA Notification and online submittal through the [Environmental Permit Information Management System \(EPIMS\) Permitting Portal](#)⁶.

Mitigation Measure #7: Best Management Practices (BMP) shall be monitored and repaired, if necessary, to ensure maximum erosion, sediment, and pollution control. The Project proponent shall prohibit the use of erosion control materials potentially harmful to fish and wildlife species, such as mono-filament netting (erosion control matting) or similar material, within stream areas. All fiber rolls, straw wattles, and/or hay bales utilized within and adjacent to the Project site shall be free of nonnative plant materials. Fiber rolls or erosion control mesh shall be made of loose-weave mesh that is not fused at the intersections of the weave, such as jute, or coconut (coir) fiber, or other products without welded weaves. Non-welded weaves reduce entanglement risks to wildlife by allowing animals to push through the weave, which expands when spread.

Recommendation #1: CDFW recommends the LSA Notification include a hydrology report to evaluate whether altering streams within the Project site may impact hydrologic activity within and downstream of the Project site. The hydrology report should also include an analysis to determine if Project activities will impact the current hydrologic regime or change the velocity of flows on site and downstream. CDFW also requests a hydrological evaluation of any potential scour or erosion at the project site and downstream due to a 100, 50, 25, 10, 5, and 2-year frequency storm event for existing and proposed conditions to determine how the Project activities may change the hydrology on site.

Recommendation #2: CDFW's issuance of an LSA Agreement for a Project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document from the

⁵ <https://wildlife.ca.gov/Conservation/LSA>

⁶ <https://epims.wildlife.ca.gov/index.do>

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County for the Project. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 1600 et seq. and/or under CEQA, the CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement.

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To compensate for any on- and off-site impacts to wetlands or riparian resources, additional mitigation conditioned in any LSA Agreement may include the following: erosion and pollution control measures, avoidance of resources, protective measures for downstream resources, on and/or off-site habitat creation, enhancement or restoration, and/or protection, and management of mitigation lands in perpetuity.

ADDITIONAL COMMENTS

Coordination. As outlined in Mitigation Measure #6, the Project proponent shall submit an LSA notification for impacts to streams within the Project area. The Project proponent may also need to obtain an ITP for impacts to Crotch's bumble bee. CDFW welcomes coordination with the City and Project proponent prior to certification of the MND to lessen significant impacts to the maximum extent feasible.

Injured or Dead Wildlife. If any special status wildlife species are found, harmed during relocation, or a dead or injured animal is found, work in the immediate area shall stop immediately, the designated biologist should be notified, and dead or injured wildlife documented immediately. A formal report should be sent to CDFW and the City within 3 calendar days of the incident or finding. The report shall include the date, time of the finding or incident (if known), and location of the carcass or injured animal and circumstances of its death or injury (if known). Work in the immediate area may only resume once the proper notifications have been made and additional mitigation measures have been identified to prevent additional injury or death.

Mitigation and Monitoring Reporting Plan. CDFW recommends the Project's environmental document include mitigation measures recommended in this letter. CDFW has provided comments via a mitigation monitoring and reporting plan to assist in the development of feasible, specific, detailed (i.e., responsible party, timing, specific actions, location), and fully enforceable mitigation measures (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). The Lead Agency is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures. Per Public Resources Code section 21081.6(a)(1), CDFW has provided a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation Monitoring and Reporting Plan (Attachment A).

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, §

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21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The [CNDDDB website](#)⁷ provides direction regarding the types of information that should be reported and allows on-line submittal of field survey forms.

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In addition, information on special status native plant populations and sensitive natural communities, should be submitted to CDFW's Vegetation Classification and Mapping Program using the [Combined Rapid Assessment and Relevé Form](#)⁸.

City of Glendora should ensure data collected for the preparation of the MND is properly submitted.

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

CDFW appreciates the opportunity to comment on the MND to assist City of Glendora in identifying and mitigating Project impacts on biological resources. CDFW requests an opportunity to review and comment on any response that the City of Glendora has to our comments and to receive notification of any forthcoming hearing date(s) for the Project (CEQA Guidelines, § 15073(e)).

Questions regarding this letter or further coordination should be directed to Andrew Aitken⁹, Environmental Scientist.

Sincerely,

DocuSigned by:
Steve Gibson
614D6A782D93439...

