

RESOLUTION NO. 2012-07

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF MONROVIA, CALIFORNIA, CERTIFYING THE FINAL ENVIRONMENTAL IMPACT REPORT FOR THE HILLSIDE WILDERNESS PRESERVE AND HILLSIDE RECREATION AREA RESOURCE MANAGEMENT PLAN, MAKING CERTAIN FINDINGS OF FACT AS REQUIRED BY THE CALIFORNIA ENVIRONMENTAL QUALITY ACT ("CEQA"), ADOPTING THE MITIGATION MONITORING AND REPORTING PLAN AND ADOPTING THE HILLSIDE WILDERNESS PRESERVE AND HILLSIDE RECREATION AREA RESOURCE MANAGEMENT PLAN

THE CITY COUNCIL OF THE CITY OF MONROVIA HEREBY FINDS, RESOLVES AND ORDERS AS FOLLOWS:

Section 1: The City of Monrovia ("City") has prepared the Hillside Wilderness Preserve and Hillside Recreation Area Resource Management Plan ("RMP") to guide long-term management for the 1,416 acre Project Area located in the foothills of the San Gabriel Mountains, within the northern portion of the City (the "Project"). The major goals of the RMP are to preserve, maintain, and enhance the Hillside Wilderness Preserve and Hillside Recreation Area, and its objectives include enhancing wildlife habitats, developing vegetation management practices, and providing safe low-impact recreational opportunities and public access.

Section 2: In accordance with Section 15063(a) of the CEQA Guidelines, the City prepared an Initial Study to analyze and identify the potential environmental impacts of the proposed RMP. The Initial Study determined that a number of environmental issue areas might be impacted by project implementation. On the basis of the Initial Study, it was determined that the proposed project could have a potentially significant impact on the environment; therefore, the preparation of an Environmental Impact Report was required, pursuant to CEQA Guidelines Section 15064.

Section 3: On November 4, 2010, the City of Monrovia circulated a Notice of Preparation (NOP) pursuant to provision of Section 15082 of the CEQA Guidelines. The NOP was sent to public agencies, special districts, and members of the public for a 37-day period commencing November 4, 2010, and ending December 10, 2010, to solicit input regarding the scope and content of the environmental information to be included in the EIR. An advertised public scoping meeting in association with the publication and distribution of the NOP was held on November 17, 2010.

Section 4: Pursuant to CEQA Guidelines Section 15084, a Draft Environmental Impact Report (DEIR) was prepared for the proposed project and was circulated for public and agency comment from August 1, 2011, through September 29, 2011, pursuant to CEQA Guidelines Section 15087.

Section 5: In accordance with Sections 15085(a) and 15087(a)(1) of the CEQA Guidelines, the City, serving as Lead Agency, published a Notice of Availability of a Draft EIR and has made available for public review copies of the DEIR. The Notice of Availability of the DEIR was also filed with the Los Angeles County Clerk and posted for the period required by Section 15087(d) of the CEQA Guidelines. A Notice of Completion (NOC) was prepared and transmitted to the State Clearinghouse. The City also sent notices to all organizations and individuals who have previously requested such notification.

Section 6: In response to the circulation of the DEIR, the City received written and oral comments regarding the DEIR. The City has prepared written responses to all comments that raised significant environmental issues. Comments unrelated to the adequacy of the DEIR or environmental issues are being forwarded to the City Council for their review and consideration. The City has incorporated the relevant comments and the City's responses into the Final Environmental Impact Report (FEIR). After the close of the public comment period, the City received additional written comments from Arthur L. Kassan regarding the Traffic section of the FEIR. Although not legally required to do so, the City's Traffic Engineer prepared a written response to Mr. Kassan's comments and revised the trip generation discussion in the FEIR relating to the Cloverleaf Drive area by correcting the numbers of vehicle trips potentially generated by the Project. This relatively minor revision did not affect the conclusions of the FEIR that traffic impacts were less than significant for the reasons set forth in the City Traffic Engineer's response. However, the FEIR is ordered revised as indicated in the letter from Infrastructure Engineers dated February 3, 2012, and Mr. Kassan's comments and the City's responses are hereby incorporated into the FEIR.

Section 7: The NOC also provided public notice of the public comment meeting held by the Planning Commission on November 9, 2011. At the meeting, the Planning Commission reviewed the Final EIR ("FEIR") for the proposed project and all interested persons were given an opportunity to be heard. The FEIR is comprised of the DEIR, including any revisions thereto and appendices; the list of persons, organizations, and public agencies which commented on DEIR; the comments which were received by the City regarding the DEIR, and the City's written responses to all comments that raised significant environmental issues, which were submitted to the City during the period for public review and comment and, in the case of Mr. Kassan's letter and the City's response, following the end of the comment period. The City has prepared a Mitigation Monitoring and Reporting Program to implement the mitigation measures set forth in this FEIR. The FEIR has been timely distributed to commenting agencies as required by law. Following the Planning Commission's review of the FEIR, the Planning Commission recommended that the City Council certify the EIR as being legally adequate and prepared according to CEQA through the adoption of Planning Commission Resolution 2011-06, which is incorporated by reference into this Resolution and the record of this proceeding.

Section 8: The City Council hereby adopts the Statement of Facts and Findings Regarding Environmental Effects attached hereto as Exhibit A and incorporated herein by

this reference. The findings of fact made in this Resolution are based upon the information and substantial evidence set forth in the FEIR, as defined in Sections 6 and 7 above, and upon other substantial evidence that has been presented in the record of this proceeding. The FEIR for the Project, the Mitigation Monitoring and Reporting Program, other documents, staff reports, technical studies, appendices, specifications, and other materials that constitute the record of proceedings on which this Resolution is based are on file and available for public examination during normal business hours in the Office of the City Clerk of the City of Monrovia, 415 South Ivy Avenue, Monrovia, CA 91016-2888. The custodian of said records is the City Clerk of the City of Monrovia.

Section 9: The City Council finds that the public and government agencies have been afforded ample notice and opportunity to comment on the DEIR, and comments received from the public and government agencies were addressed adequately.

Section 10: The City Council considered the FEIR at a duly-noticed public meeting on February 7, 2012, at which evidence, both written and oral, was presented and received. The City Council hereby finds, pursuant to CEQA Guidelines Section 15084(e), that the FEIR has been independently reviewed and analyzed by the City and its Staff, and that said documents represent the independent judgment of the City as lead agency with respect to the Project. The City Council further finds that the additional information provided in the staff reports, the FEIR, the corrections and modifications to the Draft EIR made in response to comments, and the evidence presented in written and oral testimony presented to the City Council meeting does not represent significant new information so as to require re-circulation of any portion of the EIR pursuant to Public Resources Code Section 21092.1.

Section 11: The City Council has reviewed and considered the information contained in the FEIR and in the exercise of its independent judgment and analysis hereby certifies that the FEIR for the Hillside Wilderness Preserve and Hillside Recreation Area Resource Management Plan (State Clearinghouse #2008081097) has been completed in compliance with CEQA, the CEQA Guidelines, and the City's local CEQA Guidelines as applicable.

Section 12: The City Council has reviewed and considered the Mitigation Monitoring and Reporting Program for the Project attached hereto as Exhibit "B" and incorporated herein by this reference. In the exercise of its independent judgment and analysis, the City Council finds that the Mitigation Monitoring and Reporting Program was completed in compliance with CEQA, the CEQA Guidelines, and the City's local CEQA Guidelines as applicable, and adopts the Mitigation Measures imposed therein as conditions of approval of the Project.

Section 13: The City Council hereby adopts the Hillside Wilderness Preserve and Hillside Recreation Area Resource Management Plan as recommended by the Community Services Commission, set forth as Option 5 in the Staff Report. Specifically, the Minimalist Plan identified as Alternative 2 in the FEIR is adopted, along with the further limitations on the opening of the Lower Clamshell Motorway containing Braunton's milk vetch until it is

verified that the full mitigation measures identified in the FEIR are implemented. This Alternative results in less intense environmental impacts, as indicated in the FEIR and Exhibit "A."

Section 14: The City Clerk shall certify to the adoption of this Resolution and cause all necessary notices to be filed and posted.

PASSED, APPROVED, AND ADOPTED this 7th day of February, 2012.

AYES:
NOES:
ABSTAIN:
ABSENT:

BY:

Mary Ann Lutz, Mayor

ATTEST:

APPROVED AS TO FORM:

Alice D. Atkins, CMC, City Clerk

Craig A. Steele, City Attorney

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EXHIBIT "A"

**FACTS AND FINDINGS
REGARDING THE ENVIRONMENTAL
EFFECTS FOR THE HILLSIDE WILDERNESS PRESERVE AND HILLSIDE
RECREATION AREA RESOURCE MANAGEMENT PLAN (RMP)**

SCH # 2008081097

Lead Agency:

City of Monrovia

Community Services Department

119 W. Palm Ave.

Monrovia, CA 91016

February 2012

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STATEMENT OF FACTS AND FINDINGS

1.0 INTRODUCTION

The California Environmental Quality Act (CEQA) requires that a Lead Agency issue a set of findings, also referred to as “The Statement of Facts and Findings,” where the Lead Agency identifies the significant impacts, presents facts supporting the conclusions reached in the analysis, makes one or more of three findings for each impact (identified below), and explains the reasoning behind the agency’s findings. For projects with that will generate at least one significant and unavoidable impact, the Lead Agency must issue a “Statement of Overriding Considerations.” Where a project will cause unavoidable significant impacts, the Lead Agency may still approve the project where its benefits outweigh the adverse impacts. As discussed in Section 7.0, below, no significant and unavoidable impacts would occur with implementation of the proposed Hillside Wilderness Preserve and Recreation Area RMP (the “Project”), as reflected in the Final Environmental Impact Report (EIR) for the Project. Thus, no “Statement of Overriding Considerations” is required for the Project.

1.1 CERTIFICATION

In accordance with CEQA Guidelines Section 15090, the City of Monrovia (the “City”), as Lead Agency for the Project, certifies that:

- (a) The Final EIR for the Project has been completed and processed in compliance with the requirements of CEQA;
- (b) The Final EIR was presented to the City of Monrovia who, as the decision making body for the Project, reviewed and considered the information contained in the Final EIR prior to approving the Project; and
- (c) The Final EIR reflects the City’s independent judgment and analysis.

The City has exercised independent judgment in accordance with Public Resources Code Section 21082.1(c) in retaining its own environmental consultant, directing the consultant in preparation of the EIR, as well as reviewing, analyzing, and revising material prepared by the consultant.

These Findings have been prepared in accordance with CEQA and the CEQA Guidelines. The purpose of these Findings is to satisfy the requirements of Public Resources Code Section 21081 and Sections 15090, 15091, 15092, 15093, and 15097 of the CEQA Guidelines, in connection with the approval of the Project.

Before project approval, an EIR must be certified pursuant to Section 15090 of the CEQA Guidelines. Prior to approving a project for which an EIR has been certified, and for which the EIR identifies one or more significant environmental impacts, the approving agency must make one or more of the following findings, accompanied by a brief explanation of the rationale, pursuant to Public

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Resources Code Section 21081 Section 15091 of the CEQA Guidelines, for each identified significant impact:

- (1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.
- (2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
- (3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

The City has made one or more of the specific written findings above regarding each significant impact associated with the Project. Those findings are presented in Section 6.0, below, along with a presentation of facts in support of the findings. Concurrent with the adoption of these findings, the City adopts the Mitigation Monitoring and Reporting Program (MMRP) as presented in Chapter 4.0 of the Final EIR.

Section 15092 of the CEQA Guidelines states that after consideration of an EIR, and in conjunction with the Section 15091 findings identified above, the lead agency may decide whether or how to approve or carry out the project. The lead agency may approve a project with unavoidable adverse environmental effects only when it finds that specific economic legal, social, technological, or other benefits of the proposed project outweigh those effects. Section 15093 requires the lead agency to document and substantiate any such determination in a “Statement of Overriding Considerations” as a part of the record. Since the Project would not result in any significant and unavoidable impacts, no “Statement of Overriding Considerations” is required for the Project.

As required by CEQA, the City expressly finds and certifies that the EIR was reviewed and information contained in the EIR was considered prior to approving the proposed Project. Based upon its review of the EIR, the Lead Agency finds that the EIR is an adequate assessment of the potentially significant environmental impacts of the proposed Project, represents the independent judgment of the Lead Agency, and sets forth an adequate range of alternatives to this project.

In accordance with the provisions of CEQA and the CEQA Guidelines, the City adopts these Findings as part of its certification of the Final EIR. A brief explanation of the rationale for each finding is provided in Sections 6.0 to 10.0, below.

2.0 DESCRIPTION OF PROJECT PROPOSED FOR APPROVAL

The purpose of the RMP is to: 1) document current natural and man-made conditions within the Project Area; 2) evaluate challenges and opportunities offered by the Project Area; and 3) provide a management plan that will guide stewardship of the Project Area, protect important natural resources, and where appropriate, recommend appropriate recreation opportunities. The RMP was developed using core values established by the community and approved by the Community Services Commission in 2005 as a framework. These values relate to:

- Natural Resources-Environmental and Viewshed Preservation
- Passive Recreation
- Outdoor and Nature Education
- Fire Safety

The RMP identifies Goals and Objectives, including those established by the community and the Community Services Commission, which are based on the core values. The major goals are to preserve, maintain, and enhance the Hillside Wilderness Preserve and Hillside Recreation Area. In general, the various objectives in the RMP are focused on enhancing wildlife habitats, developing vegetation management practices, and providing safe, low-impact recreational opportunities and public access. Further, the RMP includes management strategies to protect, manage and enhance natural, geologic, cultural and visual resources. In particular, the management focus will be to regularly monitor wildlife and vegetation to ensure that visitors and other activities in the Project Area are not having an adverse impact. Regular on-going monitoring will occur for the wildlife, plant communities, and visual and cultural resources identified in the RMP. If it is determined that in the process of providing safe and enjoyable passive recreation opportunities, the resource values are being adversely impacted, the recreational activities will be reevaluated to assess means to minimize the impact. Examples could include implementing seasonal trail closures, and/or examining timing and/or eliminating specific recreation or maintenance activities to reduce or minimize impacts.

3.0 ENVIRONMENTAL REVIEW PROCESS AND PUBLIC PARTICIPATION

Pursuant to CEQA Guidelines Section 15063, the City prepared an Initial Study which concluded that the Project could result in potentially significant environmental impacts and an EIR would be required. The City circulated a Notice of Preparation (NOP) of a Draft EIR for the Project to the State Clearinghouse and interested agencies and persons indicating the Initial Study would be available for at least a 30-day review period from November 4, 2010, to December 10, 2010. The City extended the required 30-day public review period to a 37-day review period. A public scoping meeting was held November 17, 2010. Comments received on the NOP were considered in the preparation of the Draft EIR.

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The Draft EIR was made available to various public agencies, citizen groups, and interested individuals for a 60-day public review period from August 1, 2011, through September 29, 2011. Two community meetings were held by the City to inform the public about the Draft EIR review and comment process on August 30, 2011 and September 21, 2011. The Draft EIR was circulated to state agencies for review through the State Clearinghouse of the Governor's Office of Planning and Research. Copies of a Notice of Availability (NOA) of the Draft EIR were also sent to citizens surrounding the Project site, interested groups, and agencies. Copies of the Draft EIR were available for review at the: Monrovia Community Center -- 119 West Palm Avenue; Monrovia City Hall -- 415 South Ivy Avenue; Monrovia Public Library -- 321 South Myrtle Avenue; and the City of Monrovia website www.cityofmonrovia.org.

Following public review of the Draft EIR, a Final EIR was prepared that includes responses to all comments received on the Draft EIR, corrections and additions to the EIR, and a Mitigation Monitoring and Reporting Program (MMRP). The Final EIR document dated November 2011, in conjunction with the August 2011 Draft EIR, which is bound separately, constitute the Final EIR for the Project.

4.0 EFFECTS DETERMINED TO BE LESS THAN SIGNIFICANT IN THE INITIAL STUDY/NOTICE OF PREPARATION

The City of Monrovia conducted an Initial Study to determine significant effects of the Project. In the course of this evaluation, certain impacts of the Project were found to be less than significant. The effects determined not to be significant and the supporting analysis provided in Appendix A, *Initial Study and Notice of Preparation*, in the Draft EIR.

AESTHETICS

Would the Project:

Have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. A scenic vista generally provides focal views of objects, settings, or features of visual interest; or panoramic views of large geographic areas of scenic quality, primarily from a given vantage point. Scenic vistas are generally associated with public vantages. A significant impact may occur if the Project introduced incompatible visual elements within a field of view containing a scenic vista or substantially altered a view of a scenic vista.

The Project Area consists of approximately 1,416 acres of wilderness and recreational land within the foothills of the San Gabriel Mountains. Due to the varied topography within the Project Area, numerous points within the upper reaches of the Project Area offer scenic views of the San Gabriel Valley. Views from the Project Area, including vista points along the Lower Clamshell Motorway, provide high quality panoramic views of the surrounding urban development in the San Gabriel Valley to the south and the undeveloped wilderness of the San Gabriel Mountains to the north. Also, from within the San Gabriel Valley, long-range views of the Project Area are considered valued public views.

At the Highland Day Use Area, the Project may include a 10-space parking lot and up to eight (8) picnic tables. In addition, the Cloverleaf Day Use Area may include: a restroom facility, nature center; native plant restoration garden; and upgrades to the Wilderness Fire Station, including an emergency helicopter landing pad. Both day use areas would be located at the base of the foothills within the Project Area and not visible from long-range vantages. Each day use area would be accessed from the terminuses of local residential streets. Views of the day use areas would be limited to those available at the terminuses of the local residential streets. The adjacent residential properties are not oriented towards the day use areas. Because of the orientation of the adjacent residential uses, views from adjacent residential properties of the day use areas would not substantially altered. Further, based on the location of the day use areas at the base of the foothills and the fact that neither day use area comprises a substantial visual component of long-range, panoramic views from a significant public vantage point, neither day use area is considered to be located within a scenic vista. In addition, the features within the day use areas would not obstruct views of a scenic vista. As such, no impacts to scenic vistas would occur within the day use areas.

The Project is also considering other limited physical improvements such as gates at entryways, informational signs/kiosks, and a trails system network. Given the limited size and scope of the trail components or physical improvements, none of these features would comprise a substantial visual component of the Project Area or substantially alter the visual character of the Project Area such that adverse effects to long-range views of the Project Area would occur. In addition, management strategies have been included in the RMP to protect visual resources, including: identifying key resources and employing sensitive and appropriate design and maintenance strategies to ensure their protection and preservation (See Section 5.2.1 and 6.4 of RMP). Implementation of the RMP management strategies would ensure that future improvements are

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sited appropriately to minimize visual impacts. Further, by protecting and enhancing natural habitats, the RMP would improve existing disturbed scenic vistas through habitat restoration and exotic vegetation management, which could result in a beneficial visual impact to currently disturbed areas. In addition, the Project identifies various vista points throughout the Project Area (refer to Figure A-5). The vista points are proposed as suitable sites that might accommodate specified capital enhancements such as picnic tables, benches and/or interpretive signage to promote views of scenic vistas available from the Project Area. Therefore, the potential impacts regarding scenic vistas are less than significant and may be beneficial given the application of the management strategies and amenities that could be provided at the vista points.

Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a city-designated scenic highway?

Less Than Significant Impact. No State designated scenic highways are located within or adjacent to the Project Area. Regardless, the Project's contemplated physical improvements and trail system components are limited in size and scope and would be implemented in a manner that would avoid or strictly limit removal of trees, avoid direct or indirect impacts on cultural resources (refer to Response Nos. V. a-d, below) and avoid adverse effects on important natural features. Thus, the Project would not result in substantial damage to trees, rock outcroppings, or historic buildings valued for their aesthetic qualities. A less than significant impact would occur regarding scenic resources.

Substantially degrade the existing visual character or quality of the site and its surroundings?

