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San Gabriel Valley Task Force, Angeles Chapter of Sierra Club

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To whom it may concern:

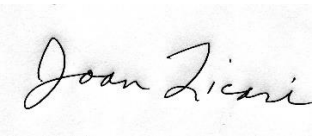
The San Gabriel Task Force of the Angeles Chapter of Sierra Club thanks the City of Glendora for the opportunity to submit the following comments on the proposed Gordon Mull Subdivision as proposed in the Draft Subsequent Environmental Report (DSEIR) provided by the City of Glendora in May, 2016.

The San Gabriel Valley Task Force was organized by the Angeles Chapter of the Sierra Club in 1999 to work with San Gabriel Valley cities and political leaders to seek ways to create a more livable environment for valley residents while preserving or improving natural resources. Since that time, we have worked with cities to preserve important hillside properties and have created projects that promote low impact outdoor recreation along the urban rivers and foothills.

We believe the Gordon Ranch property in Glendora offers great value to both the wildlife that live in these foothill areas as well as to the residents of your city. Many of your neighboring cities have worked with us to set aside foothill open space land. They realize that hillside residential areas often cost cities more in providing services to these difficult areas than they receive back in revenues. In addition, the presence of nearby open space or park land can significantly add value to existing residential areas.

In addition to the our following comments, Chatten Brown and Carstens LLP are submitting comments on behalf of the Sierra Club. Gary Stickel and Robert Hamilton are also presenting comments to which we refer in our following discussions.

Respectfully,



Joan Licari, D.Env.
Chair, San Gabriel Valley Task Force
Angeles Chapter of Sierra Club

Sierra Club Comments on the Draft Supplemental Environmental Impact Report

The Gordon Mull project proposes development of up to 18 homes. Initially this project was part of a larger proposal to develop 26 lots together that would include the Gordon Highlands tract of 7 homes that were constructed and the remaining 19 lots in the present proposed Gordon Mull project.

There has been a long history relating to development of this project. In 1990, the City approved a "Tentative Map" subdividing the property into 26 single-family lots. Approval of the Tentative Map included an Environmental Impact Report (EIR). In 1990, the Glendora City Council approved and certified the EIR (State Clearinghouse No. 88121403) for Tentative Tract Map No. 45858. There, however, does not appear to be any certification filed with the State.

We question whether the 1990 EIR was properly approved and certified to the State, what mitigation was ordered, and whether it was ever completed. The FEIR must address these issues. Similar questions about grading permits must be addressed by the developer and City.

Under the Glendora Municipal Code, any grading over 150 cubic yards in the hillside area requires approval of a Development Plan Review application. Such an approval was granted for the entire subdivision in 1990 in conjunction with the approval of the Tentative Map, but such approval has long since expired. Appendix A of the initial Study contains the Mitigation Monitoring and Reporting Program for Tentative Tract 45858. Is there any mitigation that was required and not completed?

In 1998 a "Final Map" completing the subdivision was approved and recorded: "The City also approved a grading plan in 1998 and issued permits; however, grading did not commence and these permits expired." Since approving the Final Map, seven lots within the tract have been developed. Nineteen lots remain undeveloped. (http://www.ci.glendora.ca.us/departments-services/planning/current-projects/gordon-mull-glendora-ranch; http://www.ci.glendora.ca.us/home/showdocument?id=11261)

We have questions about how these lots were graded. Were grading permits obtained? Were inspections completed? Were there irregularities, unfulfilled conditions and mitigation? Can we assume that the entire 1989-90 EIR is moot and the new EIR can reopen all issues? These issues must be clarified in the FEIR and before any approvals can be given.

The "Modified Project" is presented as the preferred project in the DSEIR that is provided as a supplement to an Approved Plan submitted in 1990. Two other alternatives, the "No Project" and "Biological Resource" options are offered. **We offer an additional alternative—a conservation alternative--that must be evaluated in the Final Environmental report that would protect the resources, both natural and cultural of this area.**

The Sierra Club has major concerns about the proposed location of up to 18 homes in an area of south facing hillsides in an area of steep slopes in the foothills of Glendora in the San Gabriel Mountains. These homes will be large—5,000 ft^2 or larger more perched on the ridgeline between Gordon and Mull Canyons in the northern part of Glendora.

Increasing the floor area of the homes as proposed over the 1990 project will tend to increase the density of the project to invite occupation by extended families according to the Draft Subsequent Environmental Impact Report (DSEIR). The intention of the Glendora Hillside ordinance is to minimize density.

It is our belief that approval of this project will require multiple variances and waivers to regulations and codes of the City of Glendora as well as violations of the Goals and Policies set forth in the Glendora General Plan 2025. It will impact the views of the hills from many areas of the City that calls itself the "Pride of the Foothills" It will degrade the quality of life for local residents, both temporary and long term with effects on cultural resources as well as traffic, air quality while causing major biological impacts. There will be potential for slope failure due to the steep terrain as well as for damage should an earthquake occur on nearby faults.

Below is a general summary of our concerns. Beginning on page 10 we provide details of those concerns summarized below.

A Summary of Sierra Club Concerns:

- We have questions about the legal relationship between the current project and its relationship to Gordon Highlands. Initially the Gordon Mull and Gordon Highlands were recorded on one map. Seven lots were developed into Gordon Highlands. Now, **seeking to separate the proposed project from limitations imposed by the recorded Final Map, the developer makes the claim that "[a]lthough recorded as one map, the subdivision effectively functions as two separate subdivisions" (DSEIR 1.1.) There is no such bifurcation concept in California subdivision law or in CEQA.** The scope of environmental impact must be measured by taking into consideration the entire project, not portions in piecemeal. Piecemeal consideration of a project results in minimization or avoidance of the scope of the total project impact.

  In evaluating environmental impact of development of the remainder of Gordon-Mull, the city must weigh the totality of the project, including the environmental impact of completed construction on 7 lots on the eastern edge of the project.

To the extent possible, the DSEIR should be revised to reflect the total impact of both the western and eastern portions of the project. For example, the extent of impact on protected and sensitive populations from previous construction must be considered together with the anticipated impact from new construction. All other impacts, i.e. the traffic impact must include traffic generated from the eastern portion of the development.

- Home pads from a previously accepted plan (1990) have significantly increased from 10,994 square feet to 17,221 square feet. These will be located on a ridge with Mull Canyon on the east and Gordon Canyon on the west in the San Gabriel Mountain foothills that form the scenic backdrop to the City of Glendora. This location, itself, we believe is in **violation of RHR codes that structures may not be located within 50' horizontally from a ridge line.**

- A road would be constructed through the project extending from the end of Lone Hill Ave. to become Gordon Ranch Road. The DSEIR also indicates the project will require off-site grading in one area to the west of the road. We assert **this will require variances, waivers from the City?**

Construction is predicted to take place in three phases over a 30-month period although it could take longer if sales do not take place as anticipated. The document does not say what will happen if sales in earlier phases are not successful. Will the later development be competed?

- If sales in earlier phases are not successful, will the later development be competed? Impacts of the potential phased development must be addressed.

- Topography is steep. **Slopes in excess of 35% will be graded in violation the RHR Zone and Hillside Development codes.** On Lot 1 grading will be of a slope of 75%. Twelve percent (12%) of the slopes in the project are in excess of 35%. Because of the sloping terrain, construction of the homes would entail multiple retaining walls in excess of the 6-foot limit set in the RHR Zone and Hillside Development regulations. Near Lots 1 and 2, the wall will be 33 feet in height (DSEIR, Fig. 3-14, 3-15.) **Thus the City would be required to issue multiple variances for this project to go forward.**

- **Impacts to Glendora residents will be significant.** Temporary impacts from construction will exist for approximately 30 months, if all goes well. However, according to the DEIR, the builder plans to develop the project in three phases. Typically, this would involve completing one phase, selling out those homes, followed by phase two, and then phase three. This could result in construction over a much longer time if sales are not favorable at each phase subjecting nearby Glendora residents to prolonged impacts.

  The DSEIR indicates that vibrations from a vibrating roller during construction activities will impact adjacent residents at 309 Lone Hill Ave. to the extent that their homes could be damaged and may have to be repaired. Vertical movements of the ground on this private home across from Lot 1 are predicted to be approximately .5 inch/per second.

Imagine your house shaking, with pictures possibly falling off the wall and articles on shelves jumping around during the day.

The mitigation promised in the DSEIR only to having a certified engineer examine the property before and after the construction activities and if they find damage, it will be fixed. This is unacceptable. The DSEIR also indicates homes just south of the project on Country Club Road will also be affected by vibrations although to a lesser degree. (Section and page).

- The builder wants to remove 13,420 cubic yards (c.y.) of rock and soil. . The average three axle dump truck has a capacity of 10-14 c.y. (http://www.earthhaulers.com/news/how-much-dirt-can-a-dump-truck-carry/).

  This calculates out to 958-1342 truckloads or round trips between the construction site and Foothill Blvd. This is twice the number of trips stated in the Air Quality part of the response. Truck trips up and down Lonehill Ave. will transport materials to and from the project over the proposed 30-month construction period. Lone Hill Ave. is already considered by L.A. County Traffic Congestion codes to exceed recommended levels that will be increased even more as a result of this project.

- Views of the foothills will be impaired from many areas of the city and the imposing gated entrance to the project is not compatible with surrounding development.

- Gating this development will prevent local residents and wildlife from using traditional trails to access the nearby city nature reserve.

- **We have questions about seismic risk and slope stability questions about this project.** A **strand of the Sierra Madre fault cuts through those two lots**. Development of them poses a risk to potential residents from building failure. Fault rupture could cut utility services and the road through the project. This strand is not included in the Alquist-Priolo zoning, although portions of the fault to both the east and west of the project are included.

  The developer is promising to develop a park on Lot 7 since it is unbuildable due to the fault. It is our belief that Lot 10 is also unbuildable. The development plan is still including that site with a setback of 30 feet from the fault. The California Geological Survey in their recommendations does not consider this buffer zone to the fault line adequate. There is no rationale or process for how a minimum setback of 30 feet for building on Lot 10 was determined. Why not 50 or 100 feet?

  What impacts to water, electrical, road and other service would occur if surface rupture along the fault occurred?

Slope failure is a possibility given the nature of the topography and geologic setting. The City of Glendora must require a slope stability evaluation for this development. There is evidence of active shallow surface mass wasting along the slopes of the proposed development

and possible landslides have been mapped north of the project in historical reports. Hillside developments on compacted fill have been notoriously unstable in Southern California.

