

California Environmental Quality Act (CEQA) Initial Study/Mitigated Negative Declaration

General Plan Amendment (GPA) No. 25-0002
Zone Change (ZC) No. 25-0001
Specific Plan (SP) No. 25-0002
Tentative Tract Map (TTM) No. TT-25-0004
Development Plan Review (DPR) No. DPR-25-0004



Lead Agency

City of Upland
460 North Euclid Avenue
Upland, CA 91786

Applicant

Century Communities
4695 MacArthur Court, Suite 300
Newport Beach, CA 92660
(805) 305-3651

Prepared By



EPC Environmental Inc.
11801 Pierce Street, Ste. 200
Riverside, CA 92505
(951) 710-3010

December 12, 2025

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Appendix C-1	Historical/Archaeological Resources Survey Report, CRM Tech, August 15, 2025
Appendix C-2	Phase I and II Environmental Site Assessment, Stantec Consulting Services, Inc., August 19, 2024
Appendix D-1	Geotechnical and Infiltration Evaluation, GeoTek, Inc., February 5, 2025
Appendix D-2	Geotechnical Infiltration Memo, GeoTek, Inc., April 25, 2025
Appendix E-1	Preliminary Hydrology and Hydraulic Study, JLC Engineering & Consulting, Inc., April 29, 2025, revised November 25, 2025
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1.0 Project Background Information

Item	Details
Project Title	Buffalo Grove Residential Tentative Tract Map No. 20820
Lead Agency Contact	Joshua Winter, Senior Planner City of Upland Development Services Department, Planning Division 460 N. Euclid Avenue Upland, CA 91786 (909) 931-4143/ jwinter@uplandca.org
Project Location	APNs: 1007-061-08 and 1007-061-23 on the corner of Foothill Boulevard and Central Avenue
Project Proponent	Century Communities 4695 MacArthur Court, Suite 300 Newport Beach, CA 92660
General Plan Designation	Existing: Commercial/Industrial Mixed Use (C/I-MU) Proposed: Specific Plan (SP)
Zoning	Existing: Commercial/Industrial Mixed Use (C/IMU) Proposed: Specific Plan (SP)
Project Description	The Project proposes a Specific Plan for residential development of approximately 4.42 acres into 72 detached multi-story residential condominium units.
Surrounding Land Uses and Setting	Foothill Boulevard bounds the Project site to the north and various commercial and industrial uses to the west, south, and east.
Other Public Agencies Whose Approval Is Required	▪ State Water Resources Control Board: The Project Applicant must submit a Notice of Intent to comply with the General Construction Activity National Pollutant Discharge Elimination (NPDES) Permit; ▪ Santa Ana Regional Water Quality Control Board: The Project Applicant must submit a Stormwater Pollution Prevention Plan (SWPPP); and ▪ Utility Providers: Connection permits.

Environmental Factors Requiring Mitigation:

The environmental resources checked below may be potentially affected by this project, as indicated by the checklist on the following pages. If a box is marked “X” Mitigation Measures are required.

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

Determination

Based on this initial evaluation:

I find that the Proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be recommended for adoption. ☐

I find that although the proposal could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the Project have been made by or agreed to by the Project Applicant. A ☒
MITIGATED NEGATIVE DECLARATION will be recommended for adoption.

I find that the proposal MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required. ☐

I find that the proposal MAY have significant effect(s) on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets if the effect is a "potentially significant impact" or "potentially significant unless mitigated." An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed. ☐

I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effect(s) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION, pursuant to all applicable standards, and have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION. ☐

Signature

City of Upland
Lead Agency

Printed Name/Title

Date

2.0 Introduction

2.1 Purpose of the Initial Study/Mitigated Negative Declaration

An Initial Study is a preliminary analysis to determine whether a Negative Declaration (ND), a Mitigated Negative Declaration (MND), or an Environmental Impact Report (EIR) is required for a Project. Based on the Initial Study prepared for the Project, it is recommended that a Mitigated Negative Declaration be adopted. A Mitigated Negative Declaration is a statement by the City of Upland that the Initial Study has identified potentially significant effects on the environment, but (1) revisions in the project plans or proposals made by, or agreed to by, the applicant in conjunction with the proposed MND and Initial Study would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur, and (2) there is no substantial evidence in light of the whole of the record before the Lead Agency that the Project, with incorporation of mitigation measures, may have a significant effect on the environment.

2.2 Summary of Mitigation Measures

Air Quality

MM AIR-1. The project construction contractor(s) and subcontractor(s) shall use only interior and exterior paints with a VOC (volatile organic compound) content maximum concentration of 10 grams per liter (g/L) for building architectural coatings during construction and for future coatings to reduce VOC emissions. All building and site plans shall note the use of paints with a maximum VOC concentration of 10 g/L. Prior to construction, the construction contractor(s) shall ensure that all construction plans submitted to the City of Upland Building and Safety Division and Planning Division clearly show this requirement.

Biological Resources

MM BIO-1 Burrowing Owl Preconstruction Survey. While suitable burrowing owl burrows are not present on the Project site at this time, there is potential for burrowing owl to occupy the site in the future; therefore, a one-visit pre-construction burrowing owl survey per California Department of Fish and Wildlife (CDFW) protocols is required within 14 days before the initiation of construction. If preconstruction surveys are positive for burrowing owl, the Project owner will be required to consult with CDFW and implement a Burrowing Owl Management Plan consistent with the guidance of the CDFW Staff Report on Burrowing Owl Mitigation (CDFW 2012).

MM BIO-2 Nesting Bird Preconstruction Survey. To avoid and minimize impacts on nesting birds and raptors, construction should be conducted during non-breeding season (September 1 to February 14). If vegetation clearing or ground-disturbing activities need to take place during breeding season (February 15 through August 31), in order to remain in compliance with the Migratory Bird Treaty Act, a pre-construction nesting bird survey(s) will be required.

Cultural Resources

MM CUL-1 Documentation of Existing Structures. It is recommended that the five buildings comprising Buffalo Inn be further documented prior to the commencement of the project, including the following procedures:

- Systematic photo-documentation of the current appearance of the buildings, including overviews from all sides, elevation shots, as well as exterior and interior details;
- Compilation of detailed plan drawings by locating original as-built plans and/or through scaled mapping of the current floor plans.

The results of these procedures should be curated at the SCCIC, the City of Upland Development Services Department (Planning Division), and other appropriate local repository to ensure long-term safekeeping and optimize public access. Under this condition, the proposed project may be cleared to proceed in compliance with cultural resources provisions of CEQA. Meanwhile, if buried cultural materials are encountered during any earth-moving operations associated with the project, all work in the immediate area should be halted or diverted until a qualified archaeologist can evaluate the nature and significance of the finds.

There is a possibility of historical and/or archaeological resources being found during grading and trenching during the construction of the Project. Therefore, the following mitigation is required.

MM CUL-2 Discovery of Archaeological Resources. The Applicant shall retain an Archaeologist who meets the requirements of the Secretary of the Interior (SOI) Professional Qualifications Standards ("Qualified Archaeologist") prior to the issuance of grading permits. If archaeological resources are discovered at the Project Site, the handling of the discovered resources will occur as described below. All artifacts discovered shall be inventoried and analyzed by the SOI Archaeologist. If any artifacts of Native American origin are discovered, all activities in the immediate vicinity of the find (within a 100-foot radius) shall stop, and the SOI Archaeologist shall follow the procedures outlined in Mitigation Measures TCR-1 through TCR-3 under Section 4.15, Tribal Cultural Resources of this Initial Study/Mitigated Negative Declaration document. Non-Native American artifacts shall be inventoried, assessed, and analyzed for cultural affiliation, personal affiliation (prior ownership), function, and temporal placement. After analysis and reporting, these artifacts will be subjected to curation or returned to the property owner, as deemed appropriate. All artifacts, except for human remains and related grave goods or sacred/ceremonial objects, belong to the property owner.

Geology and Soils

MM-PALEO-1 Retain a Qualified Paleontologist and Implement a Paleontological Monitoring

Program. Prior to the issuance of grading permits, the project applicant shall retain a qualified paleontologist, meeting the Society of Vertebrate Paleontology (SVP) standards (2010 or most current), to be on call during all ground-disturbing activities. The paleontologist shall provide a preconstruction worker environmental awareness training for construction personnel to recognize fossil resources.

The qualified paleontologist, or a paleontological monitor under their direction, shall be on site during initial ground disturbance, grading, or excavation in previously undisturbed native sediments with high paleontological sensitivity (e.g., younger alluvium mapped in the Upland area). If no fossil resources are discovered during the initial monitoring period, the paleontologist may recommend reducing or discontinuing monitoring, subject to approval by the City of Upland Planning Division.

In the event that paleontological resources (e.g., fossil remains, bone, shell, or plant impressions) are encountered during construction, all ground-disturbing work in the vicinity shall halt immediately. The paleontologist shall evaluate the find, recover fossils as appropriate, and prepare them to a curation-ready standard. Collected specimens shall be curated at a recognized scientific repository or museum (e.g., the San Bernardino County Museum or the Natural History Museum of Los Angeles County) with all associated data and field notes. A final monitoring and mitigation report shall be prepared and submitted to the City of Upland Planning Division at the conclusion of grading.

Tribal Cultural Resources

MM- TCR-1: Native American Monitoring Agreement. Prior to the commencement of any ground-disturbing activity, including, but not limited to, demolition, pavement removal, potholing, augering, grubbing, tree removal, boring, grading, excavation, drilling, and trenching, the Permit Applicant shall enter into a Tribal Monitoring Agreement with the Gabrieleño Band of Mission Indians – Kizh Nation for a Native American Monitor to be present on-site during all ground-disturbing activities associated with the Project, including both on-site and any off-site improvements required in connection with the Project.

The Yuhaaviatam of San Manuel Nation (YSMN), as a Consulting Tribe under Public Resources Code §21080.3.1(b), shall be offered the opportunity to participate in tribal monitoring. Monitoring by YSMN shall occur if requested in writing by YSMN prior to the commencement of ground-disturbing activities or upon discovery of potentially significant Tribal Cultural Resources during construction.

For purposes of this mitigation measure, a "Consulting Tribe" is defined as a tribe that initiated the AB 52 tribal consultation process for the Project, has not opted out of consultation, and has completed consultation with the City pursuant to Public Resources Code §21080.3.1(b).

The Monitoring Agreement shall include, but is not limited to, the following provisions:

- a) Provide a minimum of 30 days' advance notice to the Consulting Tribe(s) of all ground disturbing activities.
- b) Conduct a Pre-Grade Meeting with the Project archaeologist, Consulting Tribe(s), and grading contractor(s).
- c) In conjunction with the Archaeological Monitor(s) required by Mitigation Measure MM-CR-1 under Section 4.5, Cultural Resources, of this Initial Study/Mitigated Negative Declaration, the Native American Monitor(s) shall have the authority to temporarily divert, redirect, or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources.
- d) The onsite monitoring shall end when all ground-disturbing activities on the Project Site are completed, or when the Native American Tribal Monitor(s) have indicated that all upcoming ground disturbing activities at the Project Site have little to no potential for impacting Tribal Cultural Resources. The Project Proponent shall submit a fully executed copy of the Monitoring Agreement to the City of Upland Development Services Department (Planning Division) to ensure compliance with this mitigation measure. If there are multiple Consulting Tribes involved, a separate Monitoring Agreement is required for each. The Monitoring Agreement shall not modify any condition of approval or mitigation measure.
- e) A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.
- f) The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe.

MM-TCR-2: Unanticipated Discovery: The Permit Applicant or any successor in interest shall comply with the following for the life of the grading permit. If, during ground disturbance activities, unanticipated cultural resources are discovered, the following procedures shall be followed:

- a) Ground disturbing activities shall cease in the immediate vicinity of the find (not less than the surrounding 100 feet) until the find can be assessed. Ground disturbing activities are allowed on the remainder of the Project Site.
- b) In the event the unanticipated discovery includes human remains and/or cremations no photographs are to be taken except by the coroner, with written approval by the Consulting Tribes(s).

c) The project applicant or project Archeologist shall contact all Consulting Tribe (s) if any pre-contact cultural resources discovered during project implementation, and be provided information regarding the nature of the find, so as to provide Tribal input with regards to significance and treatment.

d) The Consulting Tribe(s) and the Project Archaeologist (retained by the Permit Applicant under Mitigation Measure MM-CR-1, Retain Professional Archaeologist, of this Initial Study/Mitigated Negative Declaration document), shall meet and confer, and discuss the find with respect to the following:

1. Determine if the resource is a Tribal Cultural Resource as defined by Public Resources Code §21074. If so:
2. Determine if the resource is listed or eligible for listing in the California Register on a "Local register of historical or resources" pursuant to Public Resources Code §5020.1 (k); or
3. Pursuant to Public Resources Code § 5024.1 (c) as it pertains to the Consulting Tribe(s):
(1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage, (2) Is associated with the lives of persons important in our past, (3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values, or (4) Has yielded, or may be likely to yield, information important in prehistory or history.

e) If tribal cultural resources are identified during ground-disturbing activities and preservation in place is determined to be infeasible, the resources shall be treated in a culturally appropriate manner, with a preference for reburial on-site in a location acceptable to the Consulting Tribe(s), to the extent feasible.

If on-site reburial is not feasible, reburial shall occur at an appropriate off-site location identified in consultation with the Consulting Tribe(s).

If multiple Consulting Tribes are involved and cannot reach agreement regarding the treatment or disposition of the resources, the City shall consider the input of all Consulting Tribes, may seek guidance from the Native American Heritage Commission, and shall make a final determination that reasonably balances the interests of the Consulting Tribes and complies with applicable laws.

No tribal cultural resources shall be retained for curation or display or other purposes without the express written consent of the culturally affiliated Consulting Tribe(s).

f) If the resource(s) is both a tribal cultural resource and a historic resource, the Project Archaeologist, the Consulting Tribe (s), and the City of Upland Development Services Department (Planning Division) shall meet and confer and discuss the appropriate treatment (documentation, recovery, avoidance, etc.) for the cultural and historic resource. Treatment, at a minimum, shall be consistent with Public Resources Code § 21084.3 (b). The appropriate treatment shall be prepared in conjunction with the Archaeological Treatment plan required by Mitigation Measure MM-CR2 of this Initial Study/Mitigated Negative Declaration. Further ground

disturbance shall not resume within the area of the discovery until the appropriate treatment has been accomplished.

MM-TCR-3: Final Report: If a Tribal cultural resource is also a historic resource defined above, the resource shall be included in the Final Report required by Mitigation Measure MM-CUL-2 of this Initial Study/Mitigated Negative Declaration document.

3.0 Project Description/Environmental Setting

3.1 Project Location

The Project site consists of 4.42 acres located at 1812-1816 W. Foothill Boulevard (APNS: 1007-061-08 and 1007-061-23), on the south side of Foothill Boulevard, approximately 330 feet east of Central Avenue. (See **Figure 3.1 – Project Location Map**, **Figure 3.2 – Aerial Photograph**, **Figure 3.3 – Tentative Tract Map No. 20820**, and **Figure 3.4 – View of Project Site from Foothill Boulevard Looking Southeast**.)

3.2 Project Description

The current Project site is mostly vacant, except for the abandoned Buffalo Inn. The Project proposes the following land use entitlements.

- **General Plan Amendment (GPA) No. 25-0002:** To amend the General Plan Land Use Map from Commercial/Industrial Mixed Use to Specific Plan.
- **Zone Change (ZC) No. 25-0001:** To amend the Zoning Map from Commercial/Industrial Mixed Use to Specific Plan.
- **Specific Plan (SP) No. 25-0002:** To adopt a Specific Plan setting forth the development regulations for the property.
- **Tentative Tract Map (TTM) No. TT-25-0004,** To subdivide the property into 72 detached single-family homes.
- **Development Plan Review (DPR) No. DPR-25-0004:** To review the design and layout of the proposed project, architectural design, and landscaping design.