Less Significant Impact. The visual quality and character of the 1,416-acre Project Area is diverse, ranging from steep hillsides and deep canyons to built features. Although the Project Area is largely undeveloped land with native habitat, it also includes a developed park (Canyon Park), Trask Boy Scouts Camp, Sawpit Reservoir, a Wilderness Fire Station (no fire-related apparatus), several private inholdings, disturbed areas dominated by ornamental and agricultural plantings, a former nursery area (no existing structures), nonnative weed species, and unpaved roads and trails that are currently used by pedestrians, bicyclists, and a few motorized fire, utility and private vehicles.

At the Highland Day Use Area, the Project may include a 10-space parking lot and up to eight (8) picnic tables. The parking lot would be located at the terminus of Highland Place, which is an existing paved roadway. The Highland Day Use Area currently includes a paved access road that traverses through the area. The addition of a parking lot and picnic tables would not meaningfully change the visual character of the area and would be compatible with the adjacent Highland Place roadway and existing access road through the area.

The vegetation of the area proposed for the Cloverleaf Day Use Area consists entirely of disturbed/ornamental landscaping. Existing improvements within the day use area include the Wilderness Fire Station and an access road (Lower Clamshell Motorway). No unique aesthetic features or scenic resources are located in the day use area. Single family residences are located

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south of the day use area and undeveloped land within the Project Area surrounds the day use area to the north, east and west. The day use area including such features as the nature center, native plant restoration garden, and upgrades to the Wilderness Fire Station (including helicopter landing pad) would alter the existing visual character of the area. However, the structures in the day use area would be developed at a compatible height, size and mass with the existing single family-residential uses to the south, as well as the existing fire station. The new structures would be designed to be cohesive with the natural surrounding aesthetic character of area. Furthermore, management strategies have been included in the RMP to protect visual resources, including: employing sensitive and appropriate design strategies to ensure their protection and preservation (See Section 5.2.1 and 6.4 of RMP). Overall, the features in the Cloverleaf Day Use Area would be visually compatible and consistent with the surrounding area and residences, and would not degrade the character of the area.

The Project also considers other limited physical improvements such as gates at entryways, the addition of informational signs/kiosks, and a trails system network. Given the limited size and scope of the Project's trail components or physical improvements, none of these features are expected to substantially degrade the existing visual character or quality of the site. Signs would be made of durable material that is visually compatible with the natural setting of the Project Area (See Section 7.1 of RMP). Aging existing gates would be replaced with new gates to provide consistency for entryways into the Project Area. Proposed maintenance of trails, roads and signs, erosion control, and fuel reduction activities could have an impact on the visual character or quality of the site by removing vegetation in some areas and/or installing structures to stabilize slopes. However, such impacts would be limited in scope. Many of these activities would be temporary, occurring only during the maintenance period. As discussed in Response No. 1.a above, the RMP contains management strategies designed to protect and enhance visual resources. Further, by protecting and enhancing natural habitats, the RMP would improve existing disturbed scenic vistas through habitat restoration and exotic vegetation management. Implementation of management actions pertaining to visual resources and habitat enhancement described in the RMP would benefit the existing visual character and quality of the site and its surroundings.

Overall, less than significant impacts regarding visual character or quality of the site and its surroundings would occur with project implementation.

Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. Minimal nighttime lighting currently exists at a few facilities in the Hillside Recreation Area, such as the Canyon Park Nature Center and restrooms. Nighttime lighting is limited to flashlights and campfires from campers at the Trask Boy Scouts Camp. Implementation of the Project would not include development of new facilities that would create new sources of light or glare with the exception of facilities at the Cloverleaf Day Use Area. Low-level lighting similar to the adjacent single-family residential used for way finding and security purposes may be provided for the structures within the Cloverleaf Day Use Area. Such lighting would be provided as "dark sky" fixtures directing light down to where it is needed and light would not trespass onto

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adjacent properties. In addition, the Project would not introduce glare to the area as the proposed structures and facilities would not be built with glaring materials. Thus, lighting and building materials associated with the Project would be compatible with surrounding land uses and would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Overall, light and glare impacts would be less than significant.

AGRICULTURE AND FORESTRY RESOURCES

Would the Project:

Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

Or

Conflict with the existing zoning for agricultural use, or a Williamson Act Contract?

No Impact. There are no prime or unique farmlands or other agricultural operations within the Project Area that would be impacted by implementation of the Project. In addition, the Project would not conflict with the existing zoning for an agricultural use, or a Williamson Act Contract. Thus, no impact would occur in these regards.

Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 1220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

No Impact. Project implementation would not result in changes to or cause rezoning of forest land, timber land or timberland zoned for Timberland Production. In addition, the Project Area does not include areas zoned or utilized for timberland production. Thus, no impact would occur in this regard.

Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. No forest land exists in the Project Area. As such, the Project would not result in the loss of forest land or conversion of forest land to non-forest use and no impact would occur in this regard.

Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact. As discussed above, the Project would not result in a conversion of farmland or forest land to a non-agricultural or non-forest use. No impact would occur in this regard.

AIR QUALITY

Would the Project:

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Conflict with or obstruct implementation of the AQMP or Congestion Management Plan?

No Impact. The South Coast Air Quality Management District (SCAQMD) is required, pursuant to the Clean Air Act (CAA), to reduce emissions of criteria pollutants for which the SoCAB is in non-attainment. The Project would be subject to the SCAQMD's 2007 Air Quality Management Plan (AQMP). The AQMP contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG).

SCAG is the regional planning agency for Los Angeles County and addresses regional issues relating to transportation, the economy, community development and the environment. SCAG prepares the Regional Transportation Plan (RTP), which forms the basis of the land use and transportation control portions of the AQMP. SCAG's RTP is utilized in the preparation of the air quality forecasts and the air quality consistency analysis that is included in the AQMP.

A project is consistent with the AQMP if it is consistent with the population, housing and employment assumptions which were used in the development of the AQMP. The 2007 AQMP, the most recent AQMP adopted by the SCAQMD, incorporates SCAG's RTP socioeconomic forecast projections of regional population and employment growth. The Project would not result in an increase in jobs, and therefore is not expected to exceed AQMP projections. Because it would not affect population or employment, the Project is consistent with the population forecasts for the subregion as adopted by SCAG. Because the Project is consistent with the SCAQMD's projections incorporated into the AQMP, it can be concluded that the Project would be consistent with the projections in the AQMP.

Based on the above discussion, implementation of the Project would result in no impact related to implementation of the applicable air quality plans.

Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less Than Significant Impact. The Project site is located within the SoCAB, which is characterized by relatively poor air quality. State and federal air quality standards are sometimes exceeded in many parts of the SoCAB, including those monitoring stations nearest to the Project location. The Project would contribute to local and regional air pollutant emissions. SCAQMD regional and local significance thresholds for construction and operation were used. Based on the following analysis, implementation of the Project would result in less than significant impacts relative to the daily significance thresholds for criteria air pollutant construction emissions established by the SCAQMD.

Construction Impacts

The SCAQMD has established daily significance thresholds that address pollution sources associated with general construction activities, such as the operation of on-site construction equipment, fugitive dust from site grading activities, and travel by construction workers. Project construction emissions were calculated using the URBEMIS2007 emissions inventory model,

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originally developed by the California Air Resources Board (CARB). The analysis assumed that construction activities would comply with applicable portions of SCAQMD Rule 403 regarding the control of fugitive dust.

Depending upon the options the City Council chooses, construction of individual trail components may commence as early as summer 2011. For all trail components and facilities proposed as part of the Project that is ultimately adopted, construction of individual projects would occur as funding and resources become available over time with the duration of construction dependent on individual project types. However, for purposes of this environmental review, it is anticipated that construction of facilities within the Cloverleaf Day Use Area would occur over an approximate 12 month period. Construction of facilities within the Cloverleaf Access Area would occur over an approximate three (3) month period. And, construction of facilities within the Highland Day Use Area would occur over an approximate six (6) month period. Trail maintenance and improvements will take place intermittently but would not be expected to use large heavy equipment.

Construction emissions are presented in Table B-1, *Regional and Localized - Unmitigated Construction Emissions*, in the Initial Study under conservative assumptions, which imply a default equipment mix and a worst-case construction schedule. As indicated therein, the incremental increase in emissions from Project construction activities would fall below SCAQMD significance thresholds for both localized and regional emissions. Details of this analysis are available in Appendix C, Air Quality Data, of this document.

The SCAQMD's localized significance thresholds (LSTs) represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal and state standards. As demonstrated in Table B-1, the incremental increase in emissions from the Project's construction would be below SCAQMD LSTs. In addition, the construction activities would comply with SCAQMD Rule 403 requirements for dust suppression, which would limit emissions of particulate matter. Therefore, construction activities are not expected to cause or contribute to a significant increase in the concentration of criteria pollutants.

Localized emissions refer to the on-site air quality, and regional emissions refer to the ambient conditions surrounding the site. Therefore, pollutant emissions associated with construction activities would be less than significant, and no mitigation measures are necessary.

Operational Impacts

The Project's contemplated improvements include an enhanced trails network, a nature center, a native plant restoration garden, and improvements to the existing wilderness fire station. The nature of this Project is to maintain and enhance the biodiversity and enhance recreational activities/opportunities within the Project Area. Localized operational emissions are expected to be minimal as the Project would not contain on-site stationary combustion equipment. As shown in Table B-2 of the Initial Study, localized operational emissions are less than significant. Thus, the Project would not result in new long-term stationary sources, nor would it result in a significant number of net new vehicular trips. As such, the Project would not have a less than significant impact on regional air quality.

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The SCAQMD recommends a hot-spot evaluation of potential localized carbon monoxide (CO) impacts when vehicle to capacity (V/C) ratios are increased by two percent or more at intersections with a level of service (LOS) of D or worse. Based on a trip generation assessment prepared for the Project, under existing conditions the Project Area generates 29 daily vehicular trips during peak weekend conditions. Under future with Project peak weekend conditions, the Project Area would generate 75 daily vehicular trips. Due to the minimal amount of peak weekend vehicular trips and the nature of the Project, a CO hotspots analysis is not required according to SCAQMD guidelines. Therefore, no additional analysis of this issue is necessary, and it is concluded that the project would not cause any new or exacerbate any existing CO hotspots. Accordingly, impacts related to localized mobile-source CO emissions would be less than significant. As shown in Table B-2, pollutant concentrations resulting from Project operation would not exceed SCAQMD localized thresholds. Therefore, localized air quality impacts would be less than significant.

Based on the above, construction and operation of the Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Therefore, impacts would be less than significant.

Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?

Less Than Significant Impact. Although the Project results in an increase in short-term emissions related to construction and minor increases in long-term emission related to continued recreational uses and support services, the regional emissions, as presented in Tables 1 and 2, for those pollutants and precursors for which the Basin is non-attainment are less than the applicable SCAQMD thresholds. These thresholds are designed to assist the region in attaining the applicable State and national ambient air quality standards and apply to both primary (criteria and precursor) and secondary pollutants (ozone). Although the Project site is located in a region that is in non-attainment for ozone, PM10, and PM2.5, the emissions associated with the Project would not be cumulatively considerable as the emissions would fall below SCAQMD thresholds. Therefore, impacts would be less than significant in this regard.

Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. The Project consists of several construction sites spread throughout the park area. Nearby sensitive receptors to each of these areas were identified. The closest receptors are located approximately 50 feet south of the Highland Day Use Area. The SCAQMD LST look-up tables allow for a minimum receptor-source distance of 82 feet (25 meters). For receptors located closer than 82 feet, the threshold for 82 feet shall be used according to SCAQMD guidance. Thus, to simplify the analysis, localized impacts were conservatively assessed at this distance (82 feet or 25 meters) for all construction activities regardless of location or actual source-receptor distance. As described in Response No. III.b. above, construction and operation of the Project would not result in emissions of criteria pollutants in excessive of established thresholds. Because emissions of toxic air contaminants (TACs) from diesel-powered construction equipment is expected to be minimal, intermittent, and of short duration, the Project is not

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expected to substantially increase ambient concentrations of TACs regionally or locally. Therefore, the Project would not expose sensitive receptors to substantial pollutant concentrations. As such, localized impacts to off-site sensitive receptors would be less than significant.

Create objectionable odors affecting a substantial number of people?

Less Than Significant Impact. During Project-related construction activities, various diesel-powered vehicles and equipment could create minor odors. These odors are not likely to be noticeable beyond the immediate vicinity and would be temporary and short-lived in nature. Therefore, construction odor impacts would be less than significant. Long-term odors are typically associated with industrial projects involving use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes. Odors are also associated with such uses as sewage treatment facilities and landfills. The Project involves no elements related to these types of uses. Therefore, no long-term odor impacts would occur with Project implementation.

CULTURAL RESOURCES

Would the project:

Cause a substantial adverse change in significance of a historical resource as defined in State CEQA §15064.5?

Or

Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA §15064.5?

Less Than Significant Impact. A cultural resource assessment consisting of a records search, survey, and report were conducted as part of the RMP to protect and manage cultural resources within the Project Area. The purpose of the cultural resources assessment was to identify any cultural resources that may be impacted by future construction, maintenance, or improvements within the Project Area.

A total of nine resources within or adjacent to the Project Area were identified. Of these nine sites, one site is a prehistoric artifact scatter, and eight are historic sites. More information on these sites is included in Appendix C of the RMP. There are no resources located within or adjacent to the Project Area that are listed on the National Register, California Register, California Historical Landmarks, California Points of Historical Interest, or Historic Properties Directory. The majority of the cultural resources previously recorded in the Project Area are 20th Century archaeological sites including building foundations, linear features (i.e., historic roads, trails, fences, windrows, ditches, and railroad grades constructed in a linear fashion), objects (i.e., sculptures, monuments, boundary markers, statuary, and fountains), a grave site, and trash scatters.

In addition to the cultural resources described above, many unrecorded hydrologic features exist within the Project Area that include numerous metal pipes, cisterns, weirs, and other features that

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formed a regional water conveyance system. These features appear to be associated with 19th and 20th century efforts of harnessing water. Also located within the Project Area is the Sawpit Dam, a defunct concrete constant radius arch dam. This dam was built in 1927 to control floodwaters in Sawpit Canyon, and is one of 50 such dams built in this style in existence in California. The United States Department of Agriculture Forest Service has given this resource an internal number (Forest Service Number 05-01-TU-52); however, there is no record at the South Central Coastal Information Center (SCCIC) that the Sawpit Dam resource has been recorded on State of California Department of Parks and Recreation (DPR523) Series forms.

The Project does not propose trail components or other physical improvements that would impact known historic or archaeological resources.

The geology and geomorphology of the Project Area suggest that it is possible that undiscovered archaeological sites may exist within portions of the Project Area. Sites may exist buried beneath alluvial sediments within stream drainages or below colluvium beneath hill and ridge landforms. It is also possible that some sites have been destroyed or adversely impacted over the years through the process of erosion in many of the canyons. Due to the steep terrain in portions of the Project Area, some areas may not have been adequately surveyed. However, it is likely that landforms exhibiting steep slopes would not have been favorable for occupation by Native Americans.

While the potential for prehistoric settlement and subsistence activities is low, there is nonetheless the potential for unknown historic or archaeological resources in the Project Area. Thus, it is possible that additional historical or archaeological resources could be discovered during ground disturbing activities, as well as during other management and maintenance activities. The RMP includes management strategies to protect and preserve cultural resources, including previously unknown historical or archaeological resources that might be discovered during ground disturbing activities (see Section 6.3.4). These management strategies include: conducting cultural resources surveys of the area prior to activities that may impact sites; site monitoring during earth disturbing activities; and implementation of an emergency response plan. Implementation of these management strategies would ensure impacts to previously unknown resources are less than significant.

Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact. According to records at the Natural History Museum of Los Angeles County (LACM), there are no paleontological localities within the boundaries, or the general vicinity, of the Project Area. The LACM indicated that excavation within the igneous and metamorphic rocks that are exposed throughout the Project Area had no potential to produce fossil remains. Also, surface grading or shallow excavations within the Quaternary Alluvium, exposed in the canyon bottoms, has a very low potential for encountering fossil remains. However, the LACM indicated that deep excavations into the Quaternary Alluvium always have the possibility of uncovering significant vertebrate remains. Thus, it is possible that previously unknown paleontological resources could be discovered during ground disturbing activities, as well as associated during other management and maintenance activities. The RMP includes restoration and construction monitoring management strategies to protect paleontological resources during

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construction activities (see Section 6.3.4) such as requiring future excavations to be monitored by a qualified paleontologist to quickly and professionally collect any specimens without impeding development. In addition, the RMP recommends that any fossils recovered should be deposited into an accredited and scientific institution for the benefit of current and future generations. Other management strategies include: conducting paleontological assessment surveys prior to ground disturbing activities; scientific salvage of resources; site monitoring during earth disturbing activities; emergency response plan for sites exposed by erosion or management/maintenance activities (see Section 6.3.5). Implementation of these management strategies would ensure impacts on previously unknown paleontological resources are less than significant.

Disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant Impact. Human remains may still exist at the Rankins' Grave Site (CA-LAN-2108H) within the Project Area. No Project improvements are proposed in proximity to the Rankins' Grave Site. Thus, the Project would avoid disturbing this site during proposed improvements and habitat enhancement activities. In addition, the goals and management strategies in the RMP include numerous provisions to protect the cultural resources within the Project Area, including conducting cultural resources surveys prior to activities that may impact sites; site monitoring during earth disturbing activities; and implementation of an emergency response plan (see Section 6.3 in the RMP). In addition, Objective CULT 2.1 specifically states to, "Allow the definitive elements of the Rankins' Grave Site to remain in place and be passively managed." Based on the above, no impacts to known human remains would occur at the Rankins' Grave Site.

No other known human burial sites exist within the Project Area. However, human remains could be discovered as a result of ground disturbing activities associated with management and maintenance activities. The RMP includes management strategies to deal with any human remains (see Section 6.3.1) in accordance with State Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98. Implementation of these management strategies would ensure impacts to human remains are less than significant.

GEOLOGY AND SOILS

Would the project:

Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:

- i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.*

Less Than Significant Impact. The State of California passed the Alquist-Priolo Earthquake Fault Zone Act in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. The main purpose of the Act is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The Act requires the State Geologist to establish regulatory zones

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(known as Earthquake Fault Zones) around the surface traces of active faults and issue appropriate maps. Local agencies must regulate development projects within the zones.

The entire Project Area is located within an Alquist Priolo Fault Zone and several known faults exist within and nearby the Project Area that have the potential to cause fault rupture, as described below (refer to Response No. VI.a.ii). Future visitors/trail users to the Project Area would be subject to the same seismic hazards that occur under existing conditions. The Project does consider several facilities in the Cloverleaf Day Use Area. The nature center and native plant restoration plant garden would not be developed as habitable structures. The existing fire station would be expanded and improved to be consistent with current seismic building regulations. Nonetheless, the fire station would be subject to the same seismic hazards that occur under existing conditions. Based on the above, impacts regarding fault rupture would be less than significant.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The most prominent faults in close proximity to the City of Monrovia are the Sierra Madre Fault Zone (includes the Duarte Fault), the San Andreas Fault, and the Raymond Hill Fault. The Sierra Madre Fault is located in the San Gabriel Mountains, while the Raymond Hill Fault is situated in the foothills in the northern residential portion of the City of Monrovia adjacent to the Project Area boundaries. The San Andreas Fault, which is located twenty miles to the north of the City, is also important as a major source of shaking at the base.

The Raymond Hill Fault is an active fault with a maximum moment magnitude of 6.5. The Raymond Hill Fault and the seismically active Sierra Madre Fault are both classified as Type “B” Faults by the 1997 California Building Code. Presence of these two faults implies that the Project Area could be subject to moderate to severe ground shaking in the event of a major earthquake.