Steve Gibson, Senior Environmental Scientist Supervisor
Acting for Victoria Tang, Environmental Program Manager
South Coast Region

⁷ <https://wildlife.ca.gov/Data/CNDDDB>

⁸ <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit>

⁹ Phone: 562-525-9688; Email: Andrew.Aitken@wildlife.ca.gov

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ATTACHMENTS

Attachment A: Draft Mitigation, Monitoring, and Reporting Program

ec: California Department of Fish and Wildlife
Victoria Tang, Environmental Program Manager
Steve Gibson, CESA Senior Environmental Scientist (Supervisory)
Andrew Aitken, Environmental Scientist

Office of Planning and Research
State.Clearinghouse@opr.ca.gov

REFERENCES

- Goulson, D. 2010. Bumblebees: behavior, ecology, and conservation. Oxford University Press, New York. 317pp.
- Hatfield, R., Jepsen, S., Foltz Jordan, S., Blackburn, M., Code, Aimee. 2018. A Petition to the State of California Fish and Game Commission to List Four Species of Bumblebees as Endangered Species.
- Williams, P.H., R.W. Thorp, L.L. Richardson, and S.R. Colla. 2014. Bumble bees of North America: An Identification guide. Princeton University Press, Princeton, New Jersey. 208pp.

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ATTACHMENT A: DRAFT MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

CDFW provides the following language to be incorporated into the MMRP for the Project.

Mitigation Measure	Timing	Responsible Party
Mitigation Measure #1: Crotch's Bumble Bee Surveys - The Project proponent shall retain a qualified biologist with the appropriate handling permits to conduct updated focused surveys. Focused surveys shall follow CDFW's Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species ¹⁰ (CDFW 2023). Focused surveys shall also be conducted throughout the entire Project site and during the appropriate flying season to ensure no missed detection of Crotch's bumble bee occurs. Survey results, including negative findings, shall be submitted to CDFW and the City prior to implementing Project ground-disturbing activities.	Prior to Project Implementation	Project Proponent
Mitigation Measure #2: Incidental Take Permit – The Project proponent shall coordinate with CDFW and obtain appropriate take authorization from CDFW (pursuant to Fish & Game Code, § 2080 et seq). The Project proponent shall comply with the mitigation measures detailed in the take authorization issued by CDFW. The Project proponent shall provide a copy of a fully executed take authorization to the City prior to implementing Project ground-disturbing activities and vegetation removal.	Prior to Project Implementation	Project Proponent
Mitigation Measure #3: Bat Surveys - Prior to construction activities, CDFW recommends a qualified bat specialist conduct bat surveys within the Project site (plus a 100-foot buffer as access allows) in order to identify potential habitat that could provide daytime and/or nighttime roost sites, and any maternity roosts. CDFW recommends the use of acoustic recognition technology to maximize detection of bat species to minimize impacts to sensitive bat species. A discussion of survey results,	Prior to Project Implementation	Project Proponent

¹⁰ <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline>

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Mitigation Measure	Timing	Responsible Party
including negative findings shall be provided to the City and CDFW. Depending on the survey results, a qualified bat specialist shall discuss potentially significant effects of the Project on bats and include species specific mitigation measures to reduce impacts to below a level of significance (CEQA Guidelines, § 15125). Surveys, reporting, and preparation of robust mitigation measures by a qualified bat specialist shall be completed and submitted to the City and CDFW prior to any Project-related ground-disturbing activities or vegetation removal at or near locations of habitat for bats.		
Mitigation Measure #4: If maternity roosts are found, to the extent feasible, work shall be scheduled between October 1 and February 28, outside of the maternity roosting season when young bats are present but are yet ready to fly out of the roost (March 1 to September 30).	Prior to Project Implementation	Project Proponent
Mitigation Measure #5: Biological Monitor – To avoid direct injury and mortality of any SSC, CDFW recommends the City require the Project Applicant to have a qualified biologist on site to move out of harm's way wildlife of low mobility that would be injured or killed. Wildlife shall be protected, allowed to move away on its own (non-invasive, passive relocation), or relocated to suitable habitat adjacent to the Project site. In areas where any SSC was found, work may only occur in these areas after a qualified biologist has determined it is safe to do so. Even so, the qualified biologist shall advise workers to proceed with caution near flagged areas. A qualified biologist shall be on site daily during initial ground- and habitat-disturbing activities and vegetation removal. Then, the qualified biologist shall be on site weekly or bi-weekly (once every 2 weeks) for the remainder of the Project until the cessation of all ground-disturbing activities to ensure that no wildlife of any kind is harmed.	During Project Implementation	Project Proponent