Figure 3.1 Project Location Map

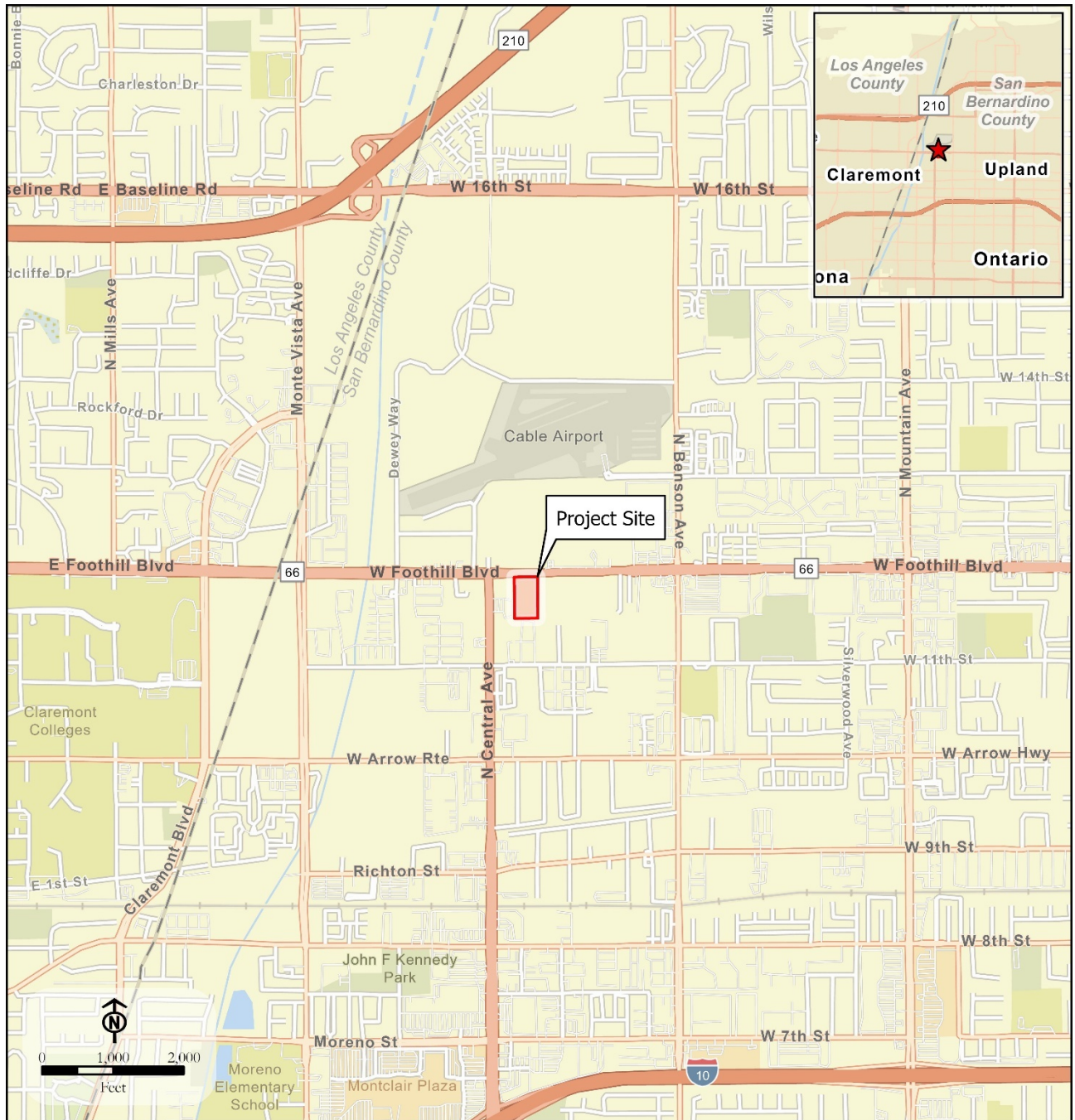


Figure 3.2 Aerial Photograph



Figure 3.3 Tentative Tract Map No. 20820

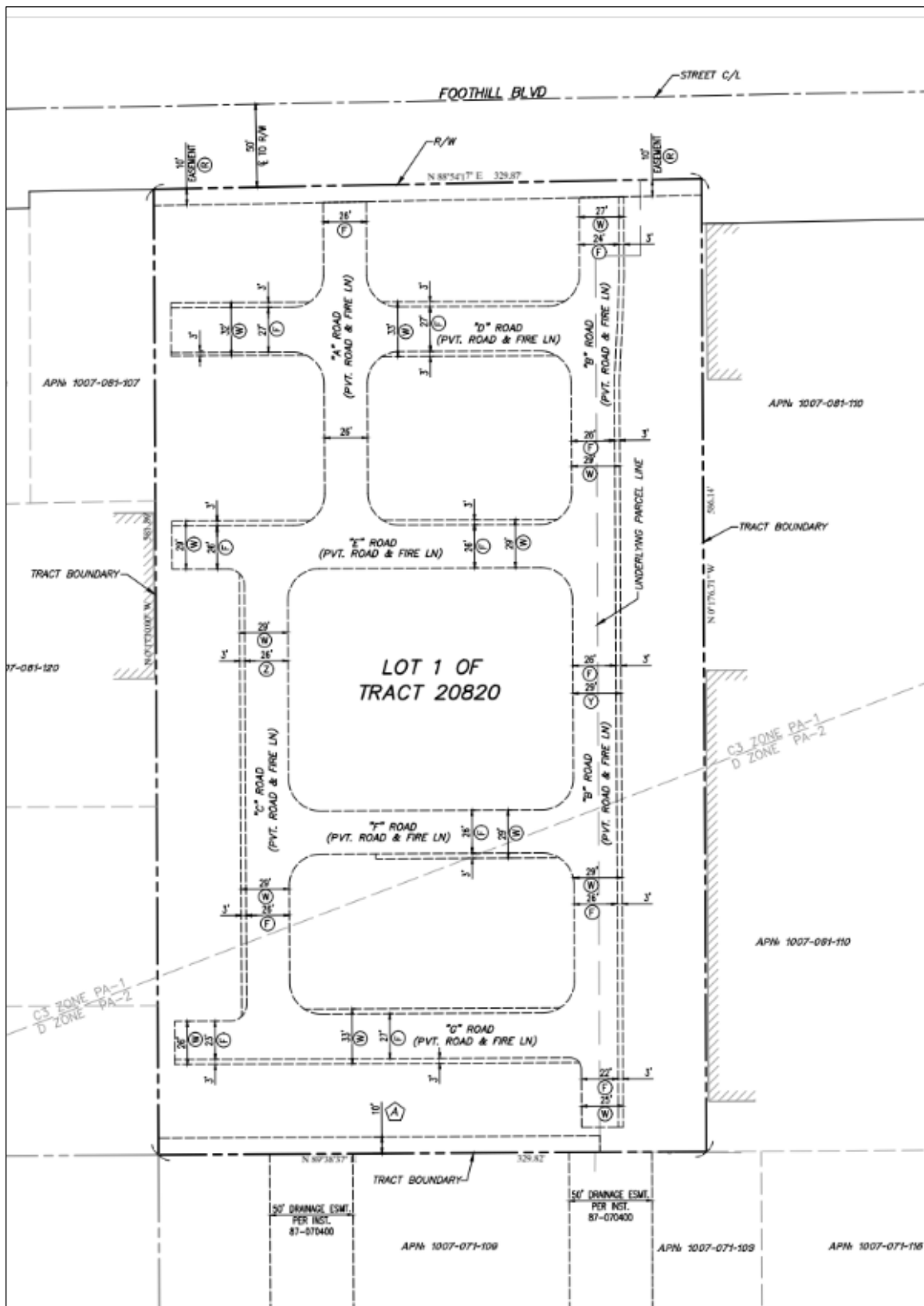


Figure 3.4 View of Project Site from Foothill Boulevard Looking Southeast

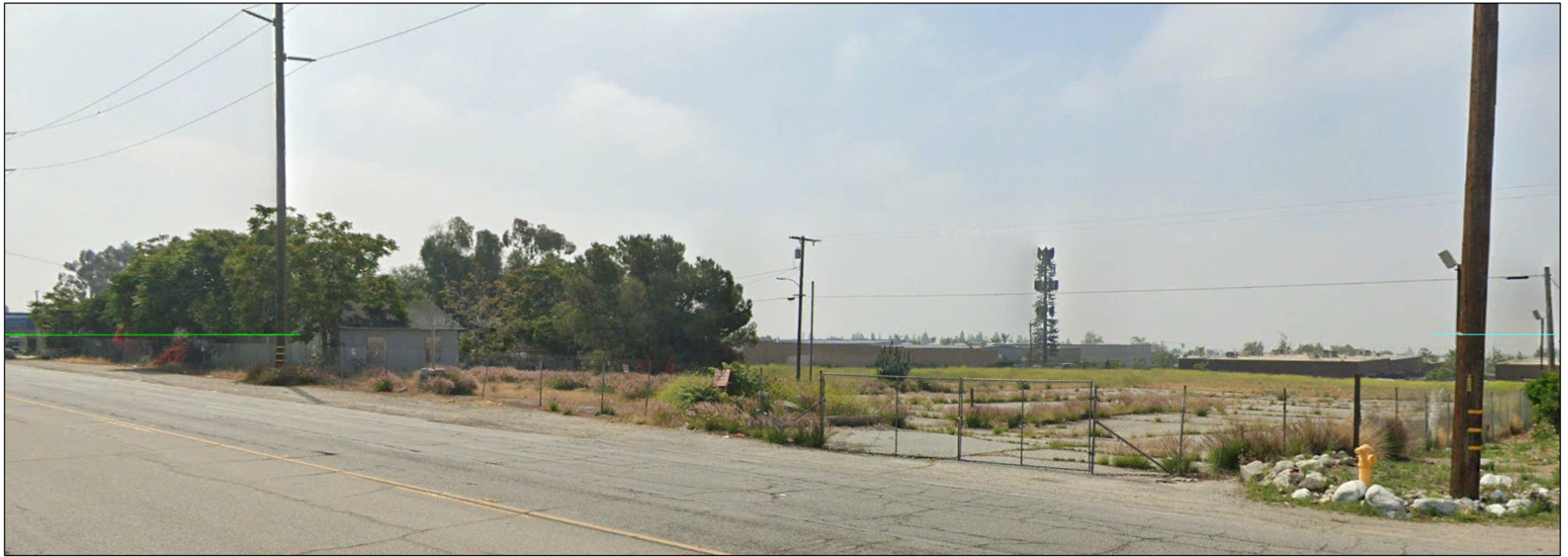


Figure 3.5 General Plan Land Use and Zoning Change

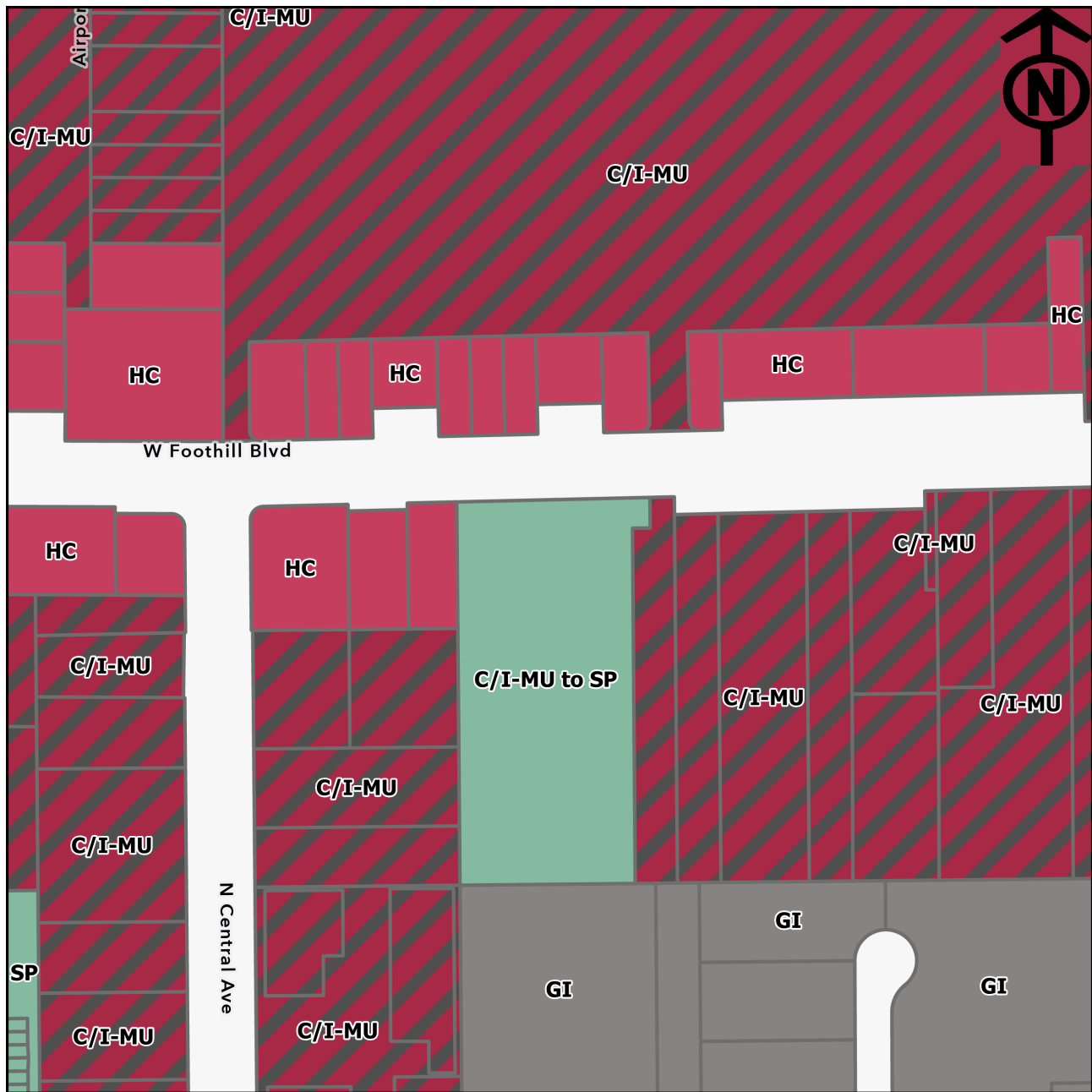


Figure 3.6 Site and Landscape Plan



Figure 3.7 Architectural Elevations



Figure 3.8 Abandoned Existing Structures



3.3 Proposed Improvements

Street Improvement and Access

Site access will be provided via one gated full access driveway on Foothill Boulevard, with a second gated driveway on Foothill Boulevard for emergency vehicles only. The following improvements would be made to the frontage of Foothill Boulevard in conjunction with the Project: improve 30 feet for travel lanes, a 7-foot parkway, a 5-foot sidewalk, and a 10-foot landscape easement.

Water and Sewer Improvements

Water and sewer service will be provided by the City of Upland's Public Works Department. The Project will connect to the existing 10-inch water line located in Foothill Boulevard, and sewer will connect to a proposed 8-inch sewer main in Foothill Boulevard, which then carries wastewater west to an existing line in Central Avenue. In addition, the Project includes installation of an on-site sewer lift station to convey flows to the public system, and may require a sewer easement along the southern boundary to accommodate the proposed off-site connection.

Storm Drainage Improvements

The Project site's runoff currently flows from north to south to two discharge points along the southern edge of the site. Improvements to the site include subsurface storm drains, inlets and subsurface basins that will ultimately carry runoff to the same two discharge points. The Project proposes two Line systems for carrying runoff: A Line A system that will carry runoff from the northern part of the site to Basin A, and a Line B system that will carry runoff from the southern portion of the site to Basin B. Basin A conveys runoff to the southwestern discharge point and Basin B conveys runoff to the southeastern discharge point.

3.4 Construction and Operational Characteristics

Construction Schedule

Construction is scheduled to last approximately five months beginning December 2026 through May 2027. Construction would involve demolition of the existing infrastructure, site preparation, grading, building, architectural coating, and paving.

Operational Characteristics

The proposed Project would serve as a residential community with typical operational characteristics, including residents/visitors traveling to and from the site, leisure and maintenance activities occurring on individual residential lots and in the on-site recreational facilities, and general maintenance of common areas. Low levels of noise and a moderate level of artificial exterior lighting typical of a residential community are expected.

Environmental Setting

Table 3.1 shows onsite and adjacent land uses, General Plan land use designations, and zoning classifications.

Table 3.1 Environmental Setting

Location	Current Land Use	General Plan Land Use District	Zoning Classification
Site	Mostly vacant land with abandoned infrastructure	Commercial/Industrial Mixed Use (C/I-MU)	C/I-MU (Commercial/Industrial Mixed Use)
North	Foothill Boulevard with scattered commercial businesses and vacant land	Highway Commercial (HC) and Commercial/Industrial Mixed Use (C/I-MU)	HC (Highway Commercial) C/I-MU (Commercial/Industrial Mixed Use)
South	Business Park	Industrial (IN)	GI (General Industrial)
East	Storage Facility	Commercial/Industrial Mixed Use (C/I-MU)	C/I-MU (Commercial/Industrial Mixed Use)
West	Shopping Center/Restaurant	Highway Commercial (HC) and Commercial/Industrial Mixed Use (C/I-MU)	HC (Highway Commercial) C/I-MU (Commercial/Industrial Mixed Use)

Source: City of Upland General Plan Map and Zoning Map, accessed September 5, 2025

4.0 Environmental Impact Analysis

The Project is evaluated based on its potential effect on 21 environmental resource topics listed in Appendix G of the CEQA Guidelines. The resulting potential effects are ranked within four identified categories and include a summary of the rationale and evaluation methods used to arrive at each determination.

Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Significant or Potentially significant impact(s) have been identified or anticipated that cannot be mitigated to a level of insignificance. An Environmental Impact Report must therefore be prepared.	Potentially significant impact(s) have been identified or anticipated, but mitigation is possible to reduce impact(s) to a less than significant category. Mitigation measures must then be identified.	No "significant" impact(s) identified or anticipated. Therefore, no mitigation is necessary.	No impact(s) identified or anticipated. Therefore, no mitigation is necessary.

The analysis considers the following.

General Plan Policies

These are policies contained in the General Plan Environmental Impact Report that, when imposed on a project, can reduce environmental impacts to a less than significant level.

Mandatory Regulations

These requirements and standard conditions, often mandated by local, state, or federal regulations regardless of CEQA review, help prevent specific impacts. Common examples include adherence to the Uniform Building Code, South Coast Air Quality Management District Rules, and paying local agency fees. Since they are not unique to the project, they are not classified as Mitigation Measures. It is assumed projects comply with these standards when evaluating their potential impacts, which may result in finding less than significant effects.

Mitigation Measures (MMs)

If, after imposing General Plan policies and mandatory requirements, impacts are still potentially significant, mitigation measures will be required. CEQA defines mitigation measures as actions taken to reduce or avoid the negative environmental impact of a project:

- **Avoiding:** Not taking an action or part of an action
- **Minimizing:** Limiting the degree or magnitude of the action
- **Rectifying:** Repairing, rehabilitating, or restoring the impacted environment
- **Reducing or eliminating over time:** Preserving and maintaining the resource during the life of the action
- **Compensating:** Replacing or providing substitute resources or environments

Mitigation measures must be feasible and enforceable through legally binding instruments.

Technical Reports

CEQA Guidelines Section 15384 defines “substantial evidence” in part as “...facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts...” This Initial Study relies upon the following technical reports that meet the requirements of substantial evidence.

Appendix A – Air Quality and Greenhouse Gas Emissions Technical Memorandum, PlaceWorks, June 12, 2025

Appendix B-1 – Biological Resource Evaluation, Hana Resources, Inc., May 2, 2025

Appendix B-2 – Burrowing Owl Focused Survey Report, Hana Resources, Inc., July 11, 2025

Appendix C-1 – Historical/Archaeological Resources Survey Report, CRM Tech, August 15, 2025

Appendix C-2 – Phase I and II Environmental Site Assessment, Stantec Consulting Services, Inc., August 19, 2024

Appendix D-1 – Geotechnical and Infiltration Evaluation, GeoTek, Inc., February 5, 2025

Appendix D-2 – Geotechnical Infiltration Memo, GeoTek, Inc., April 25, 2025

Appendix E-1 – Preliminary Hydrology and Hydraulic Study, JLC Engineering & Consulting, Inc., April 29, 2025, revised November 25, 2025

Appendix E-2 – Water Quality Management Plan, JLC Engineering & Consulting, Inc., April 29, 2025, revised November 25, 2025

Appendix F – Trip Generation and VMT Screening, TJW Engineering, Inc., March 26, 2025

Appendix G – Noise and Vibration Technical Memorandum, PlaceWorks, June 12, 2025

Appendix H – Airspace and Safety Analysis, Williams Aviation Consultants, June 27, 2025

In addition to the technical reports, footnotes referencing data or information used as substantial evidence are cited.

4.1 Aesthetics

Threshold 4.1 – Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on scenic vista?				✓
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				✓
c) If located in an Urbanized Area, conflict with applicable zoning and other regulations governing scenic quality?			✓	
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?			✓	

Applicable General Plan Policies

The following General Plan Policies were considered in this analysis.

Focus Area Element

- **Policy FA-1.7: Residential Design.** Require new residential uses to use state-of-the-art design, technologies, and siting techniques to mitigate the effects of living near a high-traffic road on residents of the new housing units.

Community Character and Urban Design Element

- **Policy CC-1.6: View Protection.** Direct private development to enhance public view corridors of the San Gabriel Mountains, where feasible. These views are an integral part of the City's geographic space and provide a unique sense of place for Upland as a foothill community.
- **Policy CC-5.1: Site Design Principles.** Require new development projects to adhere to the basic principles of high-quality site design as set forth below, elsewhere in the General Plan, zoning and development standards, and any additional design guidelines adopted by the City.
- **Policy CC-5.2: Building Design Principles.** Require new development projects to adhere to the basic principles of high-quality building design as set forth below, elsewhere in the General Plan, and in any additional design guidelines adopted by the City.

Public Facilities and Services Element

- **Policy PFS-1.8 Underground Utilities.** Encourage undergrounding of all existing and new publicly owned utility lines, encourage undergrounding of all privately owned

utility lines in new developments, and work with electricity and telecommunications providers to underground or minimize the visual impacts of existing overhead lines.

- **Policy OSC-1.7 Dark Sky Protection.** Promote shielded, dark-sky friendly lighting for Upland's outdoor lighting needs in order to reduce light pollution and glare; increase energy efficiency; protect wildlife; and promote better health.

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

Impact Analysis – No Impact

The CEQA Guidelines do not provide a definition of what constitutes a "scenic vista" or "scenic resource" or a reference as to from what vantage point(s) the scenic vista and/or resource, if any, should be observed. Scenic resources are typically landscape patterns and features that are visually or aesthetically pleasing and that contribute affirmatively to the definition of a distinct community or region such as trees, rock outcroppings, and historic buildings.

A scenic vista is generally identified as a public vantage viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. Common examples may include a public vantage point that provides expansive views of undeveloped hillsides, ridgelines, and open space areas that provide a unifying visual backdrop to a developed area.

Impacts on scenic vistas are analyzed from points or corridors that are accessible to the public and that provide a view of a scenic vista. Development within a viewer's line of sight of scenic areas may interfere with a public view of a scenic vista, either by physically blocking or screening the vista from view or by impeding or blocking access to a formerly available viewing position. Those viewers may see the scenic areas prior to development, but would have those views blocked post-development.

There are no scenic views or vistas located within the City that are designated by the City's General Plan. However, General Plan Policy CC-1.6: View Protection, as stated above, requires private development to enhance public view corridors of the San Gabriel Mountains, where feasible. From the Project site the San Gabriel Mountains are approximately 6 miles north.

Because of the distance to the San Gabriel Mountains and intervening development, public views of this scenic vista would not be blocked by the Project. No mitigation would be required.

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

Impact Analysis – No Impact

According to the California Department of Transportation, the Project site is not located within a state scenic highway.¹ Interstate 210 to the north and Interstate 10 to the south are not identified as "Officially Designated" or an "Eligible State Scenic Highway-Not Officially Designated." As such, the Project would not impact scenic resources.

¹ California Department of Transportation, State Scenic Highway Program, <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>, accessed September 5, 2025.

c) If located in an Urbanized Area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Impact Analysis – Less Than Significant Impact

According to the U.S. Census Bureau, the Project site is located in the Los Angeles-Long Beach-Anaheim Urbanized Area.² The Project is proposing a Specific Plan that includes regulations governing scenic quality that identifies conceptual themes and guidelines for architecture, landscaping, open space, walls and fences, lighting, and signage within the Plan area to guide decision-makers during the project review process. The guidelines are intended to ensure an attractive, high-quality development that complements the community and enhances the city.