Future visitors/trail users to the Project Area would be subject to the same seismic hazards that occur under existing conditions. The Project does consider several facilities in the Cloverleaf Day Use Area including the nature center, native plant restoration plant garden and upgrades to the existing fire station. Title 24 of the California Code of Regulations, or the California Building Code (CBC), has provisions for earthquake safety based on factors including occupancy type, the types of soil and rock onsite, and the strength of ground motion with specified probability of occurring at the site. The facilities within the Cloverleaf Day Use Area would meet all applicable State and City building requirements to ensure that adequate structural protection in the event of an earthquake would be provided. Based on the above, impacts from strong seismic ground shaking would be less than significant.

iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. During preparation of the RMP, a geologic and soils assessment of the Project Area was prepared. According to the assessment, the soils within the Project Area are closely aligned with the topography. The canyon floors contain alluvial soils that are designated as being prone to liquefaction by the California Division of Mines and Geology, while the steep ridges are made up of crystalline bedrock that have been designated for seismically induced landslides.

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Review of geologic maps indicates that the two dominant exposures of rock within the Project Area are Mesozoic granitic rocks and Precambrian metamorphic rocks. A few exposures of Quaternary alluvium (stream deposits) also exist in the bottom of the canyons and canyon mouths and Quaternary non-marine terrace deposits on the sides of the valleys.

Quaternary Alluvium is a geologically recent deposit of gravel, sand, silt or mud that was deposited by flowing water in a stream or river. It is found along old and active stream and river drainages and is usually loosely consolidated. Sand grains are generally sub-angular to sub-rounded, while the gravels and cobbles are rounded to well rounded. Color is usually light grey to light yellow. These deposits were usually deposited during the Holocene (from the recent to 10,000 years ago).

Quaternary non-marine terrace deposits are the sediments contained within stream terraces. Stream terraces are relatively level surfaces in a valley or canyon, flanking and more or less parallel to the stream channel. They are generally located above the level of the stream and represent the remnants of an abandoned flood plain, stream bed or valley/canyon floor produced during an earlier stage of deposition or erosion that the current active stream is cutting into and exposing. These deposits consist of interbedded silt, clayey sand, and conglomeratic coarse grained sands. These deposits are that are usually somewhat consolidated and will have a developed soil horizon. Colors can vary from light yellows to browns to reds. These sediments were deposited during the Pleistocene (between 10,000 to 2 million years ago).

As indicated above, the alluvial canyon areas of the Project Area are subject to liquefaction. The only structures to be occupied by people could occur within the Cloverleaf Day Use Area. However, this area is not within an alluvial canyon area and not otherwise considered to be susceptible ground-failure hazards. Further, visitors/trail users within the Project Area would be subject to same seismic hazards that occur under existing conditions. Based on the above, impacts associated with seismic-related ground failure, including liquefaction, are considered less than significant.

iv. Landslides?

Less Than Significant Impact. According to the City of Monrovia's General Plan Safety Element, landslides of various sizes and types can occur within the foothills of the San Gabriel Mountains. The majority of the landslides are primarily in the steep northern area, which is underlain by granite bedrock. The reasons for this activity are weakened bedrock by fracturing, faulting and weathering, as well as abnormally high seismic forces and rapid uplift of the mountain range. Most of the previous landslides appear to be shallow rock falls. However, several of the larger slide areas involved massive volumes of bedrock.

The Project does not propose structures on hillsides that would expose people or property to landslide hazards. The facilities considered at the Cloverleaf Day Use Area would be located in an area of minimal topography. The immediate surrounding area of the Cloverleaf Day Use Area consists of highly vegetated, gently sloping hillside areas that are not considered prone to significant landslide hazards. As described in Response No. VI.b, below, the RMP includes management activities that would limit the potential for erosion to occur in the Project Area. These management activities include habitat restoration, implementation of signage directing trail users

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to utilize only official trails which are routinely maintained, reclaim and revegetate unofficial trails, inspect/repair trail erosion-damaged facilities promptly to prevent further damage, and implement erosion/sediment control practices. All of the proposed erosion control management activities would reduce the likelihood of hazards associated with surface failure landslides, particularly during rainy conditions. Thus, future trail users with implementation of the Project would be less susceptible to landslide hazards when compared to existing conditions. Based on the above, impacts regarding landslides are considered to be less than significant and may be beneficial given the application of the management strategies.

b. Result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Construction activities associates with new facilities at the Highland Place and Cloverleaf Day Use Areas, other physical improvements and implementation of management activities may result in limited soil erosion or loss of topsoil. Project activities affecting less than one acre would be subject to standard City erosion control requirements, which would minimize soil erosion impacts to the extent feasible. Project activities resulting in one acre or more of impact would be subject to the requirements of the State General Construction Activity National Pollutant Discharge Elimination System (NPDES) Permit. As required, a Storm Water Pollution Prevention Plan (SWPPP) would be prepared. The SWPPP would identify Best Management Practices (BMPs) to control erosion during construction activities. A Notice of Intent (NOI) would be submitted by the City to the State Water Resources Board prior to construction activities. In addition, as discussed in Response No. III.b, above, soil erosion and loss of topsoil would be minimized through compliance with SCAQMD Rules 402/403. Compliance with the City's applicable erosion control regulations and State water quality regulations would ensure that impacts related to soil erosion during the construction activities would be less than significant.

Under existing site conditions, the steep slopes, intermittent streams and rapid rate of degradation found in the San Gabriel Mountains combine to produce large amounts of debris. The debris carried down from the mountains erodes waterways, accumulates and blocks the channels and storm drains, and causes flooding. Water moving into blocked channels has the potential to seek other courses, leading to more erosion and possible slope wasting. Due to high erosion rates, flood hazards and potential mudflow problems, the City of Monrovia and the Los Angeles County Flood Control District (LACFCD) have determined that the Project Area has a "drainage deficiency" (potential to experience flooding during a storm event). The Project Area also includes a number of unofficial trails. Poorly designed roads, trails, and slopes without vegetation are the most susceptible to erosion in the Project Area.

With implementation of the Project, the unofficial trails that have not been properly designed, including those without adequate vegetation to support trail use activities, would be reclaimed and revegetated. Thus, potential erosion impacts within these areas would decrease with Project implementation.

While trail use is anticipated to increase on certain trails within the Project Area, the RMP includes a number of erosion control management activities that would result in long-term benefits regarding erosion impacts. The RMP recognizes that erosion control is critical for maintaining

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natural drainage patterns, water and soil quality, healthy aquatic ecosystems, and safe trail conditions. Specifically, Section 9.4.1, Erosion Control, in the RMP contains goals and management strategies to reduce and control erosion and sedimentation within the Project Area, including: evaluation of on-site areas; preservation of trees and vegetation; installation of erosion/sediment control practices, such as interceptor berms, wattles, culverts, sediment traps; and BMP maintenance. Implementation of these management activities would ensure that impacts regarding soil erosion and loss of topsoil are less than significant and may be beneficial given the application of the management strategies within the Project Area.

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Less Than Significant Impact. As described above, impacts regarding landslides and liquefaction would be less than significant (refer to Response Nos. VI.a.iii-iv). Lateral spreading involves displacement of large blocks of ground down gentle slopes or towards stream channels. Lateral spreading is typically a type of displacement of major concern associated with liquefaction. As described above, liquefaction impacts are considered to less than significant and the Project Area does not have any know history of significant lateral spreading occurrences. Thus, the potential for lateral spreading is considered to be low. Subsidence is a localized mass movement that involves the gradual downward settling or sinking of the ground, resulting from the extraction of mineral resources, subsurface oil, groundwater, or other subsurface liquids, such as natural gas. The Project Area is not located within an area of known subsidence associated with oil or ground water withdrawal, peat oxidation or hydro-compaction. Furthermore, the Project does not include the extraction of oil or groundwater from aquifers under the project site. As such, the potential for subsidence to occur is low. Based on the above, a less than significant impact would occur in this regard.

Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Less Than Significant Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. Although not anticipated, expansive soils if encountered within the Cloverleaf Day Use Area would be removed and/or replaced as part of standard construction practices pursuant to the City of Monrovia and/or CBC building requirements. Therefore, Project implementation would result in less than significant impacts associated with expansive soils and substantial risks to life or property would not occur.

Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. The Project would remove septic tanks located at the existing wilderness fire station. The updated wilderness fire station and restroom facilities at the Cloverleaf Day Use Area would connect to the City's municipal wastewater system. The Project would not otherwise involve the

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use of septic tanks or alternative wastewater disposal systems. As such, no impact would occur in this regard.

GREENHOUSE GAS EMISSIONS

Would the project:

a. *Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, based on any applicable threshold of significance?*

Existing Conditions

Global climate change refers to changes in average climatic conditions on Earth as a whole, including changes in temperature, wind patterns, precipitation and storms. Greenhouse gases (GHGs) are those compounds in the Earth's atmosphere which play a critical role in determining temperature near the Earth's surface. Increased concentrations of GHGs in the Earth's atmosphere have been linked to global climate change and such conditions as rising surface temperatures, melting icebergs and snowpack, rising sea levels, and the increased frequency and magnitude of severe weather conditions. Historical records indicate that global climate changes have occurred in the past due to natural phenomena; however some data indicate that the current global conditions differ from past climate changes in rate and magnitude; thus, the current changes in global climate have been attributed to anthropogenic activities by the Intergovernmental Panel on Climate Change (IPCC).

GHGs include carbon dioxide (CO₂), methane (CH₄), ozone (O₃), water vapor (H₂O), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). CO₂ is the most abundant GHG in the atmosphere, and represents 77 percent of total GHG emissions. GHGs are the result of both natural and anthropogenic activities. Forest fires, decomposition, industrial processes, landfills, and consumption of fossil fuels for power generation, transportation, heating, and cooking are the primary sources of GHG emissions. In the state of California, the transportation sector is the greatest source of GHG emissions, accounting for 38 percent of total GHG emissions in 2004, the latest year for which data are available.

Impact Analysis

Less Than Significant Impact. Section 15064.4 of the CEQA Guidelines states "...[a] lead agency shall have discretion to determine, in the context of a particular project, whether to: (1) [u]se a model or methodology to quantify greenhouse gas emissions resulting from a project....; or (2) [r]ely on a qualitative analysis or performance based standards." It was determined that for the proposed project, a quantitative analysis was most appropriate. However, the City of Monrovia has not yet established specific quantitative significance thresholds.

Section 15064.7(c) states "when adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies...". The California Air Pollution Control Officers Association (CAPCOA) released a white paper, entitled CEQA and Climate Change, in January, 2008. The white paper examines various threshold

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approaches available to air districts and lead agencies for determining whether GHG emissions are significant, including a number of “non-zero” thresholds for land use development projects. In the absence of promulgated numeric thresholds, the most conservative (lowest) threshold suggested by CAPCOA, 900 tons per year, will be used to assess potential impacts from this Project.

GHG Emission Impacts

Not all GHGs exhibit the same ability to induce climate change; as a result, GHG contributions are commonly quantified in the equivalent mass of CO₂, denoted as CO₂e. CO₂e allows for comparability among GHGs with regard to the global warming potential (GWP). Mass emissions are calculated by converting pollutant specific emissions to CO₂e emissions by applying the proper global warming potential (GWP) value. These GWP ratios are available from the United States Environmental Protection Agency (USEPA) and published in the California Climate Action Registry (CCAR) Protocol. By applying the GWP ratios, project related CO₂e emissions can be tabulated in metric tons per year.

Construction. Construction activities associated with the Project may commence as early as summer 2011. It is anticipated that construction of facilities within the Cloverleaf Day Use Area would occur over an approximate 12 month period. Construction of facilities within the Cloverleaf Access Area would occur over an approximate three (3) month period. And, construction of facilities within the Highland Day Use Area would occur over an approximate six (6) month period. Trail maintenance and improvements will take place intermittently but would not be expected to use large heavy equipment. Emissions were calculated from fossil fuel powered on-site construction equipment and off-site vehicles used to transport construction workers and supplies. Emissions from trail maintenance and improvement activities are expected to be negligible.

To be consistent with guidance from the SCAQMD for calculating criteria pollutants from construction activities, GHG emissions from on-site construction activities and off-site hauling and construction worker commuting are considered as project-generated. Construction activities associated with the Project are estimated to emit a total of 289 tons of CO₂e over the duration of construction. Construction emissions will be amortized across the 30 year lifetime of the proposed project, per SCAQMD methodology. When amortized over 30 years, construction results in approximately 10 tons per year of CO₂e. Results of this analysis are presented in Table B-3, *Construction Greenhouse Gas Emissions*, in the Initial Study.

Construction and operation will be analyzed together, and therefore, significance of construction-related GHG emissions will be discussed in conjunction with operational GHG emissions below.

Construction output values used in this analysis are adjusted to represent a CO₂e value representative of CO₂, CH₄, and N₂O emissions from project construction activities. Construction CH₄ and N₂O values are derived from factors published in the 2006 IPCC Guidelines for National Greenhouse Gas Inventories. These values are then converted to metric tons of CO₂e for consistency.

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Operation. Operation of the project is expected to result in minor increases in GHG emissions. The expansion of the wilderness fire station, construction of the nature center and native plant restoration garden is not expected to significantly increase GHG emissions resulting from vehicular trips or energy usage. Nonetheless, GHG emissions were calculated for the project, consistent with CEQA requirements.

As shown in Table B-4, *Construction and Operational Greenhouse Gas Emissions*, in the Initial Study, annual GHG emissions resulting from vehicle, electrical, and natural gas usage associated with operation of the proposed project was estimated to be a maximum of 288 metric tons CO_{2e} with implementation of the above listed design features. Similar to construction GHG calculations describe above, operational output values used in this analysis are adjusted to represent a CO_{2e} value representative of CO₂, CH₄, and N₂O emissions from project construction activities. Including construction emissions, which were amortized over 30 years, total anticipated Project emissions (289 metric tons/30 years = 10 metric tons +114 metric tons = 124 metric tons) are lower than the 900 annual metric ton screening level threshold selected for the project. Therefore, construction and operational emissions are not expected to result in a significant impact at the project level.

Due to the complex physical, chemical and atmospheric mechanisms involved in global climate change, there is no basis for concluding that the Project's very small theoretical emissions increase could actually cause a measurable increase in global GHG emissions necessary to influence global climate change. The GHG emissions of the Project alone will not likely cause a direct physical change in the environment. It is global emissions in their aggregate that contribute to climate change, not any one source of emissions alone. Therefore, due to the incremental amount of GHG emissions estimated for this Project, the lack of any evidence for concluding that the project's GHG emissions could cause any measurable increase in global GHG emissions necessary to force global climate change, and the fact that the project incorporates design features to reduce potential GHG emissions the Project is considered not to hinder the goals of AB32. Conventional cumulative air quality analyses consider related projects; this approach is not appropriate because proximity is irrelevant to the transport and accumulation of GHG in the Earth's atmosphere. Thus, because the Project would result in total GHG emissions less than the 900 annual metric ton screening level threshold proposed by CAPCOA, it is not considered to have a significant impact on a cumulative level.

Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

No Impact. The City of Monrovia has not yet developed a Greenhouse Gas Reduction Plan that meets the requirements set forth in the latest OPR guidelines. The City has not adopted regulations for the purpose of reducing GHGs applicable to this project. The City has adopted the Monrovia Environmental Accords (MEA) program to implement "twenty-one action items" to achieve long-term sustainability to address the impact on climate change from new development. As discussed above, the Project is not expected to result in a significant increase in GHG emissions and would be consistent with the City's MEA. As a result, the Project results in GHG emissions below the 900 ton threshold and incorporates applicable portions of the City's MEA. Therefore, the Project would not

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conflict with any applicable plan, policy, or regulation to reduce GHG emissions. Further analysis of this issue is not necessary in the EIR.

HAZARDS AND HAZARDOUS MATERIALS

Would the project:

Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. Hazardous materials may be used during the construction phase of the Project's trail components and other physical improvements. Hazardous materials that may be used include, but are not limited to, fuels (gasoline and diesel), paints and paint thinners and possibly herbicides and pesticides. Generally these materials would be used in concentrations that would not pose significant threats during the transport, use and storage of such materials. Furthermore, it is assumed that potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations, including California Occupational Safety and Health Administration requirements, and Title 8 and 22 of the Code of California Regulations. Accordingly, risks associated with hazards to the public or environment posed by the transport, use or disposal of hazardous materials during construction are considered less than significant due to compliance with applicable standards and regulations.

Over the long-term, the Project would not involve facilities that include substantial storage, use, disposal, or generation of hazardous materials or wastes. However, operation of the fire station would involve the use of small quantities of potentially hazardous materials typical of those used at fire stations (i.e., oil and gasoline, cleaning solvents, pesticides for landscaping, etc.) would be used and stored on-site. In addition, maintenance activities may involve the occasional use of hazardous materials. Potentially toxic or hazardous compounds associated with maintenance activities typically consist of readily available solvents, cleaning compounds, paint, herbicides, and pesticides. These hazardous materials are regulated by stringent federal and state laws mandating the proper transport, use, and storage of hazardous materials in accordance with product labeling. The use and storage of these substances is not considered to present a health risk when used in accordance with manufacturer specifications and with compliance to applicable regulations.

Overall, construction and operation of the Project would result in a less than significant impact with regard to routine transport, use, or disposal of hazardous materials relative to the safety of the public or the environment.

Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact. As discussed in Response No. VIII.a, the Project would not involve facilities that include substantial storage, use, disposal, or generation of hazardous materials or wastes. Further, existing federal, State and local regulations exist to ensure hazardous materials use, storage, and disposal activities would not result in significant hazard to the public or the

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environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Given the limited use of hazardous materials associated with the Project, and anticipated compliance with associated federal, State, and City regulations and requirements, impacts related to the accidental release of hazardous materials would be less than significant.

Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. No schools are located within one-quarter mile of the Project Area. Regardless, as discussed above, the Project would not involve facilities that include substantial storage, use, disposal, or generation of hazardous materials or wastes. Further, it is assumed that the limited use of hazardous materials that would occur would be carried out in conformance with manufacture guidelines and applicable federal, State and local regulations that exist to ensure hazardous materials use, storage, and disposal would not result in a significant hazard to the public or the environment, including exposure of school sites to hazardous materials or emissions. No impact would occur in this regard. Further analysis of this issue is not necessary in the EIR.

Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact. The EnviroStor Database located on the State of California's Department of Toxic Substances Control website contains a listing of the following types of hazardous waste cleanup sites: federal Superfund sites, State response sites, voluntary cleanup sites, and school cleanup sites. None of these types of sites have been identified in the Project Area in the EnviroStor Database. Accordingly, Project implementation would not be subject to existing hazards from such a site. Thus, no impact would occur in this regard.

For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

No Impact. The Project Area is not located within two miles of a public airport or public use airport. The El Monte airport is located approximately five miles southwest of the Project Area. The Project Area is not located within the boundary of any airport land use plan and would therefore not result in a safety hazard for people using the Project Area. Thus, no impact would occur in this regard.

For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the area?

No Impact. There are no private airstrips in the vicinity of the Project Area. Therefore, the Project would not result in airport-related safety hazards for the people residing or working in the area. No impact would occur in this regard.

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Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. Project implementation would not alter any roads or infrastructure comprising emergency response or evacuation routes. Further, the RMP includes emergency preparedness strategies for ensuring adequate emergency response access to the Project Area (see Section 8.2.6 of the RMP). These strategies include: specific recommendations for road maintenance within the Project Area and evacuation and closure procedures for the Project Area. Implementation of these management activities would ensure that impacts regarding emergency access are less than significant and may be beneficial given the application of the management strategies within the Project Area.

HYDROLOGY AND WATER QUALITY

Would the project:

Violate any water quality standards or waste discharge requirements?

Less Than Significant Impact. Construction Impacts. Construction activities associated with the Project's contemplated trail system components or other physical improvements could result in some discharge of sediments and pollutants into surface waters as a result of these activities. As discussed in Response No. III.b, Project activities affecting areas less than one acre in size would be subject to standard City erosion control requirements, which would minimize surface water quality impacts to the extent feasible. Project activities resulting in one acre or more of impact would be subject to the requirements of the State General Construction Activity NPDES Permit. As required, a SWPPP would be prepared. The SWPPP would identify BMPs to reduce impacts to water quality during construction activities. A NOI would be submitted by the City to the State Water Resources Board prior to construction activities. In addition, soil erosion and loss of topsoil would be minimized through compliance with SCAQMD Rules 402/403. Compliance with the City's applicable erosion control regulations and State water quality regulations would ensure that impacts related to water quality during the construction activities would be less than significant.