- The State of California Seismic Hazards Zone Map shows the potential for earthquake induced landslides through Lot 5, 8, 7, 9, 11, 12,13, 14, 15, 18, and 19. There is also a question as to whether the areas to the north of Lot 15 and 18 is a landslide. This area must be further evaluated. Instability or an active landslide in this area would directly affect homes on Lot 15 and 18 and if Lots 16 and 17 were developed. (Californian Department of Conservation Division of Mines and geology, 1999)

- The study of groundwater in the area is inadequate. The DSEIR claims no groundwater was found. California is currently in drought and groundwater levels are low. These conditions could change. What are historic highs and lows? In the past, California has been subjected to great fluctuations in rainfall and consequent changes in groundwater levels.

  Impacts must be evaluated for 50 and 100 year storms (a 2% possibility each year for a 50 year storm or 1% possibility each year for the 100 year storm). What would be the impacts to slopes, local drainage and debris basins in both canyons? Local and historical data must be evaluated to evaluate potential for liquefaction.

  Mudflows could result if slopes and fill areas become saturated with water. Liquefaction could also be the result of seismic activity during a high groundwater period.

  Construction will be above volcanic bedrock that is typically stable. However, the DSEIR (Section 4) describes the subsurface bedrock as weathered and fractured. Studies of the bedrock are not adequate in the boring logs, trench logs or on the geologic map included in the document to allow us to predict how the slopes or pads will behave in seismic events or if excess water infiltrates into soil or rock below the surface.

  Looser, unconsolidated materials make up the slope surfaces. Pads will be compacted material above more solid bedrock. Loose material above solid can experience slow creep due to gravity. Compacted materials on the pads can behave differently than the volcanics below, causing damage to foundations and structures.

  Areas of earthquake-induced landslides have been identified along Gordon and Mull Canyons (State of California Seismic Hazards Zone Map, Glendora Quadrangle, dated March 25, 1999). Considering the proximity of the Sierra Madre Fault and the location of the proposed homes, how will native and manufactured slopes be mitigated?

- A **water system (water loop)** is proposed (DSEIR, page 3-6) would extend from the Blue Bird development on the west, along Ferguson Motorway across Bluebird Conservancy lands to connect the project to the water tank located in the Gordon Highlands development (Map, figure 3-16). It would also include water lines, booster pumps, and hydrants.

We assert the line across Conservancy lands may not be legal. If this access is not legal, the developer will need to find a way to provide water storage on the project site—including possible construction of a water tank/s. This issue must be resolved before approval of the project by the City. Any alternate solution will involve changed environmental impacts not addressed in the DSEIR.

- We question the **adequacy of the water tanks in Gordon Highlands** to supply water for the project. New codes require sprinklers in homes that were not required at the time of the Approved Project. The tanks may, in addition not meet current codes for earthquake safety with the increased volume of use.

- **Biological Resources evaluation is not adequate.** Three State or Federally listed species are found on-site, that include the Thread-leaved brodiaea, federally listed as "Threatened" due to habitat loss and California designated as "Endangered'; the Coastal California gnatcatcher (listed as federally "Threatened") and the cactus wren (California State Species of Special Concern). The brodiaea is also the designated flower of Glendora. **The DSEIR indicates impacts to " the thread-leaved brodiacea would be significant and unavoidable" (DSEIR, 2-3).**

  Protection of these species are mandated and incidental takes of federal or California protected species must be permitted. Mitigation offered includes instruction of equipment operators recognize these species. It is an inadequate mitigation to expect operators using bulldozers and other heavy equipment to recognize or see biological resources from their equipment control locations right in front of them about to be destroyed.

  Short and long term impacts of the proposed project will cause the destruction of vegetation with value as habitat for these or other sensitive species or vegetation types.

  The biological Resources section does not indicate the impact of grading on vegetation, construction of trail and water lines, fuel modification activities that would extend 300 feet beyond graded pads.

  Grading and construction will impact sensitive species and vegetation types, cause the loss of 176 Coastal Live oak trees and 2.6 acres of Coast of Live Oak Woodlands, impact wildlife movement along the corridor between the foothills to the South Hills reserve.

  The DSEIR does not adequately describe impacts to native vegetation that would result from grading and construction of pads and required fuel modification. Clearing of native vegetation and local irrigation will allow non-native invasive species to thrive, and plants considered valuable for fire control such as cactus will be removed. (See biological review of the DSEIR by Hamilton Biological.)

Replacement would take decades to replace destroyed habitat. Concern about loss of native vegetation is important because of the continued fragmentation of varied habitats in foothill areas such as Gordon Mull that have created fragmented habitat islands, with limited range for sensitive species that may result in their potential decline or loss of the species. This project exacerbates these regional impacts.

- **Cultural resources were not adequately evaluated.** Surveys conducted for the DSEIR are deemed inadequate by the archeologist for the Kizh Native American tribe. Consultation with representatives of Native American tribes in the San Gabriel Valley were not thorough. (Stickel, 2016 comments on DSEIR)

- Adequate study of cultural artifacts found within feet of the project on the Sassone property where between 800-1000 artifacts have been recovered and on private property within feet of the proposed project are not documented. The presence of these objects within feet of the project boundaries suggest that more be encountered on projects locations. The presence of high numbers of artifacts indicates regular use of the area, and an archaeological study needs to be completed before there is more surface disturbance… since some has already occurred.

  The mitigation offered is to call in an archeologist if artifacts are encountered. This depends on recognition of cultural resources by equipment operators. We believe an expert on Native American groups must be on site during all grading activities.

CEQA requires that the range of alternatives in an EIR is governed by a "rule of reason" and therefore, the EIR must evaluate only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the proposed project. Three alternatives were evaluated-- the "Modified Project", a "Biological Resource Avoidance Alternative", and a "No Project Alternative".

The preferred "Modified Project" proposes that 18 homes be constructed in an open space area in the foothills of Glendora, a city that proclaims itself as "Pride of the Foothills. Yet as a result of this development, **views of the foothills will be impaired** from many parts of the City, **sensitive and protected species will be injured**, oak woodlands, California walnut trees will be destroyed or damaged, native animal species will again have their range and habitat reduced, corridors for animal movement will be impaired, traffic and air quality will be impacted. Yet the DSEIR claims that these impacts are not significant when mitigated.

- **The Preferred "Modified Project" violates numerous goals and policies put forth in the City of Glendora's General Plan (also known as the Community Plan 2025) which is the primary land use policy document for the community as well as Federal and State regulations.** It will also cause irreversible damage to the environment in the area (DEIR, pg. 4.1-9)

- **The "Biological Resource Avoidance" Alternative** discussed in the DSEIR would result in reduced impacts to protected species and less impact to the Federally threatened and California Endangered Thread-leaved brodiaea and other sensitive species by elimination of 7 of the northern lots by establishment of a 300 ft. buffer zone. This plan would eliminate development on Lots 13 through 19 in the northern portion of the project site to better protect sensitive species. Twelve homes would be constructed. However, there would still be impacts that the DEIR claims can be mitigated. However, we find these claims unsubstantiated.

  There would be reduced impacts to air quality by shortened construction times, somewhat reduced traffic, noise and light pollution. This option, however, would still impact the aesthetics of a foothill view so valued by residents and the imposing gateway into the new development would still destroy the character of the area. Air quality impacts and major biological impacts would continue.

Both the "Preferred Plan" and "Biological Resource Avoidance Alternative" have significant unavoidable impacts to aesthetics, air quality and biological resources and have major problems with respect to seismic risk, slope failures, water conveyance to the project, and road development that are in conflict with the City of Glendora General Plan, the Hillside Development codes, State and Federal regulations.

Lots 7 and 10 must be eliminated from development in all alternatives considered due to seismic hazards. All manufactured slopes must be planted with native plantings. Invasive species must not be allowed in landscapes. Restrictions must be written into deeds.

Special variances and waivers will be required from the City for both alternatives.

We believe that, although better than other alternatives, **the "No Project"** alternative would just defer to future development and perhaps result in loss of opportunities for possible restoration of previously disturbed land in the project area.

Thus the Sierra Club proposes an additional alternative--a **"Conservation Alternative**"—that must be included in the Final Environmental Impact report as a "Preferred Alternative". The Sierra Club is aware of multiple other entities who are interested in this opportunity to provide protected status to threatened species in close proximity to the new San Gabriel National Monument.

Sierra Club proposed Conservation Alternative:

We believe another alternative, not discussed or analyzed in the DEIR, must be examined and investigated in the Final EIR—one that would involve purchase of the land by an agency of government or conservancy/conservancies. The Sierra Club envisions an alternative in which Sensitive, Federally or California State Threatened or Endangered species would be preserved, where sensitive oak woodland, Coastal sage scrub and California walnut trees would not be disturbed, no or few trees would be cut, and a corridor for wildlife movement

would continue to exist between the foothills and South Hills conservancy. Recreational opportunities, including trail access for local residents and the extended San Gabriel Region would continue. Perhaps the loop trail connecting the Marshall and Greencroft trails proposed in the DSEIR alternatives could be constructed.

Therefore, we support a new alternative that would protect the undeveloped foothills of the San Gabriel Mountains that form a backdrop the City that advertises itself as "The Pride of the Foothills", all the while still providing recreational access residents of the City and the population of the larger San Gabriel Valley to trails not only on this property but as a local entry point into the newly created San Gabriel Mountains National Monument. **We realize that this vision will not happen unless the land becomes public and managed by a conservancy or under protection of Federal State or local government. The Sierra Club has approached both the owner and outside entities that could possibly provide this solution.**

In support of such an alternative the **City General Plan Policy CON. 9.1** (DEIR page 4.3.30) requires that the city investigate all opportunities for open space land acquisition for the preservation of natural resources and sensitive habitats. In addition, the **City General Plan Policy CON-9.2** advocates for the Glendora Community Conservancy to determine funding opportunities for open space land acquisition for the preservation of natural resources and sensitive habitats. These options were not pursued by the City. A "Conservation/Preservation Alternative", as stated earlier in this document, must be included as a viable alternative.

The City of Glendora supported such a conservation alternative for this property in the past through grant funding partnered with local conservation groups to acquire the Gordon Mull Habitat for its high biological value. The primary purpose of this acquisition alternative would be the protection of the coastal sage scrub and oak woodlands plant communities along with the sensitive and endangered species that reside within this habitat.