The adoption of the Specific Plan implements General Plan Policy CC-5.1: Site Design Principles, and Policy CC-5.2: Building Design Principles described above.

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

Impact Analysis – Less Than Significant

Outdoor Lighting and Glare

The Project site is located in an area that is developed primarily with commercial/industrial uses, and existing sources of light in the vicinity include building lights, street lights, and pedestrian walkways lights. The Project would increase the amount of light in the area by adding new sources of illumination, including security and decorative lighting for the proposed structures, streetlights, structure-mounted lights, and illuminated and/or reflective signage material.

Section 3.7 of the Specific Plan establishes the following lighting requirements: Site lighting provides illumination for safety, security, and ambiance in parking areas, pedestrian walkways, residential entrances, landscape features, and signage.

1. Choose lighting fixtures that coordinate with building architecture, are “dark sky” compliant and promote consistent image throughout the Specific Plan area.
2. Install ground- or low-mounted fixtures to provide safety and convenience along pedestrian walkways, entrances, activity areas, steps, ramps, and special features.
3. Allow building-mounted accent lighting for general illumination provided there is no light spill or distraction onto roadways or adjacent properties.
4. Direct exterior lighting fixtures downward to avoid unnecessary light spill and glare.
5. Ensure exterior lighting is consistent with the Cable Airport Land Use Compatibility Plan.

2 United States Census Bureau, 2010 Census – Urbanized Area Reference Map, https://www2.census.gov/geo/maps/dc10map/UAUC_RefMap/ua/ua51445_los_angeles-long_beach--anaheim_ca/DC10UA51445.pdf, accessed September 5, 2025

4.2 Agriculture and Forestry Resources

Threshold 4.2 – Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				✓
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				✓
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?				✓
d) Result in the loss of forest land or conversion of forest land to non-forest use?				✓
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				✓

Applicable General Plan Policies

There are no policies that apply to the Project.

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

Impact Analysis – No Impact

The Project Site is mapped as “Urban and Built-Up Land.”³ According to the California Department of Conservation, lands in this category are used for residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

3 California Department of Conservation, California Important Farmland Finder, <https://maps.conservation.ca.gov/dlrp/ciff/>, accessed September 5, 2025

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

Impact Analysis – No Impact

The Project site is zoned Commercial/Industrial Mixed Use. The C/I-MU Zone is intended to accommodate a variety of industrial, regional retail, and support commercial activities to satisfy a range of shopping needs for residents of the community. It is also intended to encourage development of businesses in the City and maximize the potential for job generation.⁴ The Project is proposing a Zone Change to Specific Plan to set forth the regulations for the development of the property as a residential community. Therefore, the Project would not conflict with existing zoning for agricultural use. Additionally, the Project site is not within an established agricultural preserve that would conflict with a Williamson Act Contract.⁵ As discussed in Threshold 4.2 (a), the project area is classified as “Urban and Built-Up Land.” Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

Impact Analysis – No Impact

The Project site is zoned Commercial/Industrial Mixed Use and proposed to be rezoned to a Specific Plan for the development of 72 detached single-family condominium homes. No forest land or timberland occurs within the Project limits. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

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

Impact Analysis – No Impact

The Project proposes the development of 72 detached single-family condominium homes on a previously developed vacant lot. No forest land or timberland would be converted as a result of the Project. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

4 City of Upland Section 17.05.010. E, Commercial/Industrial Mixed-Use (C/I-MU).
<https://ecode360.com/44429005#44429006>

5 San Bernardino County Assessor, ARC Property Information Utility, <https://arcpropertyinfo.sbcounty.gov/>, accessed September 7, 2025

-
- e) Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?**
-

Impact Analysis – No Impact

As noted under Threshold 4.2 (a), the Project site and adjacent properties are not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as mapped by the State Department of Conservation Farmland Mapping and Monitoring Program. There are no existing agricultural activities in the vicinity of the Project site. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

4.3 Air Quality

Threshold 4.3 – Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?			✓	
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?			✓	
c) Expose sensitive receptors to substantial pollutant concentrations?			✓	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			✓	

The analysis in this section is supported by the following technical report.

- Air Quality and Greenhouse Gas Emissions Technical Memorandum, PlaceWorks, June 15, 2025 included as **Appendix A** to this Initial Study.

Applicable General Plan Policies

The following General Plan Policies were considered in the analysis.

- **Policy OSC-4.2 Compact Development.** Where development opportunities near shopping areas and transit corridors exist, prioritize higher-density residential development.
- **Policy OSC-4.11 New Development.** Review proposed development projects as required by CEQA to ensure projects incorporate feasible measures that reduce construction and operational emissions for reactive organic gases, nitrogen oxides, and particulate matter (PM10 and PM2.5) through project design.
- **Policy OSC-4.13 Best Management Practices.** Require best management practices to reduce air pollution associated with construction of development projects. Policy OSC-4.14 Construction Mitigation. Review construction plans associated with development projects to determine if all feasible mitigation measures are included.

Air Quality Setting

Topography and Climate

The Project site is located in the southwestern portion of the City of Upland, which is part of the South Coast Air Basin (SCAB) that includes all of Orange County as well as the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. The SCAB is located on a coastal plain with connecting broad valleys and low hills to the east. Regionally, the SCAB is bounded

by the Pacific Ocean to the southwest and high mountains to the east, forming the inland perimeter.

Air Pollutants and Health Effects

Air pollutants are the foreign and/or natural substances occurring in the atmosphere that may result in adverse effects to humans, animals, vegetation, and/or materials. The air pollutants regulated by the South Coast Air Quality Management District (MDAQMD) that are applicable to the Project are described below.⁶

- **Carbon Monoxide (CO):** A colorless, odorless gas resulting from the incomplete combustion of hydrocarbon fuels. Over 80 percent of the CO emitted in urban areas is contributed by motor vehicles. Carbon monoxide is harmful when breathed because it displaces oxygen in the blood and deprives the heart, brain, and other vital organs of oxygen.
- **Nitrogen Dioxide (NO_x):** Nitrogen dioxide (NO₂) is a byproduct of fuel combustion. The principal form of nitrogen oxide produced by combustion is nitric oxide (NO), but NO reacts quickly to form NO₂, creating the mixture of NO and NO₂ commonly called NO_x. NO_x can irritate eyes, nose, throat, and lungs, possibly leading to coughing, shortness of breath, tiredness, and nausea.
- **Particulate Matter (PM_{2.5} and PM₁₀):** One type of particulate matter is the soot seen in vehicle exhaust. Fine particles – less than one-tenth the diameter of a human hair – pose a serious threat to human health, as they can penetrate deep into the lungs. PM can be a primary pollutant or a secondary pollutant from hydrocarbons, nitrogen oxides, and sulfur dioxides. Diesel exhaust is a major contributor to PM pollution.
- **Sulfur Dioxide (SO₂):** A strong-smelling, colorless gas that is formed by the combustion of fossil fuels. Power plants, which may use coal or oil high in sulfur content, can be major sources of SO₂. Sulfur dioxide irritates the skin and mucous membranes of the eyes, nose, throat, and lungs.
- **Ozone:** Ozone is formed when several gaseous pollutants react in the presence of sunlight. Most of these gases are emitted from vehicle tailpipe emissions. Ozone can reduce lung function and worsen bronchitis, emphysema, and asthma.
- **Volatile Organic Compounds (VOCs):** VOCs contribute to the formation of smog and/or may themselves be toxic. VOCs often have an odor, and some examples include gasoline, alcohol, and the solvents used in paints. Health effects may include eye, nose, and throat irritation, headaches, loss of coordination, and nausea.

Nonattainment Designations and Classification Status

The United States Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) have designated portions of the District “nonattainment” for a variety of pollutants. An “attainment” designation for an area signifies that criteria pollutant concentrations did not exceed the established standard. In contrast to attainment, a “nonattainment” designation

⁶ <http://www.aqmd.gov/home/air-quality>

indicates that a criteria pollutant concentration has exceeded the established standard. **Table 4.3-1** shows the attainment status of criteria pollutants in the South Coast Air Basin (SCAB).

Table 4.3-1 Attainment Status of Criteria Pollutants in the SCAB Basin

Criteria Pollutant	State Designation	Federal Designation
Ozone – 1-hour standard	Nonattainment	No Standard
Ozone – 8-hour standard	Nonattainment	Nonattainment
Respirable Particulate Matter (PM ₁₀)	Nonattainment	Attainment (Maintenance)
Fine Particulate Matter (PM _{2.5})	Nonattainment	Nonattainment (Serious)
Carbon Monoxide (CO)	Attainment	Unclassified/Attainment
Nitrogen Dioxide (NO _x)	Attainment	Unclassified/Attainment
Sulfur Dioxide (SO ₂)	Unclassified /Attainment	Unclassified/Attainment
Lead	Attainment	Attainment

Source: Air Quality Report, Appendix A.

As shown in **Table 4.3-1** above, the SCAB is classified as Nonattainment for Ozone – 1-hour standard, Ozone – 8-hour standard, Respirable Particulate Matter (PM₁₀) and Fine Particulate Matter (PM_{2.5}).

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

Impact Analysis – Less Than Significant

Conformity with Air Quality Management Plans

The California Environmental Quality Act (CEQA) requires a discussion of any inconsistencies between a proposed project and applicable General Plans and Regional Plans (CEQA Guidelines §15125). The regional plan that applies to the proposed project includes the South Coast Air Quality Management District (SCAQMD) Air Quality Management Plan (AQMP). Therefore, this section discusses any potential inconsistencies of the proposed project with the AQMP.

The SCAQMD CEQA Air Quality Handbook states that “New or amended General Plan Elements (including land use zoning and density amendments), Specific Plans, and significant projects must be analyzed for consistency with the AQMP.” Strict consistency with all aspects of the plan is usually not required. A proposed project should be considered to be consistent with the AQMP if it furthers one or more policies and does not obstruct other policies. The SCAQMD CEQA Air Quality Handbook identifies two key indicators of consistency.

- (1) Whether the project will result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
- (2) Whether the project will exceed the assumptions in the AQMP in 2010 or increments based on the year of project buildout and phase.

Both of these criteria are evaluated in the following sections.

Criterion 1 – Increase in the Frequency or Severity of Violations

Based on the air quality modeling analysis contained in the Air Quality Analysis Handbook, neither short-term construction impacts nor long-term operations will result in significant impacts based on the SCAQMD regional and local thresholds of significance.

Therefore, the proposed Project is not projected to contribute to the exceedance of any air pollutant concentration standards and is found to be consistent with the AQMP for the first criterion.

Criterion 2 – Exceed Assumptions in the AQMP

The Project is located within the South Coast Air Basin (SCAB), which is governed by the South Coast Air Quality Management District (SCAQMD). The U.S. Environmental Protection Agency (U.S. EPA) requires areas that do not meet a National Ambient Air Quality Standard (NAAQS or standard) to develop and submit a State Implementation Plan (SIP) for approval. SIPs are used to show how the region will meet the standard. Regions must attain NAAQS by specific dates or face the possibility of sanctions by the federal government and other consequences under the Clean Air Act (CAA). This can result in increased permitting fees, stricter restrictions for permitting new projects, and the loss of federal highway funds. The South Coast AQMD SIPs are developed within the SCAQMD's Air Quality Management Plans (AQMPs). The most recent AQMP was developed in 2016 and addressed the 1997 8-hour and 2008 8-hour ozone standards, as well as PM_{2.5} standards. On December 2, 2022, the SCAQMD Governing Board adopted the 2022 Air Quality Management Plan (2022 AQMP).⁷ The 2022 AQMP is focused on attaining the 2015 8-hour ozone standard of 70 parts per billion (ppb).

SCAQMD is in the process of developing an Air Quality Analysis Guidance Handbook (Handbook) to replace the CEQA Air Quality Handbook approved by the South Coast AQMD Governing Board in 1993.⁸ Until the 1993 Handbook is updated, the SCAQMD provides a list of supplemental information on its website to guide the preparation of an air quality impact analysis.

- (1) Whether the project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
- (2) Whether the project will exceed the assumptions in the AQMP in 2010 or increments based on the year of project build-out.

7 South Coast AQMD, 2022 Air Quality Management Plan, https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf?sfvrsn=edcebd61_16, accessed July 6, 2025.

8 SCAQMD Website, Air Quality Analysis Handbook, <https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>, accessed July 6, 2025.

Criterion 1

With respect to the first criterion, SCAQMD methodologies require that an air quality analysis for a project include forecasts of project emissions in relation to contributing to air quality violations and delay of attainment.

- a) Would the Project result in an increase in the frequency or severity of existing air quality violations?

Because the consistency criteria identified under the first criterion pertain to pollutant concentrations, rather than total regional emissions, an analysis of the Project's pollutant emissions relative to localized pollutant concentrations is used as the basis for evaluating Project consistency. As discussed in Response (4.3 c) below, localized concentrations of carbon monoxide (CO), nitrogen oxide (NO_x), particulate matter less than 10 microns in diameter (PM₁₀), and particulate matter less than 2.5 microns in diameter (PM_{2.5}) would be less than significant during Project construction and operation. **Therefore, the proposed Project would not result in an increase in the frequency or severity of existing air quality violations.**

- b) Would the Project cause or contribute to new air quality violations?

As discussed in Responses (4.3 b) and (4.3 c), the proposed Project would result in emissions that are below the SCAQMD thresholds for regional and localized emissions. **Therefore, the Project would not have the potential to cause or affect a violation of the ambient air quality standards.**

- c) Would the Project delay timely attainment of air quality standards or the interim emissions reductions specified in the AQMP?

The proposed Project would result in less than significant impacts with regard to regional and localized concentrations during Project construction and operation; refer to Responses (4.3 b) and (4.3 c) below. As such, **the Project would not delay the timely attainment of air quality standards or 2022 AQMP emissions reductions.**

Criterion 2

The 2022 AQMP was prepared by SCAQMD and adopted on December 2, 2022. It is important to recognize that air quality planning within the Basin focuses on the attainment of ambient air quality standards at the earliest feasible date. Projections for achieving air quality goals are based on assumptions regarding population, housing, and growth trends. Thus, SCAQMD's second criterion for determining Project consistency focuses on whether the Project exceeds the assumptions utilized in preparing the emission forecasts presented in the 2022 AQMP to the degree that the control measures are no longer valid and the emission reduction targets are compromised.

Determining whether a Project exceeds the assumptions reflected in the 2022 AQMP involves the evaluation of the criteria stated below.

- a) Would the Project exceed the population number and location or Regional Housing Needs Assessment identified in the AQMP?

A Project is consistent with the 2022 AQMP in part if it is consistent with the population, housing, and employment assumptions that were used in the development of the 2022 AQMP. Future growth projections were based on demographic growth forecasts for various socioeconomic categories (e.g., population, housing, employment by industry) developed by SCAG for their 2020 RTP/SCS. **Table 4.3-2**, Baseline Demographic Forecasts in the 2022 AQMP, shows the population and housing assumptions included in the 2022 AQMP.

Table 4.3-2 Baseline Demographic Forecasts in the 2022 AQMP

Category	2018 (millions)	2037 (millions)	2037 % Growth from 2018
Population	16.7	18.6	12%
Housing Units	5.3	6.2	17%

Source: https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/06-ch3.pdf?sfvrsn=a1c5bd61_18, p. 3-23

As shown in **Table 4.3-2** above, current forecasts indicate that the region will experience population growth of 12% between 2018 and 2037. Housing units show the largest change in socioeconomic indicators with a projected 17% increase from 2018 to 2037.

The Project's incremental increase in housing units and population is shown in **Table 4.3-3**, Jurisdiction-Level Growth Forecast Compared to Proposed Project, below.

Table 4.3-3 Jurisdiction-Level Growth Forecast Compared to Proposed Project

Category	SCAG Forecast	With Proposed General Plan Amendment	Increase in Growth Compared to SCAG Forecast (%)
Households – Upland city	32,800	32,872	0.21%
Population	93,000	93,202	0.21%

Source: Connect SoCal, Demographics and Growth Forecast, Jurisdiction-Level Growth Forecast, https://scag.ca.gov/sites/default/files/old/file-attachments/0903fconnectsocial_demographics-and-growth-forecast.pdf?1606001579, pg. 40, accessed September 6, 2025.

As shown in **Table 4.3-3** above, the Project's incremental increase only results in a 0.21% increase in households and population above the SCAG Growth Forecast used in the preparation of the 2022 AQMP.

Additionally, as stated in CEQA Guidelines § 15206, Projects of Statewide, Regional, or Areawide Significance:

- “(b) (2) A project has the potential for causing significant effects on the environment extending beyond the city or county in which the project would be located. Examples of the effects include generating significant amounts of traffic or interfering with the attainment or maintenance of state or national air quality standards. Projects subject to this subdivision include: (A) A proposed residential development of more than 500 dwelling units. (B) A proposed shopping center or business establishment

employing more than 1,000 persons or encompassing more than 500,000 square feet of floor space. (C) A proposed commercial office building employing more than 1,000 persons or encompassing more than 250,000 square feet of floor space. (D) A proposed hotel/motel development of more than 500 rooms. (E) A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or encompassing more than 650,000 square feet of floor area."

Changes in population, housing, or employment growth projections have the potential to affect SCAG's demographic projections and, therefore, the assumptions in SCAQMD's AQMP. Per CEQA Guidelines §15206(b), a proposed project is of statewide, regional, or area-wide significance if the project is a residential development of more than 500 dwelling units. The proposed project would develop 72 detached condominium residences on the Project site, so it would not meet the criteria for a project of statewide, regional, or areawide significance established under CEQA Guidelines §15206(b)(2). Furthermore, as shown in **Table 4.3-6, Regional Significance – Operational Emissions**, the regional emissions that would be generated by the operational phase of the proposed Project would be less than the SCAQMD emissions thresholds. Therefore, SCAQMD would not consider it a substantial source of air pollutant emissions that would have the potential to affect the attainment designations in the SCAB. The proposed Project would not affect the regional emissions inventory or conflict with strategies in the AQMP. Therefore, the proposed Project is considered consistent with the 2022 AQMP. Impacts associated with consistency with the 2022 AQMP would be less than significant.

b) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Impact Analysis – Less Than Significant

Construction Air Quality Emissions Impact

The latest version of CalEEMod was used to estimate the onsite and offsite construction emissions. The emissions incorporate Rule 402 and 403. Rule 402 and 403 (fugitive dust) are not considered mitigation measures, as the project by default, is required to incorporate these rules during construction.

Regional Construction Emissions

The construction emissions for the Project would not exceed the SCAQMD's daily emissions thresholds at the regional level, as demonstrated in **Table 4.3-4, Regional Significance – Unmitigated Construction Emissions**, and therefore would be considered less than significant.

Table 4.3-4 Regional Significance – Unmitigated Construction Emissions

Construction Phase	Pollutants (pounds per day) ^{1,2}					
	VOC	NOx	CO	SO ₂	PM ₁₀	PM _{2.5}
Year 2026						
Demolition	2	22	20	<1	3	1
Site Preparation	2	18	17	<1	6	3
Grading	2	26	24	<1	6	3
Building Construction	1	11	16	<1	1	1
Year 2027						
Building Construction	1	10	17	<1	1	1
Paving	1	7	10	<1	1	<1
Architectural Coating	157	1	2	<1	<1	<1
Finishing/Landscaping	<1	1	1	<1	<1	<1
Building Construction, Paving, Architectural Coating & Finishing/Landscaping Overlap	160	18	30	<1	2	1
Maximum Daily Construction Emissions						
Maximum Daily Emissions	160	26	30	<1	6	3
South Coast AQMD Regional Construction Threshold						
Significant?	Yes	No	No	No	No	No

Source: Air Quality and Greenhouse Gas Emissions Technical Memorandum, **Appendix A**.

- 1 Based on the preliminary information provided or verified by the applicant. Where specific information regarding project-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by South Coast AQMD of construction equipment.
- 2 Includes implementation of fugitive dust control measures required by South Coast AQMD under Rule 403, including watering disturbed areas a minimum of two times per day, reducing speed limit to 25 miles per hour on unpaved surfaces, and street sweeping with Rule 1186-compliant sweepers.