Long-Term Impacts. In 1994, the Los Angeles Regional Water Quality Control Board (RWQCB) approved the Water Quality Control Plan: Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan). According to the Basin Plan, none of the drainages within the Project Area are specifically listed as impaired; however, runoff from the Project Area ultimately drains into the San Gabriel River and then the Pacific Ocean. Some of the impairments listed in the RMP include: coliform, toxicity, dissolved copper, zinc, and selenium, among others.

Primary activities on-site which currently have the potential to impact downstream water quality are domestic animal waste, litter and unauthorized trail use. The City of Monrovia currently requires that park patrons pick up after their dogs. Staff enforces trail rules to minimize the creation of unauthorized trails in inappropriate areas, and prevent the accumulation of litter. While

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there would be increased trail usage on some trails, the RMP would implement new signage programs and provide informational kiosks to better inform the public about the City's policies on picking up after dogs and no littering policies. With implementation of the Project, the unofficial trails that have not been properly designed, including those without adequate vegetation to support trail use activities, would be reclaimed and revegetated. Thus, potential erosion impacts and subsequent sedimentation/water quality impacts from non-maintained, unofficial trails to surface water bodies would decrease with Project implementation. Based on the above, it is not anticipated that substantial water quality impacts regarding domestic animal waste, litter and unauthorized trail use would occur with Project implementation.

With implementation of the Project, the number of vehicles using trails would be limited to existing private property owners, maintenance vehicles and City of Monrovia personnel or contractor vehicles, and deposition of constituents from mobile sources that may affect storm water quality would be limited. This condition would be similar to what occurs today under existing conditions.

RMP policies to enhance and protect natural landscapes and open space areas in Sections 5.0, Management Goals and Objectives, and 6.0, Natural Resources Management, could potentially result in beneficial impacts to water quality due to higher levels of the cleansing effects of vegetation that occurs as a result of habitat enhancement activities. In addition, the RMP contains goals and management strategies in Section 9.4.1 to reduce and control erosion and sedimentation within the Project Area, including: evaluation of on-site areas; preservation of trees and vegetation; installation of erosion/sediment control practices, such as interceptor berms, wattles, culverts, sediment traps; and BMP maintenance. Implementation of these management activities would reduce potential soil erosion and subsequent sedimentation impacts which would result in beneficial water quality impacts.

Development of new facilities at the Highland and Cloverleaf Day Use Areas would convert existing undeveloped land to urbanized uses. Runoff from facilities has the potential to contain contaminants such as trash, sediment, nutrients, pathogens, organics, heavy metals, and hydrocarbons among other pollutants. However, future development activities would be subject to compliance with the City's requirements to prepare and implement long-term water quality management plans, as necessary. Facilities would be reviewed by the City to determine whether a Standard Urban Stormwater Mitigation Plan (SUSMP) or a Site Specific post development plan is required. These plans would be prepared for approval by the City and would be implemented throughout the operational life of the Project to ensure that project operation would not adversely affect the quality of storm water runoff. Project post-development water quality BMPs may include measures such as installation of clarifiers or fossil filter systems to treat on-site surface water (i.e., from the apparatus bay or parking areas) prior to entering the storm drain system. Compliance with the City's requirements would ensure that the Project does not contribute substantial pollutants to the storm water conveyance system and/or downstream receiving water bodies during operation.

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Overall, with implementation of the RMP maintenance policies and compliance with the storm water requirements of the City of Monrovia, long-term water quality impacts are considered less than significant.

Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?

Less Than Significant Impact. The City of Monrovia provides water to the City. The City obtains approximately 8,200 acre-feet per year from five wells pumping from an average depth of 140-feet (static level). Development at the Highland and Cloverleaf Day Use Areas would result in the creation of impervious and semi-pervious surfaces. An increase in the amount of impervious surfaces can reduce the amount of water that recharges the local groundwater basin. A reduction in aquifer recharge can subsequently result in a depletion of groundwater supplies. However, the increase in the amount of impervious surfaces as a result of implementation of the Project is considered insignificant due to the limited surface area of such improvements and therefore significant impacts on the recharge characteristics of the local groundwater basin are not expected. Further, the Project would not include large subsurface features or wells and therefore would not affect the direction or rate of flow of groundwater. It is acknowledged that facilities at the Cloverleaf Day Use Area and maintenance activities could minimally increase water demand. However, given the limited extent of the contemplated facilities, any nominal increase in water would not substantially deplete groundwater supplies such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.

Based on the considerations stated above, less than significant impacts regarding groundwater supply and recharge would occur with Project implementation.

Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. The Project Area is located in the Lower Canyon Hydrologic Unit of the Los Angeles Basin which includes the watershed of the San Gabriel River. This watershed encompasses the steep slopes and canyons that drain the San Gabriel Mountains with water generally flowing north to south into the San Gabriel River. Within the Project Area, there are several large canyons which could contain “blue line” streams that could be considered jurisdictional waters. These canyons include Clamshell and Ruby Canyons in the western portion of the Project Area, and Spanish, Monrovia, Maple, Sawpit, Sycamore, Vassar and Twin Springs Canyons in the eastern portion of the Project Area. A small, unnamed canyon at the western edge of the Project Area contains a drainage that flows into the Santa Anita Wash. All the waterways, with the exception of Monrovia Canyon Creek and Sawpit Canyon Creek, are intermittent (e.g., occur only during periods of rainfall).

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Implementation of the Project's trail components and other physical improvements, as well as maintenance activities, would not directly result in alteration of the course of a stream or river. As described in above, compliance with the City's applicable erosion control regulations and State water quality regulations would ensure that impacts related to soil erosion during construction activities would be less than significant.

In addition, development at the Highland and Cloverleaf Day Use Areas would require limited amount so grading to create building pads for the contemplated facilities. However, appropriate drainage improvements would be made as necessary on-site to contain and direct stormwater flows to the local storm drain system. Also, enhancing and/or upgrading trail facilities may require limited amounts of grading. Such grading activities would not result in substantial topographical changes within the Project Area that substantial erosion or siltation on- or off-site would occur.

As described in Response Nos. VI.b and IX.a above, with implementation of the Project, the unofficial trails that have not been properly designed, including those without adequate vegetation to support trail use activities, would be reclaimed and revegetated. Thus, potential erosion impacts within these areas would decrease with Project implementation. In addition, while trail use is anticipated to increase on certain trails within the Project Area, the RMP includes numerous erosion control management activities that would result in long-term benefits regarding erosion impacts. Also, implementation of the habitat restoration and protection goals and strategies of the RMP would restore and enhance existing drainages and natural communities within the Project Area. These goals and strategies would also result in long-term benefits regarding erosion impacts.

Overall, the drainage patterns of the Project Area would not be substantially altered in a manner which would result in substantial erosion or siltation on- or off-site. Therefore, impacts related to alteration of drainage patterns associated with Project implementation would be less than significant.

Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site?

Less Than Significant Impact. The Federal Emergency Management Agency (FEMA) maintains and updates the National Flood Insurance Program (NFIP) maps, which identify community flood hazard zone designations. The entire City of Monrovia, including the Project Area, has been placed in Zone D, "an area of possible but undetermined flood hazard." There is no Federal requirement for the purchase of flood insurance in this zone nor is the community required to implement any floodplain management regulations as a condition for participation in the NFIP.

As described above, the Project would not substantially alter the existing drainage pattern of the Project Area during construction or operation of the Project. Given the limited nature of the Project's proposed maintenance activities, trail components and physical improvements, compliance with applicable regulatory requirements during construction activities and implementation of the management activities in the long-term would ensure that less than significant flooding impacts occur on- or off-site.

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Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. As discussed under Response Nos. VIII.c-d, the drainage pattern of the Project Area would not be substantially altered and appropriate drainage improvements would be made on-site to contain and direct stormwater flows to the local storm drain system. Given the size of the physical improvements (particularly within the Cloverleaf Day Use Area), the amount of impervious surfaces under the proposed conditions would not substantially increase the volume of runoff compared to existing conditions. Therefore, the Project would not create or contribute runoff that would exceed the capacity of existing or planned stormwater drainage systems.

Furthermore, project implementation would comply with all applicable water regulations including preparation of a SWPPP, SUSMP or Site Specific post development plan, if required, to reduce water quality impacts during construction and operation. As described in Response Nos. VI.b and IX.a above, BMPs as part of the standard regulatory compliance measures would be used during construction activities, as well as during long-term management and maintenance activities to protect water quality. In addition, the preservation and restoration of native vegetation habitats management activities proposed in the RMP would decrease runoff after large precipitation events, benefiting the existing stormwater drainage system and reducing polluted surface runoff. Restoration of native vegetation would provide a better system of branches and roots to hold erosion-prone soil in place reducing the level of sediment in downstream flows. Given the limited nature of any improvements and habitat enhancement and restoration activities associated with the Project, the future quantity of off-site runoff is not expected to substantially increase and the substantial additional sources of polluted runoff would not occur. Therefore, impacts are considered less than significant in this regard.

Otherwise substantially degrade water quality?

Less Than Significant Impact (c-f). Project implementation would not substantially degrade water quality. As described therein, compliance with applicable water quality regulations would ensure that short- and long-term water quality impacts would be less than significant. In addition, the RMP includes policies and management activities to enhance and protect natural landscapes and open space areas that could potentially result in beneficial impacts to water quality due to the cleansing effects of vegetation.

Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

No Impact. According to flood maps prepared by FEMA, the entire Project Area is located within a Zone D, “an area of possible but undetermined flood hazard.” Thus, the Project Area is not located within a 100-year floodplain as mapped by FEMA. The Project does not involve the construction of new housing, however, it is acknowledged that the wilderness fire station may potentially provide sleeping quarters for fire personnel on an as needed basis. Regardless, since the Project Area is not within a 100-year floodplain, no impact would occur in this regard.

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Place within a 100-year flood plain structures which would impede or redirect flood flows?

No Impact. The Project Area is not within a 100-year floodplain. Thus, no impact would occur in this regard.

Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

Less Than Significant Impact. The Project Area is not within a designated 100-year floodplain. The defunct Sawpit Dam is located within the Project Area. The Project does not propose any modifications or components that would impact the Sawpit Dam. Structures within the Cloverleaf Day Use Area would not be located within the potential flood zone any other levee or dam. Also, as described above, in part due to high erosion rates, the City of Monrovia and the LACFD have determined that the Project Area has an existing drainage deficiency and as such, could be subject potential flood hazards during a storm event under existing conditions. The RMP includes goals and management strategies to reduce and control erosion and sedimentation within the Project Area, including: evaluation of on-site areas; preservation of trees and vegetation; installation of erosion/sediment control practices, such as interceptor berms, wattles, culverts, sediment traps; and BMP maintenance. In addition, reclamation of unofficial trails would reduce potential erosion impacts. Implementation of these management activities and project features designed to reduce erosion impacts would also help reduce the potential for flood hazards when compared to existing conditions. Based on the above, less than significant impacts would occur with Project implementation. Further analysis of this issue is not necessary in the EIR.

Inundation by seiche, tsunami, or mudflow?

Less Than Significant Impact. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant undersea disturbance such as tectonic displacement of the sea floor associated with large, shallow earthquakes. Mudflows result from the downslope movement of soil and/or rock under the influence of gravity.

The Project Area is not subject to tsunami hazards. Several reservoirs are located within the Project Area. However, the Project does not propose any habitable structures near a large body of water that would be subject to hazards created by a seiche. Given the steep hillsides of some canyon areas within the Project Area, mudflows could occur. The only structures considered by the Project may be located within the Cloverleaf Day Use Area. The gently sloping topography of the Cloverleaf Day Use Area which is immediately surrounded by densely vegetated, moderately sloping hillsides is not conducive to sustaining mudflows. The RMP includes goals and management strategies to reduce and control erosion within the Project Area. Implementation of these management activities and project features designed to reduce erosion impacts would also help reduce the potential for mudflows when compared to existing conditions. Based on the above, less than significant impacts associated with inundation by seiche, tsunami, or mudflows would occur with Project implementation.

LAND USE AND PLANNING

Would the project:

Physically divide an established community?

No Impact. While there are several private inholdings within the Project Area, no established communities are located within the Project Area. Therefore, no impact related to the physical division of an established community would result from Project implementation.

Conflict with applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. The General Plan designations for the Project Area are the Hillside Wilderness Preserve (zoning designation HWP) and Hillside Recreation (zoning designation HR). The land uses allowed in these designations are specified in the Land Use Element of the City General Plan and referenced in Title 17 (Zoning) of the Monrovia Municipal Code. The classification “Hillside Wilderness Preserve” is designated for preserving open space land left in its natural state including preservation of endangered habitats and species, wildlife habitats, and wildlife corridors; open space for passive recreation uses such as hiking and nature studies; utility easements and reservoirs; and nature centers and educational facilities. This Hillside Wilderness Preservation designation is only assigned to land owned by or conveyed to a public agency, Public Trust or conservancy, and for lands with irrevocable offers of dedication to the City.

The Project’s proposed physical improvements and trail system components, including facilities with the Highland and Cloverleaf Day Use Areas would be consistent with the land use designations for the Project Area. In addition, the goals, objectives, and management actions included in the RMP designed to protect and enhance natural, cultural and visual resources within the Project Area are compatible with the policies in the City of Monrovia General Plan and Title 17. Similarly, the United States Forest Service, the County of Los Angeles, and the City of Arcadia recognize the value of the Project Area as an open space area and have designated it as such. Goals, objectives, and management actions included in the RMP would also be compatible with the planning objectives of these surrounding communities. Overall, the Project would be consistent with the with the applicable land use plans, policies, and regulations with jurisdiction over the site and a less than significant would occur in this regard.

MINERAL RESOURCES

Would the project:

Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Or

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Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact. According to the Los Angeles County General Plan Conservation and Open Space Element, there are no known local mineral resources within the Project Area. No known State-designated mineral resource areas have been identified within the Project Area. The Project does not incorporate heavy industrial uses of any type or propose mineral development activities. Further, implementation of the Project would not impede the potential for direct use or future exploration of mineral resources. Therefore, the Project would result in no impact regarding mineral resources.

NOISE

Would the project result in:

For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The Project Area is not located within an airport land use plan or within two miles of a public airport or public use airport. The nearest airport, El Monte Airport, is located approximately five miles to the southwest. Therefore, Project implementation would not expose people to excessive airport related noise levels. No impact would occur in this regard.

For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The Project Area is not located within five miles of a private airstrip. Therefore, the Project would not expose people residing or working in the project area to excessive noise levels from such uses. No impact would occur in this regard.

POPULATION AND HOUSING

Would the project:

Induce substantial population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

No Impact. Project implementation would not result in the construction of new homes or businesses. The Project would require minor utility upgrades and/or connections within the Cloverleaf Day Use Area. However, no indirect population growth would occur within the Project Area. While the Project is expected to improve recreational experiences for residents and visitors in the Project Area, in and of itself, the Project is not expected to change the population in the City in the near- or long-term. Accordingly, the Project is not expected to induce substantial population growth directly or indirectly and no impact would occur in this regard.

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Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?

Or

Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?

No Impact. Project implementation would not displace existing housing. Therefore, no impact would occur to existing housing.

PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

Police Protection.

Less Than Significant Impact. City of Monrovia Canyon Park staff are responsible for day to day routine enforcement of rules and regulations which prohibit unauthorized trail use, littering and vandalism, among other things. The City of Monrovia Police Department provides assistance to staff during an emergency or a disaster. It is assumed that there would be an increase in visitors to the Project Area. While future trail system components could be subject to vandalism and could bring additional recreational users into the Project Area, these factors are not expected to significantly increase the Police Department's workload or to result in the need for new or physically altered police facilities. Further, access to the Project Area is not currently limited due to the lack of regulation in place. Implementation of the Project would allow the City to enact and enforce regulations over the Project Area and would limit access during operating hours, which are dawn to dusk. The Project would implement a uniform gate system at access points that would enable the City to more effectively limit use of the Project Area. Further, the RMP recommends the provision of volunteers to patrol and enforce rules in the Project Area (See Section 5.2. of BIO-7 and 9.4 of RMP), as well as signing to delineate and secure boundaries (See Section 5.21 Goal Interp. 2 of RMP). Implementation of these recommendations could potentially reduce the need for police protection services by reducing trespassing and illegal activities within the Project Area. Nonetheless, given that any increase in demand for police services associated with the Project is expected to be small, and the management recommendations described above in the RMP, impacts regarding police protection services would be less than significant.

Schools.

No Impact. The Project does not include land uses that would increase demand for school facilities or services. Thus, no impact regarding schools would occur with Project implementation.

Parks.

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No Impact. The Project Area is itself a large open space area for conservation and pedestrian use and bicycling. The Project Area is adjacent to several other open space areas, including the Angeles National Forest, the Arcadia Wilderness Area and private undeveloped land. The Project does not propose any land uses (i.e., residential) that would create a new source of demand for park facilities. It is acknowledged that the Project’s trail system components could incrementally increase use within the Project Area. While the Project is expected to improve recreational experiences for residents and visitors in the Project Area, in and of itself, the Project is not expected to change the population in the City in the near- or long-term. Thus, there would be no need for new parks, construction of which could cause physical significant environmental impacts. Therefore, no impact would occur in this regard.

Other public facilities.

No Impact. While the Project is expected to improve recreational experiences for residents and visitors, in and of itself, the Project is not expected to change the population in the City in the near- or long-term. Accordingly, the Project would not result in any substantial increases in demands on other government services or public facilities such as libraries, hospitals, or post offices. Thus, the Project would not increase the need for maintenance of these public facilities. A less than significant impact would occur in this regard.

RECREATION

Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

No Impact. While the Project is expected to improve recreational experiences for residents and visitors in the Project Area, in and of itself, the Project is not expected to change the population in the City in the near- or long-term. Thus, there would be no increase in the use of existing neighborhood and regional parks or other recreational such that substantial physical deterioration of the facility would occur or be accelerated. Therefore, no impact would occur in this regard.

TRANSPORTATION/TRAFFIC

Would the project:

Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No Impact. The Project does not propose any structures that would interfere with air traffic patterns; nor would the Project increase use of any airport. Thus, no impact regarding air traffic patterns would occur with Project implementation.

Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. Implementation of the Project would improve safety within the Project Area. Trail facilities would be maintained and improved consistent with maintenance

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management strategies proposed in the RMP. The provision of additional signage, as outlined in the RMP, would secure Project Area boundaries and alert visitors to potentially dangerous conditions (i.e., roadway crossings, entry onto private property, steep slopes or other dangerous conditions). Therefore, impacts related to design features are considered less than significant.

Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

No Impact. Monrovia Transit, a curb to curb dial-a-ride system would provide rides for \$1 for general public and \$.75 for seniors and disabled to entry and exit points. There is no fixed transit service to any of the potential Project Area access points. There is also no fixed transit service to the Project Area, although there are provisions for local school buses (two at any given time) to park in Canyon Park in conjunction with the youth outdoor education programs. Facilities are currently provided for walking and bicycling and provide connections to adjacent recreational facilities (i.e., Angeles National Forest, Arcadia Wilderness Park). Also, existing access points provide opportunities for local residents to access the Project Area on foot or bicycle. The Project does not propose facilities or management activities that would conflict with any existing alternative transportation facilities. Further, the Project would not conflict with existing or potential future policies plans or programs supporting alternative transportation. Thus, the Project would result in no impact with regards to alternative transportation.

UTILITIES AND SERVICE SYSTEMS

Would the project:

Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Less Than Significant Impact. While the Project is expected to improve recreational experiences for residents and visitors in the Project Area, in and of itself, the Project is not expected to change the population in the City in the near- or long-term. Thus, no new increase in wastewater demand would occur from a change in the City's population. While there would be restroom facilities at the Cloverleaf Day Use Area and the existing wilderness fire station would be expanded, these limited additional wastewater volumes would not require the construction of new wastewater treatment facilities or result in unusual wastewater exceeding the wastewater treatment requirements. Compliance with the existing regulations established by the City of Monrovia MCWD and/or Los Angeles RWQCB would ensure that impacts regarding wastewater treatment are less than significant.

Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact. The City of Monrovia Utilities Division, Public Works Department provides water to the City and owns, operates and maintains the sewage collection systems for the City. As discussed above, the Project is not anticipated to generate sufficient wastewater volumes to require the construction of new wastewater treatment facilities. Also, the Project would not generate a new water demand that would require the construction of new water treatment facilities

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or expansion of existing facilities. Minor infrastructure improvements may be required at the Cloverleaf Day Use Area to provide connections with existing water or wastewater infrastructure. These minor improvements would not have the potential to cause significant environmental impacts. Overall, a less than significant impact would occur in this regard.

Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact. Construction activities at the Highland and Cloverleaf Day Use Areas may include new stormwater drainage facilities or expansion of existing facilities within the Project Area. As discussed above, compliance with the City's applicable erosion control regulations and State water quality regulations would ensure that impacts related to water quality during construction activities, including stormwater facilities, would be less than significant. No other specific drainage facilities are being proposed by the Project. Thus, less than significant impacts would occur in this regard.

Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?

Less Than Significant Impact. The City of Monrovia provides water supply to the City. The City obtains approximately 8,200 acre-feet per year from five wells pumping from an average depth of 140-feet (static level). As discussed in Response No. IX,a, the increase in the amount of impervious surfaces as a result of Project implementation is considered insignificant and is not expected to affect the recharge characteristics of the local groundwater basin. At the Cloverleaf Day Use Area, the native plant restoration garden may require a demand of approximately 85 gallons per day or 600 gallons per week. In comparison, within the City of Monrovia, total water use averages 178 gallons per capita per day. The addition of restroom facilities and expansion of the wilderness fire station would result in an incremental increase in daily water demand within the City since many of the trail users and visitors are likely to reside in the area and their use would not be a net increase. In addition, maintenance activities would require periodic use of minimal amounts of water over time. The limited increase in water use at the Cloverleaf Day Use Area and associated with maintenance activities is not expected to require new or expanded water entitlements. Based on these considerations, a less than significant impact regarding water supply would occur with Project implementation.

Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. As discussed above, Project implementation would not generate wastewater volumes that would require the construction of new or expansion of existing wastewater treatment facilities. Thus, a less than significant impact would occur in this regard.

Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

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Less Than Significant Impact. Disposal destinations for solid waste generated within the Project Area would be at the discretion of the private haulers, who maintain disposal agreements with landfill operators within the region. Solid waste generated within the Project Area would likely be disposed of at one of Los Angeles County's 12 operating landfills. The Project could generate limited amounts of solid waste from facilities at the Cloverleaf Day Use Area and trash receptors located at various access points in the Project Area. The Project's incremental increase in solid waste compared to the amount to solid waste currently generated within the City would be accommodated by one of the County landfills serving the City of Monrovia. Thus, impacts to landfills would be less than significant.

Comply with federal, state, and local statutes and regulations related to solid waste?

No Impact. As indicated above, the Project's incremental increase in solid waste compared to the amount to solid waste currently generated within the City would be accommodated by one of the County landfills serving the City of Monrovia. As part of ongoing operations in the Project Area, the City would comply with applicable federal, State, and local statutes related to solid waste recycling and no impact associated with the Project would occur in this regard.

5.0 EFFECTS DETERMINED TO BE LESS THAN SIGNIFICANT IN THE EIR

The City of Monrovia found that the Project would have a less than significant impact, either directly or cumulatively, with respect to a number of environmental topics discussed in the EIR, without the need for mitigation. A less than significant environmental impact determination was made for each topic area listed below.

BIOLOGICAL RESOURCES

Sensitive Plant and Wildlife Species. Implementation of new trail or day use area facilities within the Project Area would not significantly impact special status species, either directly or indirectly. With implementation of the goals, objectives and management strategies to preserve and enhance habitat that would support sensitive plant and wildlife species and protect these species, the Project would have a long-term beneficial effect on sensitive plant and wildlife species.

Wildlife Corridors. Implementation of new facilities as part of the Project would result in less than significant impacts to wildlife movement corridors. With implementation of the goals, objectives and management strategies to preserve and enhance wildlife corridors, the Project would result in a long-term beneficial effect to wildlife corridors.

Local Policies or Ordinances Protecting Biological Resources. Project implementation would not conflict or have any adverse impacts on local policies or ordinances. Thus, no impacts would occur regarding consistency with local policies or ordinances.

Conservation Plans. Project implementation would not conflict with or otherwise impact any adopted Habitat Conservation Plans. Thus, no impact would result regarding consistency with a conservation plan.

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Cumulative Biological Resources Impacts. As discussed in Section 3.0, *Basis for Cumulative Analysis*, of the Draft EIR, there are seven related projects identified in the vicinity of the Project area. Related Project No. 7 is located immediately west of the Project area within the City of Arcadia on Los Angeles County owned lands. The remaining related projects are located a minimum of 1.6 miles away from the Project area within urbanized areas that are devoid of native biological resources. Consequently, Related Project Nos. 1-6 would not contribute to the cumulative impacts to biological resources in the vicinity of the Project. Related Project No. 7 consists of draining the Santa Anita Reservoir, removing sediment and debris from the basin by dry excavation, and removing vegetation from the sediment receiver sites, including coast live oak woodland. Although Related Project No. 7 entailed the removal of coast live oak woodland, considered to be a sensitive natural community, the Project would not result in more than minimal removal of native vegetation and, therefore, would not contribute substantially to the cumulative loss of biological resources in the area. Furthermore, given the RMP's strong emphasis on management and enhancement of biological resources, the Project is likely to have an overall beneficial effect on biological resources. Based on the above, cumulative impacts are concluded to be less than significant.

WILDLAND FIRES AND FIRE PROTECTION SERVICES

Wildland Fires. Project implementation would reduce the potential for wildland fires to occur within the Project Area. Thus, a long-term beneficial effect regarding wildland fire hazards would occur with Project implementation.

Fire Protection Services. Project implementation would not require new or physically altered fire protection facilities. Existing fire protection services would accommodate future fire protection needs within the Project Area. As Project implementation would reduce the potential for wildland fires to occur within the Project Area, a long-term beneficial effect regarding fire protection services would occur with Project implementation.

Cumulative Wildland Fires and Fire Protection Services Impacts. As discussed in Section 3.0, *Basis for Cumulative Analysis*, of the Draft EIR, there are seven related projects identified in the vicinity of the Project Area. Related Project No. 7 is located immediately west of the Project Area within the City of Arcadia on Los Angeles County owned lands. The remaining related projects are located a minimum of 8,500 feet away from the Project Area. Given the distance of these project sites to the Project Area and their incremental increase in development and population within the City, Related Project Nos. 1-6 would not increase the potential for wildland fire hazards within the Project Area. Related Project No. 7 consists of draining the Santa Anita Reservoir, removing sediment and debris from the reservoir by dry excavation, removing vegetation from the Santa Anita sediment placement sites. As part of Related Project No. 7, wildfire avoidance measures would be coordinated with the U.S. Forest Service Fire Division and the City of Arcadia Fire Department prior to construction; thus, precluding the potential for significant cumulative wildland fire impacts.

Due to the short-term nature and scope of activities for Related Project No. 7, it would not result in long-term impacts to fire protection services. Related Project Nos. 1-6 would comply with the

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applicable City of Monrovia Fire Code and Building Code regulations related to fire safety, access, and fire flow. In addition to site plan review by the MFD, the MFD reviews Initial Studies and other informational documents for related projects and requires the implementation of mitigation measures, as applicable. The MFD has not indicated any deficiencies in the area's fire stations or expansion plans that may occur as a result of growth and new development. Further, the related projects are located within existing, accessible fire service areas; and no deficiencies in the ability of the current stations to meet projected demand have been identified by the MFD. It should also be noted that the Related Projects Nos. 1-6 would generate revenue to the City's general fund in the form of net new property tax, direct (i.e., from on-site commercial uses) and indirect (i.e., from household spending) sales tax, utility user's tax, gross receipts tax, real estate transfer tax on residential initial sales and annual re-sales, and other miscellaneous household-related taxes (e.g., parking fines). This revenue could be used to fund MFD expenditures as necessary to offset cumulative impacts to fire protection facilities and services. Since the Project would result in a long-term beneficial effect regarding fire-protection services and the related projects are not anticipated to result in relocation or construction or expansion of new fire facilities, cumulative impacts regarding fire protection services would be less than significant.

NOISE

Construction Noise. Construction activities associated with Project implementation would be conducted within the allowable hours specified in the City's noise ordinance. Compliance with the requirements of the City's noise ordinance would ensure that construction noise impacts are less than significant.

Construction Vibration. Construction activities associated with Project implementation would produce groundborne vibrations. However, vibration velocities would not exceed allowable levels (i.e., significance threshold of 0.5 inches per second) at the nearest vibration-sensitive uses. Thus, construction vibration impacts would be less than significant.

Operational Vibration. Project implementation would not generate excessive vibration levels to nearby sensitive receptors. Thus, long-term vibration impacts would be less than significant.

Cumulative Noise Impacts. As discussed in Section 3.0, *Basis for Cumulative Analysis*, of the Draft EIR, there are seven related projects identified in the vicinity of the Project Area. Related Project No. 7 is located immediately west of the Project Area within the City of Arcadia on Los Angeles County owned lands. The remaining related projects are located a minimum of 8,500 feet away from the project area. Noise from construction associated with Project implementation would be localized, thereby potentially affecting areas immediately within approximately 500 feet from the construction site. No construction activities would occur as part of Project implementation within 500 feet of any of the related projects. Due to distance attenuation and intervening structures, construction noise from any of the related project sites and improvements as part of the Project would not result in a noticeable increase in noise at sensitive receptors near any sensitive receptor sites, which would preclude the potential for a cumulative noise impact. As such, cumulative impacts associated with construction noise would be less than significant.

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The Project Area and surrounding area have been developed with uses that have previously generated, and will continue to generate, noise typical of residential communities such as from lawn maintenance activities, mechanical equipment (e.g., air conditioning systems), and vehicle movements, among other community noise sources. The related projects are of sufficient distance from the Project Area that operational noise levels from these projects would not be perceivable within the Project Area. As such, cumulative noise impacts related to long-term project operations would be less than significant.

TRAFFIC AND PARKING

Congestion Management Program. Project implementation would not conflict with the County's congestion management program. Thus, no impact regarding consistency with the County's congestion management program would occur with Project implementation.

Parking. Parking related impacts to local roadways would be less than significant as the Project would provide sufficient on-site parking for future visitors to the Project Area. As the Project would provide on-site parking, existing visitors to the Project Area that park on adjacent local roadways would no longer be required to do so with the Project. This is considered to be a beneficial effect of the Project.

Cumulative Traffic Impacts. As discussed in Section 3.0, *Basis for Cumulative Analysis*, of the Draft EIR, there are seven related projects identified in the vicinity of the Project area. Related Project No. 7 is the Santa Anita Dam Riser Modification and Reservoir Sediment Removal Project. This Project would not produce any long-term vehicle trips along local roadways serving the Project Area. The remaining related projects are located a minimum of 1.6 miles away from the Project Area. Due to their proximity to the Project Area and incremental increases to the City's population base, these projects are not expected to change the anticipated number of peak weekend visitors to the Project Area, as analyzed throughout this EIR. Therefore, cumulative traffic impacts would be similar to the Project-related impacts identified above. Similar to the Project, cumulative impacts regarding traffic are considered to be potentially significant. Implementation of Mitigation Measure 4.D-1-1 would ensure that cumulative traffic impacts are not cumulative considerable. In addition, the Project's incremental increase in traffic would occur primarily during off-peak hours on weekend days. Accordingly, the Project would not contribute a substantial level of traffic to CMP freeway monitoring locations or arterial monitoring intersections during weekday peak A.M. or P.M. hours to result cumulatively considerable CMP impacts.

Similar to the Project, because future visitors to the Project Area would utilize Cloverleaf Drive north of Lotone Street to access the Project Area, emergency impacts are considered to be potentially significant as this roadway segment is a deficient roadway. Implementation of Mitigation Measure 4.D-1-1 would ensure that cumulative impacts regarding emergency access are not cumulative considerable.

With regard to parking, the Project would provide ample parking within the Project Area for future visitors to the Project Area. Due to the distance of the related projects to the Project Area, no cumulative parking impacts would occur at or near the Project area. In addition, future related projects

would be subject to City review to ensure that adequate parking is provided on a project-by-project basis.

6.0 EFFECTS DETERMINED TO BE LESS THAN SIGNIFICANT WITH MITIGATION, AND FINDINGS

The City of Monrovia, having reviewed and considered the information contained in the Final EIR, the Technical Appendices and the administrative record, finds, pursuant to California Public Resources Code 21081 (a)(1) and *CEQA Guidelines* 15091 (a)(1) that changes or alterations have been required in, or incorporated into, the Project which would avoid or substantially lessen to below a level of significance the following potentially significant environmental effects identified in the Draft EIR in the following categories: Biological Resources, Noise, and Traffic and Parking. The potentially significant adverse environmental impacts that can be mitigated are listed below. The City of Monrovia finds that these potentially significant adverse impacts can be mitigated to a less than significant level after implementation of mitigation measures identified in the Draft EIR. The Draft EIR is incorporated by reference.

BIOLOGICAL RESOURCES

Sensitive Habitat. Implementation of new trail or day use area facilities within the Project Area would not significantly impact sensitive habitats, either directly or indirectly. With implementation of the prescribed mitigation measure and goals, objectives and management strategies to preserve and enhance sensitive habitats, the Project would avoid or reduce potentially significant impacts to sensitive habitats to a less than significant level. Further, by implementing the Project, long-term beneficial effect would occur to sensitive habitats.

Finding

- *Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Draft EIR.*

Facts in Support of Finding

The potentially significant sensitive habitat impacts have been eliminated or substantially reduced to a less than significant level by virtue of the following mitigation measure identified in the Draft EIR.

Mitigation Measure:

Mitigation Measure 4.A-2-1 In the event the City elects to conduct stream crossing repair/maintenance/improvement, bank stabilization, riparian habitat restoration and/or improve trail crossings along stream courses within the Project Area, the City shall notify and consult

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with the CDFG regarding the need for a Streambed Alteration Agreement (SAA). All work shall be performed in compliance with the conditions set forth in the SAA, as determined by the CDFG. Such conditions shall include the in-kind replacement or restoration of riparian habitat at a 1:1 ratio for temporary impacts and a 2:1 ratio for permanent impacts within the Project Area, or as otherwise directed by the CDFG. Alternatively, if the impacts are very minor, the CDFG may, at its discretion, allow the work to proceed under a letter of law without mitigation other than notification and consultation.

Federally Protected Wetlands. Implementation of new trail or day use area facilities within the Project Area would not significantly impact federally protected wetlands, either directly or indirectly. With implementation of the prescribed mitigation measure and goals, objectives and management strategies to preserve and enhance sensitive habitats, including wetlands, the Project avoid or reduce potentially significant impacts to wetlands to a less than significant level. Further, by implementing the Project, long-term beneficial effect would occur to wetlands.

Finding

- *Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Draft EIR.*

Facts in Support of Finding

The potentially significant impacts to federally protected wetlands have been eliminated or substantially reduced to a less than significant level by virtue of the following mitigation measure identified in the Draft EIR.

Mitigation Measures:

Mitigation Measure 4.A-3-1 In the event the City elects to conduct stream crossing repair/maintenance/improvement, bank stabilization, riparian habitat restoration and/or improve trail crossings repair, maintain and/or improve trail crossing within wetlands within the Project Area, the City shall notify and consult with the ACOE regarding the need for a Section 404 Permit. All work shall be performed in compliance with the conditions set forth in the Permit, as determined by the ACOE. Such conditions shall include the in-kind replacement or restoration of wetlands at a ratio of 1:1 for temporary impacts and a ratio of 2:1 for permanent impacts within the Project Area, or as otherwise directed by the ACOE. Alternatively, if the impacts are less than 0.1 acre, the ACOE may, at its discretion, allow the work to proceed without mitigation other than notification and consultation.

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Nesting Birds. Project implementation could significantly impact nesting birds. Implementation of the prescribed mitigation would reduce impacts to a less than significant level.

Finding

- *Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Draft EIR.*

Facts in Support of Finding

The potentially significant impacts to nesting birds have been eliminated or substantially reduced to a less than significant level by virtue of the following mitigation measures identified in the Draft EIR.

Mitigation Measure:

Mitigation Measure 4.A-7-1 To the extent practicable brush and tree removal activities for trail reclamation, fuel modification, facility improvement, construction and other Project components performed by the City shall be initiated outside of the nesting bird season, which is generally held to be from February 15 to September 15, and shall be carried out with no more than a two week lapse in the work. If the City deems this to not be practicable the City shall have a nesting bird survey by a monitoring biologist conducted within 300 feet (for songbirds) and 500 feet (for raptorial birds) of construction sites no more than one week prior to initiating construction. If no active nests of songbirds and raptors are found within 300 feet and 500 feet, respectively, of the construction site, the work may begin. If active nests are found within the survey areas the City shall delineate a buffer zone of 300 feet and 500 feet for songbirds and raptors, respectively, around the nest. Based on the nature of the work to be performed and the equipment to be used, the monitoring biologist may reduce the buffer zone based on intervening vegetation and topography. Such buffer zones shall remain in place until the young in the nest have fledged or the nest has failed, as determined by the monitoring biologist.

Human/Wildlife Conflicts. Increased human activity in the Project Area could increase the potential for conflicts between humans and wildlife resulting in harm to both humans and wildlife and wildlife habitat. Implementation of the prescribed mitigation would reduce impacts to a less than significant level. By implementing the prescribed mitigation measure, a long-term beneficial effect would occur regarding wildlife conflicts.

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Finding

- *Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Draft EIR.*

Facts in Support of Finding

The potentially significant impacts regarding human and wildlife conflicts have been eliminated or substantially reduced to a less than significant level by virtue of the following mitigation measure identified in the Draft EIR.

Mitigation Measure:

Mitigation Measure 4.A-8-1 In order to minimize conflicts between humans and wildlife; and minimize impacts from human activity within the Project Area, the City shall implement the following measures through educational materials provided to RMP area users or through kiosks/signage to be located at each public access point to the Project Area.

1. Domestic Dog Controls - The following measures shall be implemented and identified on signage, as appropriate:
 - a. Leash restrictions shall be identified and enforced within the Project Area. These restrictions shall include a standard leash length to minimize the effects of vegetation trampling and trail braiding.
 - b. Those areas with sensitive vegetation communities in close proximity to the trails shall be considered as potential “no dog” areas. Signage shall be installed within the Project Area to properly identify these areas.
 - c. Dog waste disposal/bag stations shall be provided along trails areas open to dogs to ensure proper dog waste disposal.
 - d. Dog use upon trails shall be monitored and corrective measures taken if is determined that dog use promotes an adverse modification to the biology of the area.
2. Public Access in Wildlife Areas - The following measures shall be implemented and identified on signage, as appropriate:
 - a. Educational materials and signage shall be provided to trail users to clarify the harms of feeding of wildlife.

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- b. Monitoring and patrols of the trails network shall be conducted to help identify problem areas in need of further restrictions.
 - c. The use of firearms, air guns, bows and arrows and sling shots or other weapons shall not be allowed.
 - d. No hunting or trapping of any living or dead animal shall be allowed.
 - e. No cutting, pruning or intentional injury to vegetation shall be permitted.
 - f. No glass containers or alcohol shall be allowed.
 - g. Vegetative buffers to provide separation for avoiding or reducing impacts to wildlife from human activities shall be used, as feasible.
3. Mountain Biking - The following measures shall be implemented and identified on signage, as appropriate:
- a. Trails open to biking shall include proper signage and guidance to encourage bikers to practice trail etiquette, yield to hikers, and practice safe speeds.
4. Wildlife Encounters/Conflicts - The following measures shall be implemented and identified on signage, as appropriate:
- a. Educational material and signage shall be made available to trail users to identify human behaviors with a tendency to attract bears and mountain lions, the risks and potential dangers of wildlife encounters, and the most effective methods for avoiding and managing conflict.
 - b. Efforts shall be made to identify potentially sensitive areas for wildlife breeding activity and close those trails within proximity.
 - c. Proper daily trash disposal methods such as utilizing bear proof trash containers would be identified and implemented to minimize wildlife conflicts.
 - d. Signage shall include a statement directing the trail user to a publication titled "Living with Wildlife," available at the City's web site.