The type of habitat being protected by an acquisition alternative would support the federally-listed coastal California gnatcatcher recently documented within one mile of this project, the California cactus wren that has been observed on the Gordon Mull property by Robert A. Hamilton, President, Hamilton Biological, Inc. as well as the Thread-leaved brodiaea.

Specific Sierra Club Comments On The DSEIR:

We have examined the DSEIR and have the following concerns that must be addressed in the FEIR.

DSEIR Section 3.4

The proposed project calls for retaining structures (a soil nail wall) 33 feet in height. This can be seen below (east of) Lot 2 on Figure 3-14, and contradicts the retaining wall info in Section 3.4 of the DSEIR. Section 3.4 is garbled and does not clearly state what the plan is regarding soil retention.

EXTENSIVE EXCAVATION, FILL, AND OVERSIZE RETAINING STRUCTURES VIOLATE THE HILLSIDE DEVELOPMENT ORDINANCE AND RISK DAMAGE TO

RESIDENTS AND THE DOWNHILL COMMUNITY
In order to reduce the amount of earth hauling, the builder has decided to increase the building pad sizes by about 60%, from an average of 10,994 square feet to 17,221. Increasing building pad sizes will be enable the builder to "balance" 70,810 cubic yards of earth from extensive road cuts, storing it behind oversized retaining walls and soil nail walls that exceed the legal height limits. (DSEIR 3.4.)

This passage of the SDEIR (3.4, page 3-6) states that the proposed project would have 43 masonry retaining walls ranging in height from 2 to 10 feet, and nine soil nail walls from 2 to 28 feet tall. It is unclear whether crib walls will now be used as originally proposed. In fact, this paragraph of the SDEIR is hopelessly garbled, contradicted by the information in Figure 3-14, and must be corrected.

According to the Hillside Development Ordinance (Glendora Municipal Code Section 21.04.030 D.7), masonry retaining walls visible from public rights-of-way may not exceed six feet in height and crib walls may not exceed 15 feet. The ordinance is silent on the relatively new technology of "soil nail" walls; experts suggest their dimensions and appropriate use are determined by the nature of the soil being retained. No justification for the use of soil nail walls appears in the DSEIR.

As noted above, the heights of the retaining structures in SDEIR 3.4 are contradicted by notations throughout Figure 3-14, which is supposed to depict the locations and heights of walls. It appears that masonry retaining walls on Lot 16 will attain heights of 11, 14, 17 and 20 feet, and that the southernmost retaining wall on the west side of the Lone Hill extension reaches 10 feet. The soil nail walls, which line the proposed public right-of-way, flagrantly exceed the height limitations on both retaining walls and crib walls, those below Lot 2 reaching 33 feet in height. A soil retention structure would tower 21 feet over the entrance to the project, clearly exposed to the existing public roadway at north Lone Hill.

The extravagant use of soil-retaining walls throughout the project and along the proposed roadway and the accumulations of fill dirt around home sites exposes the development and the surrounding community to the risk of collapse and mudflows during rainstorms. Many sections of the proposed roadway are far below grade, trenched between tall retaining walls and soil nail walls. The collapse of a bordering hillside during a rainstorm would subject the residential community below the project to mudflows, which would be forcefully channeled by the sluice-like roadway.

Aesthetics (Section 4.1)

In accordance with Appendix G of the State CEQA Guidelines, a threshold of significance relative to aesthetics and visual quality is as follows: Threshold 4.1-1: Would the project have a substantial adverse effect on a scenic vista? In addition, the RHR zone and Hillside Development regulations for the City of Glendora indicate design must enhance vistas. The DSEIR considers the view impacts are less than significant with mitigation. **We strongly disagree.**

The DSEIR includes simulated vistas of the proposed very large homes as viewed from a distance from many areas of Glendora after completion. The vistas included in Figs. 4.1-7 through 4.1-9 show the development detracts from the view from various areas of the City. In particular, Fig. 4.1-11 simulates the view from Country Club Road and Valliant St. shows how obtrusive these large homes will be.

The massive walled and gated entrance on Gordon Ranch Road (Fig. 4.1-12) is not compatible with the general character of the existing development in this area as is seen with the existing home on left just beyond the gate. The open space view from the Bluebird section of Glendora Conservancy lands from above the project is obliterated by the 5000 + square foot monster pictured in Fig. 4.1-13.

Although Glendora that advertises its city as "Pride of the Foothills", it has failed to take advantage of the opportunity to expand and increase the effectiveness and value to the city of its own Conservancy by acquiring or zoning but instead proposing to allow this damage to their view-shed. damage to their view-shed from many areas within the city.

The scenic value of its foothills with views of the already preserved areas of the Glendora Conservancy, the Angeles National Forest, and the newly created San Gabriel National Monument will be destroyed. Table 4.1-1 indicates "Applicable Community Plan 2025 Goals and Policies Related to Aesthetics. This project violates a number of these goals. The project is not compatible with adjacent land use (Goal LU-18). The large size of these homes is not consistent with existing residential development to the south and is totally incompatible with the preserved open space to the north. The development is in violation of LU-20, LU-20.1 and LU-20-6 goals that require compatibility of scale and character already existing in the area.

In the DSEIR, (pg. 4.1-25) the claim is made "Therefore, impacts on the immediately surrounding neighborhoods would be less than significant." All the colors, landscaping, placement and fencing plans cannot hide these intrusions on the visual landscape. In addition, we do not have the plans homes that are to be constructed.

In addition, the cumulative impacts to the aesthetics of previously approved and contemplated future development must be considered in the FEIR. Two ridges adjacent on the east and west of the proposed development have already been approved and constructed, detracting from the foothills view. Another loss of the open space ridge view in this area will destroy it completely.

Impacts of the Modified Project related to aesthetics were determined to be less than significant; impacts associated with the Biological Resource Avoidance Alternative would be less than those of the Modified Project. This alternative would only result in the construction of 11 new residences.

Compared to the Modified Project, the visual alternations of the Biological Resource Avoidance Alternative to the hillside would be limited to the southern portion of the project site. The imposition of the entrance gate with the massive walls, the very large obtrusive homes beyond visible from Lone Hill and other locations in Glendora still would not be consistent with the

homes presently in the area. Also the gate would limit access of the local community to the area just up the road. Views of the foothills will be degraded, although to a lesser extent.

The project still would not be compatible with adjacent land use (Goal LU-18). The large size of these homes is not consistent with existing residential development to the south and is totally incompatible with the preserved open space to the north. The development is also in violation of LU-20, LU-20.1 and LU-20-6 goals that require compatibility of scale and character already existing in the area.

We applaud the creation of the loop trail connecting the Marshall and the Greencroft Trail. However, the development of the Gordon Mull Project would degrade the experience of a natural setting with large homes defacing the ridgeline. This trail extension could be a part of a Conservation Alternative or a "No Project Alternative".

Air Quality (DSEIR, Section 4.2)

Several issues arise that are not addressed in the DSEIR. The South Coast Air Quality Management District is non-attainment for several pollutants--Ozone and Particulates (PM_{10}, Pm $_{2.5}$). **The project will produce air quality impacts that even with mitigation that are significant and unavoidable according to the DSEIR.**

The DSEIR concedes that homes adjacent to the construction will be subject to unacceptable levels of emissions that cannot be mitigated. However, this may understate the problem. Residents residing on Lone Hill above Foothill will be ground zero for noise and emissions. Maximum daily localized construction emissions that would be generated during construction of the approved project would exceed the South Coast Air Quality Management District threshold of 10.4μg/m3 for PM2.5 (parts per million) and PM_{10}.

Highest pollution concentrations would likely occur at those residences located south of the project, near the dead end of Lone Hill Avenue and North of Valiant Street. Efforts to mitigate pollution impacts would be insufficient to lower levels below the $PM_{2.5}$ and PM_{10} threshold.

Based on the amount of soil predicted to be removed and the capacity of standard commercial dump trucks, it would take approximately 500 truckloads of dirt be carried out. This translates into approximately 1000 trip past these homes. Local residents report that they already bear the impact of noise and diesel emissions from Flood Control District annual clearances of mud flows from the catch-basins above and Glendora roads as these trucks move down Foothill Boulevard to South Lone Hill. Residents complain that this is a health problem for residents as well as dangerous since children use the driveways for these homes as places to play.

In addition the 70,810 cy of raw compacted fill or 13,420 cy of soil are expected to be exported off-site. This will expose soils to wind and rainfall. Mitigations listed in the DSEIR do not meet AQMD regulations.

The Glendora Community Plan CON-5 policies direct the City Council to reduce demand for energy in new developments by introduction conservation techniques which would reduce emissions. The DSEIR claims "The Modified Project would not create any electrical system capacity problems or result in the construction of new energy facilities or expansion of existing facilities. Therefore, impacts related to electricity would be less than significant (page 4.1-13)**." We disagree.**

The direction of All future developments must meet efficiency standards that are LESS than previous standards, if we are to meet California goals of energy reduction and reliance on fossil fuels. Every governmental unit has an obligation to do their part. A similar obligation to conserve water, and switch to modern systems which can make effective use of what was once considered "waste" water. Transporting around the state is one of the largest consumers of energy in California. The point is, until we begin to roll out these new technologies we are continuing to affect the Earth adversely.

During hot spells of 2016, as early as January 2016, there were rolling black outs and shut offs of air conditioning by SCE, and similar events are predicted in the future (ABC News, Mar. 19). Rising temperatures associated with global warming will exacerbate this problem. **Although this project by itself seems small, it must be considered along with the cumulative impacts of all developments within the City and the Southern California air quality basin.**

The FEIR must address potential ways of reducing long term air quality impacts and cumulative impacts. What transportation alternatives could be included in the design of the Gordon Mull project? Is the reduction of air emissions from homes by use of alternative energy sources (i.e. mandatory rooftop solar etc., energy efficient home building) incorporated in the proposed buildings? These are high-cost, large homes; such considerations must be included to reduce the emissions over the long term.

The City of Glendora is in the process of developing a Climate Action Plan. It was not available to review at the time of the DSEIR analysis. However, it is critical to consider the impact of greenhouse gases, in light of the developing evidence of rising temperatures.