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Mitigation Measure	Timing	Responsible Party
Mitigation Measure #6: The Project applicant (or "entity") must provide notification to CDFW pursuant to Fish and Game Code, section 1600 et seq. Based on this notification and other information, CDFW determines whether a Lake and Streambed Alteration (LSA) Agreement with the applicant is required prior to conducting the proposed activities. Please visit CDFW's Lake and Streambed Alteration Program ¹¹ webpage for information about LSA Notification and online submittal through the Environmental Permit Information Management System (EPIMS) Permitting Portal ¹² .	Prior to Project Implementation	Project Proponent
Mitigation Measure #7: Best Management Practices (BMP) shall be monitored and repaired, if necessary, to ensure maximum erosion, sediment, and pollution control. The Project proponent shall prohibit the use of erosion control materials potentially harmful to fish and wildlife species, such as mono-filament netting (erosion control matting) or similar material, within stream areas. All fiber rolls, straw wattles, and/or hay bales utilized within and adjacent to the Project site shall be free of nonnative plant materials. Fiber rolls or erosion control mesh shall be made of loose-weave mesh that is not fused at the intersections of the weave, such as jute, or coconut (coir) fiber, or other products without welded weaves. Non-welded weaves reduce entanglement risks to wildlife by allowing animals to push through the weave, which expands when spread.	During Project Implementation	Project Proponent
Mitigation Measure #8: Coordination - As outlined in Mitigation Measure #6, the Project proponent shall submit an LSA notification for impacts to streams within the Project area. The Project proponent may also need to obtain an ITP for impacts to Crotch's bumble bee. CDFW welcomes coordination with the City and Project	Prior to adoption of the MND	Lead Agency

¹¹ <https://wildlife.ca.gov/Conservation/LSA>

¹² <https://epims.wildlife.ca.gov/index.do>

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Mitigation Measure	Timing	Responsible Party
proponent prior to certification of the MND to lessen significant impacts to the maximum extent feasible.		
Mitigation Measure #8: Injured or Dead Wildlife - If any special status wildlife species are found, harmed during relocation, or a dead or injured animal is found, work in the immediate area shall stop immediately, the designated biologist should be notified, and dead or injured wildlife documented immediately. A formal report should be sent to CDFW and the City within 3 calendar days of the incident or finding. The report shall include the date, time of the finding or incident (if known), and location of the carcass or injured animal and circumstances of its death or injury (if known). Work in the immediate area may only resume once the proper notifications have been made and additional mitigation measures have been identified to prevent additional injury or death.	During Project Implementation	Project Proponent
Recommendation #1: CDFW recommends the LSA Notification include a hydrology report to evaluate whether altering streams within the Project site may impact hydrologic activity within and downstream of the Project site. The hydrology report should also include an analysis to determine if Project activities will impact the current hydrologic regime or change the velocity of flows on site and downstream. CDFW also requests a hydrological evaluation of any potential scour or erosion at the project site and downstream due to a 100, 50, 25, 10, 5, and 2-year frequency storm event for existing and proposed conditions to determine how the Project activities may change the hydrology on site.	Prior to Project Implementation	Project Proponent

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Mitigation Measure	Timing	Responsible Party
Recommendation #2: CDFW's issuance of an LSA Agreement for a Project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document from the County for the Project. To minimize additional requirements by CDFW pursuant to Fish and Game Code section 1600 et seq. and/or under CEQA, the CEQA document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement.	Prior to adoption of the MND	Lead Agency

Response to Comments

A1. Response to Comments from the California Department of Fish and Wildlife, Steve Gibson, Senior Environmental Scientist Supervisor, dated December 24, 2025.

A1-1 The California Department of Fish and Wildlife (CDFW) reviewed the public draft IS/MND that was circulated and made available for public review between December 11, 2025, and January 9, 2026. In their review CDFW outlined a number of comments and recommendations to assist the City of Glendora (City) in adequately identifying and/or mitigating the project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Specifically, comments and recommendations were provided regarding the Crotch's Bumble Bee, bat species, special status reptiles, and stream features.

The City, in coordination with its environmental and biological resources consultants, reviewed the comment letter and agreed with CDFW's comments and recommended mitigation measures regarding the aforementioned biological resources. In response to the CDFW comments and recommendations, the City revised the Biological Resources topical section (Section 3.4) of the IS/MND and accompanying Biological Resources Evaluation and Preliminary Jurisdictional Delineation Report (which are included as Appendices B and C, respectively, to the IS/MND) to incorporate additional analysis regarding the Crotch's Bumble Bee, bat species, special status reptiles, and stream features, and to incorporate the recommended mitigation measures outlined by CDFW in their comment letter. The revisions in the IS/MND are shown in ~~strike through~~ text for deletions and underline text for additions.