Facts and Findings

NOISE

Operational Noise. Project implementation could significantly impact adjacent noise sensitive receptors to the Project Area. Implementation of the prescribed mitigation measures would ensure that potentially significant noise impacts from new facilities and activities within the Highland and Cloverleaf Day Use Areas are reduced to a less than significant level.

Finding

- *Changes or alterations have been required in, or incorporated into, the project which avoids or substantially lessens the significant environmental effect as identified in the Draft EIR.*

Facts in Support of Finding

The potentially significant operational noise impacts have been eliminated or substantially reduced to a less than significant level by virtue of the following mitigation measures identified in the Draft EIR.

Mitigation Measures:

Mitigation Measure 4.C-1 Cloverleaf Day Use Area: New facilities within the Cloverleaf Day Use Area shall be at least 30 feet from the nearest off-site residence. New facilities include picnic tables, nature center, native plant restoration garden, new trails, and parking lot facilities.

Mitigation Measure 4.C-2 Highland Day Use Area: New facilities within the Highland Day Use Area shall be at least 30 feet from the nearest off-site residence. New facilities include picnic tables and parking lot facilities.

Mitigation Measure 4.C-3 Highland and Cloverleaf Day Use Areas: Signs shall be posted to prohibit amplified sound at the day use areas.

Mitigation Measure 4.C-4 Cloverleaf Day Use Area: Amplified sound shall be prohibited at the nature center and native plant restoration garden.

TRANSPORTATION AND PARKING

Traffic. Project implementation would not cause a significant increase in traffic to the local street network. However, the Project would contribute traffic to a currently deficient roadway. This impact is considered to be potentially significant. Implementation of the prescribed mitigation would reduce this impact to a less than significant level and create beneficial effect to the currently deficient roadway.

Facts and Findings

Finding

- *Changes or alterations have been required in, or incorporated into, the project which avoids or substantially lessens the significant environmental effect as identified in the Draft EIR.*

Facts in Support of Finding

The potential traffic impacts have been eliminated or substantially reduced to a less than significant level by virtue of the following mitigation measure identified in the Draft EIR.

Mitigation Measure:

Mitigation Measure 4.D-1 Prior to implementation of proposed RMP improvements, the roadway segment along Cloverleaf Drive north of Lotone Street to the access gate of the Project Area shall be widened to at least 20-feet or as otherwise determined appropriate by the City of Monrovia Public Works and/or Fire Department to accommodate two-way traffic and emergency vehicle access.

Emergency Access. The issue of emergency access along Cloverleaf Drive north of Lotone Street is considered a potentially significant impact given the Project would contribute traffic to this currently deficient roadway segment. Potentially significant emergency access impacts would be reduced to a less than significant level with implementation of and adherence to the RMP's emergency preparedness strategies and implementation of the prescribed mitigation measure. Implementation of the prescribed mitigation would create beneficial effect to the currently deficient roadway.

Finding

- *Changes or alterations have been required in, or incorporated into, the project which avoids or substantially lessens the significant environmental effect as identified in the Draft EIR.*

Facts in Support of Finding

The potential emergency access impacts have been eliminated or substantially reduced to a less than significant level by virtue of the following mitigation measure identified in the Draft EIR.

Mitigation Measure:

Refer to Mitigation Measure 4.D-1. No additional mitigation measures are necessary.

User Conflicts. Increased human activity in the Project Area could increase the potential for user conflicts within and adjacent to the Project Area. Implementation of the prescribed mitigation measure would reduce potentially significant impacts to a less than significant level. By implementing the prescribed mitigation measure, a long-term beneficial effect would occur regarding user conflicts.

Facts and Findings

Finding

- *Changes or alterations have been required in, or incorporated into, the project which avoids or substantially lessens the significant environmental effect as identified in the Draft EIR.*

Facts in Support of Finding

The potential user conflict impacts have been eliminated or substantially reduced to a less than significant level by virtue of the following mitigation measures identified in the Draft EIR.

Mitigation Measures:

Mitigation Measure 4.D-5-1 Warning signs shall be installed within the Project Area at blind corner locations where there could be potential for user conflicts between vehicles, hikers and/or bikers.

Mitigation Measure 4.D-5-2 Warning signs shall be posted along roadways providing access to the Project Area where there could be potential for user conflicts between vehicles, hikers and/or bikers.

7.0 ENVIRONMENTAL EFFECTS WHICH REMAIN SIGNIFICANT AND UNAVOIDABLE AFTER MITIGATION AND FINDINGS

The EIR for the proposed Hillside Wilderness Preserve and Recreation Area RMP did not identify any significant and unavoidable environmental impacts. All potentially significant impacts were able to be mitigated to a less than significant level.

8.0 FINDINGS ON THE ALTERNATIVES TO THE PROJECT

The Draft EIR, in Section 5.0, *Alternatives* (incorporated by reference), discusses the environmental effects of alternatives to the Project. A description of these alternatives, a comparison of their environmental impacts to the Project, and the City’s findings are listed below. These alternatives are compared against the Project relative to the identified Project impacts, summarized in Sections 6.0, above, and to the Project Objectives, as stated in Section 2.0, *Project Description* (re-stated below), of the Draft EIR. In making the following alternatives findings, the City of Monrovia certifies that it has independently reviewed and considered the information on alternatives provided in the Draft EIR, including the information provided in the comments on the Draft EIR and the responses thereto.

Project Objectives

- No. 1. To maintain and/or restore the ecosystems represented in the Project Area.

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No. 2. To maintain a wilderness environment to promote an appreciation of beauty and solitude.

No. 3. To preserve the endangered habitats and species, wildlife habitat and wildlife corridors.

Outdoor and Nature Education

No. 4. To provide environmental literature to foster respect, appreciation and protection for the environment.

No. 5. To educate the community concerning the importance of conservation and stewardship of natural resources and open space.

No. 6. To provide and facilitate environmental interpretation.

No. 7. To provide and facilitate environmental studies by local and regional educational institutions.

Fire Safety

No. 8. To mitigate fire danger under the authority of the Monrovia Fire Department by providing measures such as:

- A rapid, all-weather, 24-hour, automatic early detection system.
- Look-out towers within the Project Area.
- Fire analysis within the Project Area.
- Underground utility services for all structures within the Project Area.

No. 9. To maintain emergency fire vehicle access routes, including approved fire apparatus roads and turnarounds.

No. 10. To propose, enact and enforce fire safety regulations.

No. 11. To reduce the likelihood of ignition within the Project Area.

No. 12. Provide phos-check and other fuels treatment applications within the Project Area. To reduce the intensity of fire within the Project Area by providing measures such as:

- Buffer zones, fuel breaks and fuel removal within the Project Area.
- Brush chipper processes within the Project Area.
- Goats and other live-stock for fuel removal.
- Removal of non-native vegetation.
- Planting of native, drought-resistant vegetation.

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- Prescribed backfires for fuel removal following approved safety measures.

[Project Objective No. 13 deleted in Final EIR. See Corrections and Additions.]

- No. 14. To decrease damage to structures within the Very High Fire Hazard Zone bordering the Project Area.
- No. 15. To increase the resiliency of structures within the Very High Fire Hazard Zone bordering the Project Area.
- No. 16. Enhanced operational response by providing measures such as:
- Improved Fire Station facility within Project Area.
 - New fire apparatus storage facility within the Project Area.
 - Improved water supply within the Project Area for fire operations.
 - Helicopter landing pad within the Project Area for enhanced fire operations.

Passive Recreation

- No. 17. To provide services and access that represent good stewardship of the natural resources.
- No. 18. To determine appropriate public access policies through environmental studies and public input.
- No. 19. To provide efficient, effective and environmentally sensitive trail management.
- No. 20. To develop interpretive and education signage.

A. ALTERNATIVES CONSIDERED AND REJECTED

In accordance with CEQA Guidelines Section 15126.6(c), an EIR should identify any alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the CEQA Guidelines, among the factors that may be used to eliminate alternatives from detailed consideration are the alternative's failure to meet most of the basic project objectives (outlined above), the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. Those alternatives that have been considered and rejected as infeasible are summarized as follows:

- Alternative Trail Alignments: New or alternative trail alignments to the Project's proposed trail alignments were considered by the by City as an alternative component of the Project. However, construction of new trail alignments would increase the potential for impacts to sensitive biological resources which is contrary to the Natural Resources goals for the project. The Natural Resources goals for the Project include maintaining and/or restoring the ecosystems in the Project Area, as well as preserving endangered habitats and species,

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and wildlife habitat and wildlife corridors. As indicated in this EIR, there are three rare communities (Southern Coast Live Oak Woodland, Alluvial Fan Scrub, Coastal Sage Scrub) and one rare community (Sycamore Riparian Woodland) in various areas of the Project Area. In addition, there are various sensitive/endangered plant and animal species, as well as wildlife corridors in the Project Area. With the exception of the new foot trails on the Cloverleaf Day Use Area and the Traci Lane Extension that would be located on disturbed/ornamental or Chaparral vegetation (both non-sensitive areas), all the trail alignments within the Project Area would occur on existing trails that have been previously disturbed and do not contain sensitive/endangered plant communities or habitat that would support sensitive/endangered plant or wildlife species to minimize impacts to biological resources.

- **Alternative Access Points:** The access points identified by the Project are existing access points. No new access points are being considered by the City at this time to minimize the potential for new impacts created by the Project, particularly related to biological resources. This includes access points from the City of Arcadia Wilderness Park. Should future access points from the Arcadia Wilderness Park be identified by the City in collaboration with the City of Arcadia, environmental review for that project would occur as required by appropriate local and State environmental regulations (i.e., CEQA). Canyon Park is located within the Project Area. The trails in Canyon Park would continue to provide access to the Project Area similar to existing conditions.

B. NO PROJECT/NO RMP ALTERNATIVE

Under the No Project/No RMP Alternative, the RMP would not be implemented. No physical changes to the Project Area would occur and the existing on-site trails would continue to operate as they currently do. No day use areas would be developed. No increase in visitors to the Project would occur. The RMP's long-term goals, objectives, and management guidelines to enhance wildlife habitats, develop vegetation management practices, minimize fire hazard risks, and provide safe, low-impact recreational opportunities and public access would not be implemented.

Finding

- *Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible this project alternative identified in the final EIR.*

Facts in Support of Finding

Many of the improvements and project goals, objectives, management strategies proposed as part of the Project would have beneficial effects, which would not occur under the No Project/No RMP Alternative (refer to the discussion above). This would be the case with regards to various issues within the topics of biological resources, wildland fires/fire protection services, and traffic impacts. Only noise impacts would be overall less under this Alternative, when compared to the Project. Even so, noise impacts would be less than significant after mitigation under the Project. Neither

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this Alternative nor the Project would result in significant and unavoidable impacts. Overall, since the Project would result in beneficial effects in regards to various topics within biological resources, wildland fires/fire protections services, and traffic; and noise impacts would be less than significant, the No Project/No RMP Alternative is considered environmentally inferior to the Project.

Under the No Project/No RMP Alternative, the RMP would not be implemented. No physical changes to the Project Area would occur and the existing on-site trails would continue to be used as they currently are, without management, consent or supervision. Without a management plan for the Project Area, none of the Project Objectives would be met under the No Project/No RMP Alternative. Specifically, the No Project/No RMP Alternative would not implement management strategies to maintain and restore the ecosystems of the Project Area, promote outdoor and nature education, provide fire-safety management practices and features, and environmentally sensitive passive recreation opportunities. In addition, the lack of a coordinated plan for reasonable public access to the area might not comply with the conditions of State grants used to acquire some of the property in question.

Given that the Project would not result in any significant and unavoidable impacts and this Alternative would not meet the Project Objectives to the same extent of the Project, the findings set forth in this document provide support for the Project and the elimination of this Alternative from further consideration.

D. MINIMALIST PLAN ALTERNATIVE

The Minimalist Plan Alternative is very similar to the original RMP Project, with the primary difference being that this Alternative includes the fire-related physical improvements to the existing wilderness fire station in the Cloverleaf Day Use Area, for reasons discussed below.

The Minimalist Plan Alternative would not include the new facilities at the Highland Day Use Area, the Cloverleaf Day Use Area and the Cloverleaf Access Area that would be expected to draw new visitors to the Project Area. These facilities include parking lots, picnic tables, the nature center (Cloverleaf Day Use Area), and the native plant restoration garden (Cloverleaf Day Use Area). However, under this Alternative, formal (authorized) trail access would be permitted at various access points to the Project Area. Formal access to the Project Area could incrementally increase the number of visitors to the Project Area, despite no new facilities at the Highland and Cloverleaf Day Use Areas. The incremental increase in visitors could be greater than existing conditions, but would be far less than the Project. New gates and signage at these locations and other access points would be similar to the Project. “No Parking” signs would be provided along Cloverleaf Drive north of Lotone Street to prevent vehicles from utilizing this deficient roadway segment. Management and maintenance activities within the Project Area included as part of the Project would be conducted in a similar manner under this Alternative. This Alternative would include the same fire-safety components [as described in Section 2.d(4)(a)] as the Project which include improvements to the existing wilderness fire station. Improvements to the wilderness fire station would not increase visitors to the Project Area and as analyzed in this EIR, would not result in any significant environmental impacts. As such fire-safety improvements would result in long-term safety benefits

Facts and Findings

regarding wildland fire protection, such improvements are being included as part of this Alternative.

Finding

The Community Services Commission recommended the Minimalist Plan, a plan substantially the same as that previously adopted by the City Council, because it meets many of the goals of the Project in a way that minimizes environmental impacts and impacts associated with more intense uses studied as part of the Project. In addition, the City finds that this alternative is feasible and would meet the City's legal and contractual obligation to provide reasonable, low-impact public access to the site.

Facts in Support of Finding

The Minimalist Plan Alternative would result in similar impacts to: sensitive plants, wildlife and habitat; federally protected wetlands; consistency with local policies/ordinances protecting biological resources; and consistency with habitat conservation plans. However, this Alternative would result in less impacts regarding wildlife corridors, nesting birds, and human/wildlife conflicts. This Alternative would result in similar impacts regarding wildland fires and less impacts regarding fire protection services when compared to the Project. Noise and vibration impacts would be less under this Alternative with regard to short-term construction activities and long-term operation when compared to the Project. Since this Alternative would not be required to implement the Project's prescribed mitigation to improve the currently deficient roadway segment along Cloverleaf Drive north of Lotone Street, this Alternative would result in greater traffic and emergency access impacts when compared to the Project. In addition, as on-site parking impacts would not be provided under this Alternative, current off-site parking impacts would continue to occur under this Alternative. Thus, parking impacts could be greater under this Alternative when compared to the Project if use of the area continues to grow without action by the City.

The Minimalist Plan Alternative would implement the same policies and management strategies as the Project with regards to biological resources. Thus, the Project and this Alternative would achieve the "Natural Resources - Environmental & Viewshed Preservation" Project Objectives (No. 1-3) to a similar degree.

Project Objectives Nos. 4-7 are intended to promote "Outdoor and Nature Education." Unlike the Project, the Minimalist Plan Alternative would not include the nature center or native plant restoration garden. Both of these facilities would promote outdoor and nature education to the general public, including the neighbors to the Project Area. Without these facilities, Objective Nos. 4 to 7 would be achieved to a lesser degree under this Alternative when compared to the Project.

Project Objective Nos. 8 - 16 deal with fire safety in and around the Project Area. This Alternative would provide improvements to the existing wilderness fire station in a similar manner as the Project. However, this Alternative would not be required to implement the Project's mitigation to widen the roadway segment along Cloverleaf Drive north of Lotone to accommodate two-way traffic and enhance emergency vehicle access. This Alternative would also not include a fire engine

Facts and Findings

turn around in the Highland Place Day Use Area. Without these features, this Alternative would not meet Objective Nos. 9 and 16 to the degree of the Project. Otherwise, Objective Nos. 8, and 10-15, would be met to a similar degree under this Alternative as the Project as the same improvements to the existing wilderness fire station would occur and the same policies and management strategies that promote fire safety in the Project Area would implemented.

Project Objective Nos. 17 to 20 promote environmentally conscious passive recreational opportunities in the Project Area. Both the Project and this Alternative would include interpretive and education signage, environmentally sensitive trail management, and similar access points. As such, the Project and this Alternative would implement Objective Nos. 17-20 to a similar degree. In addition, both the Project and this Alternative would include a network of recreational trail facilities that would provide passive recreational opportunities for visitors to the Project Area. However, this Alternative would not include the Project's day use facilities that include picnic facilities, as well as a nature center and native plant restoration garden in the Cloverleaf Day Use Area. As indicated in this EIR, the development of the Day Use Areas after implementation of the prescribed mitigation measures would not result in any significant impacts to the environment. Thus, the day use area facilities would represent new passive recreational opportunities that would be compatible with the natural resources within the Project Area. Accordingly, since this Alternative includes fewer passive recreational opportunities that would be compatible with the natural resources within the Project Area, this Alternative would not meet Objective No. 17 to the extent of the Project.

The Project and this Alternative would not result in any significant and unavoidable impacts. While this Alternative would not meet some of the Project Objectives to the same extent of the Project, the City finds that this Alternative adequately balances the objectives of the Project with the City's goal of providing reasonable public access as required by law and contract in ways that minimizes impacts.

E. REDUCED TRAILS NETWORK ALTERNATIVE

The Reduced Trails Network Alternative would not include the portion of the Lower Clamshell Motorway (semi-loop) that traverses the near and through private in-holdings as a multiple-use trail available to the general public. Only the Lower Clamshell Motorway Connector Trail (east-west trail), which is north of the private in-holdings, and the eastern and western segments of the Lower Clamshell Motorway would be available to the public for trail use. Otherwise, this Alternative would be similar to the Project. Management and maintenance activities within the Project Area included as part of the Project would be conducted in a similar manner under this Alternative. Also, the Day Use Area facilities would be developed under this Alternative similar to the Project. The overall number of trail users in the overall Project Area would be similar under this Alternative and the Project.

Finding

- *Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible this project alternative as identified in the final EIR.*

Facts in Support of Finding

The Reduced Trails Network Alternative would result in similar impacts to biological resources and wildland fires/fire protection services. With regards to noise, construction-related noise and vibration and operational vibration impacts would be similar to the Project. However, operational noise impacts would be incrementally less at the private inholdings compared to the Project. Regards traffic impacts, traffic emergency access, and parking impacts would be the same as the project. However, the potential for user conflicts would be incrementally less than the Project under this Alternative.

The Reduced Trails Network Alternative would implement the same policies and management strategies as the Project with regards to biological resources. Thus, the Project and this Alternative would achieve the “Natural Resources - Environmental & Viewshed Preservation” Project Objectives (No. 1-3) to a similar degree.

Project Objectives Nos. 4-7 are intended to promote “Outdoor and Nature Education.” The Project and this Alternative would include the same day use facilities, including the nature center and native plant restoration garden within the Cloverleaf Day Use Area. Both of these facilities would promote outdoor and nature education to the general public, including the neighbors to the Project Area. Overall, Objective Nos. 4 to 7 would be achieved to a similar degree under this Alternative when compared to the Project.

Project Objective Nos. 8 – 16 deal with fire safety in and around the Project Area. This Alternative would provide improvements to the existing wilderness fire station in a similar manner as the Project. This Alternative would implement the Project’s mitigation to widen the roadway segment along Cloverleaf Drive north of Lotone Street to the access gate of the Project Area to at least 20-feet to accommodate two-way traffic and emergency vehicle access. This Alternative would also include a fire engine turn around in the Highland Place Day Use Area. With these features, this Alternative would meet Objective Nos. 8 – 16 to a similar degree as the Project.