The California Green Building Code, referred to as CALGreen, is the first Statewide green building code. It was developed to provide a consistent, approach for green building within California. CALGreen lays out minimum requirements for newly constructed buildings in California, which will reduce greenhouse gas emissions through improved efficiency and process improvements. It requires builders to install plumbing that cuts indoor water use by as much as 20 percent, to divert 50 percent of construction waste from landfills to recycling, and to use low-pollutant paints, carpets, and floors, (DSEIR pg. 4.6-5). Are these requirements met in the proposed alternatives?

The General Plan says a strict interpretation of the "no net" increase prohibition suggests that any general development within the region, no matter how large or small, would have a significant, project-specific air quality impact unless the development-related emissions are offset by concurrent emissions reduction elsewhere within the air-shed. Offsets must be found within the San Gabriel Valley, a region that does not meet air quality attainment standards.

Cumulative impacts for other developments in the Glendora or adjacent areas are addressed adequately. Current plans being considered for development in Glendora include:

Monrovia Nursery Specific Plan: 121 single-family houses.
Gables on 66: 20 single-family houses; 106 townhouses; 1,950 square feet of retail space
Melia Homes Single-Family Subdivision: 2-lot single-family subdivision
Gordon Mull/Glendora Ranch 19-lot single-family subdivision
Carroll Vermont Single-Family: 40 detached condominiums
Arrow Highway Townhomes: 23 two story townhouses
Foothill 533: 44 townhouses
Grand/Route 66 Commercial Remodel

(http://www.ci.glendora.ca.us/departments-services/planning/current-projects). These projects seem to be in addition to those listed in the DSEIR. **Can offsets be found in the area**?

The DSEIR claims that air quality impacts are not a significant risk. What are potential health impacts to those with respiratory problems? This project, as planned could take 30 months or more subjecting the local residents to air quality impacts of construction for almost 3 years or more. How can these be mitigated? If not, **the project as proposed must not proceed—the no action alternative is the alternative that would address these issues or the "Conservancy Alternative" proposed in these comments.**

Biological Resources Section (DSEIR, Section 4.3)

We have great concern about the loss of habitat, damage to protected species, potential loss of trees and habitat considered sensitive as well as disruption of wildlife corridors. The site boasts 311 trees of significant size, 286 of which are native species. (DSEIR p. 4.325.) Half of the site's acreage (21.7 acres) is designated as sensitive or locally important natural communities by the California Department of Fish and Wildlife (CDFW). (DSEIR p. 4.31 to 4.34.)

We believe impacts, including, but not limited to, invasive plants, pet predation of wildlife, use of fertilizers and pesticides by residents after sale and nighttime light impact on nocturnal animals will occur. These must be addressed in the FEIR and in required stipulations associated with deeds.

We do not believe the mitigation measures are adequate to protect the Federally or State listed species or the loss of significant habitats. CEQA, State, Federal and City of Glendora guidelines will be violated.

The DSEIR concludes mitigation measures BR-1 through B-14 are claimed to mitigate the impacts of this project. We disagree. We also believe that the project is not in conformance with the General Plan 2025 nor with City goals of preserving open space with land acquisition for preservation.

The property is located adjacent to the Bluebird unit of the Glendora Wilderness area to the north which is in turn bounded by the Angeles National Forest and the new San Gabriel Mountains

National Monument. Addition of the lands to conserved open space already created would extend habitat and wildlife corridors into the South Hills area.

The City General Plan Policies CON. 9.1-9.2 (DSEIR, page 4.3.30) requires that the city investigate all opportunities for open space land acquisition for the preservation of natural resources and sensitive habitats. In addition, Policy CON-9.2 advocates for the Glendora Community Conservancy to determine funding opportunities for open space land acquisition for the preservation of natural resources and sensitive habitats. These options were not pursued. **A conservation/preservation alternative, as stated earlier in this document, must be included as a viable alternative in the FEIR.**

CON-9.4 and 9.5 goals in the City General Plan Policy require the City to ensure preservation of natural plant communities in the hillside areas and ensure land use preservation of the natural plant communities in the hillside areas and preservation of plant and animal species critical habitat, wildlife corridors and biologically sensitive areas. The approval of either the "Preferred Alternative" or "Biological Resources Avoidance Alternative" would jeopardize the protected species, mature trees, sensitive vegetation types in this area. The "No project alternative" is the only option in the DSEIR that would meet these goals.

A "Conservation Alternative" as we propose, would meet the goals of the stated policies as well as provide recreational opportunities for residents and the region.

The project area, as described in the DSEIR, contains a mosaic of plant associations including Coast Live Oak Woodland (14 acres), California Black walnut, Western Sycamore, Coast Prickly Pear Scrub (approximately 5 acres), Purple Needlegrass Grassland, Blue Elderberry stands and California Buckwheat Scrub (DSEIR pg. 4.3-1-4.3-2).

Coast Prickly Pear Scrub, Purple needlegrass grassland, Blue Elderberry and California Walnut Woodland are all classified as sensitive natural communities by the California Dept. of Fish and Wildlife (CDFW). The Coast Live Oak Woodland is considered locally important by the CDFW.

Oak woodland is considered sensitive by CEQA and any loss of this habitat is considered significant. The DSEIR indicates that the project would impact a total of 2.6 acres of Coast Live Oak Woodland and destruction of 176 oak trees.

Before grading, the draft indicates a restoration plan must be submitted. What is the plan for Coast Live oak mitigation? Small trees for large is not acceptable. Hamilton (comments of July 29, 2016) supports a 7-1 replacement. The DSEIR claims there will be mitigation for purple needlegrass, prickly pear, elderberry, and California black walnut. The DSEIR says, with mitigation, impacts will be insignificant. Mitigation plans must be presented in the FEIR. Otherwise we getting a pig in a poke.

Is mitigation to be done when all construction is completed? Mitigation must occur quickly, not in 30 months. Who will be responsible for the implementing the plans? This is of concern since mitigation for damage from construction of Gordon Highlands has still not taken place. Some

mitigation must also be done for damage from unauthorized grading and fuel modifications that recently occurred.

How many mature trees are going to be lost? How many trees of each type must be removed? This must be stated in the FEIR. In the earlier approved plan, many trees were to be destroyed.

The DSEIR also says some mitigation may take place off-site. Mention is made of the possibility of the Native Habitat Authority lands miles away in the Puente Hills (DSEIR, 4.3-41) as an area of potential offset. This is unacceptable. **Offsets must take place in the Glendora area to preserve the flora and fauna of this area—not somewhere a distance away.**

Seeds for revegetation should come from local areas, not just characteristic of area. Herbicides to be used must be listed in DSEIR. 2-9 to determine what impacts they might have. These need to be addressed in the FEIR for proper evaluation by the City before approval.

A number of sensitive plants and protected have been observed or also may occur on the project site (Table 4.3.2). **Neither the "Preferred project" nor Biological Resources Avoidance alternatives would eliminate impact on these plant species.**

CEQA Threshold 4.2-1 states "Would the project have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate sensitive or special status species in local or regional plans, policies or regulations, or by the CA Dept. of Fish and Wildlife? **There are three listed species present in the project area--the Thread-leaved brodiaea, Cactus Wren and California Gnatcatcher along with numerous sensitive species.**

Thread-leaved brodiaea (*Brodiaea filifolia*) was observed on-site. This species is listed as Federally threatened and California Endangered, and it is interesting that the species is also the **official flower of the City**. It has been seen on lots 14 and 15. The DSEIR indicates that **impacts to this species would be "considered significant and unavoidable**" even with mitigation Measures BR4 and BR6 (DSEIR, 4.3-38).

The DSEIR states "More specifically, the Modified Project would indirectly impact thread-leaved brodiaea populations that occur on Lots 14 and 15 due to grading and road construction. We have received information from California Fish and Wildlife Service that brodiaea has been found further down on Lot 14 than previously observed.

Roads, pads, and landscaping immediately upslope and adjacent to the Thread-leaved brodiaea population would affect local soils and hydrology and change site conditions and possibly local ecology for this species." (DSEIR pg. 4.3-38). This plant reproduces by corms not visible during much of the year. In addition, due to drought conditions, this species could not be adequately observed.

Brodiaea surveys were conducted in 2014, 2015, 2016. (page 19). SWCA biologists (Appendix. C) recorded 3 plants in 2013, 7 in 2014, 8 in 2015 and only 4 in 2016. (Hamilton Biological report, July 29, 2016). In contrast, in 2009, 49 plants were observed. Brodiaea does not bloom in

dry years. In the last three years precipitation has been below average. **Surveys cited in the DSEIR for brodiacea are inadequate.**

Thread-leaved brodiaea on Lots 14 and 15 would live within the fuel modification zone. Brush clearing would cause destruction of plants and long term modification of the habitat.

A letter from SWA Consultants included in the DSEIR (Appendix C) from Robert Montejo reports results of a brodiaea survey conducted for this project that **"Avoidance may be the only feasible means for avoiding impacts to the species from construction.** This could be achieved by placing a construction buffer around and especially upslope of the mapped plants if the intent is to preserve these plants in situ, as it appears that even slight changes to soil and slope, and possibly hydrology, could affect the species.

The mitigation offered is training of workers to recognize the presence of this species. This would not be effective in prevention of destruction since the plant exists much of the year as corms below the surface.

The "Preferred Project" proposes construction of 12-18 homes. **The DSEIR declares that "With implementation of the Project Design Features and Mitigation Measures BR4 and BR6, the impacts would be minimized, but these impacts would still be considered significant and unavoidable". This is unacceptable.** Therefore, lots with documented brodiacea must be eliminated from planning must this project go forward. This must be addressed in the FEIR.

In addition, the construction activities, building and cemented surfaces on Lot 16 would potentially impact continued existence of brodiaea in the project site and violates CEQA Threshold 4.3-1.

CEQA Threshold 4.3-2 asks "Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural communities identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?" The changes to and interruption of drainage caused by construction activities and impermeable surfaces on Lot 16 and 15 could cause adverse effect on the brodiaea.

The Sierra Club believes the mitigation measures are inadequate. **Lots 14, 15 and 16 must be eliminated from the proposal in the FEIR**. **Either the "No project alternative must be the preferred project or the Conservation alternative included in the FEIR to protect the Thread-leaved brodiacea.**

Three bird species are of concern. Coastal sage scrub is the primary habitat of two birds, the California Gnatcatcher, *Polioptila californica californica*, and the San Diego Cactus Wren, *Campylorhynchus brunneicapillus sandiegensis* that are declining rapidly because of loss of habitat to urbanization. The project area has about 5 acres of Coastal Sage Scrub. As a result, he project area is potential habitat of these two species. https://www.westernfieldornithologists.org/archive/V21/21(3)%20p0081-p0126.pdf).