To reduce VOC emissions to less than significant, the project would be required to implement **Mitigation Measure AIR-1**, requiring the use of ultra-low VOC coatings (10 g/L). As shown in **Table 4.3-5, Mitigated Maximum Daily Regional Construction Emissions**, implementation of Mitigation Measure AIR-1 would reduce VOC emissions to below SCAQMD's 75 pounds per day threshold. Therefore, regional construction emissions would be less than significant with mitigation.

MM AIR-1 The project construction contractor(s) and subcontractor(s) shall only use interior and exterior paints with a VOC (volatile organic compound) content maximum concentration of 10 grams per liter (g/L) for building architectural coating during construction and for future coating to reduce VOC emissions. All building and site plans shall note use of paints with a maximum VOC concentration of 10 g/L. Prior to construction, the construction contractor(s) shall ensure that all construction plans submitted to the City of Upland Building and Safety Division and Planning Division clearly show this requirement.

As shown in **Table 4.3-5**, with implementation of MM AIR-1, VOC emissions decrease to 37 pounds per day.

Table 4.3-5 Mitigated Maximum Daily Regional Construction Emissions

Construction Phase	Pollutants (lb/day) ^{1,2}					
	VOC	NOx	CO	SO ₂	PM ₁₀	PM _{2.5}
Year 2026						
Demolition	2	22	20	<1	3	1
Site Preparation	2	18	17	<1	6	3
Grading	2	26	24	<1	6	3
Building Construction	1	11	16	<1	1	1
Year 2027						
Building Construction	1	10	17	<1	1	1
Paving	1	7	10	<1	1	<1
Architectural Coating	35	1	2	<1	<1	<1
Finishing/Landscaping	<1	1	1	<1	<1	<1
Building Construction, Paving, Architectural Coating & Finishing/Landscaping Overlap	37	18	30	<1	2	1
Maximum Daily Construction Emissions						
Maximum Daily Emissions	37	26	30	<1	6	3
South Coast AQMD Regional Construction Threshold	75	100	550	150	150	55
Significant?	No	No	No	No	No	No

Source: CalEEMod Version 2022.1.

- 1 Based on the preliminary information provided or verified by the applicant. Where specific information regarding project-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by South Coast AQMD of construction equipment.
- 2 Includes implementation of fugitive dust control measures required by South Coast AQMD under Rule 403, including watering disturbed areas a minimum of two times per day, reducing speed limit to 25 miles per hour on unpaved surfaces, and street sweeping with Rule 1186-compliant sweepers.
- 3 Includes implementation of Mitigation Measure AIR-1 requiring the use of ultra-low VOC coatings (10 g/L).

Regional Operational Emissions

The Project would be operated as a residential subdivision. Typical operational characteristics include residents and visitors traveling to and from the site, delivery of goods and services to the residents, and maintenance activities. The operating emissions were based on year 2027. The emissions created by the proposed Project's long-term operations were calculated, and the highest emissions from either summer or winter are summarized in **Table 4.3-6**.

Table 4.3-6 Regional Significance – Operational Emissions

Source	Maximum Daily Emissions (pounds per day)					
	VOC	NOx	CO	SO ₂	PM ₁₀	PM _{2.5}
Mobile*	3	2	28	<1	6	2
Area	4	<1	4	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Total Maximum Daily Emissions	3	2	28	<1	6	2
South Coast AQMD Regional Threshold	55	55	550	150	150	55
Exceeds Regional Threshold?	No	No	No	No	No	No

Source: CalEEMod Version 2022.1. Highest winter or summer emissions are reported. The highest emissions for VOCs, CO, SO₂, PM₁₀, and PM_{2.5} are in summer while the highest emissions of NO_x are in winter.

Notes: Totals may not add up to 100 percent due to rounding.

*Based on trip generation and VMT data provided by TJW Engineering (see **Appendix F**).

As shown in **Table 4.3-5** and **Table 4.3-6** above, the Project does not exceed the SCAQMD daily emissions threshold, and regional operational emissions are considered to be less than significant.

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

Impact Analysis – Less Than Significant Impact

Table 4.3-7 shows the calculated emissions for the proposed operational activities compared with appropriate Localized Significance Thresholds (LSTs). The LST analysis only includes on-site sources; however, the CalEEMod software outputs do not separate on-site and off-site emissions for mobile sources. For a worst-case scenario assessment, the emissions shown in **Table 4.3-7** include all on-site Project-related stationary sources and 10% of the Project-related new mobile sources.⁹ This percentage is an estimate of the amount of Project-related new vehicle traffic that will occur on-site.

Table 4.3-7 Localized Construction Emissions

Construction Activity	Pollutants (pounds per day) ¹			
	NOx	CO	PM ₁₀ ²	PM _{2.5} ²
Demolition 2026	2	21	2	<1
Paving 2027	1	6	<1	<1
1.00-Acre or Less Screening-Level LST	334	5,691	103	32
Exceeds LST?	No	No	No	No
Building Construction 2026	1	10	<1	<1
Building Construction 2027	1	9	<1	<1
1.31-Acre or Less Screening-Level LST	348	6,028	92	33
Exceeds LST?	No	No	No	No
Site Preparation 2026	2	18	5	3
1.50-Acre or Less Screening-Level LST	356	6,235	85	34
Exceeds LST?	No	No	No	No
Building Construction, Paving, Architectural Coating & Finishing/Landscaping Overlap 2027	2	16	<1	<1
2.81-Acre or Less Screening-Level LST	407	7,543	86	38
Exceeds LST?	No	No	No	No
Grading 2026	2	15	3	1
3.00-Acre or Less Screening-Level LST	414	7,722	91	39
Exceeds LST?	No	No	No	No

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

Notes: In accordance with South Coast AQMD methodology, only on-site stationary sources and mobile equipment are included in the analysis. Screening-level LSTs are based on receptors within 364 feet (200 meters) for NOx, CO, PM₁₀, and PM_{2.5} of the project site in SRA 32.

- 1 Based on the preliminary information provided by the applicant. Where specific information for project-related construction activities or processes was not available, modeling was based on CalEEMod defaults. These defaults are based on construction surveys conducted by the South Coast AQMD.
- 2 Includes fugitive dust control measures required by South Coast AQMD under Rule 403, such as watering disturbed areas a minimum of two times per day, reducing speed limit to 25 miles per hour on unpaved surfaces, and street sweeping with Rule 1186-compliant sweepers

⁹ The project site is approximately 0.12 miles in length at its longest point; therefore, the on-site mobile source emissions represent approximately 1/57th of the shortest CalEEMod default distance of 6.9 miles. Therefore, to be conservative, 1/10th the distance (dividing the mobile source emissions by 10) was used to represent the portion of the overall mobile source emissions that would occur on-site.

Construction Health Risk

South Coast AQMD currently does not require health risk assessments for short-term emissions from construction equipment. Emissions from construction equipment primarily consist of diesel particulate matter (DPM). The Office of Environmental Health Hazard Assessment (OEHHA) adopted new guidance for the preparation of health risk assessments in March 2015. OEHHA has developed a cancer risk factor and noncancer chronic reference exposure level for DPM, but these factors are based on continuous exposure over a 30-year time frame. No short-term acute exposure levels have been developed for DPM. SCAQMD currently does not require the evaluation of long-term excess cancer risk or chronic health impacts for a short-term project. The proposed Project site would be developed in approximately 6 years. The relatively short duration when compared to a 30-year time frame would limit exposures of on-site and off-site receptors. In addition, exhaust emissions from off-road vehicles associated with overall project-related construction activities would not exceed the screening-level LSTs. Therefore, project-related construction activities would not expose sensitive receptors to substantial Toxic Air Contaminants TAC concentrations.

Operations – Localized Human Health Impacts

Operation of the proposed Project would not generate substantial quantities of emissions from on-site stationary sources. Land uses that have the potential to generate substantial stationary sources of emissions that would require a permit from SCAQMD include industrial land uses, such as chemical processing and warehousing operations where substantial truck idling could occur on-site. Because the proposed Project would involve residential development, it does not fall within these categories of uses.

While operation of the proposed Project could result in the use of standard on-site mechanical equipment such as heating, ventilation, and air conditioning units in addition to occasional use of landscaping equipment for Project site maintenance, air pollutant emissions generated from these sources would be nominal (see Area and Energy source emissions in **Table 4.3-6**). Therefore, on-site emissions generated from operation of the proposed Project would not expose off-site sensitive receptors to substantial pollutant concentrations.

CO Hot Spot Emissions

Areas of vehicle congestion have the potential to create pockets of CO called “hot spots.” These pockets have the potential to exceed the state 1-hour standard of 20 parts per million (ppm) or the 8-hour standard of 9.0 ppm. Because CO is produced in greatest quantities from vehicle combustion and does not readily disperse into the atmosphere, adherence to Ambient Air Quality Standards (AAQS) is typically demonstrated through an analysis of localized CO concentrations, typically produced at intersections where vehicles queue for longer periods and are subject to reduced speeds. The SCAB has been designated as attainment under both the national and California AAQS for CO. Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection to more than 44,000 vehicles per hour – or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited – to generate a significant CO impact. As mentioned previously, SCAQMD does not currently have adopted CO hotspot screening guidance, so guidance from the Bay Area Air District was utilized to determine whether the proposed Project could result in potentially significant impacts related to CO hotspot generation.

Operation of the proposed Project would generate up to 50 AM peak hour vehicle trips and 68 PM peak hours. When added to the existing peak hour volume at the intersection of Foothill Boulevard and Garey Avenue, the proposed Project's trips would result in a maximum intersection peak hour volume of 1,718 peak hour trips, which is less than the 44,000 vehicles per hour screening criteria threshold. Therefore, development and operation of the proposed Project would not result in the volume of traffic required (i.e., 24,000 to 44,000 peak hour vehicle trips) to generate a CO hotspot at intersections within the project traffic study area.

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

Impact Analysis – Less Than Significant

The threshold for odor is whether a project creates an odor nuisance pursuant to SCAQMD Rule 402, Nuisance, which states:

A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

The types of facilities that are considered to have objectionable odors include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities. The nearest sensitive receptors to the Project site are residences approximately 654 feet to the south; however, numerous industrial and commercial uses operate adjacent to the Project site to the east, west, and south.

While the proposed Project would include a sewer lift station on-site that could generate odors associated with wastewater transfer, it would be equipped with an odor control unit that would scrub emissions of hydrogen sulfide through an odor control valve. Proper installation and maintenance of this standard lift station accessory would ensure that the proposed residences on-site and businesses in the vicinity are not exposed to odors associated with the lift station. Emissions from construction equipment, such as diesel exhaust and volatile organic compounds from architectural coatings and paving activities, may also generate odors. However, these odors would be low in concentration and temporary and are not expected to affect a substantial number of people.

4.4 Biological Resources

Threshold 4.4 – Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?		✓		
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?				✓
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				✓
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				✓
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				✓
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				✓

The analysis in this section is supported by the following technical report.

- Biological Resource Evaluation, Hanna Resources, May 2, 2025, included as **Appendix B-1** to this Initial Study.

Applicable General Plan Policies

The following General Plan Policies were considered in the analysis.

Open Space and Conservation Element

- **Policy OSC-1.1: Resource Preservation.** Preserve open space and habitat areas by promoting conservation and preservation easements that protect habitat areas, habitat corridors, and sensitive biological resources.

-
- a) Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**
-

Impact Analysis – Less Than Significant with Mitigation Incorporated

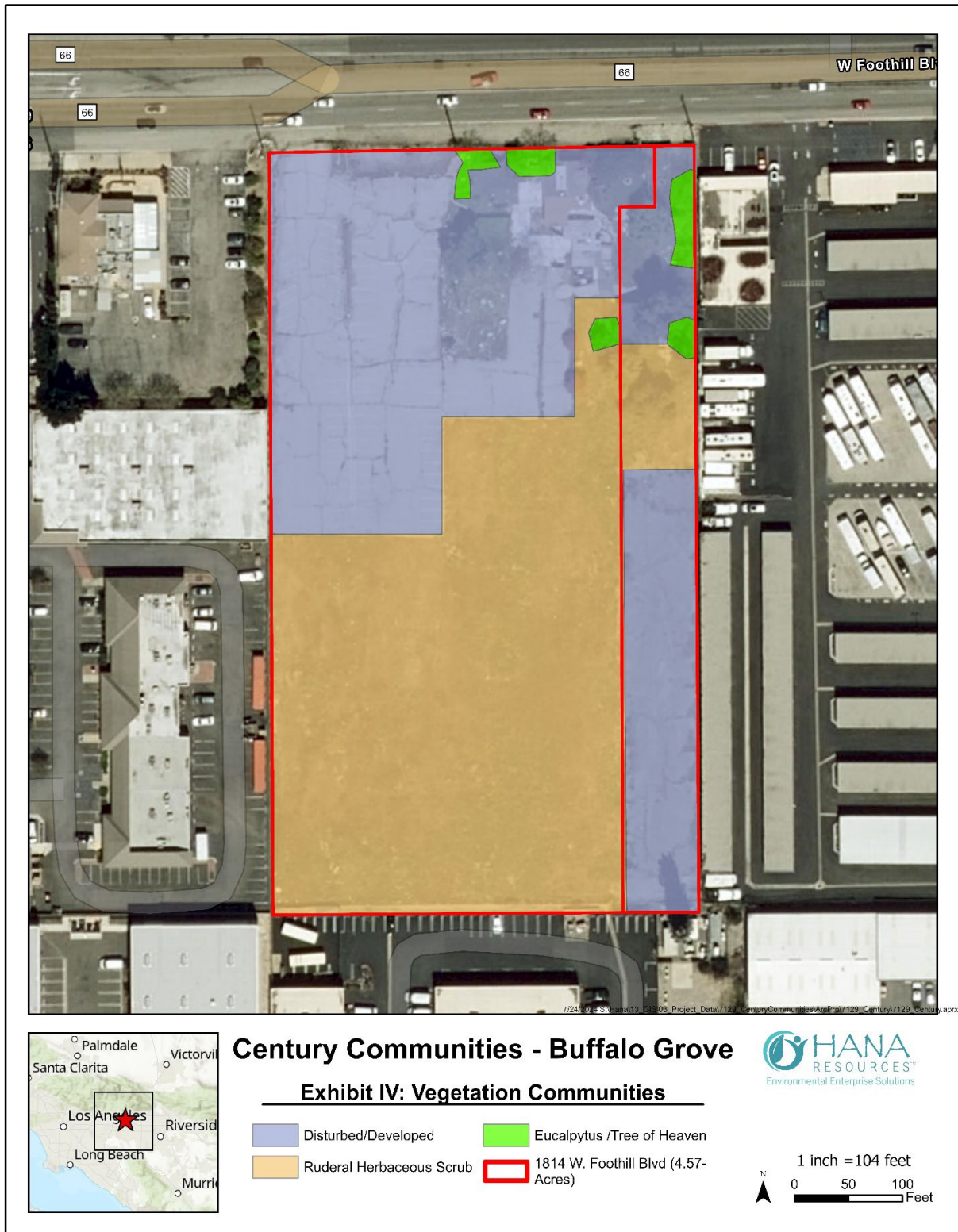
Vegetation Types and Other Areas

The following vegetation types and other areas occur within the Project site: Ruderal herbaceous scrub, eucalyptus/tree of heaven, and disturbed/developed (**Figure 4.4-1**). The majority of the Project site is covered by ruderal herbaceous scrub, with the northern portion dominated by disturbed/developed land and small pockets of eucalyptus/tree of heaven.

Special Status Plant Species

The majority of the Project site is dominated by dry grasslands and shrublands dominated by non-native species or ruderal native species. No special status plant species were observed on the Project site, nor did the site contain a suitable habitat to support special status plant species. The heavily disturbed habitat and urban development in the vicinity makes it unsuitable for many sensitive species.

Figure 4.4-1 Vegetation Types and Other Areas



Special Status Wildlife Species

Wildlife may be considered special status due to declining populations, vulnerability to habitat change, or restricted distributions. Critical Habitat is designated for the survival and recovery of species listed as Threatened or Endangered under the Federal Endangered Species Act. The Project site is not located in areas designated or proposed as Critical Habitat.

During the field survey, no special status wildlife species were observed on the site due to the limited habitat to support such species.

Various site features exist that discourage occupancy of the buildings by bats, limits the potential presence of bats on site as whole, and therefore results in a negligible impact of future demolition and construction activities on potential bat habitat. While bats are known to occur in urban settings like abandoned buildings, overpasses, and various municipal structures, the biological survey that was conducted on 4/8/25 found that the site lacks suitable habitat for bat species. This includes adjacent foraging habitat in the form of grassland, coastal scrub, woodland, and sagebrush habitat, features such as bodies of water or riparian trees, and potential urban roosting opportunities. The abandoned buildings are directly adjacent to Foothill Blvd on the northern portion of the site. This proximity to a major arterial street imposes significant traffic noise and activity pressure. Signs such as a large amount of refuse present and evidence of frequent human occupancy (e.g., undone door boarding, sleeping mattresses/materials, broken fencing) suggest a high level of human disturbance, which adversely affects potential bat site colonization or occupancy. In addition, there are no modern CNDDDB records (<20 years) within 3 miles of the BSA for any bat species designated as Endangered, Threatened, or a Species of Special Concern by CDFW. No additional mitigation measures are required

Some burrows on the Project site could potentially support burrowing owls, a candidate for California's Endangered Species List. The burrows include abandoned ground squirrel burrows and man-made structures. While burrowing owls are not present on the Project site at this time, there is potential for burrowing owls to occupy the site in the future; therefore, a one-visit pre-construction burrowing owl survey would be recommended within 14 days prior to the initiation of construction.

The following mitigation measures are recommended to avoid and minimize impacts on burrowing owls.

Mitigation Measures

MM BIO-1 Burrowing Owl Preconstruction Survey. While suitable burrowing owl burrows are not present on the Project site at this time, there is potential for burrowing owl to occupy the site in the future; therefore, a one-visit pre-construction burrowing owl survey per California Department of Fish and Wildlife (CDFW) protocols is required within 14 days before the initiation of construction. If preconstruction surveys are positive for burrowing owl, the Project owner will be required to consult with CDFW and implement a Burrowing Owl Management Plan consistent with the guidance of the CDFW Staff Report On Burrowing Owl Mitigation (CDFW 2012).

MM BIO-2 Nesting Bird Preconstruction Survey. To avoid and minimize impacts on nesting birds and raptors, construction should be conducted during non-breeding season (September 1 to February 14). If vegetation clearing or ground-disturbing activities

need to take place during breeding season (February 15 through August 31), in order to remain in compliance with the Migratory Bird Treaty Act, a pre-construction nesting bird survey(s) will be required.

-
- b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?**
-

Impact Analysis – No Impact

No riparian vegetation (e.g., cottonwoods, willows) exist on the site or in the adjacent habitats.

-
- c) Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**
-

Impact Analysis – No Impact

Section 404 of the federal Clean Water Act (CWA) and Section 1602 of the California Fish and Game Code regulate activities affecting resources under the jurisdiction of the U.S. Army Corps of Engineers (USACE) and the California Department of Fish and Wildlife (CDFW), respectively. The USACE has jurisdictional authority over wetland and non-wetland Waters of the United States. The CDFW has jurisdictional authority over resources associated with rivers, streams, and lakes. Section 401 of the CWA provides the Regional Water Quality Control Board (RWQCB) with the authority to regulate, through a Water Quality Certification, any proposed federally permitted activity that may affect water quality. The RWQCB also has jurisdiction over non-federal wetlands and waters of the State under the Porter-Cologne Water Quality Control Act.

No jurisdictional resources are present on the Project site.

-
- d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**
-

Impact Analysis – No Impact

The Project site is bordered by development on the west, south, and east, and Foothill Boulevard on the north with scattered development and some vacant land on the north. Given that the Project site is surrounded by urban development, it would not function as a wildlife corridor between areas of open space; only urban-adapted wildlife are expected to move through the Project site. Further, the General Plan EIR notes that due to the high degree of urbanization within City limits, no significant wildlife corridors are present within the City limits or sphere of influence. As such, the proposed Project would not interfere with the movement of fish or wildlife and would not affect wildlife corridors.