Due to the substantive changes undertaken by the City, the IS/MND was recirculated for an additional 30-day public review and comment period pursuant to the provisions of Section 15073.5 of the State CEQA Guidelines.

Response to Comments

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Response to Comments

LETTER A2 – California Department of Parks & Recreation (2 pages)

Jorge Estrada

From: Way, Kristen@Parks <Kristen.Way@parks.ca.gov>
Sent: Monday, December 29, 2025 3:31 PM
To: Megan Stone
Cc: Kelsey Fay, Freehling, Katie@Parks
Subject: South Hills Bike Park IS/MND and NPS Review

Follow Up Flag: Flag for follow up
Flag Status: Flagged

A2

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Megan,

Hope you're doing well! I saw that the IS/MND was posted on the State Clearinghouse, and have reviewed all of the documents uploaded there. I have a couple of comments/questions regarding the documents and how they affect the NPS review:

A2

- **Project Construction Timing:** The IS/MND states that construction will be commencing in January 2026. Since the CEQA timeline doesn't estimate having an NOD until February, I'm assuming that this information isn't accurate. However, I did want to add a reminder that no project construction (including grading) within the LWCF boundary can take place until NPS provides their Notice of Award and all consultations (NHPA Section 106 and ESA Section 7 included) are complete.
- **Bald and Golden Eagle Protection Act:** The biological report states that both the bald and golden eagle have a moderate potential to occur within the project area. Can your consultant provide more info on compliance with the Bald and Golden Eagle Protection Act, and whether there are any known nests are within 660 feet of the Project area?
- **Endangered Species Act, Section 7:** Since the coastal California gnatcatcher is present within the Project site, and there is a potential for the least Bell's vireo, southwestern willow flycatcher, thread-leaved brodiaea, and the Braunton's milkvetch to occur within the Project area, consultation with USFWS will be required for this project under Section 7 of the ESA. I have let NPS know, and we will likely be reaching out to USFWS in the new year. I may ask for additional information regarding your project as we communicate with USFWS, and I will keep you updated on the status of the consultation.
 - **Mitigation Measure Changes:** I saw that the CDFW left comments regarding some of the mitigation measures. Since the ESA consultation will include a list of the City's commitments/mitigation measures, please let me know if there are any changes to the mitigation measures once the public comment period is over.
- **A&R Form:** I also just wanted to let you know that the A&R Form has been updated recently. We have transferred all of your previous work into the updated form ([10-904 A&R Highlighted \(ver. 10.25\) South Hills with KF Notes 1.16.2024.docx](#)) within the LWCF Post Selection Hub. There are a couple of new questions, and Sections 3C and 3D were blank from before, as the IS/MND and Section 106 consultation had not yet begun. Same as before, please reach out if you or your consultants have any questions regarding Section 3C or 3D of the A&R Form when filling out these sections.

Please let me know if you have any questions regarding the comments/questions above.

Thank you, and hope you have a happy new year!

Response to Comments

Kristen Way [she/her]
Senior Environmental Scientist
Department of Parks and Recreation
Phone: (916) 902-8277
Cell: (916) 203-9193

Response to Comments

A2. **Response to Comments from the California Department of Parks & Recreation, Kristen Way, Senior Environmental Scientist, dated December 29, 2025.**

A2-1 The California Department of Parks and Recreation (DPR) reviewed the public draft IS/MND that was circulated and made available for public review between December 11, 2025, and January 9, 2026. In their review DPR outlined several comments regarding the project's potential impact on the Coastal California gnatcatcher and gold and bald eagles and the need for the City to undertake Section 7 consultation with the US Fish and Wildlife Service and comply with the Bald and Golden Eagle Protection Act.

The City, in coordination with its environmental and biological resources consultants, reviewed the comment letter and agreed with DPR's comments regarding the Coastal California gnatcatcher and gold and bald eagles. In response to the DPR comments, the City revised the Biological Resources topical section (Section 3.4) of the IS/MND and accompanying Biological Resources Evaluation (which is included as Appendix B to the IS/MND) to incorporate additional analysis regarding the Coastal California gnatcatcher and gold and bald eagles. The revisions are shown in ~~strikeout~~ text for deletions and underline text for additions.

Due to the substantive changes undertaken by the City, the IS/MND was recirculated for an additional 30-day public review and comment period pursuant to the provisions of Section 15073.5 of the State CEQA Guidelines.

Response to Comments

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