California Gnatcatcher *(Polioptila californica*) :

The California Gnatcatcher is listed as a Species of Special Concern in California and as Threatened by the U.S. Fish and Wildlife Service in 1993 due to habitat loss (USFWS 1993). The California Gnatcatcher is also a focal species under California's Natural Communities Conservation Planning (NCCP) program. Several sub-regional coastal sage scrub focused conservation plans are approved or in the late planning stages throughout southern California. Is Glendora one of these areas? I

"Its limited habitat .... is being taken over by housing tracts and other developments. California Gnatcatchers live in coastal sage scrub (http://www.audubon.org/field-guide/bird/california-gnatcatcher)". The DSEIR claims the gnatcatcher has not been observed on this site. However, Robert A. Hamilton, President, Hamilton Biological, Inc. has observed the species recently on the Gordon Mull property and within about a mile from the project (Robert A. Hamilton, President, Hamilton Biological, Inc., personal communication).

Approximately 7.5 acres of suitable California sagebrush-Californian buckwheat scrub habitat is on the project that would be lost due to construction (DSEIR 4.3-38). Construction of homes in this project would further exacerbate the habitat loss of this species. **This action will violate Glendora Policy CON-9-5.**

Coastal Cactus wren

The Cactus wren (*Campyforhynchus brunneicapillus*) has been observed on site and has nested in the project site. The Coastal Cactus Wren is a resident, non-migratory subspecies of Cactus Wren found only in Southern California. The species is presently listed as a California State Species of Special Concern. Coastal populations of the Cactus Wren are inhabitants of coastal sage scrub, a natural vegetation community of low, semi-woody vegetation found only in coastal and near-coastal portions of the state, generally below 3000 ft. (http://www.prbo.org/calpif/htmldocs/species/scrub/cactus_wren.html).

Because these birds require stands of healthy cactus for nesting, their survival hinges on the health of their shrinking habitat. Unfortunately, wren populations are declining and becoming more fragmented as a result of the loss and degradation of cactus scrub.

Habitat loss, degradation, and fragmentation are the most critical management issues facing this species, problems which have been more recently exacerbated by the 2007 wildfires which burned much of the cactus scrub that they depend on.

The DSEIR indicates the project will result in loss of 7.5 acres of California Sagebrush-California Buckwheat scrub (suitable foraging habitat) and a loss of 1.8 acres of Prickly Pear Scrub (suitable nesting habitat (Fig. 4.3-2). Because of this, impact to the cactus wren will occur. This impact is added to damage already done by early work on the project in the 1990s and unpermitted bulldozing the occurred recently. **This action will violate Glendora Policy CON-9-5.** This habitat loss must be addressed in the final FEIR and project.

Only 193 pairs of Coastal Cactus Wrens were known to occur in all of Los Angeles County in 2011 with ¼, the largest known population in the County occurring in the East San Gabriel Foothills. The recent 5-year drought has undoubtedly reduced populations. This loss is

cumulative with the loss of habitat as other areas of habitat for the cactus wren in the county are slated for development.

Southern California fires have killed cactus plants outright and that, along with brush control, has allowed invasion of non-native and native plants (Hamilton report, July 29, 2016). Removal occurred on the project site without permits in 2014 without oversight of biologist that left highly flammable exotic fountain grass. This is unfortunate since L.A. County approves of *Opuntia littoralis* as a fire-resistant succulent plant.

The Hamilton report (July 29, 2016, page 8) indicates that the DSEIR provides inadequate information to the public about the number of wren pairs present on site and nearby areas to appreciate the severity of the impact of this project to the species by this project and inadequacy of proposed mitigation.

Mitigation plans suggest that off-site or in-lieu fees could be used to offset impacts on the Gordon Mull property. The Puente Hills Native Habitat Authority lands are mentioned as a potential site. How can this mitigation miles away from the damaged area help restore the population of the species in the San Gabriel foothills.

Wildlife Corridors

Mull and Gordon Canyons and ridgetop on the project site run roughly north to south and act as conduits for animals traveling between vastly different habitat types from the mountains to the foothills. The project site acts as a linkage and corridor for larger wildlife species between the relatively natural landscape of the San Gabriel Mountains and the urban areas of Glendora, and eventually to isolated semi-natural areas, as in South Hills.

The DSEIR itself indicates that "implementation of the Modified Project would result in reduced functionality of the wildlife corridor" (DSEIR). The major impact would be along the ridgeline which will be occupied by large footprints of homes, roads, driveways, and patios. This action will violate Glendora Policy CON-9.5 and affect movement of animals between Gordon Mull, the Bluebird Conservancy lands, and South Hills.

Concerns about mitigation measures:

BR4 indicates that prior to the initiation of construction and for the duration of project activities that could affect natural habitat, all new personnel shall attend a "construction Personnel Environmental Awareness Training and Education Program within one week of employment.

After completion of the training they will wear a hard hat with a sticker indicating their attendance in this training program while operating equipment. **We cannot believe that this training will equip the individuals to really be able to identify sensitive habitat or species and know if damage is occurring.** This issue needs to be addressed in the FEIR. On-site monitoring during grading by a biologist must be required.

BR5 states that "if a California gnatcatcher is detected on the project site, the applicant shall initiate coordination with USFWS to determine whether an incidental take permit pursuant the

federal ESA is required". If a gnatcatcher is detected on a lot, and a USFWS permit is not given, will that lot be abandoned for development?

BR6 stipulates that the Modified Project shall be designed to reduce impacts to special status plant species "to the extent feasible". What if mitigation is not feasible and an incidental take permit is not available?

BR13 indicates impacts to "the potential wildlife movement corridors in the Gordon Canyon and Mull Canyon shall be avoided and minimized. What about the ridgeline where all the development will take place which is also a potential wildlife corridor?

BR14 is designed to protect tree species on the project. No indication of number or types of trees that will be taken or impacted is given. Also, measures to protect the trees after purchase should be included in restrictions home owners agree to with property purchase.

A Conservancy alternative:

A primary purpose of the acquisition alternative would be the protection of the coastal sage scrub, cactus scrub and oak woodlands plant communities along with the sensitive and endangered species that reside within this habitat. The type of habitat being protected by an acquisition alternative would support the protected species

Cultural Resources (Section 4.4):

"A Review and Critique of the "Draft cultural resources survey report for the Gordon Mull Subdivision Project, Glendora, Los Angeles County" and the Cultural Resources Section of the Gordon Mull subdivision draft subsequent environmental impact report supplied by E Gary Stickel, the anthropologist for the Kizh Nation of Native Americans is submitted with these comments. This report describes misinformation concerning descriptions of the prehistory of the Gordon Mull area that must be addressed in the FEIR.

Inadequacies of site inspection and the lack of information on archeological information about artifacts found near the project need to be addressed. The "intensive survey" conducted by the SWCA consultants was not adequate. They state that no artifacts were encountered.

Contrary to statements in the SDSEIR, significant sites can be located in steep terrain. Living sites are not the only type of archeological site and sites other than living sites can have significance. In addition, living sites can have other sites of activity in close proximity.

A significant site--the Sassoon site (CA-LAN-339)--is located adjacent to the project area. It is considered the most significant site in the Glendora area. The SDSEIR does not indicate the significance of this site other than to say that Native American groups have indicated the area is highly sensitive and recommend archeological and Native American monitoring of ground-disturbing activities. Comments by Gary Stickel include a letter in the Appendices of the DEIR from Andy Salas that indicates that the project area is "EXTREMELY HIGHLY SENSITIVE". It is "Extremely Sensitive" because of The Ancestral Villages once inhabited this exact location.

The DSEIR claims the Sassone Site is located only 100 meters from the project area. The site was measured again and is only 25 meters from the project site. The owners have collected nearly 800 artifacts and excavations have uncovered and additional 157. The presence of a cog stone at this site indicates the area may be sacred to the Kizh. None of the information is included in the SDSEIR. (Stickel, pg. 12)

In the 1970s, a metate was found approximately 12 feet from the project boundary and a stone pestle was found only 5 about feet from the property line southeast of the Sassone property, immediately adjacent to the Gordon Mull project, The presence of these artifacts so close to the Gordon Mull property makes it highly likely that such resources will be found on the project area. (Stickel comments, page 12).

Comments:

The FEIR must address the following issues:

1. The SDSEIR underplays the cultural significance of the project site. Mitigation must include a certified archeologist on site during excavation and preparation of lots. Calling one in after an artifact is discovered is not adequate. It is unlikely a construction worker would recognize, or even see, the presence of artifacts.
2. The Kizh as well as the Tongva tribal representatives must be consulted about the significance of the Gordon Mull area. Provisions must be made as to who would take possession should any artifacts be found. If discovery of human remains occurs, a representative of the Kizh/and or Tongva tribe/s as well as the County Coroner must be brought in to determine the human remains are properly identified so the "Most Likely Descendant" will be properly notified.
3. A proper study of the site must be made with acceptable spacing of transects before the FEIR is developed.
4. The inadequacy of workers being able to recognize the significance of Native American relicts during clearing and grading, makes the need of an on-site archeologist trained in local Native American tribal activities be on site during grading activities. Stickel contends that should any human remains be found not only must the County Coroner be summoned but that there is also a need for a qualified archeologist to also be involved.
5. Study of the site was inadequate. The grid used is not acceptable.
6. The DSEIR states that "none of the archeological sites is within the project (DSEIR, 4.4-7). However, the nearby presence of relicts on the Sassone site and within a few feet of the project boundary suggest relicts could be encountered during project activities.
7. Paleontology should be in a separate section from Cultural Resources. These are separate disciplines. Paleontology is the study of fossil life while archeology is the study of cultures and their artifacts.

All these issues must be addressed in the FEIR.

Geology and Soils (DSEIR, Section 4.5)

Seismic Hazards

We are disturbed about the potential for damage from seismic events in the project area from surface rupture, ground shaking with resulting landslides, and liquefaction.

According to Appendix G of the CEQA Guidelines, a project would have significant effect on geology and soils if it would: "Expose people or structures to potential substantial adverse effects including the risk of loss, injury or death involving:

- Strong seismic shaking
- Rupture of a known Earthquake Fault Zone as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist or based on other substantial evidence of a known active fault trace.