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

Impact Analysis – No Impact

The Project site does not include bodies of water, wetlands, or vegetation that would support candidate, sensitive, or special status species. The site does include a scattering of eucalyptus and trees of heaven, and implementation of the Project would include removal of existing trees. The eucalyptus tree and tree of heaven are not a protected biological resources.

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

Impact Analysis – No Impact

Regional multiple species conservation plans offer long-term assurances for conservation of covered species at a landscape scale, in exchange for biologically appropriate levels of incidental take and/or habitat loss as defined in the approved plan. California's NCCP (Natural Community Conservation Planning) Act (FGC §2800 et seq.) governs such plans at the state level, and was designed to conserve species, natural communities, ecosystems, and ecological processes across a jurisdiction or a collection of jurisdictions. According to the California Natural Community Conservation Plans Map maintained by the California Department of Fish and Wildlife, there are no such plans that encompass the Project site.¹⁰

¹⁰ California Natural Community Conservation Plans, <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>, accessed September 7, 2025

4.5 Cultural Resources

Threshold 4.5 – Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines §15064.5?		✓		
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5?		✓		
c) Disturb any human remains, including those interred outside of formal cemeteries?			✓	

The analysis in this section is supported by the following technical report:

- Historical/Archaeological Resources Survey Report, CRM Tech, August 15, 2025, included as **Appendix C-1** to this Initial Study.

Applicable General Plan Policies

The following General Plan Policies were considered in the analysis.

Community Character and Urban Design Element

- Policy CC-9.4: Early Consultation.** Minimize the potential impacts to historic and cultural resources by consulting with property owners and land developers early in the development review process.
- Policy CC-9.5: Consultation with Individuals and Organizations.** Consult with the appropriate organizations and individuals (e.g. Information Centers of the California Historic Resources Information System (CHRIS), the Native American Heritage Commission (NAHC), and Native American groups and individuals) to minimize potential impacts to historic and cultural resources.

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

Impact Analysis – Less Than Significant with Mitigation Incorporated

Cultural Resource Records Search and Literature Review

CRM Tech conducted a cultural resources literature review and records search from the South Central Coastal Information Center (SCCIC) on May 22, 2025. The SCCIC is a designated branch of the California Historical Resources Information Center (CRHR) and houses records of archaeological and historic resources recorded in San Bernardino County. The records search included a 1-mile search radius around the proposed Project site. The purpose of the literature

search was to identify precontact or historic archaeological sites or historic buildings and structures previously recorded within and around the Project alignment. CRM also reviewed the National Register of Historic Places (NRHP), the CRHR, local registers, and Archaeological Determinations of Eligibility. The records were reviewed to accomplish the following.

- Identify cultural resources (e.g., archaeological sites) in the Project site and surrounding areas;
- Identify and determine the adequacy of previous cultural resources studies in the Project site;
- Develop management recommendations for cultural resources within or adjacent to the Project site; and
- Assess what additional cultural resources studies would need to be undertaken for the proposed Project.

According to the SCCIC records the Project site had no prior cultural resources surveys recorded, and there were about two dozen cultural studies completed in the 1-mile radius around the site. As a result of these past studies, 14 historical/archaeological sites were previously recorded. Half of these historic sites were refuse deposits, two were segments of Foothill Boulevard, three bridges, an industrial building, and Claremont Colleges.

Foothill Boulevard is listed on the National Register of Historic Places under the Multiple Property Documentation Form (MPDF) for "U.S. Highway 66 in California." Contributors to the historical significance of this National Register property include adjacent traveler-related buildings, services, and features that share a historical association with Route 66 and date within Route 66's period of significance, namely 1926-1974. As such, Buffalo Inn in the project area, which dates to the historic period, constitutes a potential contributor to the MPDF.

Field Survey

CRM surveyed the Project site on June 17 and 18, 2025. The entire Project site was surveyed by walking a series of north-south transects spaced approximately 50 feet apart. The archaeologist examined all areas considered highly sensitive for cultural resources and the ground surface for the presence of the following:

- Prehistoric artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools);
- Historic artifacts (e.g., metal, glass, ceramics);
- Sediment discoloration that might indicate the presence of a cultural midden;
- Depressions and other features are indicative of the former presence of structures or buildings (e.g., post holes, foundations); and
- Fossil localities.

The field survey did not identify any historical and/or archaeological resources on the surface of the Project site. The five buildings comprising the Buffalo Inn property were found to retain sufficiently recognizable historical characteristics compatible to their 1929-1948 origins; therefore, they were collectively recorded into the California Historical Resources Inventory under the temporary designation of Site 4278-01H, pending assignment of permanent identification number by the SCCIC.

Mitigation Measures

MM CUL-1 Documentation of Existing Structures. It is recommended that the five buildings comprising the Buffalo Inn be further documented prior to the commencement of the project, including the following procedures:

- Systematic photo-documentation of the current appearance of the buildings, including overviews from all sides, elevation shots, as well as exterior and interior details;
- Compilation of detailed plan drawings by locating original as-built plans and/or through scaled mapping of the current floor plans.

The results of these procedures should be curated at the SCCIC, the City of Upland Development Services Department (Planning Division), and other appropriate local repository to ensure long-term safekeeping and optimize public access. Under this condition, the proposed project may be cleared to proceed in compliance with cultural resources provisions of CEQA. Meanwhile, if buried cultural materials are encountered during any earth-moving operations associated with the project, all work in the immediate area should be halted or diverted until a qualified archaeologist can evaluate the nature and significance of the finds.

There is the possibility of historical and/or archaeological resources to be found during grading and trenching during construction of the Project. Therefore, the following mitigation measure is required.

MM CUL-2 Discovery of Archaeological Resources. The Applicant shall retain an Archaeologist who meets the requirements of the Secretary of the Interior (SOI) Professional Qualifications Standards ("Qualified Archaeologist") prior to the issuance of grading permits. If archaeological resources are discovered at the Project Site, the handling of the discovered resources will occur as described below. All artifacts discovered shall be inventoried and analyzed by the SOI Archaeologist. If any artifacts of Native American origin are discovered, all activities in the immediate vicinity of the find (within a 100-foot radius) shall stop, and the SOI Archaeologist shall follow the procedures outlined in Mitigation Measures TCR-1 through TCR-3 under Section 4.15, Tribal Cultural Resources of this Initial Study/Mitigated Negative Declaration document. Non-Native American artifacts shall be inventoried, assessed, and analyzed for cultural affiliation, personal affiliation (prior ownership), function, and temporal placement. After analysis and reporting, these artifacts will be subjected to curation or returned to the property owner, as deemed appropriate. All artifacts, except for human remains and related grave goods or sacred/ceremonial objects, belong to the property owner.

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

Impact Analysis – Less Than Significant

The Project site does not contain a cemetery, and no known formal cemeteries are located within the immediate site vicinity. If human remains are discovered during Project grading or other ground-disturbing activities, the Project would be required to comply with the applicable provisions of California Health and Safety Code §7050.5 as well as Public Resources Code §5097 et seq. With the implementation of the California Health and Safety Code, impacts under Threshold 4.5 (c) would remain less than significant.

4.6 Energy

Threshold 4.6 – Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			✓	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			✓	

The analysis in this section is supported by the following technical report:

- Air Quality and Greenhouse Gas Emissions Technical Memorandum, PlaceWorks, June 12, 2025, included as **Appendix A**.

Applicable General Plan Policies

The following General Plan Policies were considered in the analysis.

Open Space and Conservation Element

- **Policy OSC-5.4: CEQA Review.** Evaluate greenhouse gas emission impacts from proposed development projects as required by the California Environmental Quality Act.
- **Policy OSC-5.2: Greenhouse Gas Reduction in New Development.** Reduce greenhouse gas emissions from new development by promoting water conservation and recycling; promoting development that is compact, mixed-use, pedestrian-friendly, and transit-oriented; promoting energy-efficient building design and site planning; improving the jobs/housing ratio; and other methods of reducing emissions.

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

Impact Analysis – Less Than Significant

The Project would require electricity and fuel during construction and operations. Construction electricity demand would be temporary and limited to the use of power tools, small equipment, and temporary lighting, totaling approximately 3,600 to 12,000 kilowatt-hours (kWh) over 151 workdays. Construction fuel demand would total approximately 18,450 gallons, including about 7,750 gallons from on-road vehicles and 10,700 gallons from off-road diesel equipment. These amounts represent a negligible share of regional energy supplies and would occur only during the short construction period. Construction equipment would comply with California Air

Resources Board (CARB) regulations, which limit idling and require modern fuel-efficiency standards, ensuring no wasteful or inefficient fuel consumption.

Operational energy demand is projected at approximately 1.67 million kWh annually, including about 353,000 kWh per year for the residential units and parking areas and approximately 1.3 million kWh per year for the sewer lift station. Annual operational fuel use is estimated at approximately 73,800 gallons, based on the 72 single-family units and statewide household averages. These operational energy needs are typical for residential projects of this scale and would be supported by existing utility providers without the need for new or expanded energy infrastructure.

Accordingly, neither construction nor operation of the project would result in the wasteful, inefficient, or unnecessary consumption of energy resources. Impacts would be less than significant.

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

Impact Analysis – Less Than Significant

The regulations directly applicable to the Project are Building Energy Efficiency Standards, Title 24, Part 6, and CALGreen Title 24, Part 11. These regulations include, but are not limited to, the use of energy-efficient heating and cooling systems, water-conserving plumbing, and water-efficient irrigation systems. The Project is required to demonstrate compliance with these regulations as part of the building permit and inspection process.

4.7 Geology and Soils

Threshold 4.7 – Would the project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?				✓
ii) Strong seismic ground shaking?			✓	
iii) Seismic-related ground failure, including liquefaction?				✓
iv) Landslides?				✓
b) Result in substantial soil erosion or the loss of topsoil?			✓	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable because of the Project, and potentially result in on-site or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?				✓
d) Be located on expansive soil, as defined in the Uniform Building Code, creating substantial risks to life or property?				✓
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				✓
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		✓		

The analysis in this section is supported by the following technical reports:

- Geotechnical and Infiltration Evaluation, GeoTek, Inc., February 5, 2025, attached as **Appendix D-1**
- Geotechnical Infiltration Evaluation Memo, GeoTek, Inc., April 25, 2025, attached as **Appendix D-2**

Applicable General Plan Policies

The following General Plan policies were considered in this analysis.

Safety Element

- **Policy SAF-3.3: Geotechnical Investigations.** Require site-specific soils and/or geologic reports for development in areas where potentially serious geologic risks exist. These reports shall address the degree of hazard, design parameters for the project based on the hazard, and the appropriate mitigation measures.

Impact Analysis – No Impact

According to the California Department of Conservation and the Geotechnical Evaluation attached as **Appendix D-1**, the site is not located within an identified or suspected Alquist-Priolo Earthquake Fault zones. The nearest zoned fault is the Sierra Madre Fault Zone, located approximately 19 miles north of the Project Site.¹¹ Human occupancy structures are prohibited within 50 feet of an active fault. Due to the distance of the nearest fault, rupture on-site is not anticipated, therefore, no impacts are anticipated.

ii) Strong seismic ground shaking?

Impact Analysis – Less Than Significant

As is typical for most areas of Southern California, strong seismic ground shaking resulting from earthquakes associated with nearby faults may occur at the Project Site. Development of the Project Site would take place in accordance with the applicable requirements listed in the International Building Code (IBC), the California Building Standards Code, and the Buildings and Construction requirements of the City of Upland Municipal Code.

iii) Seismic-related ground failure, including liquefaction?

Impact Analysis – No Impact

According to The California Geological Survey's Earthquake Hazards Zone Application (EQ Zapp) and the Geotechnical Evaluation attached as **Appendix D-1**, the Project site is not located in a liquefaction zone.¹¹

iv) Landslides?

Impact Analysis – No Impact

The site is relatively flat and is not adjacent to any slopes or hillsides that could be potentially susceptible to landslides.

¹¹ Source: Earthquake Zones of Required Investigation, <https://maps.conservation.ca.gov/cgs/EQZApp/>, accessed September 8, 2025

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

Impact Analysis – Less Than Significant

Construction

The development of the Project site would include disturbance of 4.42 acres. Project-related dust may be generated due to the operation of machinery on-site or due to high winds. Construction would be subject to compliance with the UMC Grading Permit regulations that address erosion control. Specifically, Upland Municipal Code (UMC) §16.16.070.B, Grading and Erosion Control, specifies that every subdivision map shall be conditioned on compliance with the requirements for grading and erosion control, including the prevention of sedimentation or damage to off-site property, as set forth in UMC Chapter 15.52, Grading Restrictions.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable because of the Project, and potentially result in on-site or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?

Impact Analysis – No Impact

Landslides, lateral spreading, subsidence, liquefaction, and collapse as a result of an earthquake are largely dependent on the underlying geologic conditions (e.g., bedrock, type of soil, and the depth of the water table). The site is composed mostly of interbedded dense sand and gravel with varying amounts of cobbles (SP and GP soil types). Based on the relatively dense nature of the subsurface soils encountered, along with the relatively deep ground water depth, the liquefaction potential at the subject site is considered to be very low, therefore there would be no impact.

d) Be located on expansive soil, as defined in the Uniform Building Code, creating substantial risks to life or property?

Impact Analysis – No Impact

The Geotechnical Evaluation (**Appendix D-1**) indicated that the soils encountered at the site were composed mostly of SP (poorly graded sand) and GP (gravel with varying amounts of cobbles) soil types. The report indicated that the soils encountered exhibit a "Very Low" Expansion Index. Therefore, no known or anticipated impacts will occur as a result of the implementation of the project.

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

Impact Analysis – No Impact

The Project does not propose the use of septic tanks or alternative wastewater disposal systems. The Project would install domestic sewer infrastructure and connect to the City of Upland's sewer conveyance and treatment system.

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

Impact Analysis – Less Than Significant with Mitigation Incorporated

A Historical/Archaeological Resources Report was conducted by CRM Tech (**Appendix C-1**). The study states that no historical resources were identified on the Project site during the field survey. However, if buried cultural materials are encountered during any earth-moving operations associated with the project, all work should be halted and **MM CUL-2, Discovery of Archaeological Resources**, shall apply.

Unique Geologic Feature

The Project site is relatively flat. The site is composed mostly of SP (poorly graded sand) and GP (gravel with varying amounts of cobble) soil types, which are common soil types in the area. As such, the Project does not contain a geologic feature that is unique or exclusive locally or regionally.

Mitigation Measure

MM PALEO-1: Retain a Qualified Paleontologist and Implement a Paleontological Monitoring Program Prior to the issuance of grading permits, the project applicant shall retain a qualified paleontologist, meeting the Society of Vertebrate Paleontology (SVP) standards (2010 or most current), to be on call during all ground-disturbing activities. The paleontologist shall provide a preconstruction worker environmental awareness training for construction personnel to recognize fossil resources.

The qualified paleontologist, or a paleontological monitor under their direction, shall be on site during initial ground disturbance, grading, or excavation in previously undisturbed native sediments with high paleontological sensitivity (e.g., younger alluvium mapped in the Upland area). If no fossil resources are discovered during the initial monitoring period, the paleontologist may recommend reducing or discontinuing monitoring, subject to approval by the City of Upland Planning Division.

In the event that paleontological resources (e.g., fossil remains, bone, shell, or plant impressions) are encountered during construction, all ground-disturbing work in the vicinity shall halt immediately. The paleontologist shall evaluate the find, recover fossils as appropriate, and prepare them to a curation-ready standard. Collected specimens shall be curated at a recognized scientific repository or museum (e.g., the San Bernardino County Museum or the Natural History Museum of Los Angeles County) with all associated data and field notes. A final monitoring and mitigation report shall be prepared and submitted to the City of Upland Planning Division at the conclusion of grading.

4.8 Greenhouse Gas Emissions

Threshold 4.8 – Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			✓	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			✓	

The analysis in this section is supported by the following technical report:

- Air Quality and Greenhouse Gas Emissions Technical Memorandum, PlaceWorks, June 12, 2025, attached as **Appendix A**.

Applicable General Plan Policies

The following General Plan policies were considered in this analysis:

- **Policy OSC-5.2: Greenhouse Gas Reduction in New Development.** Reduce greenhouse gas emissions from new development by promoting water conservation and recycling; promoting development that is compact, mixed use, pedestrian friendly, and transit oriented; promoting energy-efficient building design and site planning; improving the jobs/housing ratio; and other methods of reducing emissions.
- **Policy OSC-5.4: CEQA Review.** Evaluate greenhouse gas emission impacts from proposed development projects as required by the California Environmental Quality Act.
- **Policy OSC-5.11: Minimum Green Building Standards.** Require new development to comply with the California Green Building Code (CALGreen) adopted by the California Building Standards Commission at the time of building permit application.

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

Impact Analysis – Less Than Significant

Pursuant to CEQA Guidelines §15064.4, when determining the significance of greenhouse gas emissions, the “lead agency shall have discretion to determine, in the context of a particular project, whether to use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use.” Moreover, CEQA Guidelines §15064.7(c) provides that “a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts” on the condition that “the decision of the lead agency to adopt such thresholds is supported by substantial evidence.”

The South Coast Air Quality Management District (SCAQMD) formed a GHG CEQA Significance Threshold Working Group in 2008 to develop GHG CEQA significance thresholds to address projects for which SCAQMD is the lead agency under CEQA. The interim thresholds are based on a tier system and have several options.

The City has been relying on the option of 3,000 MTCO₂e per year because this level would capture 90% of GHG emissions from new development projects in the region. This type of market capture analysis captures a substantial fraction of the GHG emissions from future development to accommodate for future population and job growth and excludes small development projects that would contribute a relatively small fraction of the cumulative statewide GHG emissions. result in a significant GHG emissions impact under CEQA because SCAQMD is an expert agency in the Southern California region.

Greenhouse Gas Emissions Impact

Global climate change is not confined to a particular project area and is generally accepted as the consequence of global industrialization over the last 200 years. A typical project, even a very large one, does not generate enough greenhouse gas emissions on its own to influence global climate change significantly; hence, the issue of global climate change is, by definition, a cumulative environmental impact.

Implementation of the proposed Project would result in the development of up to 72 new townhomes. Operation of development accommodated by the proposed Project would generate 679 new weekday vehicle trips. Furthermore, operation of the proposed Project would result in an increase in water demand, wastewater and solid waste generation, area sources (e.g., consumer cleaning products), refrigerants, and energy use. Project-related construction emissions, totaling 200 MTCO₂e from the 2-year construction duration, were amortized over 30 years and added to the operational emissions, consistent with the recommended SCAQMD methodology. Energy emissions include electricity use from the townhomes and parking areas in addition to the electricity use of the motor that would power the sewer lift station. The project-related GHG emissions are shown in **Table 4.8-1, Project-Related GHG Emissions**. As shown in the table, the primary sources of GHG emissions are mobile sources. However, development and operation of the proposed Project would not generate annual emissions that exceed the SCAQMD bright-line threshold of 3,000 MTCO₂e per year. Therefore, the proposed Project would not cumulatively contribute to GHG emissions.

Table 4.8-1 Project-Related GHG Emissions

Source	Project GHG Emissions (MTCO ₂ e/Year)	Percentage of Project Total MTCO ₂ e/Year
Mobile ¹	951	74%
Area	5	0%
Energy ²	292	23%
Water	10	1%
Solid Waste	17	1%
Refrigerants	<1	<1%
30-Year Amortized Construction Emissions ³	7	1%
Total	1,282	100%
South Coast AQMD's Bright-Line Threshold	3,000	NA
Exceeds Bright-Line Threshold	No	NA

Source: CalEEMod, Version 2022.1. Totals may not equal the sum of the values as shown due to rounding.

Notes: MTCO₂e = metric ton of carbon dioxide equivalence.

1 Transportation emissions based on trip generation data provided by TJW Engineering (see Attachment B).

2 Energy emissions include the electricity use of the townhome and parking lot uses calculated in CalEEMod (86 MTCO₂e) and the off-model calculation of the electricity use from the sewer lift station (206 MTCO₂e).

3 Total construction emissions of 200 MTCO₂e are amortized over 30 years based on recommended South Coast AQMD methodology (South Coast AQMD 2009).