Project Objective Nos. 17 to 20 promote environmentally conscious passive recreational opportunities in the Project Area. Both the Project and this Alternative would include interpretive and education signage, environmentally sensitive trail management, and similar access points. As such, the Project and this Alternative would implement Objective Nos. 18-20 to a similar degree. This Alternative would include the Project’s day use facilities that include picnic facilities, as well as a nature center and native plant restoration garden in the Cloverleaf Day Use Area. However, this alternative would reduce the extent of trails network and number of scenic viewing locations available to the public. By removing a portion of the Lower Clamshell Motorway from the trails network, this Alternative would include decrease the extent of passive recreational opportunities

Facts and Findings

that would be compatible with the natural resources within the Project Area when compared to the Project. Accordingly, this Alternative would not meet Objective No. 17 to the extent that the Project would. Given the lack of any significant benefit associated with this Alternative, and its utter failure to meet a significant objective of the Project, this Alternative is not in any way superior to the proposed Project or favored alternatives.

9.0 FINDINGS ON THE MITIGATION MONITORING AND REPORTING PROGRAM

Pursuant to Section 21081.6 of the Public Resources Code, the City, in adopting these Findings, also adopts the Mitigation Monitoring and Reporting Program (MMRP) for the Hillside Wilderness Preserve and Recreation Area RMP Project. The MMRP is designed to ensure that, during Project implementation, the City and other responsible parties will comply with the mitigation measures adopted in these Findings. The City hereby finds that the MMRP, which is incorporated into the Final EIR document dated November 2011, shall be revised to accurately reflect the mitigation measures to be implemented for Alternative No. 2 (see attached revised MMRP). The MMRP meets the requirements of Public Resources Code Section 21081.6 by providing for the implementation and monitoring of Project conditions intended to mitigate potential environmental effects of the Project.

10.0 FINDINGS REGARDING FINAL EIR

Pursuant to CEQA, on the basis of the review and consideration of the Final EIR, the City finds that all information included in the Final EIR in “response to comments” and “corrections and additions” to the Draft EIR merely clarifies, amplifies or makes insignificant modifications to an already adequate EIR pursuant to CEQA Guidelines Section 15088.5(b) and that no significant new information has been received that would require recirculation.

11.0 CUSTODIAN OF RECORDS

The custodian of the documents or other material which constitute the record of proceedings upon which the City’s decision is based is the:

City of Monrovia
City Clerk
415 S. Ivy Ave.
Monrovia, CA 91016

4.0 MITIGATION MONITORING AND REPORTING PROGRAM

This Mitigation Monitoring and Reporting Program (MMRP) has been prepared for the City of Monrovia Hillside Wilderness Preserve and Hillside Recreation Area Resource Management Plan (the Project”) in compliance with Section 21081.6 of the Public Resources Code and Section 15097 of the CEQA Guidelines, which is required for all projects where an Environmental Impact Report (EIR) or Mitigated Negative Declaration has been prepared. Section 21081.6 of the Public Resources Code states: “ ...the [lead] agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment...[and the program] shall be designed to ensure compliance during project implementation.” The City of Monrovia is the Lead Agency for the Project.

This MMRP identifies the mitigation measures prescribed in the Draft EIR to reduce the Project’s potentially significant environmental impacts to a less than significant level.

This MMRP provides a basis in which future management activities and/or physical components implemented under the Project would utilize to mitigate or avoid potentially significant impacts, as necessary. As individual management activities and/or physical components are developed under the Project, the City would review each activity and/or physical components for its specific characteristics and its location to determine which mitigation measures are applicable based on the “Mitigation Applicability” in the MMRP and analysis contained in the Section 4.0 of the Draft EIR, as appropriate. Thus, this MMRP would be re-used for individual management activities and/or physical components as part of the Project when such management activities and/or physical components are implemented by the City.

Also, the MMRP defines the timing during which the mitigation measure is to be implemented and monitored; the enforcement agency; and the verification/approval party. The MMRP is included as Table 4-1 below.

Table 4-1

Mitigation Monitoring and Reporting Program

Mitigation Measure	Mitigation Applicability	Implementation (I)/ Monitoring (M) Phase	Enforcement Agency	Verification		
				Staff Compliance Verification	Date of Implementation (I)/ Monitoring (M)	Remarks
Biological Resources						
<p>Mitigation Measure 4.A-2-1: Sensitive Habitats - In the event the City elects to conduct stream crossing repair/ maintenance / improvement, bank stabilization, riparian habitat restoration and/or improve trail crossings along stream courses within the Project Area, the City shall notify and consult with the CDFG regarding the need for a Streambed Alteration Agreement (SAA). All work shall be performed in compliance with the conditions set forth in the SAA, as determined by the CDFG. Such conditions shall include the in-kind replacement or restoration of riparian habitat at a 1:1 ratio for temporary impacts and a 2:1 ratio for permanent impacts within the Project Area, or as otherwise directed by the CDFG. Alternatively, if the impacts are very minor, the CDFG may, at its discretion, allow the work to proceed under a letter of law without mitigation other than notification and consultation.</p>	<p>Management activities and/or physical components with potential to impact stream courses.</p>	<p>(I) Pre-construction; during construction (M) Pre-construction; during construction</p>	<ul style="list-style-type: none"> ▪ City Community Development Department ▪ City Public Works and Utilities 		<p>(I) (M)</p>	
<p>Mitigation Measure 4.A-3-1: Federally Protected Wetlands - In the event the City elects to conduct stream crossing repair/maintenance/improvement, bank stabilization, riparian habitat restoration and/or improve trail crossings repair, maintain and/or improve trail crossing within wetlands within the Project Area, the City shall notify and consult with the ACOE regarding the need for a Section 404 Permit. All work shall be performed in compliance with the conditions set forth in the Permit, as determined by the ACOE. Such conditions</p>	<p>Management activities and/or physical components with potential to impact wetlands.</p>	<p>(I) Pre-construction; during construction (M) Pre-construction; during construction</p>	<ul style="list-style-type: none"> ▪ City Community Development Department ▪ City Public Works and Utilities 		<p>(I) (M)</p>	

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Mitigation Measure	Mitigation Applicability	Implementation (I)/ Monitoring (M) Phase	Enforcement Agency	Verification		
				Staff Compliance Verification	Date of Implementation (I)/ Monitoring (M)	Remarks
shall include the in-kind replacement or restoration of wetlands at a ratio of 1:1 for temporary impacts and a ratio of 2:1 for permanent impacts within the Project Area, or as otherwise directed by the ACOE. Alternatively, if the impacts are less than 0.1 acre, the ACOE may, at its discretion, allow the work to proceed without mitigation other than notification and consultation.						
Mitigation Measure 4.A-7-1: Nesting Birds - To the extent practicable brush and tree removal activities for trail reclamation, fuel modification, facility improvement, construction and other Project components performed by the City shall be initiated outside of the nesting bird season, which is generally held to be from January 1 to September 15, and shall be carried out with no more than a two week lapse in the work. If the City deems this to not be practicable the City shall have a nesting bird survey by a monitoring biologist conducted within 300 feet (for songbirds) and 500 feet (for raptorial birds) of construction sites no more than one week prior to initiating construction. If no active nests of songbirds and raptors are found within 300 feet and 500 feet, respectively, of the construction site, the work may begin. If active nests are found within the survey areas the City shall delineate a buffer zone of 300 feet and 500 feet for songbirds and raptors, respectively, around the nest. Based on the nature of the work to be performed and the equipment to be used, the monitoring biologist may reduce the buffer zone based on intervening vegetation and topography. Such buffer zones shall remain in place	Management activities and/or construction activities for physical components occurring between January 1 to September 15.	(I) Pre-construction; during construction (M) Pre-construction; during construction	<ul style="list-style-type: none"> ▪ City Community Development Department ▪ City Public Works and Utilities 		(I) (M)	

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Mitigation Measure	Mitigation Applicability	Implementation (I)/ Monitoring (M) Phase	Enforcement Agency	Verification		
				Staff Compliance Verification	Date of Implementation (I)/ Monitoring (M)	Remarks
until the young in the nest have fledged or the nest has failed, as determined by the monitoring biologist.						
<p>Mitigation Measure 4.A-8-1: Human/Wildlife Conflicts - In order to minimize conflicts between humans and wildlife; and minimize impacts from human activity within the Project Area, the City shall implement the following measures through educational materials provided to RMP area users or through kiosks/signage to be located at each public access point to the Project Area.</p> <p>1. <u>Domestic Dog Controls</u> - The following measures shall be implemented and identified on signage, as appropriate:</p> <ul style="list-style-type: none"> a. Leash restrictions shall be identified and enforced within the Project Area. These restrictions shall include a standard leash length to minimize the effects of vegetation trampling and trail braiding. b. Those areas with sensitive vegetation communities in close proximity to the trails shall be considered as potential “no dog” areas. Signage shall be installed within the Project Area to properly identify these areas. c. Dog waste disposal/bag stations shall be provided along trails areas open to dogs to ensure proper dog waste disposal. d. Dog use upon trails shall be monitored and corrective measures taken if is determined 	Upon Project implementation	(I) Project implementation (M) Project implementation	<ul style="list-style-type: none"> ▪ City Community Development Department ▪ City Public Works and Utilities 		(I) (M)	

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Mitigation Measure	Mitigation Applicability	Implementation (I)/ Monitoring (M) Phase	Enforcement Agency	Verification		
				Staff Compliance Verification	Date of Implementation (I)/ Monitoring (M)	Remarks
<p>that dog use promotes an adverse modification to the biology of the area.</p> <p>2. <u>Public Access in Wildlife Areas</u> - The following measures shall be implemented and identified on signage, as appropriate:</p> <ul style="list-style-type: none"> a. Educational materials and signage shall be provided to trail users to clarify the harms of feeding of wildlife. b. Monitoring and patrols of the trails network shall be conducted to help identify problem areas in need of further restrictions. c. The use of firearms, air guns, bows and arrows and sling shots or other weapons shall not be allowed. d. No hunting or trapping of any living or dead animal shall be allowed. e. No cutting, pruning or intentional injury to vegetation shall be permitted. f. No glass containers or alcohol shall be allowed. g. Vegetative buffers to provide separation for avoiding or reducing impacts to wildlife from human activities shall be used, as feasible. <p>3. <u>Mountain Biking</u> - The following measures shall be implemented and identified on signage, as appropriate:</p> <ul style="list-style-type: none"> a. Trails open to biking shall include proper 						

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Mitigation Measure	Mitigation Applicability	Implementation (I)/ Monitoring (M) Phase	Enforcement Agency	Verification		
				Staff Compliance Verification	Date of Implementation (I)/ Monitoring (M)	Remarks
<p>signage and guidance to encourage bikers to practice trail etiquette, yield to hikers, and practice safe speeds.</p> <p>4. <u>Wildlife Encounters/Conflicts</u> - The following measures shall be implemented and identified on signage, as appropriate:</p> <ul style="list-style-type: none"> a. Educational material and signage shall be made available to trail users to identify human behaviors with a tendency to attract bears and mountain lions, the risks and potential dangers of wildlife encounters, and the most effective methods for avoiding and managing conflict. b. Efforts shall be made to identify potentially sensitive areas for wildlife breeding activity and close those trails within proximity. c. Proper daily trash disposal methods such as utilizing bear proof trash containers would be identified and implemented to minimize wildlife conflicts. d. Signage shall include a statement directing the trail user to a publication titled "Living with Wildlife," available at the City's web site. 						

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Mitigation Measure	Mitigation Applicability	Implementation (I)/ Monitoring (M) Phase	Enforcement Agency	Verification		
				Staff Compliance Verification	Date of Implementation (I)/ Monitoring (M)	Remarks
<i>Noise</i>						
Mitigation Measure 4.C-1: Operational Noise - Cloverleaf Day Use Area: New facilities within the Cloverleaf Day Use Area shall be at least 30 feet from the nearest off-site residence. New facilities include picnic tables, nature center, native plant restoration garden, new trails, and parking lot facilities.	Facilities within Cloverleaf Day Use Area.	(I) Project design (M) Plan check; during construction	<ul style="list-style-type: none"> ▪ City Community Development Department ▪ City Public Works and Utilities 		(I) (M)	
Mitigation Measure 4.C-2: Operational Noise - Highland Day Use Area: New facilities within the Highland Day Use Area shall be at least 30 feet from the nearest off-site residence. New facilities include picnic tables and parking lot facilities.	Facilities within Highland Day Use Area.	(I) Project design (M) Plan check; during construction	<ul style="list-style-type: none"> ▪ City Community Development Department ▪ City Public Works and Utilities 		(I) (M)	
Mitigation Measure 4.C-3: Operational Noise - Highland and Cloverleaf Day Use Areas: Signs shall be posted to prohibit amplified sound at the day use areas.	Facilities within Highland and Cloverleaf Day Use Areas.	(I) Prior to operation of facilities at the day use areas (M) Plan check; Initial operation of day use areas	<ul style="list-style-type: none"> ▪ City Community Development Department ▪ City Public Works and Utilities 		(I) (M)	

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Mitigation Measure	Mitigation Applicability	Implementation (I)/ Monitoring (M) Phase	Enforcement Agency	Verification		
				Staff Compliance Verification	Date of Implementation (I)/ Monitoring (M)	Remarks
Mitigation Measure 4.C-4: Operational Noise - Cloverleaf Day Use Area: Amplified sound shall be prohibited at the nature center and native plant restoration garden.	Nature center and native plant restoration garden facilities at the Cloverleaf Day Use Area.	(I) Prior to operation of facilities at the Cloverleaf Day Use Area (M) Plan check; Initial operation of facilities at the Cloverleaf Day Use Area	<ul style="list-style-type: none"> ▪ City Community Development Department ▪ City Public Works and Utilities 		(I) (M)	
Traffic						
Mitigation Measure 4.D-1: Traffic - Prior to implementation of proposed RMP improvements, the roadway segment along Cloverleaf Drive north of Lotone Street to the access gate of the Project Area shall be widened to at least 20-feet or as otherwise determined appropriate by the City of Monrovia Public Works and/or Fire Department to accommodate two-way traffic and emergency vehicle access.	Facilities within Cloverleaf Day Use Area.	(I) Project design (M) Plan check; during construction	<ul style="list-style-type: none"> ▪ City Community Development Department ▪ City Public Works and Utilities ▪ Monrovia Fire Department 		(I) (M)	
Mitigation Measure 4.D-5-1: User Conflicts - Warning signs shall be installed within the Project Area at blind corner locations where there could be potential for user conflicts between vehicles, hikers and/or bikers.	Upon initial Project implementation	(I) Initial Project implementation (M) Initial Project implementation	<ul style="list-style-type: none"> ▪ City Community Development Department ▪ City Public Works and Utilities 			

Table 4-1 (Continued)

Mitigation Monitoring and Reporting Program

Mitigation Measure	Mitigation Applicability	Implementation (I)/ Monitoring (M) Phase	Enforcement Agency	Verification		
				Staff Compliance Verification	Date of Implementation (I)/ Monitoring (M)	Remarks
<p>Mitigation Measure 4.D-5-2: User Conflicts - Warning signs shall be posted along roadways providing access to the Project Area where there could be potential for user conflicts between vehicles, hikers and/or bikers.</p>	<p>Upon initial Project implementation</p>	<p>(I) Initial Project implementation (M) Initial Project implementation</p>	<ul style="list-style-type: none"> ▪ City Community Development Department ▪ City Public Works and Utilities 			

ARTHUR L. KASSAN, P.E.
Consulting Traffic Engineer

RECEIVED

February 1, 2012

Honorable Members of the City Council
c/o Alice Atkins, CMC
City Clerk, City of Monrovia
415 S. Ivy Avenue
Monrovia, CA 91016

FEB - 2 2012

Office of the City Clerk
City of Monrovia

Subject: Hillside Wilderness Preserve and Recreation Area RMP
Environmental Impact Report

Dear Members of the City Council:

I am a Registered Traffic Engineer and a Registered Civil Engineer, both in the State of California. I have been practicing traffic engineering for over 51 years, and have held responsible positions in both the public and private sector. My public sector experience includes working for two states and three cities. As a private consultant, I have headed my own firm for over 24 years. A copy of my résumé is attached to this letter.

On behalf of residents of Cloverleaf Drive, I have reviewed the *Hillside Wilderness Preserve and Recreation Area Resource Management Plan Environmental Impact Report*, prepared in 2011. I concentrated my review on materials contained in the Draft EIR (DEIR), particularly the following sections:

Executive Summary
Section 2.0 Project Description
Section 4.0.D. Environmental Impact Analysis, Traffic and Circulation
Section 5.0 Alternatives
Appendix D. Traffic Impact Study for Monrovia Hillside Preserve
& Recreational Area RMP

Following are my comments based on my document review and my personal, on-site investigation of existing conditions in the Cloverleaf Drive vicinity.

- 1. The trip generation in the traffic impact analysis is underestimated by 100%. The numbers of trips generated will be at least twice the levels shown in the DEIR.**

Traffic engineers define a "trip" as "a single or one-direction vehicle movement [emphasis added] with either the origin or the destination (exiting or entering) inside a study site. For trip generation purposes, the total trip ends for a land use over a given period of time are the total of all trips entering plus all trips exiting a site during a designated time period." [*Trip Generation, User's Guide*, Volume 1, Institute of Transportation Engineers, 2008, page 9] What is generally called a "round trip" would be considered by a traffic engineer to be two trips: one trip entering the study site (for example, a trip from home to the wilderness area); and one trip exiting the site (a trip from the wilderness area returning to home).

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5105 Cimarron Lane
Culver City, CA 90230

FAX
(310) 558-1829

In the DEIR, the trip generation estimates are shown in Table 4.D-3 [page 4.D-10]. In making his estimates, the City's consultant estimated only one of the two trips that a vehicle would make in relation to the wilderness area – either the trip entering the area or the trip exiting the area, but not both. Therefore, he estimated only half the number of trips that would actually occur, based on the standard traffic engineering definition of a trip.

Concentrating on the estimates for Cloverleaf Drive, the Table 4.D-3 shows the following for the "Future Weekend Daily Usage":

<u>Peak Trail Usage</u>	<u>Average Auto Occupancy</u>	<u>Daily Visitors</u>	<u>Daily Vehicles</u>
Trails	2.50	16	6
Picnic Tables	3.00	60	20
Nature Center & Plant Garden	2.50	20	8
Sub-Total		96	34

The numbers of "Daily Vehicles" were calculated by dividing the number of "Daily Visitors" by the "Average Auto Occupancy". For example, 16 trails visitors with an average auto occupancy of 2.50 visitors per vehicle will **enter in 6 vehicles** [$16 \div 2.50 = 6.4$ or 6, rounding down, as the consultant did]. However, those 16 visitors will also **exit in 6 vehicles**. Therefore, they will generate a **total of 12 trips**, 6 entering and 6 exiting.

The same analysis logic must be applied to the other uses: the **picnic tables** will generate a **total of 40 daily trips**; and the **nature center/garden** will generate a total of **16 daily trips**. There will be a **total of at least 68 daily trips** for the Cloverleaf Drive area. That contradicts the following statement in the DEIR, "Future use of these trails are forecast to have a maximum of 96 visitors on a peak weekend day, with 34 daily vehicle trips and an anticipated seven (7) future peak-hour vehicle trips." [DEIR Section 4.D, page 4.D-11] The trip estimates in the statement are wrong by a factor of 100% of the estimates.

The same comments apply regarding the estimates for the other locations included in Table 4.D-3: Highland Place; Ridgeside Drive; and Sleepy Hollow.