The **City of Glendora Community Plan 2025 Goal SAF-4** requires the City to protect citizens from loss of life and property during seismic events. Policy **SAF-4.1 requires that new development and infrastructure avoid on-site seismic hazards such as faults, liquefaction zones and landslide areas.** At the State level, the Alquist-Priolo Earthquake Fault Zoning Act (Alquist-Priolo Act) requires that investigations be performed for certain defined "projects" to ensure that they (buildings) are not built across active fault traces.

Of particular concern is potential for movement on the Sierra Madre Fault Zone (SMFZ), a 128 km long thrust fault that cuts through Southern California in the San Gabriel Mountains foothills. A thrust fault results in vertical offset. This fault consists of 8 individual segments. **A 15 km long segment of this fault cuts through the Gordon Mull property, trending west to east across lots 7 and 10 of the Gordon Mull property.** California Geological Survey suggests that offset on such a strand could experience rupture should a major earthquake occur on any other section of the SMFZ or another nearby fault.

Sections of the Sierra Madre Fault Zone are designated as being within Alquist-Priolo zones. If a project is within such a zone, the Act requires that investigations be performed for certain defined "projects" to ensure that they (buildings) are not built across active fault traces and a 500 foot setback for residences.

The strand crossing the Gordon Mull project is not included in an Alquist-Priolo zone. However, the Sierra Madre Fault Zone could break along the local segment or in combination with in combination with or the entire fault**. The DEIR Appendix F indicates that "the risk of ground rupture is considered to be high".**

Investigations show that rock and alluvial materials on this strand have been offset **as recently as about 15,000 years ago; this strand has an estimated recurrence interval of greater than 7,000 years.** (Recurrence interval for movements along a fault is the average time between ruptures of a particular size along that fault, a term that is used to denote the repeat time of major events, usually defined as those which rupture much or all of the length of the fault, and typically resulting in appreciable surface rupture). This strand is not considered active (DSEIR). However, the California Geological Survey (CGS) suggests that "investigations of sites for the possible hazard of surface fault rupture is a deceptively difficult geologic task" since active faults…are complex. **CGS also indicates that in some cases fault rupture can distributed**

across zones hundreds of feet wide. (CGS Guidelines for evaluating the hazard of surface fault rupture Note 49.)

The DSEIR states that the "segments of the fault within Glendora are not considered active" That is unsupported. The Sylmar and San Fernando Earthquakes occurred along segments that were not "considered active". Evaluation of this segment must be thoroughly studied using the most recent information and modeling techniques such as the SCEC Community Velocity Model. .

Appendix III indicates that the zone of deformation in a trench extends 25 feet south of the fault and a minimum setback of 30 feet is suggested. Using this criteria, Lot 7 is designated as an open space park since this offset will not allow for a residence on that pad. However, the DSEIR still claims that with a relocation of the house, a residence can be built on Lot 10.

The policy of the State Geologist, "since 1977 is to position the fault zone boundary about 500 feet (150 meters) away from major active faults and about 200 to 300 feet (60 to 90 meters) away from well-defined, minor faults" (Bryant and Hart, 2007, p.6). **Would a building on Lot 10 meet this criteria? How was the 30 foot set back arrived at?**

A 50 foot setback is commonly mentioned as a starting point for a strand of this type. There is no fault report meeting Los Angeles County or CGA 49 recommendations. The DSEIR suggests a 30 foot offset. There is no basis for this recommendation. Why not a greater distance? This recommendation must be validated.

The DEIR claims that "evidence of recent faulting has not been found along the portions of this fault within Glendora". This statement is unsupported since segments on both sides of the Glendora are considered active. The segment in Glendora has not been adequately studied.

The project site is also located near to other major fault zones in Southern California. The San Andreas Fault Zone and major strands of the Sierra Madre Fault are to the north. An earthquake along the southern section of the San Andreas is considered a likely location for an earthquake within the next few decades.

The General Plan of 2001, Map SAF-3 includes description of the Sierra Madre, Cucamonga and San Andreas Fault Zones. The Puente Hills Thrust must also be considered. This fault, discovered as a result of the Whittier Narrows earthquake in October 1987, could cause major ground shaking in the project and must be thoroughly considered. This fault zone is not included in the General Plan nor in the DEIR.

These and other faults nearby present the potential for ground accelerations that could cause damage to structures as well as slope failures, primarily in fill areas and naturally steep and mechanically steepened slopes. The statement that seismic hazards within the foothill portions of the City are the same as in the Los Angeles Basin are similar are not correct. Seismic risk in steep hillsides and the Basin with deep alluvium are not the same.

Show maximum rotated forces for movement along the Sierra Madre, Puente Hills Thrust and Southern San Andreas. Show potential duration of shaking including vertical accelerations.

The proposed water system will connect the Gordon Mull property to the tank on the Gordon Ranch. Seismic behavior of tanks have long critical periods; the DSEIR must show G forces these tanks would potentially experience along with velocities and displacements. Is the current tank designed to prevent rocking or elephant-footing and sloshing as a result of seismic activity. A certification by an engineer experienced in critical structure tank design is required that the design and construction meets these forces.

The potential exists for impact to critical infrastructure, i.e. roads, fire-fighting water system/tanks. This is of particular concern because of the steep slopes covered with unconsolidated material, the use of high retaining walls, nail walls, the proposed connection to the water tank north of the property.

We believe because of this potential for offset, Lot 10 as well as Lot 7 must remain as open space should the project go forward as either the Preferred Alternative or as the Biological Resource Avoidance Alternative.

The FEIR must consider the potential impact of a break in the local segment but also the impacts if a combination of segments or all experience movement at the same time.

The Biological Resource Alternative would eliminate lots 13-19. **We believe that should this alternative be accepted as the ultimate preferred alternative in the final EIR both lots 7 and 10 must be eliminated.**

Again, the best alternative would either be a No Project alternative or Conservancy alternative, either of which would leave the project site undeveloped with no potential threat from earthquake injury or loss of life.

Geology and Soils—ground failure.

Twelve percent (12.7 %) of the project area is in slope above 35%. Offsite grading is required in area west of Lots 1 and 2 (Fig. 3-9). Maps 3.8 and 3.9 show extensive areas of slope either on pads or building slopes

We are concerned about the stability of the steep slopes on many of these lots. The potential for ground failure due to seismic shaking (particularly during a wet period when unconsolidated material may become saturated, failure of compacted fill areas due to surface loading, failure in the event of high precipitation during a year to produce mudflows, drainage from impermeable surfaces on lots that could cause erosion of slope areas, the potential for mudflows or flooding should a brush fire denude the surfaces of vegetation. The DSEIR concludes that portions of the site are located in an area considered to have a high potential for landslides. Duration of shaking must be considered and an analysis of short period-short duration and and long-period duration data-long period duration.

Slope Stability Analysis Must be performed as part of the EIR process and not delayed until construction is committed.

Slopes in the project area are steep. RHR Zone and Hillside Development regulations in the City of Glendora do not allow grading or building on natural slopes exceeding 35% grade. **No waivers should be granted by the City. The FEIR must address how would these regulations impact any of the alternatives?**

The DEIR Appendix F indicates that cuts may exceed 28 feet or more in some areas and in others on lots 8, 10,11, 12, 13, 14, 15, 16, 17, 18, 19 where cuts would be between 11 and 28 feet. The City of Glendora regulations regarding cut slopes indicates that cut slopes shall be no steeper than 2 feet horizontal to 1foot vertical. Will the developer be able to meet these RHR requirements? If not, **variances must not be accorded**.

The section on retaining walls is hopelessly garbled and it is unclear whether crib walls are still a feature. The statements about retaining wall heights are contradicted by notations on the retaining wall map submitted. Soil nail walls are not mentioned in the hillside ordinance, but they will now be used. Are there any code constraints on where or how they can be built?

Ground water levels vary over time and seasons, particularly with respect for rainfall in the project area. Rising levels can impact slope stability. In the Appendix F, it notes that groundwater levels were not encountered and an evaluation of variable groundwater levels was "beyond the scope of this report". Since steep slopes are covered by unconsolidated materials, impacts of rising subsurface water levels during a particularly wet year must be evaluated. Historical data on groundwater levels must be sought and consideration of the impacts of a 50- or 100-year storm must be made.

The DSEIR Appendix F, pg. 33 claims that because of the surface and underlying rock materials are dominantly impermeable, they assumed that there will be 100% runoff from the pad sites with attendant erosion. However, if the Glendora volcanics are fractured and weathered, infiltration could occur, water could flow along fractures in the underlying Glendora Volcanics to cause saturation and springs on the steep hillsides could result in slope failure. This must be addressed in the FEIR.

DSEIR states "In general, care shall be taken not to overwater slopes and vegetation. Water shall be curtailed in the late Fall to minimum survival levels in anticipation of the rainy season." The FEIR must include a plan for maintenance and identify who will monitor the implementation of these requirements.

The DSEIR (page 4.5-12, No. 8) in a discussion of mitigation requires that "A program for maintenance of slopes shall be developed. Existing and manufactured slopes shall be maintained periodically to reduce the potential for erosion or debris flows. The maintenance plan must be presented in the FEIR and include a plan on how this maintenance will occur.

Increased size of the proposed building sites over the originally proposed project (1990) would necessarily entail additional grading to level the lots. This would contravene the mandate of the

Glendora Hillside ordinance to use stepped foundations wherever possible to avoid excessive grading,

The DEIR (DEIR, Appendix E, pg. 34) notes that soils engineering is a relatively new field and as such, new information is rapidly becoming available. **The report by Krazan and Associates Inc. recommends that their report should remain valid for a maximum of 2 years.** Should the development take place over a longer period, soils evaluations must be repeated. **This recommendation should be included as a stipulation for the development.**

Concerns about Hillside development that must be addressed in the FEIR. The Glendora RHR Zone and Hillside Development regulations does not allow grading or building on natural slopes greater than 35% and structures may not be located within 50 feet horizontally of a ridge. Grading will involve 12.7% of the area of this project on slopes in excess of 35%--the maximum slope the City allows. **Variances from the City would be required for the project.**

We note that grading must also take place outside the property line in the area west of the proposed road and Lots 1 and 2 **(Fig. 3-9).** How does the property owner have access to that area? This must be explained in the FEIR.