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

Impact Analysis – Less Than Significant

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

CARB Scoping Plan

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

Statewide strategies to reduce GHG emissions in the 2022 Climate Change Scoping Plan include: implementing SB 100, which expands the RPS to 60 percent by 2030; expanding the Low Carbon Fuel Standards (LCFS) to 18 percent by 2030; implementing the Mobile Source Strategy to deploy zero-electric vehicle buses and trucks; implementing the Sustainable Freight Action Plan; implementing the Short-Lived Climate Pollutant Reduction Strategy, which reduces methane and hydrofluorocarbons to 40 percent below 2013 levels by 2030 and black carbon emissions to 50 percent below 2013 levels by 2030; continuing to implement SB 375; creating a post-2020 Cap-and-Trade Program; and developing an Integrated Natural and Working Lands Action Plan to secure California's land base as a net carbon sink.

Other statewide strategies to reduce GHG emissions include the low carbon fuel standards, California Appliance Energy Efficiency regulations, California Renewable Energy Portfolio

standard, changes in the (Corporate Average Fuel Economy (café) standards, and other early action measures as necessary to ensure the state is on target to achieve the GHG emissions reduction goals of AB 32, SB 32, and AB 1279. In addition, new developments are required to comply with the current Building Energy Efficiency Standards and California Green Building Standards Code (CALGreen). The proposed Project would comply with these GHG emissions reduction measures since they are statewide strategies. The proposed project GHG emissions would be further reduced from compliance with statewide measures that have been adopted since AB 32, SB 32, and AB 1279 were adopted. Therefore, the proposed project would not obstruct or conflict with implementation of the 2022 Scoping Plan.

SCAG's Regional Transportation Plan/Sustainable Communities Strategy

SCAG adopted the 2024-2050 RTP/SCS, Connect SoCal, in April 2024. Connect SoCal is a long-term plan for the Southern California region that details the development, integrated management, and operation of transportation systems and facilities that will function as an intermodal transportation network for the SCAG metropolitan planning area. This plan outlines a forecast development pattern that demonstrates how the region can sustainably accommodate needed housing and job centers with multimodal mobility options. The overarching vision is to expand alternatives to driving, advance the transition to clean-transportation technologies, promote integrated and safe transit networks, and foster transit-oriented development in compact and mixed-use developments.

In addition, Connect SoCal is supported by a combination of transportation and land use strategies that outline how the region can achieve California's GHG-emission-reduction goals and federal Clean Air Act requirements. The projected regional development, when integrated with the proposed regional transportation network in Connect SoCal, would reduce per-capita GHG emissions related to vehicular travel and achieve the GHG reduction per capita targets for the SCAG region.

The Connect SoCal Plan does not require that local general plans, proposed projects, or zoning be consistent with the SCS, but provides incentives for consistency to governments and developers. The proposed project would accommodate residential development, which would provide townhomes on the project site. Since the proposed project is located within a Transit Priority Area and low VMT-generating area it is assumed to have a less than significant impact with respect to VMT according to the City's Guidelines. Therefore, the proposed project would not interfere with SCAG's ability to implement the regional strategies in Connect SoCal.

4.9 Hazards and Hazardous Materials

Threshold 4.9 – Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			✓	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			✓	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				✓
d) Be located on a site, which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and, as a result, would create a significant hazard to the public or the environment?				✓
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area?			✓	
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			✓	
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				✓

The analysis in this section is supported by the following technical report.

- Phase I and II Environmental Site Assessment, Stantec Consulting Services, Inc., August 19, 2025, **attached as Appendix C-2**

Applicable General Plan Policies

The following General Plan policies were considered in this analysis.

Safety Element

- Policy SAF-5.2: Investigate Sites for Contamination.** Ensure buildings and sites are investigated for the presence of hazardous materials and/or waste contamination before development and periodically during operation for which City discretionary

approval is required. The City shall ensure appropriate measures are taken to protect the health and safety of all possible users and adjacent properties.

-
- a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**
 - b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?**
-

Impact Analysis – Less Than Significant

Existing Conditions

The Project site consists of vacant, partially developed land. The Phase I ESA report performed by Stantec concluded that the site does have historical agricultural use until the mid-1990s. As a result of this report Stantec performed a Phase II ESA that included the collections of soil samples. The report results showed hazardous materials concentrations that were consistently lower than the United States Environmental Protection Agency Regional Screening Levels and the California hazardous waste levels.

Construction Activities

At the start of construction activities, construction contractors are required to comply with all applicable federal, state, and local laws and regulations regarding hazardous materials, including but not limited to requirements imposed by the Environmental Protection Agency, the California Department of Toxic Substances Control, the South Coast Air Quality Management District, and the Santa Ana Regional Water Quality Board. As such, impacts due to construction activities would not cause a significant hazard to the public or the environment through the release of hazardous materials into the environment.

Operational Activities

The Project site would be developed with residential land uses, which are land uses that are not typically associated with the transport, use, or disposal of hazardous materials. Although residential land uses may utilize household products that contain toxic substances, such as cleansers, paints, adhesives, and solvents, these products are usually in low concentration and small in amount and would not pose a significant risk to humans or the environment during transport to/from or use at the Project site.

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

Impact Analysis – No Impact

The closest school to the Project site is Cabrillo Elementary School, located approximately 0.5 miles southeast. Sycamore Elementary School is approximately 1.3 miles northeast, and Baldy View Elementary School is approximately 1.3 miles east of the site. Claremont Colleges are located approximately 1.3 miles west of the site. There is no school within one-quarter mile of the Project site. As discussed in the responses to Thresholds 4.9 (a) and 4.9 (b) above, all hazardous

or potentially hazardous materials would comply with all applicable federal, state, and local agencies and regulations regarding hazardous materials. Additionally, the Project site would be developed with residential land uses, which are land uses that are not typically associated with the transport, use, or disposal of hazardous materials. Therefore, regardless of the proximity of planned or proposed schools, the Project would not impact schools.

-
- d) Would the project be located on a site, which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and, as a result, would create a significant hazard to the public or the environment?**
-

Impact Analysis – No Impact

The Hazardous Waste and Substances Sites (Cortese) List is a planning document used by state and local agencies to comply with the California Environmental Quality Act requirements in providing information about the location of hazardous materials release sites pursuant to Government Code §65962.5. Based on a review of the Cortese List¹² maintained by the Department of Toxic Substances Control, the Project site is not identified on the list of hazardous materials sites compiled pursuant to Government Code §65962.5.

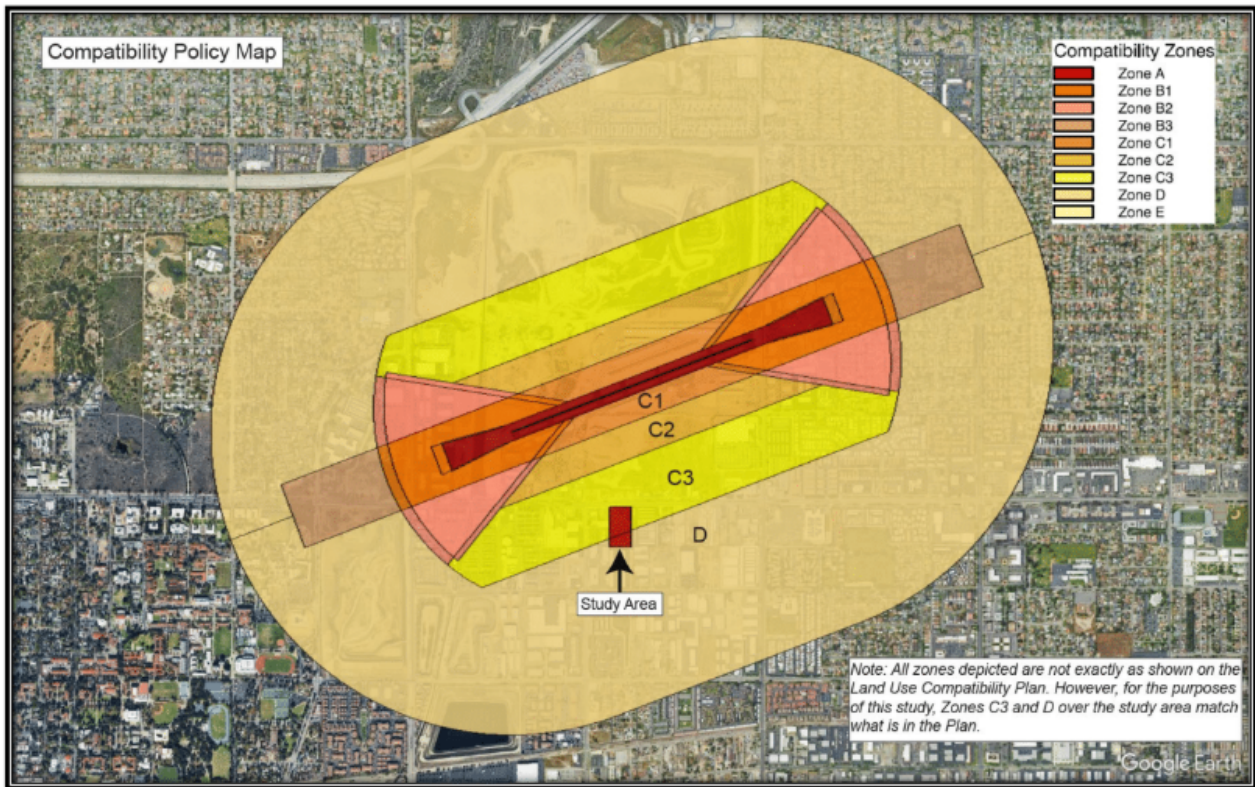
-
- e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area?**
-

Impact Analysis – Less Than Significant

The Project site is located within the Cable Airport Influence Area and must be consistent with the Cable Airport Land Use Compatibility Plan (CALUCP) (**Figure 4.9-1**), which establishes the allowable density based on proximity to the airport runway. According to CALUCP, the northern part of the Project site is in Zone C3, which allows for 15 dwelling units per acre (du/ac), and the southern part of the Project site is in Zone D, which allows for 25 du/ac. The Project proposes a density of 15 du/ac in the northern portion and a density of 19.51 du/ac in the southern portion.

¹² Department of Toxic Substances and Control EnviroStor
<https://www.envirostor.dtsc.ca.gov/public/search?basic=True>, accessed September 8, 2025

Figure 4.9-1 Cable Airport Compatibility Policy Map



Source: Williams Report, Appendix H

Based on a comprehensive evaluation of the 2015 Cable Airport Land Use Compatibility Plan, the 2011 California Airport Land Use Planning Handbook, and FAA Land Use guidance, Williams Aviation Consultants concludes that the proposed single-family residential development within Zone C3 and Zone D is compatible with applicable land use and safety criteria. This determination is supported by the following finding in **Table 4.9.1**:

Table 4.9-1 Cable Airport Land Use Compatibility Plan Consistency Findings

Topic	Compatibility Findings
Safety Compatibility	Zone C3 classified as Low Risk, few aircraft accidents, limited overflight activity
Density	15 dwelling units/acre, within allowed 15.0 units/acre limit
Building Height	36 feet, well below 150-foot limit, compliant with safety and airspace criteria
Overflight Notification	Required Overflight Notification and Airport Proximity Disclosure included in property records and sales documents
Avigation Easement	May be required, per Compatibility Plan's special circumstances section
Airport Plan Context	No known plans for runway extension or airport expansion to increase impact risks
Zoning Scope	2015 Cable Plan designates nine safety zones, exceeds 2011 Handbook recommendation of five to six zones
Zone Restrictiveness	Zones C2 and C3 not compact, unnecessarily restrictive, conflict with Handbook guidance
Handbook Zone	Project falls within Safety Zone 6 in 2011 California Handbook; permits residential uses, no density restrictions, Low risk

Topic	Compatibility Findings
FAA Zone 6	Traffic Pattern Zone supports low-density residential use, aligns with study area
Existing Residential	Site within airport's traffic pattern area, not near critical runway ends
Adjacent Residential	Existing developments on both sides of project site within Zone C3
Other Residential Zones	Additional residential areas in Compatibility Zones B1, B2, B3, closer to runway, greater safety and noise considerations
Airspace Protection	CFR Part 77 and TERPS analysis completed, no impacts to protected airspace for Cable Airport (CCB)
FAA Submission	Submitted to FAA Obstruction Evaluation Group on June 17, 2025, cases 2025-AWP-10587, 10588, 10589, 10591-OE, under review

Based on the analysis above, the proposed Project complies with the Cable Airport Land Use Compatibility Plan regarding applicable density, height, airspace protection, and overflight notification requirements. Additionally, the Federal Aviation Administration issued a Determination of No Hazard to Air Navigation, indicating that the Project would not be a hazard to air navigation. **(See Appendix I).**

Airport-Related Noise Evaluation

The Project site is located within the Cable Airport Land Use Compatibility Plan (CALUCP) noise impact area, with the majority of the property situated in the 55–60 dB CNEL contour and a small portion in the 60–65 dB CNEL contour. Although the CALUCP identifies these contours for noise compatibility evaluation, the Project is consistent with applicable CALUCP noise policies because interior noise standards can be achieved with standard building construction and required sound attenuation features. A detailed analysis of airport-related noise exposure, compliance with CALUCP noise criteria, and confirmation of interior noise compatibility is provided in Section 4.13, Noise, of this IS/MND.

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

Impact Analysis – Less Than Significant

Access to the Project site is proposed from Foothill Boulevard, with emergency vehicles having their own gated access. The Project site does not contain any emergency facilities, nor does it serve as an emergency evacuation route. During construction and long-term operation, the Project would be required to maintain adequate emergency access for emergency vehicles on Foothill Boulevard.

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

Impact Analysis – No Impact

According to the California Fire Hazard Severity Zone Viewer maintained by CAL FIRE, the Project site is not located within a high wildfire hazard area; therefore, no impacts are anticipated.¹³ Also refer to the analysis under Section 4.20, Wildfire.

¹³ Source: Fire Hazard Severity Zone Viewer for Real Estate Inspections.
<https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/>, accessed September 8, 2025

4.10 Hydrology and Water Quality

Threshold 4.10 – Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			✓	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			✓	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would:			✓	
i) Result in substantial erosion or siltation on- or offsite?			✓	
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?			✓	
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?			✓	
(iv) Impede or redirect flood flows?			✓	
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?			✓	
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			✓	

The analysis in this section is supported by the following technical reports:

- Preliminary Hydrology & Hydraulic Study for Buffalo Grove, JLC Engineering and Consulting, April 29, 2025, revised November 25, 2025, included as **Appendix E-1** to this Initial Study.
- Water Quality Management Plan, JLC Engineering and Consulting, April 29, 2025, revised November 25, 2025, included as **Appendix E-2** to this Initial Study.

Applicable General Plan Policies

The following General Plan policies were considered in this analysis.

- **Policy HC-3.2: Water Quality.** Improve and maintain the quality of water resources by controlling runoff, managing the watershed, and implementing other best management practices. (cf: General Plan Policy PFS-7) Public Facilities and Services Element
- **Policy PFS-1.2: Growth and Level of Service.** Require new development to provide adequate facilities or pay its fair share of the cost for facilities needed to provide services to accommodate growth without adversely impacting current service levels.
- **Policy PFS-1.7;. Infill Areas.** Identify and prioritize infill areas for infrastructure improvements and assist developers in identifying funding mechanisms to cover the cost of providing facilities and services in infill areas.
- **Policy PFS-2.9: Development Review Process.** Identify and mitigate fire hazards through the development review process.
- **Policy PFS-2.12: Public and Private Roadways.** Ensure that new public and private roadways are adequate in terms of width, radius and grade to accommodate fire-fighting apparatus, while maintaining Upland's neighborhoods and small-town character.
- **Policy PFS-8.4: New Development.** Require new developments to dedicate land for water infrastructure such as tanks, pump stations, and wells as needed to support project development.
- **Policy PFS-9.1: Best Management Practices.** Require new development projects to adopt best management practices for water use efficiency and demonstrate specific water conservation measures.
- **Policy PFS-10.2: Connection to Wastewater System.** Require all new development located within the City limits to connect to public wastewater collection system.
- **Policy PFS-11.1: Protection of Surface Water Resources.** Implement the Santa Ana Regional Water Quality Control Board's (SARWQCB) Best Management Practices to protect surface water resources from contamination from runoff containing pollutants and sediment.
- **Policy PFS-11.2: New Development.** Require new development to protect the quality of water bodies and natural drainage systems through site design, source controls, stormwater treatment, runoff reduction measures, best management practices (BMPs), Low Impact Development (LID), and hydromodification strategies consistent with the City's NPDES Permit.
- **Policy PFS-11.3: No Net Increase.** Require all new development to contribute no net increase in stormwater runoff peak flows over existing conditions associated with a 100-year storm event.
- **Policy PFS-11.4: Post-Development Runoff.** Require controlling the volume, frequency, duration, and peak flow rates and velocities of runoff from development projects to prevent or reduce downstream erosion and protect stream habitat.

Safety Element

- **Policy SAF-1.12: Operational Noise.** Require mixed-use, commercial, and industrial projects to mitigate operational noise impacts to adjoining sensitive uses to meet operational noise thresholds.
- **Policy SAF-2.9: Impervious Surfaces.** Minimize impervious surfaces to reduce stormwater runoff and increase flood protection.

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

Impact Analysis – Less Than Significant

The Santa Ana Regional Water Board oversees programs that regulate discharges from domestic or municipal wastewater, food processing-related wastewater, industrial wastewater, and stormwater discharges from three potential sources: municipal separate storm sewer systems (MS4s), construction activities, and industrial activities.

Construction Impacts

Construction of the Project would involve clearing, grading, paving, utility installation, building construction, and the installation of landscaping, which would result in the generation of potential pollutants such as silt, debris, chemicals, paints, and other solvents with the potential to adversely affect water quality. As such, short-term water quality impacts have the potential to occur during construction activities in the absence of any protective or avoidance measures.

Chapter 17.93.050 - Soil Erosion and Sediment Control Plan of the Zoning Ordinance requires the Project to obtain a National Pollutant Discharge Elimination System (NPDES) Municipal Stormwater Permit for construction activities. The permit is required for all projects that include construction activities, such as clearing, grading, and/or excavation that disturb at least one acre of total land area.

Compliance with the permit requires the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) to identify construction Best Management Practices (BMPs) that will be implemented to prevent soil erosion and the discharge of sediment into the local storm drains during the Project's construction phase. Typical BMPs include, but are not limited to, preserving natural vegetation, stabilizing exposed soils, use of sandbags, and installation of temporary silt fencing.

Storm Water System Design

As required by Upland Municipal Code §13.32 Treatment of Storm Water Runoff, stormwater runoff will be collected into underground infiltration chambers in the southwest corner, where it can infiltrate. The infiltration chambers will be unlined to promote infiltration and groundwater recharge. During more significant storm events when the onsite infiltration chambers reach capacity, overflow would be conveyed south through the existing drainage easement to the Upland Basin for treatment. Overflows from the Upland Basin ultimately drain to the Prado Basin in accordance with the existing regional stormwater management system. (See **Appendix E-1** and **Appendix E-2** for details.)

Best Management Practices

In accordance with the City of Upland Storm Water Program and applicable requirements of the Santa Ana Region MS4 Permit and Water Quality Management Plan (WQMP) the following the Project proposes the following Best Management Practices (BMPs.)

- **Landscape Management BMPs:** The landscaped areas within the project site are to be tended to and maintained by outside contractor in compliance with CASQA BMP Factsheet #SC-41. Landscape maintenance shall include mowing and trimming.
- **Spill Contingency Plan:** There will be no hazardous materials stored onsite that require a spill contingency plan.
- **Litter/Debris Control Program:** The project will implement the maintenance and removal of litter from common areas by private contractor that will collect trash weekly.
- **Vacuum Sweeping of Private Streets and Parking Lots:** The project will perform vacuum sweeping along the common street and parking lot areas. Street sweeping shall be done on a bi-monthly basis and it is recommended to be performed after waste management company picks-up trash for the project area.
- **Minimize Impervious Areas:** The site will be designed to optimize the pervious surfaces with landscape areas, approximately 23%.
- **Maximize Natural Infiltration Capacity:** The site will utilize underground infiltration as the primary water quality BMP, including five chambers to retain the design capture volume.
- **Preserve Existing Drainage Patterns and Time of Concentration:** The site will be designed to maintain the historic drainage path of travel as feasible. It will drain to the southwest via sheet flow and drainage swales.
- **Disconnect Impervious Areas:** The paved area is surrounded by landscape areas.
- **Utilize Vegetated Drainage Swales in Place of Underground Piping or Imperviously Lined Swales:** The Project will use drainage swales and a single drainage basin.