Therefore, the **entire traffic impact analysis is flawed**, because the trip estimates are half of what they should be. **The analysis should be revised to reflect trip generation levels at twice those shown in the report. The DEIR should be re-circulated with the corrected analysis to properly apprise the decision-makers and the public of the correct estimates of vehicle trips and the re-analyzed levels of impacts.**

2. **The estimates of future parking demands do not take into account the full range of those who will want to or need to park in the Cloverleaf Day Use Area.**

The Cloverleaf Day Use Area is proposed to contain 10 picnic tables, the nature center/garden, an improved fire station, a restroom, an emergency helicopter pad, and hiker access to trails. There will be a parking area with approximately 25 parking spaces.

According to the DEIR, "The parking lot is anticipated to include designated spaces for the Fire Department, Park Rangers, and volunteers, leaving the remainder for visitors/general use." [DEIR page ES-2]

According to the DEIR Table 4.D-7, Parking Demand Summary [page 4.D-16], the Cloverleaf Day Use Area will need only 6 of its 25 parking spaces to serve all of its parking demands. That does not seem to include all of the potential parking space users, as follows.

- Approximately **4 spaces** will be necessary for **City employees/volunteers** assuming at least two Fire Department personnel, one Park Ranger, and one nature center/garden volunteer. Those are spaces that would be designated for full-time use by those people and would not be available to others, as implied in the DEIR sentence from page ES-2, quoted above.
- Approximately **6 spaces** will be needed for **hikers**, as shown in the report.
- At least **10 spaces** will be needed for the users of the **10 picnic tables** at one time.
- **Additional picnickers** may be at the area using blankets on the grass or their personal, portable picnic furniture. Some of those would be people who arrive expecting to use the tables, but finding them full, decide to picnic informally. They have not been included in any analysis and may need approximately **5 parking spaces**.
- **Visitors to the nature center/garden** who are not hiking or picnicking will also need parking spaces. They may need an additional **3 spaces**. (In fact, there may be times when there will be the need to park a **school bus or similar large vehicle** transporting a group visiting the nature center/garden.)

That is a **conservative total of 28 spaces needed**, which **will exceed the planned supply of 25 spaces**. People who cannot find spaces within the parking lot will seek parking elsewhere, such as along the residential section of Cloverleaf Drive immediately south of the subject site. Such parked vehicles will block the already-narrow roadway, which is proposed to be widened to a maximum of 20 feet (although that widening may not be feasible, as discussed later); that width will not be sufficient for two traffic lanes plus parking. Visitor circulation to and from the Day Use Area will become inconvenient and potentially hazardous, and emergency access may be blocked at peak-use times.

The purpose of the DEIR is to provide a **conservative analysis** of the potential project impacts. The parking analysis in DEIR Section 4.D does not meet that standard, because it does not address the parking needs of all of the potential users of the proposed parking facility and does not provide a proper analysis of the potential project impacts. **The parking analysis should be re-done with the all user components taken into account, and the DEIR should be re-circulated with the corrected parking analysis.**

3. The primary measure that has been proposed to mitigate the identified traffic impacts may not be feasible.

In the DEIR, Mitigation Measure 4.D-1 reads, "The roadway segment along Cloverleaf Drive north of Lotone Street to the access gate of the project area shall be widened to at least 20 feet or as otherwise determined appropriate by the City of Monrovia Public Works and/or Fire Department to accommodate two-way traffic and emergency access." [DEIR page ES-18]

Cloverleaf Drive, between Lotone Street and Hidden Valley Road, has an existing **12-foot wide pavement**. That is adequate for only **one lane** of traffic in **one direction at a time**. Along the east side of the street, there is a tall and steep embankment of dirt and rock with oak trees growing on it. Along the west side of the street, there is a narrow shoulder and a steep drop-off to private property well below the level of the roadway. The shoulder and the private property have oak trees. Widening the road in that direction would require a **substantial and costly retaining wall** to minimize impacts on the private property.

North of Hidden Valley Road, Cloverleaf Drive remains narrow at 10 to 12 feet of pavement. There is private property immediately adjacent to the paved roadway; in fact, the roadway itself is private property belonging to the adjacent property owners. Whether or not the City could widen into the property adjacent to the paved roadway is questionable.

Considering the significant physical constraints and the property ownerships, it may not be feasible to widen Cloverleaf Drive in either of the two sections described. Before proceeding to adopt that critical mitigation measure, there should be a **feasibility and cost study** for the purpose of proving to the decision-makers and the public that implementation of the measure will be feasible and affordable within the confines of the project budget. Without that study, the **measure cannot be considered as an acceptable condition of the project**. If the measure cannot be implemented and the significant impact remains, the safety of the area residents and the Cloverleaf Day Use Area visitors and staff would be compromised by retention of the existing narrow roadways. Additionally, emergency access to the area would be impacted. **Without the measure, there would be significant impacts that would be permanent**. The feasibility and cost study should be part of the re-circulated DEIR.

4. Using warning signs to mitigate the potential hazards of mixing motor vehicles, pedestrians, and bicyclists on a narrow, one-lane, mountainous, unpaved road would be ineffective.

Cloverleaf Drive, north of the existing entry gate near Hidden Valley Road, is an **8-foot wide, unpaved** (compacted dirt) road with approximately **25 sharp, blind curves** and a relatively **steep grade**. The road has **no shoulders**. The road is cut into the side of the mountain with a steep slope upward adjacent to one edge and a steep slope downward adjacent to the other edge. There is scant room for a vehicle and a pedestrian or bicycle to pass each other.

It is not likely that people on a "wilderness hike" would stay in single-file tight to the edge of the road adjacent to the upper slope for the full 1.3-mile length of the road. Even in single-file, **pedestrians would be in danger**, because there are **no shoulders** where they could walk out of the paths of motor vehicles.

The unpaved road surface is full of ruts, and bicyclists avoiding the most significant of those will tend to steer their bicycles into the roadway and away from the edge adjacent to the upper slope. In doing so, the bicyclists could move into the path of on-coming motor vehicles. Also, it is not realistic to assume that bicyclists will stay in a tight single file on the road.

There are **no standard signs** that would adequately serve to warn motorists, pedestrians, and bicyclists of the potential dangers of using the road, and the City's consultants have not specified any special signs that they can say with confidence would accomplish the mitigation required. To allow the mixing of motor vehicles, bicycles, and pedestrians on that road is to open the City to **liability** that cannot be mitigated by the use of warning signs. **The potential hazards of the mixed traffic will remain permanently as an unmitigated significant traffic impact.**

5. Although the peak usage of the existing trails occurs in July, November, and December, all of the traffic counts and speed measurements were done in the off-peak month of January.

According to the DEIR traffic report, "Review of [City of Monrovia Park Rangers] patrol logs from the 2009-2010 fiscal year indicates that trail usage peaked in the months of July, November and December." [DEIR Appendix D, page 14] However, the City's traffic consultant chose to do the foundational traffic counts and speed studies in January 2011. The DEIR was not completed until August 2010. It would have been more representative of high (if not peak) trail usage to do the studies in May, when the weather is generally more attractive to outdoor users than it is in January. From May to July, there would have been adequate time to complete the traffic study for incorporation into the DEIR for publication in August.

In summary,

- the traffic study is based on estimates of traffic that are only half of the correct levels based on standard traffic engineering methodology;
- the parking needs estimates do not take into account all of the components of the Day Use Area visitors and staff;
- there is no assurance that it will be feasible to widen Cloverleaf Drive as proposed at a cost that is acceptable; to the contrary, it is highly probable that the measure is infeasible, and the impacts could not be mitigated; and
- there is no signage that will mitigate the high probability hazards of mixing motor vehicles, pedestrians (hikers), and bicyclists on a narrow, unpaved, rutted, curvy, steep, mountainous road with no shoulders.

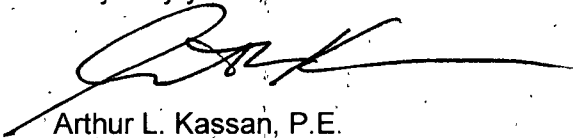
Honorable Members of the City Council
City of Monrovia
February 1, 2012

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Implementation of the mitigation measures cannot be guaranteed. It is likely that the significant impacts identified in the traffic study cannot be mitigated and will be permanent, resulting in impairment of the circulation to and from the area, potential hazards to visitors and employees within the area, and potential impedance of emergency services.

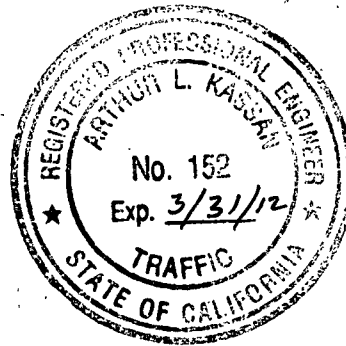
Thank you for your attention to our concerns.

Very truly yours,



Arthur L. Kassan, P.E.
Registered Traffic Engineer No. 152
Registered Civil Engineer No. 15563

Attach.



ARTHUR L. KASSAN, P.E.

Consulting Traffic Engineer

RÉSUMÉ

Arthur L. Kassan, P.E., Consulting Traffic Engineer, is a firm specializing in the traffic engineering needs of private developers and neighborhood organizations. With over 51 years of experience, Mr. Kassan has developed a balanced perspective in which problems are brought into focus resulting in feasible solutions.

EDUCATION

The Cooper Union, New York, New York.
Bachelor of Civil Engineering, 1959.

Yale University Bureau of Highway Traffic, New Haven, Connecticut.
Certificate in Highway Traffic, 1961.

REGISTERED PROFESSIONAL ENGINEER

Civil Engineer, California, No. 15563.
Traffic Engineer, California, No. 152.

PROFESSIONAL SOCIETIES

Life Fellow, Institute of Transportation Engineers.
Life Member, American Society of Civil Engineers.

EXPERIENCE

1987 - Present; President, Arthur L. Kassan, P.E., Consulting Traffic Engineer. As a consultant to numerous developers, architects, and civil engineers, Mr. Kassan prepares feasibility and planning studies; site planning studies; off-site improvement designs; parking needs studies; conceptual parking facility layout and signing/stripping studies; and traffic impact studies for all types of developments including: shopping centers; schools; entertainment complexes; industrial parks; office complexes; residential communities; hotels and motels; government centers; and parking facilities. As a consultant to several cities and a Redevelopment Agency, Mr. Kassan has participated in the transportation planning processes, and has evaluated development proposals and their potential environmental impacts. He has managed the Neighborhood Traffic Management Program for a city, assisting residents in designing programs to mitigate local street through traffic and speeding problems. He also consults with several neighborhood organizations regarding such matters.

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1969-1987; Senior Traffic Engineer, Donald Frischer & Associates, Van Nuys, California. Over an 18-year period, Mr. Kassan was in responsible charge of several hundred traffic engineering design and planning studies for private developers and government agencies. Those projects included all types of developments; streets, freeway; and traffic signal designs; and community master plans.

1968-1969; Traffic Engineer, City of Los Angeles Traffic Department. As Head of the Research Bureau, Mr. Kassan planned and directed studies of new techniques and devices for controlling traffic flow, increasing freeway flow, and improving transit operations.

1965-1968; Senior Traffic Engineer, Victor Gruen Associates, Los Angeles, California. Mr. Kassan prepared the traffic plans for numerous cities, particularly downtown redevelopment projects, and commercial developments. He participated in comprehensive research projects sponsored by the National Highway Research Board and the Automobile Manufacturers Association. He represented the firm as resident traffic engineer in Tehran, Iran during the preparation of the comprehensive plan for that city.

1964-1965; Traffic Engineer, City of Huntington Beach, California.

1962-1964; Traffic Engineer, City of Santa Ana, California.

1961-1962; Director, Statewide Accident Reduction Program, State of Ohio Department of Highways, Columbus, Ohio.

1959-1960; Civil Engineer, State of California Division of Highways, Los Angeles, California.



February 3, 2012

Ms. April L. Soash
Director of Community Services
City of Monrovia
119 W. Palm Ave.
Monrovia, CA 91016

Subject: **Response to Arthur L. Kassan's Traffic Engineering Review Letter
Hillside Wilderness Preserve DEIR**

Dear Ms. Soash,

Infrastructure Engineers is pleased to submit the following response to comments presented by Mr. Kassan in his review of the Hillside Wilderness Preserve DEIR. Our responses below follow the same numerical format included in his letter.

First, it is recognized that the Draft EIR was made available by the City for a 60-day public review period from August 1 through September 29, 2011 (CEQA requires a 45-day review, but the City provided a 60-day review). The comment letter provided by Arthur L. Kassan's on the Draft EIR traffic analysis was submitted on February 1, 2012, well after the public comment period ended. Nonetheless, the City has chosen to have Infrastructure Engineers prepare a response despite the fact that the comment letter was not timely, and that it should not be assumed that the City will provide a written response to any other late comment received.

1. Mr. Kassan stated that the trip generation was understated by 100% and the entire traffic impact analysis is flawed.

Daily Trip Generation - The traffic study did understate the daily trip generation. This was a numerical oversight as the daily trip generation should be doubled to reflect both the arrival and departure trips for the project. For the Cloverleaf Drive area the report should have stated that 69 daily trips are anticipated. However, the understatement of daily trip generation does not change the conclusions of the report relative to traffic capacity. Doubling the daily trip generation still results in a less than significant impact on area roadways. For example, 69 vehicles added to Cloverleaf Drive over a 12 hour period (typical daylight hours) equates to less than 6 vehicles per hour or one vehicle every 10 minutes. Even on the most congested of roadways, 6 vehicles per hour would not be considered a significant traffic impact.

Peak-Hour Trip Generation – Due to the relatively light daily trip generation the traffic impact study focused on peak-hour impacts. The peak-hour vehicular volumes presented in the report are correct since the duration of visitors on hiking, picnicking and nature center is longer than one hour. Therefore the report's stated conclusions relative to traffic volume impacts are correct. No significant impacts are anticipated by the project.

The responses above are also relevant to the other locations including Highland Place, Ridgeside Drive and Sleepy Hollow.

The following presents an updated trip generation table which shows the corrected forecast of daily vehicle trips.

Weekend Daily Usage							
Hillside Wilderness Area							
Peak Trail Usage	Existing Weekend Daily Usage			Future Weekend Daily Usage			Future Peak Hour Vehicles ^d
	Daily Visitors	Average Auto	Daily Vehicles ^a	Added Features	Daily Visitors ^b	Daily Vehicles ^c	
Cloverleaf Drive							
Trails	8	2.50	3	0	16 ^e	13	1
Picnic Tables	0	3.00	0	10	60 ^f	40	4
Nature Center & Plant Garden	0	2.50	0	1	20 ^g	16	2
Sub-Total	8		3		96	69	7
Highland Place							
Trails	16	2.50	6		32 ^e	26	3
Picnic Tables	0	3.00	0	8	48 ^f	32	3
Sub-Total	16		6		80	58	6
Ridgeside Drive	44	2.50	18	0	44	18	4
Sleepy Hollow	4	2.50	2	0	4	2	0

Based on the above, the Draft EIR's stated impact conclusions relative to traffic volume impacts are correct with the corrected forecast of daily vehicle trips. No new significant traffic impacts would occur, nor would the impacts identified in the Draft EIR be substantially increased. Further, no new mitigation measures would be required.

2. Mr. Kassan stated "The estimates of future parking demands do not take into account the full range of those who will want to or need to park in the Cloverleaf Day Use Area."

Mr. Kassan presented a very conservative estimate of parking needs which assumes that staff will all require parking at the same time and 6 parking spaces would be required by hikers all at the same time as well as assuming that all 10 picnic tables will be simultaneously occupied each requiring a parking space. Added to that he assumed another 3 parking spaces would be needed for the nature center. His conservative total indicates that 28 parking spaces will be required to service this area.

We believe that Mr. Kassan's parking requirement assumptions are overstated however, if we were to accept his very conservative assumptions then a surplus of 5 parking spaces will still be available to serve the area. The project proposes 25 parking spaces in the Cloverleaf Day Use Area and an additional 8 parking spaces in the Cloverleaf Reservoir access area which provides a total of 33 parking spaces.

Therefore, the proposed parking supply contains a surplus and is adequate to accommodate the anticipated demand and no changes to the study or EIR are required.

3. Mr. Kassan stated "The primary measure that has been proposed to mitigate the identified traffic impacts may not be feasible".

The City is aware that portions of Cloverleaf Drive are narrow and the traffic impact study and EIR call for mitigation of widening the roadway. Adequate right-of-way exists to accommodate the widening. The project is feasible from an engineering and available right-of-way perspective. As with any EIR the determination of whether a City has the budget to implement the mitigation is not the issue. The EIR is to identify what mitigation is needed and recommend that mitigation if a potentially significant impact would occur with project implementation. If the project is to be implemented then the City will need to budget the improvements in order to offset the potential impacts. The project would not move forward unless the City was able to secure funding for the mitigation prescribed in the Draft EIR.

Therefore, the traffic study and EIR have correctly identified the required mitigation and no changes to the documents are required.

4. Mr. Kassan stated "Using warning signs to mitigate the potential hazards of mixing motor vehicles, pedestrians, and bicyclists on a narrow, one-lane, mountainous, unpaved road would be ineffective".

The roadways serving the Wilderness Area are currently providing shared access with vehicles, pedestrians and bicycles. Thus, the project is not creating a new user conflict impact. The recommended installation of signs would improve safety and increase awareness of an existing situation. The City disagrees that the signs would be ineffective.

It is not uncommon in open space areas and wilderness parks for hikers and bikers to share the road with occasional utility vehicles and/or City staff vehicles due to the limited amount of vehicle traffic on such roads. Vehicle traffic on the dirt utility roads in the Project Area is infrequent and at low speeds due to the rugged terrain of the roads. Vehicle traffic is typically limited to ranger patrols and from the privately held in-holdings. Further, with the exception of the new foot trails in the Cloverleaf Day Use Area, all the trail alignments within the Project Area would occur on existing trails, some of which currently accommodate multiple users (vehicles, hikers and bikers). The trails within the Project Area utilized by the private in-holders, while narrow at some points, are generally wide enough to allow hikers and bikers to pass one another safely on the trail when vehicles and bicyclists are operating at slow speeds. In areas where a trail is narrow, implementation of Mitigation Measure 4.D-5-1, which requires warning signs to be installed within the Project Area at blind corner locations where there could be potential for user conflicts between vehicles, hikers and/or bikers, would address user conflicts at narrow points along the trails. Thus, the Project would not be introducing new features that substantially increase hazards due to a design feature. Moreover, no accident reports involving hikers or bikers and motorized vehicles have been filed with the Monrovia Police Department during the past 9 years. Based on the above, no revisions to the Draft EIR are necessary to further address impacts associated with user conflicts or design hazards.

5. Mr. Kassan stated "Although the peak usage of the existing trails occurs in July, November, and December, all of the traffic counts and speed measurements were done in the off-peak month of January".

Based on a review of Park Ranger patrol logs it was determined that when accounting for the "no use" days, the average daily use during the peak months for Highland Place,

Cloverleaf Drive and Sleepy Hollow were less than one trail user per day. This minor variation was so low it was not expected to have any significant impact on traffic counts.

The traffic count data collected in January was utilized to present a typical representation of traffic, which for the most part services the residential uses within the area. Forecasted visitor trips were added to the existing counts which most likely present a "worst case" scenario since visitors may have been on the roadways when the count was conducted but have not been removed from the counts.

Therefore, the traffic count data is representative of typical residential traffic and no changes to the documentation are required.

In Summary

- The EIR traffic study did understate the daily trip generation. However, the understatement of daily trip generation does not change the impact conclusions of the Draft EIR relative to traffic capacity.
- The proposed parking supply supporting the Cloverleaf Day Use Area would provide a parking surplus and would be adequate to accommodate the anticipated project demand.
- The traffic study and EIR have correctly identified the significance level of traffic impacts and appropriate mitigation. The comment letter has not provided any new information that would result in new or substantially increased impacts identified in the EIR. No new mitigation measures are necessary based on the comment letter.
- The EIR recommendation for installation of additional warning signs is appropriate.
- The EIR traffic count data is representative of typical residential traffic.

We appreciate the opportunity to provide these responses to comments. Please feel free to call me at (951) 529-7236 if you have any questions.

Respectfully yours,



Stephen D. Hilton, T.E.
Registered Traffic Engineer No. 2422