The Geotechnical Report must specifically address roads for fire equipment access and emergency exits; one way in and out is not acceptable. If walkways and trails or bike paths are specified, they must be shown.

Public Resources Code Section 4290 requires minimum statewide fire safety standards pertaining to:

- Road standards for fire equipment access;
- Standards for signs identifying streets, roads, and buildings;
- Minimum private water supply reserves for emergency fire use; and Fuel breaks and greenbelts.

Greenhouse Gas (GHG) Emissions (Section 4.6)

The DEIR 4.6-9 claims annual greenhouse gas emissions from the Modified Plan would be less than significant without mitigation. **The analysis, however, does not provide evidence this is accurate.**

The primary anthropogenic sources of the increase of GHG in the atmosphere is the result of burning of carbon fuels, deforestation, soil erosion, and animal agriculture. Page 4.5-2.3 indicates that the project site does not include an existing land use that generates GHG emissions. Vegetation on-site that will be removed act as a carbon sink for these pollutants.

Four concerns must be addressed: 1) The removal of vegetation (a carbon sink) to build project structures, 2) GHG emissions from construction activities 3) the contribution to GHG emissions from residents living in the project areas over the lifespan of the residential area 4) cumulative impacts of this project along with all proposed projects in Glendora.

The DEIR claims the Modified project by itself will not meet the Threshold 4.6-1. However, nowhere are cumulative impacts of all proposed projects in Glendora or the surrounding area addressed.

The City is in the process of developing a Climate Action Plan that was not available to review at the time of the DEIR. If this plan is available by the time the FEIR is completed, concurrence with the Climate Action Plan must be included. Further, the City should ask the developer to include solar energy systems on all these homes, if built, to minimize GHG emissions over the long life of the project.

Hydrology and Water (Section 4.7)

This section includes a description of Landscape Irrigation Practices that will minimize use of water and runoff. These must be stipulations in HOA agreements. Who will ensure these are being followed?

It further (4.7-16) that permeable decomposed granite, or compacted base would be considered for all excess parking areas and bioretention tree filters would be used in landscaping. These must be required.

The DSEIR (App. F, pg. 3) indicates the soil on the site is shallow artificial fill underlain by volcanic bedrock that is described as weathered and very dense. It claims the subject subsurface conditions are not considered conducive to on-site infiltration. However, if the volcanics are weathered and fractured, water could move through existing openings.

The DEIR (Appendix F, pg. 33) claims that because of the surface and underlying rock materials are dominantly impermeable, we must assume that there will be 100% runoff from the pad sites. Materials on natural slopes are mapped as soils covering weathered and fractured volcanics.

The Appendix G indicates that MSL prepared a drainage study for the project. Lot 27 along the west side of Gordon Ranch Road will remain open as will Lot 30, the 3.71 acres of Gordon Ranch road (Appendix G, fig. 2).

There are mapped intermittent streams in the bottoms of Mull and Gordon Canyons with drainage from project areas into either Mull or Gordon Canyons. Steep slopes are found on some lots are present below proposed building pads: Lot 7 (not developed except for park includes slopes up to 63.3%; Lot 18-- 50.1% slope; Lot 14: 40.6% (Appendix G, Sheet C30.1).

App. G, pg. 3 indicates "A large portion of storm water runoff from the project continues to flow via overland sheet flow to the existing Mull and Gordon Debris Basins." However, App. G, pg. 4 claims "that there is no increase to the expected or "tabled" flows for Mull Debris Basin and Gordon Debris Basin. These statements seem to be contradicting.

How would 100 or 50 year floods affect the project and the adjacent drainage basins? The term "100-year flood" is used in an attempt to simplify the definition of a flood that statistically has a 1-percent chance of occurring in any given year. Likewise, the term "100-year storm" is used to define a rainfall event that statistically has this same 1-percent chance of occurring.

Although California is experiencing drought, these conditions hopefully will not be permanent. In fact, the pendulum could swing to the other extreme. In 2011, based on California's history of storms in the past, a simulation, ARkstorm, predicted a winter megastorm will happen sometime. Such a storm might drop as much as 10 feet of rain on California over the course of a single month. Impact of such a storm must be considered. (http://earthsky.org/earth/lucy-jones-on-california%E2%80%99s-coming-megastorm; http://pubs.usgs.gov/of/2010/1312/)

The City MUST state the number of concurrent sprinkler activations that must be supported by the fire-fighting system and the system must be designed and specked to support that number of activations. The current tank may be inadequate to provide for both the Gordon Highlands and Gordon Mull projects.

Additional comments concerning water supplies and issues:

Statements about area of hardscape or impervious areas are confusing. The Executive Summary, App. G, pg. i states that the hardscape/landscape area will be 19.54 acres. However, on page 3-2.2 A, the statement is that "19.54 acres of the undeveloped site will be improved as part of the project as shown on the…map in Figure 3. However, before development, the impervious area is 11 acres (Fig. 2). **Diagrams Fig. 2 and 3 are confusing. Fig. 2: Existing impervious areas currently are denoted as having 11 acres. Fig. 3: Proposed condition with development: Impervious area shown as having 7.3 acres—less than without development? How can this be?**

Since surface runoff should increase due to the increase in impermeable areas, knowing what will actually be impervious areas is important for calculations. How can we know what the designs will be when no designs are available?.

Where is lot 29? (Appendix G, pg. 1).

We have concerns about an increase in overland flow and mudflows resulting due to the impervious hardscape on Lots 2-5. Flow will be down the slopes on the south sides of these lots into a cemented swale that drains into an inlet located north of Country Club Road and Greencroft Ave. Will infiltration from heavy rains cause loss of strength of those slopes and result in mudflows into the backyards of homes into the Country Club and Greencroft Ave. cul de sacs? Stipulations about increasing impervious surfaces after sale should be included in the HOA stipulations.

What are the conditions of site surfaces on natural slopes? Weathered and fractured volcanics could accept infiltration and could cause reduction in strength leading to rock or mudslides or failure of retaining walls, soil-nail retaining walls. Is this possibility addressed in the DSEIR?

Will irrigation systems be required to use sae conserving landscape material? Will a water-wise plant palette be required? All these requirements must be stipulated in HOA agreements.

What are the green areas on Sheet C30.1?

Noise and Vibration (DSEIR, Section 4.8)

Noise

The Modified Design Project includes no design features with regard to noise and vibration (Page 4.8-9). However, **the DSEIR indicates that homes adjacent to the construction will be subject to unacceptable levels of noise and emission that cannot be mitigated.** The DSEIR indicates that sensitive receptors shown in Fig. 4.9-3 are located approximately 50 feet from Lot 1 and the proposed roadway (page 4.8-4).

In addition, as indicated earlier in this document, months of trucks moving up and down the Lone Hill will result in noise, increased traffic, emissions, as well as a danger of accident involving local residents.

Appendix E of the DSEIR further indicates that the underlying rock material in much of the site, the Glendora Volcanics, are "very hard and can present a significant difficulty in excavation" but then also says they are weathered and can be excavated with earth moving equipment. **Which is accurate?**

If these volcanics, including basalts, andesites, and rhyolitic lavas must be excavated, how would this be accomplished? Would local residents suffer from months of jackhammering until all necessary work is done? This possibility must be addressed in the FEIR.

The DSEIR concedes that noise from pneumatic hammer work would go on throughout the almost three-year period predicted for construction or longer because of the phasing of activities. Continuous noise would reach unacceptable levels in areas immediately surrounding the site and would be heard a distance from the site on Conservancy lands, south, east and west of the development.

Comments:

The City of Glendora in the Noise Element of the City General Plan has set quantitative significance thresholds relevant to the Modified Project:

- Would the project generate construction noise that would exceed the ambient noise level by 5dBA L_{eq} or more at a noise-sensitive site. Table 4.8-7, page 4.8-11) indicates that this is so for areas potentially at a distance of at least 800 ft., the maximum calculated in Appendix J, page 1. How will these residents be protected since no real mitigation seems to be planned.
- If there are to be violations of the sound thresholds set by the City, mitigations must be found. **Variances or waivers should not be provided by the City.**

Limits must be placed on the acceptable levels of noise that may be produced during construction. The City must continuously monitor levels with the ability to penalize the builder or stop work should they be exceeded.

Vibration

The DSEIR indicates the primary concern regarding construction vibration relates to damage. The DSEIR specifies that the residence at 309 North Lone Hill Avenue would be affected by

construction activities including the use of a vibratory roller. **The construction of the new roadway would travel within 15 feet of this residence resulting in a vibration level of approximately 0.452 inches per second. This would exceed the 0.3 inches per second significance threshold. (4.8-12)**

The DSEIR also indicates that the residence at 267 North Country Club Road would be the next closest receptor. Vibrations at this site would result from equipment similar to a large bulldozer. The residence is located approximately 25 feet east of construction activity. The vibration level is estimated to be 0.089 inches per second. This estimate is below the threshold of significance. The impact of this activity, without mitigation, would result in significant impact related to construction vibration. (DSEIR, 4.8-13)

The mitigation indicated for the residence at 309 Lone Hill Avenue is to have a qualified structural engineer to survey the existing foundation and other structural aspects of the residence prior to construction activities to establish baseline conditions. After construction of the roadway, a follow-up letter describing damage, if any to the residence. Repairs shall be undertaken and completed in conformance with all applicable codes prior to issuance of any temporary or permanent certificate of occupancy. The DSEIR further claims that since repair work would fix any damage, there are no significant impact. (DSEIR, 4.8-14)

How can the city issue permits for activity that could so potentially damage a residence? How can a city subject its residents to vibrations that might not cause structural damage but cause objects to dance around on shelves, pictures to fall, objects to crash to the floor similar to what might happen during an earthquake?

The DSEIR does not indicate the project would cause any vibration problems at the residence at 267 North Lone Hill since the estimated levels would be below the threshold so does not even propose any mitigation. Even below threshold, this impact must not be allowed.

The roadway must be moved if these problems cannot be resolved or another access to the project found. These concerns must be addressed in the FEIR.

Public Services (DSEIR, Section 4.9)

The DSEIR indicates that public services in the area including wastewater, energy, and solid waste are adequate.