(See **Appendix E-2** for details.)

Operational Impacts

Stormwater pollutants commonly associated with industrial land uses include sediments, nutrients, trash and debris, bacteria and viruses, oil and grease, and pesticides. City of Upland Zoning Ordinance Chapter 17.93.060 requires the preparation of a Water Quality Management Plan (WQMP) for managing the quality of stormwater or urban runoff that flows from a developed site after construction is completed. The Project will comply with the City of Upland and the Phase II Small MS4 General Permit for the Santa Ana Watershed as described below.

Water and Urban Runoff Management and Discharge Control require the preparation of a Water Quality Management Plan (WQMP) for managing the quality of stormwater or urban runoff that flows from a developed site after construction is completed, and the facilities or structures are occupied and/or operational. The Project includes inlets, storm drain systems, and

a subsurface system to collect, convey, and treat runoff from the site. The subsurface system is intended to infiltrate the water quality volume and provide storage for runoff mitigation.

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

Impact Analysis – Less Than Significant

On-Site Groundwater Conditions and Physical Effects

The Project site is located within a developed urban area. According to the Geotechnical Evaluation prepared for the Project, groundwater was not encountered to a depth of approximately 51.5 feet below ground surface (bgs). Regional groundwater data from the California Department of Water Resources indicate a groundwater depth of approximately 377.9 feet bgs at a monitoring well located about 0.45 miles southwest of the Project site. Given the substantial depth to groundwater, Project grading and excavation will be shallow and limited to surface preparation and utility trenching—will not intercept groundwater or require dewatering. Therefore, construction activities would not decrease groundwater levels.

The Project would increase impervious surface area compared to existing conditions; however, the Project is required to comply with the San Bernardino County MS4 Permit and the City of Upland's stormwater development standards. These requirements include installation of low-impact development (LID) Best Management Practices (BMPs) that promote infiltration to the maximum extent practicable. Implementation of these BMPs ensures that post-construction conditions do not substantially alter local infiltration potential or reduce groundwater recharge. As a result, the Project would not physically interfere with groundwater recharge or reduce groundwater supplies.

Basin Adjudication and Sustainable Management

As stated in the City of Upland 2020 Urban Water Management Plan:

"The City's groundwater supplies come from wells located in three adjudicated basins: Chino Basin, Six Basins (specifically the Upper Claremont Heights and San Antonio Canyon subbasins), and Cucamonga Basin. The City has groundwater rights in Chino Basin and Six Basins. The City purchases groundwater from these two basins as well as from Cucamonga Basin from the Dan Antonio Water Company, SAWCo, and West End Consolidated Water Company (WECWC).

These judgments and decree indicate the basins were historically in overdraft at various times; however, recent operational data indicate that the basins have been managed within the safe yield. DWR Bulletin 118 does not list these three basins as being in "critical overdraft" nor does Bulletin 118 specifically identify them as over drafted basins. The Watermasters for Chino Basin and Six Basins, as well as the pumpers of Cucamonga Basin are actively managing the basins to prevent overdraft. Entitlements based on City rights and stock ownership to the

*supplies within these three basins may vary depending on the established Operating Safe Yield (OSY) in a particular year, although they usually do not vary greatly year by year. The City complies with all Sustainable Groundwater Management Act requirements to maintain sustainable groundwater City of Upland 6-3 2020 Urban Water Management Plan conditions in accordance with the judgments and decree and groundwater management planning for these three basins."*¹⁴

Because groundwater production within these adjudicated basins is regulated by court-approved Operating Safe Yield allocations, groundwater extraction for all users, including municipal supply to the Project site—is managed to remain within sustainable levels. Accordingly, no individual development, including the Project, can independently cause depletion of groundwater supplies or impede sustainable management of the basin.

Regional Groundwater Recharge Conditions

On February 20, 2025, Chino Valley, in partnership with Western Water, City of Riverside Public Utilities, and Upland Valley Water Conservation District, announced the completion of the Santa Ana River Enhanced Recharge Phase 1-B Project. This project significantly increases regional groundwater recharge capacity by enabling the capture and storage of up to 80,000 acre-feet of stormwater annually within the local aquifer. The Santa Ana River Enhanced Recharge Project will include 20 new recharge basins, improved flood control structures, and inter-basin conveyance facilities, all of which enhance long-term groundwater replenishment within the region.

Conclusion

Based on the substantial depth to groundwater beneath the site, the absence of construction activities that would intercept groundwater, compliance with MS4 LID BMPs that maintain infiltration, active adjudicated basin management ensuring sustainable groundwater allocations, and regional recharge enhancements, the Project would not substantially decrease groundwater supplies or interfere with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. Impacts would be less than significant.

¹⁴ City of Upland 2020 Urban Water Management Plan, p. 6-2 to 6.3,
<https://www.uplandca.gov/uploads/files/PW/Upland%202020%20Draft%20UWMP%20N%20WSCP.pdf>

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would:

- (i) Result in substantial erosion or siltation on-or offsite?**
- (ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or offsite?**
- (iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?**
- (iv) Impede or redirect flood flows?**

Impact Analysis – Less Than Significant

Existing Condition

The existing site condition consists of undeveloped graded land. Runoff flows from west to east through the Project site. In the existing condition, runoff leaves the Project Site along the eastern edge and flows into Oakwood Drive and Miramonte Drive.

Proposed Condition

The Project includes inlets, storm drain systems, and a subsurface system to collect, convey, and treat runoff from the site. The subsurface system is intended to infiltrate the water quality volume and provide storage for runoff mitigation. Runoff is conveyed via an outlet line to a pump system and subsequently to the existing storm drain on Little Mountain Drive. Preliminary hydrology and hydraulic analyses reviewed the proposed storm drain system and determined that the post-project outflow is less than 90% of the pre-project flow rate. As a result, the Project complies with increased runoff mitigation criteria.

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

Impact Analysis – Less Than Significant

According to the Federal Emergency Management Agency (FEMA), the Project site is not located within a flood hazard zone.¹⁵ According to the California Department of Conservation, California Official Tsunami Inundation Maps, the site is not located within a tsunami inundation zone.¹⁶ In addition, the Project would not be at risk from seiche because there is no water body in the area of the Project site capable of producing seiche.

¹⁵ Source: FEMA Flood Maps, <https://www.fema.gov/flood-maps>, accessed October 30, 2024

¹⁶ Tsunami Hazard Area Map, https://maps.conservation.ca.gov/cgs/informationwarehouse/ts_evacuation/, accessed October 24, 2024

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

Impact Analysis – Less Than Significant

As discussed under Thresholds 4.10 (a) and 4.10 (c), the Project would not conflict with or obstruct the implementation of the Santa Ana River Basin Plan. In addition, as discussed under Threshold 4.10 (b), the Project site is not subject to a Sustainable Groundwater Management program and will not substantially impede sustainable groundwater management of the basin.

4.11 Land Use and Planning

Threshold 4.11 – Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Physically divide a community?				✓
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?		✓		

Applicable General Plan Policies

- **Policy FA-1.6 Housing.** Allow for and encourage the development of multi-family residential projects at mid-blocks along Foothill Boulevard.

Also see **Table 4.11-1, Location of Plans, Policies, or Regulations** in the Initial Study Document below.

a) Would the project physically divide a community?

Impact Analysis – No Impact

An example of a Project that has the potential to divide an established community includes the construction of a new freeway or highway through an established neighborhood. The Project site is bordered on the north by north by Foothill Boulevard, followed by commercial businesses and vacant land, on the south by a business park, on the east by a storage facility, and on the west by a shopping center/restaurant. Because of the adjacent and surrounding land uses, the Project would not divide an established community.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Impact Analysis – Less Than Significant with Mitigation Incorporated

Public Resources Code §21060.5 defines “Environment” as the physical conditions that exist within the area that will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, or objects of historic or aesthetic significance.

Applicable General Plan Mitigation Measures

The analysis focuses on the following plans, policies, or regulations that affect land, air, water, minerals, flora, fauna, noise, or objects of historic or aesthetic value. As summarized in Table 4.11-1, **Location of Plans, Policies, or Regulations in the Initial Study Document**.

Table 4.11-1 Location of Plans, Policies, or Regulations in the Initial Study Document

General Plan	Initial Study Section Where Impact Analysis is Located
General Plan Element	
Chapter 1. Land Use Element. Regulates the growth of the community in order to achieve a balanced and orderly pattern of development.	4.11 Land Use and Planning
Chapter 2. Focus Area Element. Focus Areas are locations in the City that are given more focused policy direction to guide future growth and/or preservation in a manner consistent with the community's vision for each area.	4.1 Aesthetics
Chapter 3. Community Character Element. Influence the future physical form of the community by guiding the desired quality and character of future development, and by protecting important aspects of the natural and built environment that define the image and spirit of Upland.	4.1 Aesthetics
Chapter 4. Economic Sustainability Element. Envisions a sustainable local economy, which provides an array of quality job and business opportunities for residents, entrepreneurs and investors across multiple local and regional-serving industries.	There are no policies that apply to the Project.
Chapter 5. Circulation Element. The Element evaluates the City's circulation needs and recommends circulation improvements to accommodate the future demand for transportation service generated by the General Plan Land Use Element. Upland's transportation network consists of highways, streets, pedestrian paths, bikeways, air transport, buses, rails, and paratransit service.	4.16 Transportation
Chapter 6. Open Space and Conservation Element. Emphasizes "growing green" and ensuring environmental sustainability in terms of Upland's outdoor spaces and natural resources.	4.4 Biological Resources 4.5 Cultural Resources 4.7 Geology and Soils (Paleontology) 4.17 Tribal Cultural Resources
Chapter 7. Public Facilities Element. Addresses the provision of efficient and cost-effective services for fire prevention, emergency response, law enforcement, education, recreation, library and animal services; and partners with the school district, outside agencies, the private sector and utility companies for the provision of other key services necessary for maintaining a high quality of life and attracting residents to the City	4.10 Hydrology and Water Quality 4.15 Public Services 4.16 Recreation 4.19 Utilities and Service Systems
Chapter 8. Healthy Community Element. Intended to promote a living and working environment that improves the health and well-being of residents, families, and community.	4.3 Air Quality 4.6 Energy 4.8 Greenhouse Gas Emissions
Chapter 9. Safety Element. Addresses natural hazards such as earthquakes, flooding, and wildfires; and by man-made threats caused by exposure to harmful noise sources, hazardous materials, sickness and crime.	4.7 Geology and Soils 4.9 Hazards and Hazardous Materials 4.20 Wildfire
Other City of Upland Requirements	
City of Upland Municipal Code	Code sections are cited throughout the Initial Study as applicable.
Cable Airport Land Use Compatibility Plan (ALUCP)	4.9 Hazards and Hazardous Materials

General Plan	Initial Study Section Where Impact Analysis is Located
	4.12 Noise
Regional Plans	
South Coast Air Quality Management District Air Quality Management Plan	4.3 Air Quality
Water Quality Control Plan for the San Ana River Basin (Basin Plan)	4.10 Hydrology and Water Quality
California Air Resources Board AB32 Scoping Plan	4.8 Greenhouse Gas Emissions
Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (Connect SoCal)	4.11 Land Use and Planning

City of Upland Municipal Code

The Project Proponent submitted the following land use entitlement applications:

- **General Plan Amendment (GPA) No. 25-0002:** To amend the General Plan Land Use Map from Commercial/Industrial Mixed Use to Specific Plan.
- **Zone Change (ZC) No. 25-0001:** To amend the Zoning Map from Commercial/Industrial Mixed Use to Specific Plan.
- **Specific Plan (SP) No. 25-0002:** To adopt a Specific Plan setting forth the development regulations for the property.
- **Tentative Tract Map (TTM) No. TT-25-0004:** To subdivide the property into seventy-two detached single-family homes.
- **Development Plan Review (DPR) No. DPR-25-0004:** To review the design and layout of the proposed project, architectural design, and landscaping design,

To ensure that the proposed Project complies with all applicable performance standards and design guidelines, and to determine if there were any conflicts with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, City staff reviewed the Project. City staff authorized the release of this Initial Study and affirms that it meets the requirements of CEQA Guidelines Section 15074(b) of the CEQA Guidelines, which states:

(b) Prior to approving a project, the decision-making body of the lead agency shall consider the proposed mitigated negative declaration together with any comments received during the public review process. The decision-making body shall adopt the proposed mitigated negative declaration only if it finds on the basis of the whole record before it, that there is no substantial evidence that the project will have a significant effect on the environment and that the mitigated negative declaration reflects the lead agency's independent judgement and analysis.

Additionally, a staff report prepared for the Project pursuant to Upland Municipal Code Section 17.43.090 Project Evaluation and Staff Reports, which states:

- A. *Project Evaluation. Development Services Department staff and affected disciplines, as necessary, shall review all applications to determine if they comply with all applicable requirements, including the Zoning Ordinance, other applicable provisions of the Upland Municipal Code, the General Plan,*

applicable specific plans, the Airport Land Use Plan, the Subdivision Map Act, and any other requirements that apply.

Pursuant to Upland Municipal Code Section 17.43.090, this Initial Study discusses the Project's compliance with relevant Municipal Code regulations for each environmental topic assessed, focusing on measures that prevent or mitigate environmental impacts. As demonstrated throughout this document, the Project was determined to be in full compliance with all applicable Municipal Code requirements.

Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (Connect SoCal)

According to the Southern California Association of Governments (SCAG):

Connect SoCal 2024 (also known as the 2024 -2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS or the "Plan"), represents the vision for Southern California's future, including policies, strategies, and projects for advancing the region's mobility, economy, and sustainability through 2050. The plan details how the region will address its transportation and land use challenges and opportunities to achieve its regional emissions standards and greenhouse gas (GHG) reduction targets. Connect SoCal 2024 builds from the policy direction established in Connect SoCal 2020 as well as more recent policy direction from SCAG's Regional Council policy committees and special subcommittees to reflect emerging issues such as equity, resilience, and the economy. Connect SoCal 2024 is required by federal and state legislation to qualify project sponsors for federal funding. SCAG is required to update this long-range planning document every four years.¹⁷

Connect SoCal contains 88 regional policies to implement the vision described above. Given the magnitude and scope of Connect SoCal, it is not directly applicable to individual development projects at a local level, such as the construction of 72 single-family homes.

As stated in Connect SoCal:

The Regional Planning Policies are a resource for County Transportation Commissions (CTCs) and local jurisdictions, who can refer to specific policies to demonstrate alignment with the Regional Transportation Plan/Sustainable Communities Strategy when seeking resources from state or federal programs. However, there are no one-size-fits-all solutions in such a diverse region, so it is up to local agencies to identify which are the most applicable Regional Planning Policies.¹⁸

The following policies are indirectly applicable to the Project and are analyzed below.

¹⁷ SCAG, Connect SoCal 2024 Frequently Asked Questions, <https://scag.ca.gov/connect-socal-faqs>

¹⁸ Connect SoCal, <https://scag.ca.gov/read-plan-adopted-final-connect-socal-2020>

Table 4.11-2 Consistency Analysis – Connect SoCal

Policies	Consistency Determination
Complete Streets	
03. Pursue the development of Complete Streets that comprise a safe, multimodal network with flexible use of public rights-of-way for people of all ages and abilities using a variety of modes (e.g., people walking, biking, rolling, driving, taking transit)	Consistent. Foothill Boulevard adjacent to the Project site is a paved roadway. The Project will repair the existing pavement and construct new curb, gutter, and sidewalks that can accommodate transit, pedestrian, and bicycle modes of travel.
04. Ensure the implementation of Complete Streets that are sensitive to urban, suburban or rural contexts and improve transportation safety for all, but especially for vulnerable road users (e.g., people, especially older adults and children, walking and biking)	Consistent. See response above.
Priority Development Areas	
32. Promote the growth of origins and destinations, with a focus on future housing and population growth, in areas with existing and planned urban infrastructure that includes transit and utilities.	Consistent. The Project site is an infill development site adjacent to urban infrastructure and utilities, and can accommodate transit services.
Housing the Region	
36. Encourage housing development in transit-supportive and walkable areas to create more interconnected and resilient communities.	Consistent. The Project site is an infill development site adjacent to sidewalks and within walking distance to transit routes. It also implements <i>Policy FA-1.6 Housing</i> . Allow for and encourage the development of multi-family residential projects at mid-blocks along Foothill Boulevard.
15-Minute Communities	
42. Promote 15-minute communities as places with a mix of complementary land uses and accessible mobility options that align with and support the diversity of places (or communities) across the region. These are communities where residents can either access their most basic, day-to-day needs within a 15-minute walk, bike ride or roll from their home or as places that result in fewer and shorter trips because of the proximity of complementary land uses.	Consistent. The Project site is located within one-half mile of a Walmart and other retail and service businesses.
Sustainable Development	
48. Promote sustainable development and best practices that enhance resource conservation, reduce resource consumption and promote resilience.	Consistent. The housing will be constructed to meet Title 24 Energy conservation requirements.
Air Quality	
51. Reduce hazardous air pollutants and greenhouse gas emissions and improve air quality throughout the region through planning and implementation efforts.	Consistent. As detailed in Section 4.3, Air Quality, and Section 4.8, Greenhouse Gas Emissions, the Project will not exceed SCAQMD thresholds for hazardous air pollutants and greenhouse gas emissions.

Conclusion

As demonstrated throughout this Initial Study/Mitigated Negative Declaration, the Project would not conflict with any applicable land use plan, policy, or regulation. It would avoid or mitigate any physical impact on the environment through the implementation of Mitigation Measures identified in this Initial Study.

4.12 Mineral Resources

Threshold 4.12 – Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region?			✓	
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?				✓

Applicable General Plan Policies

There are no policies that apply to the Project.

a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region?

Impact Analysis – Less Than Significant

The City of Upland General Plan indicates the Project site is within a large area encompassing much of the City that has been designated with a Mineral Land Classification of MRZ-2, an area where the available geologic information indicates that there are significant mineral deposits or that there is a likelihood of significant mineral deposits.¹⁹ The development of the Project could result in the loss of availability of these resources, however the site is currently partially developed and surrounded by commercial uses, and under the City's General Plan, would not be permitted for mining.

b) Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

Impact Analysis – No Impact

As stated in Threshold 4.12 (a) above, the site is currently partially developed and surrounded by commercial uses, and under the City's General Plan, would not be permitted for mining. According to the City's General Plan Land Use Element there are no land use designations in the City intended for mineral production; therefore, there are no mineral resource recovery sites delineated on the current General Plan Land Use map.²⁰

¹⁹ City of Upland General Plan, September 15, 2015, pg. 5.12-2

²⁰ City of Upland General Plan, September 15, 2015, pg 5.12-5

4.13 Noise

Threshold 4.13 – Would the Project result in:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project more than standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		✓		
b) Generation of excessive groundborne vibration or groundborne noise levels?			✓	
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people be residing or working in the project area to excessive noise levels?			✓	

Impact Analysis

The analysis in this section is supported by the following technical report:

- Noise and Vibration Technical Memorandum, PlaceWorks, June 12, 2025, and included as **Appendix G** in this Initial Study.

Applicable General Plan Policies

The following General Plan policies were considered in this analysis:

Healthy Community Element and Safety Element

- **Policy HC-3.3: Noise Levels.** Protect the health of residents from excessive interior and exterior noise through the enforcement of noise standards, land use siting criteria, and appropriate mitigation. (cf: General Plan Policy SAF-1).
- **Policy SAF-1.5: Noise Impact Study.** Require a noise impact study to evaluate impacts of projects that may exceed 65 Ldn as part of the design review process.
- **Policy SAF-1.11: Construction Noise.** Require construction projects to adhere to the City's construction hours and incorporate measures to minimize impacts.
- **Policy SAF-1.12: Operational Noise.** Require mixed-use, commercial, and industrial projects to mitigate operational noise impacts to adjoining sensitive uses to meet operational noise thresholds.
- **Policy SAF-1.13: Airport Compatibility.** Prohibit new residential development within the 60 dBA CNEL airport noise contour, and only approve noise-compatible land uses consistent with the ALUCP.