Cumulative impacts of this project and others being considered must be evaluated for impacts to service infrastructure

<u>Water</u>

Two main water lines were previously built—one on the west under Lone Hill Ave. and one to Gordon Highlands on the east side. The line under Lone Hill Ave. will connect to a new line under the new roadway (Gordon Ranch Road) extending north to branch east-west along Ferguson Motorway within the project boundary. **New proposed lines from the Bluebird development on the west and a proposed line from the tanks supplying Gordon Highlands**

to the east will connect to the Gordon Mull line running under Ferguson Motorway. (Fig. 3-16)

The project would complete the fire protection waterline between Gordon Highlands Road and Lone Hill Ave to create a loop system and an **extension of a water line from off-site water tanks north of the project site (Fig. 3-16).**

It is unknown whether the line connecting to the off-site water tank in Gordon Highlands where the lines traverse Glendora Conservancy lands is legal according to agreements made during the sale of the land north of the project to the Glendora Conservancy and across the Bluebird Conservation lands.

Is there an easement from the northeastern edge of the project to the water tank and an easement from Bluebird Highlands to the edge of Lot 16 as indicated on figure 3-16? If there is a recorded, legal agreement with or without a recorded easement, there still is gross lack of clarity. Water construction proposals must receive careful and documented review prior to any implementation of so-called agreement/easement plans.

Legality must be determined before the project plan is finalized and must be addressed in the FEIR. If this line cannot cross Conservancy lands, ZH LLC would be required to build its own water tank on its own property to supply domestic water to the project. If this is necessary, these changes to the project plan need to be made to the project plan in the FEIR. Also, can they legally run the pipleine the existing roads?

However, the question of legality is not the only concern related to the "water loop". Review and verification by CEQA and State Fish & Wildlife are needed to proceed. Of particular concern to conservation organizations, such as Sierra Club and the Conservancies, are the negative impacts and potential loss of endangered species and habitat within the "new or newly interpreted easement". When the easement was introduced and/or recorded, endangered species or threatened species may not have been yet discovered.

Water line construction proposals must receive careful and documented review prior to any implementation of so-called agreement/easement plans. To our knowledge this review/verification has not been done.

Another concern exists relative to water supplies to this project. The City MUST state the number of concurrent sprinkler activations that must be supported by the fire-fighting system and the system must be designed to meet needs to support that number of activations. The current tank may be inadequate. Will additional use of this tank require an upgrade to new codes?

Within the last few years, surveys, documentation, and maps have been produced which show the precise locations of endangered plant species (namely, *Brodiaea filifolia*) within what we are told by the City Staff as proposed water loop construction lands. The Brodiaea findings are further documented and verified by the State Fish & Wildlife Agency.

It should also be noted that the Brodiaea of nearby areas on Gordon Highlands, Gordon Mull, etc. have additional restrictions on takings, construction, and/or negative impacts by adherence to

a 300' boundary "buffer" requirement. This is not a suggestion; State and federal law requirements for construction, development, disturbance protect these endangered species and habitats. **Incidental takings must be permitted.**

Transportation and Traffic (DSEIR, Section 4.10)

The DSEIR (pg. 4.10-1) describes the Highway Capacity Manual, 2000, method used to calculate intersection Level of Service (LOS). LOS is a qualitative measure used to describe the condition of traffic flow, ranging from excellent conditions at LOS A to overloaded conditions at LOS F. LOS D is typically recognized as the minimum acceptable LOS in an urban area.

Existing LOS at Lone Hill Ave. at Route 66 and Lone Hill Ave. at I-210 west bound ramp have existing conditions without the project of LOS E. Lone Hill Ave. at Foothill Boulevard has an LOS without the project of D. These measurements are at AM peak hours. (DSEIR, pg. 4.10-8)

It is estimated that the cumulative levels of LOS with project conditions at Lone Hill at Foothill Blvd. will increase to LOS E at the above sites. (DSEIR, pg. 4.10-12)

The only mitigation planned are management plans and notifications to local residents and notification to the City of street closures, detours, or lane reductions during construction. This is unacceptable.

The addition of traffic from this project will increase traffic above levels that are already above the acceptable levels

The project proposes an extension of the Lone Hill Road from its end and up into the project area as Gordon Ranch Road. The roadway width will vary from 28 feet wide where Lots 1-6 would have frontage and increase to 32 feet where Lots 7,8, and 10 have frontage.

The maps indicating the proposed location of the road on Fig. 3-16 and Fig. 4.10.1 seem to be in conflict. On Fig. 3-16 Gordon Ranch Road is indicated as a direct extension of Lone Hill Ave. On Fig. 4.10.1 the road is indicated to come off Foothill Blvd. Which is accurate? This must be corrected in the FEIR.

The DSEIR indicates that construction activities will take place within 15 feet of the property at 309 North Lone Hill Road. This is **not an adequate setback according to Glendora City codes**.

If it is impossible to construct the road between the property located at 309 North Lone Hill and Lot 1 due to potential for vibration damage, how will the roadway into the property be constructed? What will the impacts be? What will the slopes be for this road? Will they be within hillside development regulations?

Map Fig. 3-8 indicates off-site grading will take place west of the roadway and Lots 1 and 2. How can this occur without permission for the property owner?

We have concerns about access to the project. There are two roadways that connect on map Fig. 3-8 west of Lot 3 and west of the road between Lots 6 and 9. It is our understanding that Gordon Ranch Road was the preferred access into the property in initial proposals back in 1990.

However, private properties blocked the use of this option. Currently those properties are currently offered for sale. Could the project owner, purchase these properties that would allow an alternate access route that would not affect the Lone Hill residents that are to be subject to vibrations and offsite grading. **This alternative must be investigated prior to issuance of the FEIR and the environmental impacts of that option investigated.**

Maximum height of retaining walls is 6 feet visible from the right of way. Map Fig. 3-14 indicates heights of proposed retaining walls; Map Fig. 3-15 shows approved building Pad and Retaining Walls. Along Gordon Ranch Road, these walls commonly exceed 6 feet. West of Lot 2, retaining walls are shown to be 33 feet. Will variances be required from the City for these walls? What alternatives exist if variances cannot be acquired? This problem must be addressed in the FEIR.

Cumulative impacts (DSEIR, Section 4.12)

The DSEIR states that Section 15130 of CEQA requires an EIR to discuss cumulative impacts if "two or more individual effects which when considered together, are considerable or which compound or increase other environmental impacts." (State CEQA Guidelines, Section 15355)

Cumulative impacts of this development will be added to those with others currently being considered by the City. Current plans being considered for development in Glendora include:

Monrovia Nursery Specific Plan: 121 single-family houses.
Gables on 66: 20 single-family houses; 106 townhouses; 1,950 square feet of retail space
Melia Homes Single-Family Subdivision: 2-lot single-family subdivision
Gordon Mull/Glendora Ranch 19-lot single-family subdivision
Carroll Vermont Single-Family: 40 detached condominiums
Arrow Highway Townhomes: 23 two story townhouses
Footthill 533: 44 townhouses
Grand/Route 66 Commercial Remodel
(http://www.ci.glendora.ca.us/departments-services/planning/current-projects)

These projects listed on the Glendora City website seem to be in addition to those listed in the DSEIR. Cumulative impacts of all these projects in addition to those already recently approved must be addressed in the FEIR.

Cumulative impacts that cannot/or would not be mitigated from this project include the following:

- Air Quality: The Modified Project would result in significant and unavoidable air quality impacts during construction and the additional air emissions from activities associated with the homes (DSEIR, 4.12-2). These increases would impact the air pollution in the San Gabriel Valley—a region that has some of the worst air pollution in Southern

California (SCAQMD). **Offsets to mitigate must be within the within the San Gabriel Valley.**

- Aesthetics: The DSEIR contends that this project and others do not have a cumulative impact but rather that the development would "appear as an extension of the existing hillside residential neighborhoods to the east and west. The simulations presented in Section 4.1 do not appear as an extension of existing residential development. The DSEIR claims impacts related to aesthetics would not be cumulatively considerable. We disagree.

  As stated in the "Aesthetics Section" of this document and shown in photographic simulations in the DSEIR, Figs. 4.1-7 through 4.1-9, the project is an obtrusive extension of development on hillsides in an area of country-like development. The City of Glendora has allowed the Blue Bird and Gordon Ranch projects over the years. Glendora touts itself as the "Pride of the Foothills". Similar projects in adjacent cities are also taking place. These cumulative impacts must be included in the FEIR.

  The foothills are disappearing! This project should not be approved.

- Biological Resources: The DSEIR claims cumulative impacts on biological resources with mitigation would not be cumulatively considerable. The project will impact habitat for the Cactus wren as cactus vegetation on the high parts of the property will be the sites of the new homes. Protected species and their habitat will be impacted by homes, and, although the DSEIR claims corridors will remain open for animal movements, travel along the ridgeline will be obstructed. And if movement does occur in those areas, there will be complaints to the City about the presence of the wildlife.

  These impacts have a cumulative relationship with other foothill development not only in Glendora but in nearby cities and, in fact with the Southern California region where projects are eliminating sensitive habitats. These cumulative impacts must be evaluated in the FEIR.

- Geology and Soils: These impacts are typically site and project specific and have been addressed earlier in this document.

- Greenhouse gas emissions: Emissions from this project would be added to the overall pollutant loads from within the Southern California region. All SCAQMD regulations, Federal and State regulations must be followed.

- Noise and vibration: These are typically site specific for construction impacts, but additional traffic caused by the project will be added to local streets and cumulative to other projects proposed in the area. Are there currently other proposed developments in the area? If so, cumulative impacts must be addressed in the FEIR. The projects

currently listed on their website do not correspond to proposed City projects listed in the DSEIR.

- Transportation and Traffic: The addition of traffic from this project will increase traffic above levels that are already above the acceptable levels

Existing LOS at Lone Hill Ave. at Route 66 and Lone Hill Ave. at I-210 WB ramp have existing conditions without the project of LOS E. Lone Hill Ave. at Foothill Boulevard has an LOS without the project of D. These measurements are at AM peak hours. (DSEIR, pg. 4.10-8)

It is estimated that the cumulative levels of LOS with project conditions at Lone Hill at Foothill Blvd. will increase to LOS E at all of the above sites. (DSEIR, pg. 4.10-12)

The only mitigation planned is during construction times with management plans and notifications to local residents and notification to the City of street closures, detours, or lane reductions. This is unacceptable.

- This project is proposed as a gated community. Will the public have access to the trails in the open area and access to Glendora Conservancy lands—an impact that affects all residents of the City.

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