- **Policy SAF-1.14: Noise Level Reduction Near Airport.** Require new structures within any Airport Land Use Compatibility Zone except D or E to incorporate exterior-to-interior noise level reduction design features sufficient to meet the interior noise level criteria specified in the ALUCP.

a) Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project more than standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Impact Analysis – Less Than Significant Impact with Mitigation Incorporated

Under *CBIA v. BAAQMD*, (2015) 62 Cal. 4th 369, the California Supreme Court held that CEQA normally requires analysis of a project's impacts on the environment, not the environment's impacts on a project. Existing traffic noise levels – no matter how high – are considered part of the environment affecting the project, not a CEQA impact caused by the project itself. Thus, potential exposure of new residents to traffic noise above 65 CNEL does not trigger a CEQA significance finding; it is instead addressed through policy consistency (e.g., General Plan noise standards, building code interior noise limits).

The ambient noise environment in the Project area along Foothill Boulevard ranges from 67.6 to 68.9 dBA CNEL according to Upland's General Plan EIR. This is above the 65 CNEL threshold where incremental changes are closely scrutinized.

The project's traffic would add 679 daily trips, but noise modeling shows the increase is less than 1 dBA CNEL along all roadway segments. CEQA thresholds identify significant impacts as:

- 1.5 dBA if ambient $\geq$ 65 CNEL
- 3 dBA if 60–64 CNEL
- 5 dBA if $<$ 60 CNEL

Because the Project's contribution is well below 1.5 dBA, it is not significant under CEQA.

Even though existing noise levels exceed 65 CNEL, *CBIA v. BAAQMD* establishes that CEQA does not treat those conditions as environmental impacts of the Project. The Project's traffic contribution of $<$ 1 dBA is below applicable thresholds, confirming that no significant traffic-noise impact would result under CEQA. Compliance with Upland's General Plan and building code standards will ensure interior noise remains acceptable for new residents.

Existing Ambient Noise Levels

The Project site is bounded by commercial/retail and industrial uses, including a storage facility to the west, a shopping center to the east, and a business park to the south. The Project site is also approximately 1,400 feet south of Cable Airport and 900 feet south of a quarry on Airport Drive. The Project site is in a predominantly industrial/commercial area with a noise environment influenced primarily by transportation noise from Foothill Boulevard, industrial activities associated with the surrounding uses (e.g., equipment use at the quarry, heavy duty vehicles), and aircraft noise associated with Cable Airport.

Ambient noise measurements conducted in 2009 for the City of Upland General Plan EIR (State Clearinghouse No. 2012041006) indicate that the noise environment in the vicinity of the Project site ranges from 67.6 dBA CNEL to 68.9 dBA CNEL. Existing traffic noise that was modeled and shown in Table 5.7-4 of the General Plan EIR also indicates that noise levels 100 feet from the centerline on the segment of Foothill Boulevard between Central Avenue and Benson Avenue are 67.6 dBA.

Short-term noise levels measured in 2019 for an acoustical assessment of the Bridge Point Upland project at the northern boundary of the project site on Foothill Boulevard were 73.5 dBA Leq.

The majority of the Project site is within the 55 to 60 dBA contour of the Cable Airport's Land Use Compatibility Plan (ALUCP) noise contour map, and part in the northwest is within the 60 to 65 dBA contour (see **Figure 4.13-1, Future Noise Impact Area, Cable Airport**).

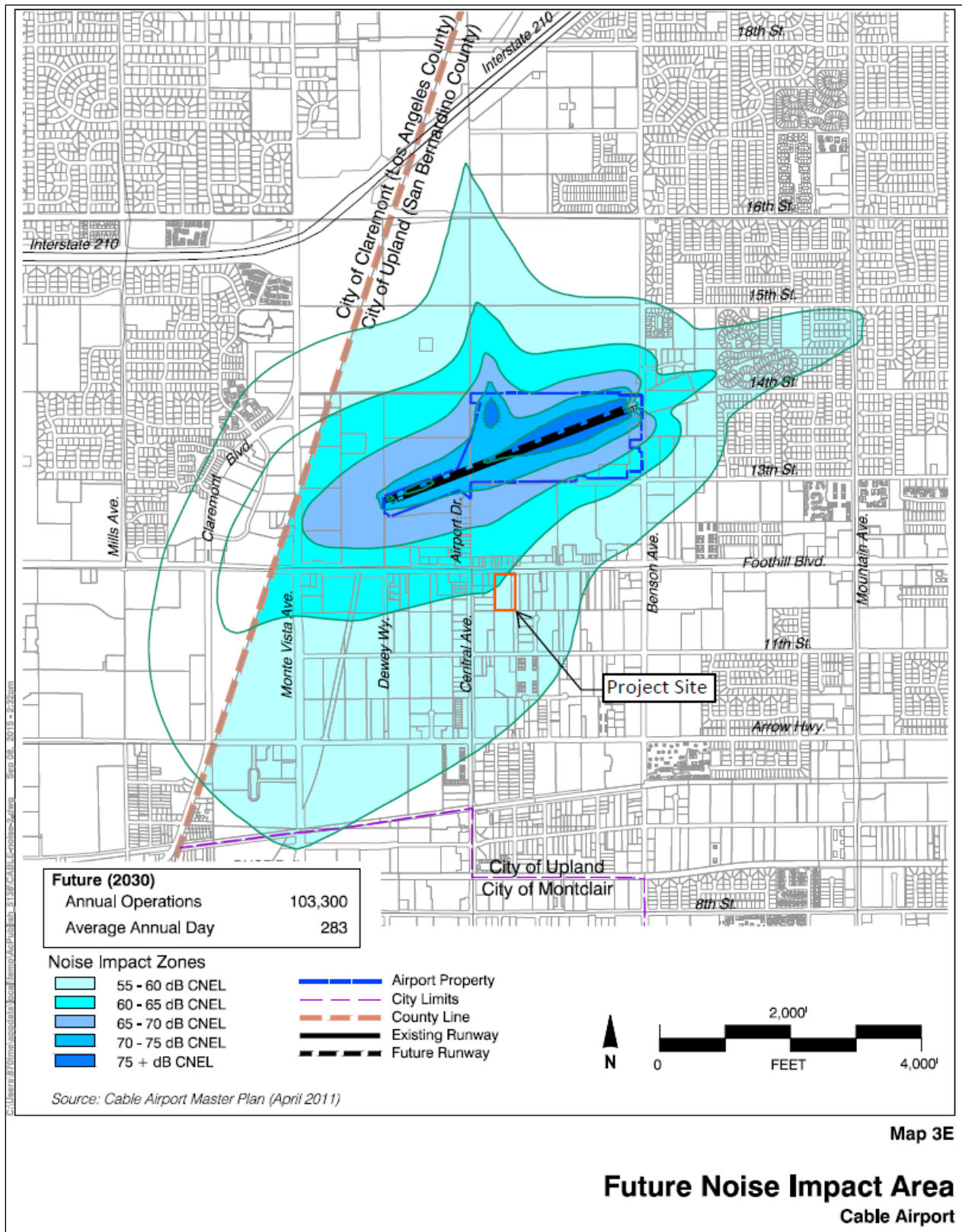
Sensitive Receptors

Certain land uses are particularly sensitive to noise and vibration. These uses include residences, schools, hospital facilities, houses of worship, and open space/recreation areas where quiet environments are necessary for the enjoyment, public health, and safety of the community. The nearest sensitive receptors to the Project site are single-family residences approximately 640 feet to the east. Other sensitive receptors include an apartment complex approximately 720 feet south of the Project site. Due to the distance of these receptors from the Project site, the following analysis also evaluates noise, and vibration impacts at the adjacent commercial center, approximately 30 feet west of the Project site boundary.

City of Upland Noise Standards

- **Construction Noise.** Section 9.40.100(M) regulates construction noise. The Noise Ordinance permits noise generated by construction activities between the hours of 7:00 a.m. and 6:00 p.m. on weekdays. Construction noise is prohibited on Sundays and holidays.
- **Operational Noise.** Section 9.40.070 establishes the exterior noise standards for residential uses, while Section 9.40.080 establishes the exterior noise standards for nonresidential uses. Exterior noise should be measured on the exterior of the properties, and no noise level should exceed the levels presented in **Table 4.13-1, Residential Exterior Noise Limits**. Section 9.40.080 states that for nonresidential properties, no noise level should exceed the respective base ambient noise levels of 65 dBA at any time for uses not specified, and 75 dBA at any time for industrial and commercial uses. If actual decibel measurements exceed these levels, the actual measurements are employed as the base ambient noise levels.

Figure 4.13-1 Future Noise Impact Area, Cable Airport



- **Additional Noise Restrictions.** Section 9.40.100 lists additional noise sources that are subject to restrictions. For example, Section 9.40.100(E) states that it is unlawful for any person to operate, cause to operate or permit the operation of any machinery, equipment, device, pump, fan, compressor, air conditioning apparatus, or similar mechanical device that would cause the noise level at the property line of any property to exceed the ambient noise base level by 5 dBA. Section 9.40.100(P) also requires that any noise-creating blower or power fan or any internal combustion engine shall be equipped with a muffler device sufficient to deaden such noise.

Table 4.13-1 Residential Exterior Noise Limits, City of Upland

Maximum Time of Exposure	Noise Metric	Noise Level Not to be Exceeded	
		7:00 a.m. to 10:00 p.m. (Daytime)	10:00 p.m. to 7:00 a.m. (Nighttime)
30 Minutes/Hour	L50	55 dBA	45 dBA
15 Minutes/Hour	L25	60 dBA	50 dBA
5 Minutes/Hour	L8	65 dBA	55 dBA
1 Minute/Hour	L2	70 dBA	60 dBA
Any Period of Time	Lmax	75 dBA	65 dBA

Source: City of Upland Municipal Code, Section 9.40.070.

Construction Noise Impact Analysis

Noise generated by on-site construction equipment is based on the type of equipment used, its location relative to sensitive receptors, and the timing and duration of noise-generating activities. Each phase of construction involves different types of equipment and has distinct noise characteristics. Noise levels from construction activities are typically dominated by the loudest three pieces of equipment. The dominant equipment noise source is typically the engine, although work-piece noise (such as dropping of materials) can also be noticeable.

Table 4.13-2 Detailed Analysis Construction Noise Criteria

Land Use	Daytime 1-Hour Leq (dBA)	Nighttime 1-Hour Leq (dBA)
Residential	80	70
Commercial	85	85
Industrial	90	90

Source: Transit Noise and Vibration Impact Assessment Manual (FTA 2018).

Notes: dBA = A-weighted decibels; FTA = Federal Transit Administration; Leq = equivalent continuous sound level

The expected construction equipment mix was estimated and categorized by construction activity using the Federal Highway Administration Roadway Construction Noise Model (RCNM). Average noise levels from project-related construction activities are calculated by modeling the three loudest pieces of equipment per activity phase. Equipment for grading and site preparation is modeled at spatially averaged distances (i.e., from the acoustical center of the general construction site to the property line of the nearest receptors), because the area around the center of construction activities best represents the potential average construction-related noise levels at the various sensitive receptors for mobile equipment. Building construction and architectural coating are measured from the edge of the proposed buildings to the nearest sensitive receptors. Additionally, paving is measured from the area of the nearest paving

activities to the nearest sensitive receptors. Construction noise modeling does not account for the numerous intervening structures between the project site and the residential receptors. Distances to sensitive receptors vary depending on construction activity location for each phase relative to adjacent off-site receptors and are shown in Attachment C, *Construction and Vibration Modeling*. Results are summarized in **Table 4.13-3, Project-Related Construction Noise Levels**, at the nearest receptors. Construction noise levels at a reference distance of 50 feet would range between 74 dBA and 85 dBA Leq throughout the construction period.

Table 4.13-3 Project-Related Construction Noise Levels at Nearest Receptors

Construction Phase	Noise Levels in dBA Leq			
	RCNM Reference Noise Level	Residential Receptor to the West	Residential Receptor to the South	Commercial Use to the West
Distance (feet)	50	870	1,040	180
Demolition	85	60	59	74
Site Prep	82	57	56	71
Grading	84	59	58	73
Distance (feet)	50	670	73	30
Building Construction	80	57	57	84
Architectural Coating	74	51	51	78
Landscaping	78	55	55	82
Distance (feet)	50	675	780	70
Paving	80	57	56	77
Maximum dBA Leq	85	60	59	84
Exceeds FTA's 80 or 85 dBA Leq Threshold?		No	No	No

Source: FHWA's RCNM software. See Attachment B for construction noise inputs and calculations. dBA Leq = Energy-Average (Leq) Sound Levels.

1 Distances were measured using Google Earth (2025).

2 The FTA 80 dBA threshold applies to the residential uses while the 85 dBA threshold applies to the commercial use.

Standard Condition. The construction contractor shall limit construction activities to between the hours of 7:00 a.m. and 6:00 p.m. on weekdays pursuant to Section 9.40.100(M) of the City's Municipal Code. Construction is prohibited outside these hours during weekdays and anytime on weekends.

Noise Impacts Because of Project-Generated Traffic

The proposed Project would generate an increase of 679 two-way trips per day with 50 AM peak hour trips and 60 PM peak hour trips compared to existing daily trips. A project will normally have a significant effect on the environment related to traffic noise if it substantially increases the ambient noise levels for adjoining areas. Most people can detect changes in sound levels of approximately 3 dBA under normal, quiet conditions, and changes of 1 to 3 dBA under quiet, controlled conditions. Changes of less than 1 dBA are usually indiscernible. A change of 5 dBA is readily discernible to most people in an outdoor environment. Noise levels above 65 dBA CNEL are normally unacceptable at sensitive receptor locations such as residences, schools, and noise environments in these areas would be considered degraded. Based on this, a significant impact would occur if traffic noise increases by 3 dBA.

Traffic noise increases are calculated using a version of the FHWA RD-77-108 Traffic Noise Prediction Model. The traffic noise prediction model takes into account the following inputs:

average daily traffic (ADT) volumes; vehicle mix; speeds; number of lanes; and day, evening, and night traffic splits. Existing traffic noise estimates are based on the City of Upland General Plan's horizon year roadway noise level estimates in Table 5.7-8 of the General Plan EIR. Project trips were provided by TJW Engineering (2025) (see Attachment D, Trip Generation and VMT Screening Memorandum). Traffic noise modeling does not account for existing masonry walls at adjacent residential property lines. **Table 4.13-4, Project-Related Increases in Traffic Noise, dBA CNEL at 50 Feet**, shows that the addition of proposed project trips would result in an increase of less than 1 dBA over existing conditions. Project traffic noise impacts would be less than significant.

Table 4.13-4 Project-Related Increases in Traffic Noise, dBA CNEL at 50 Feet

Roadway	Segment		Traffic Noise Increase		
	From	To	Existing No Project	Existing with Proposed Project	Increase
Foothill Boulevard	Monte Vista Ave	Central Ave	73	73	<1
	Central Ave	Benson Ave	73	73	<1
	Benson Ave	Mountain Ave	73	73	<1
	Mountain Ave	San Antonio Ave	74	74	<1

Source: TJW Engineering 2025; Upland 2015 (see Attachment C, Traffic Noise Modeling).

Operational Noise Impacts from Stationary Sources

Stationary noise sources associated with the proposed project would include mechanical equipment and recreational activities at outdoor common uses areas. The proposed project would include an open space amenity area at the center of the site but this area would be shielded from surrounding uses by intervening on-site buildings of the proposed townhomes. Therefore, noise levels associated with the outdoor common areas are not anticipated to exceed the City's General Plan standard (Policy SAF-1.2) of an increase of 1 dBA above existing noise levels at residential uses or 3 dBA above existing noise levels at commercial uses. These noise levels would also not exceed the base ambient noise levels of 45 dBA at nighttime or 55 dBA at daytime for residential uses and 75 dBA for commercial uses, complying with the City of Upland's exterior noise standards in Section 9.40 of the Municipal Code.

The proposed Project would include ground-mounted HVAC equipment at each townhome. Ground-mounted residential HVAC units would generate noise levels of up to 69 dBA at 3 feet and, due to distance, attenuation would be reduced to 45 dBA at 45 feet (Carrier 2009). The nearest receptors are the commercial uses approximately 30 feet west of the nearest ground-mounted residential HVAC units. HVAC noise levels would be approximately 49 dBA at the nearest commercial receptors to the west. The nearest residential receptors are 670 feet west of the nearest ground-mounted residential HVAC units and would experience HVAC noise levels of 22 dBA, not accounting attenuation of sound level due to intervening buildings. Therefore, the project's HVAC noise levels would not exceed Section 9.40.070 noise standards for commercial or residential uses of 75 dBA and 45 dBA for commercial and residential uses, respectively, and would not exceed the City's General Plan standard (Policy SAF-1.2) of an increase of 1 dBA above existing noise levels at residential uses or 3 dBA above existing noise levels at commercial uses. Furthermore, project HVAC noise would not generate an increase of

5 dBA above existing noise levels at adjacent uses per Section 9.40.100. Therefore, project HVAC noise would be less than significant.

b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Impact Analysis – Less Than Significant

The City of Upland does not have a quantified threshold for temporary construction noise and vibration. Therefore, to determine impact significance, FTA criteria are used. A vibration impact would occur if vibration levels exceed 0.20 inches/second (in/sec) peak particle velocity (PPV) at the façade of a non-engineered structure (e.g., wood-frame residential). Additionally, the FTA's threshold of 72 vibration velocity (VdB) for frequent events will be used to assess vibration annoyance to residences at the nearby sensitive receptors.

Construction Vibration

Construction activities can produce a vibration that may be felt by adjacent land uses. The construction of the proposed Project would not require the use of equipment such as pile drivers, which are known to generate substantial construction vibration levels. The primary vibration source during construction may be a bulldozer. A large bulldozer has a vibration impact of 0.089 inches per second peak particle velocity (PPV) at 25 feet which is perceptible but below any risk of architectural damage.

The thresholds from the Caltrans Transportation and Construction Induced Vibration Guidance Manual in **Table 4.13-5** (below) provide general thresholds and guidelines as to the vibration damage potential from vibratory impacts.

Table 4.13-5 Guideline Vibration Damage Potential Threshold Criteria

Structure and Condition	Maximum PPV (in/sec)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5

Source: Table 19, Transportation and Construction Vibration Guidance Manual, Caltrans, Sept. 2013.

Note: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

Table 4.13-6 gives approximate vibration levels for particular construction activities. This data provides a reasonable estimate for a wide range of soil conditions.

Table 4.13-6 Vibration Source Levels for Construction Equipment

Equipment	Peak Particle Velocity (inches/second) at 25 feet	Approximate Vibration Level LV (dVB) at 25 feet
Pile driver (impact)	1.518 (upper range)	112
	0.644 (typical)	104
Pile driver (sonic)	0.734 upper range	105
	0.170 typical	93
Clam shovel drop (slurry wall)	0.202	94
Hydromill	0.008 in soil	66
(slurry wall)	0.017 in rock	75
Vibratory Roller	0.21	94
Hoe Ram	0.089	87
Large bulldozer	0.089	87
Caisson drill	0.089	87
Loaded trucks	0.076	86
Jackhammer	0.035	79
Small bulldozer	0.003	58

Source: Transit Noise and Vibration Impact Assessment, Federal Transit Administration, May 2006.

At a distance of 50 feet (northeast property line to the nearest residence to the east), a large bulldozer would yield a worst-case 0.042 PPV (in/sec), which means the vibration would be perceptible during grading along the eastern property line of the Project Site but is below any threshold of damage.

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

Impact Analysis – Less Than Significant Impact

The Cable Airport ALUCP was last updated in September 2015. The ALUCP contains compatibility criteria for land use projects within the airport's influence area, including Noise Compatibility Criteria in Section 3.2. This section provides guidance for assessing the compatibility of development projects with the airport with respect to noise. Criterion 3.2.1, Maximum Acceptable Exterior Noise Exposure, of the ALUP states:

To minimize noise-sensitive development in noisy areas around Cable Airport, new land use development shall be restricted in accordance with the following.

- a) New residential development shall be deemed incompatible within the projected CNEL 60 dB contour of Cable Airport depicted on Map 3E, Future Noise Impact, and is one of the factors considered in establishing the Compatibility Zone boundaries in Map 3A. For the purposes of implementing this policy:
 - 1) New residential development either single-family or multi-family should be avoided in Compatibility Zones B3 and C3. To be acceptable, the development must meet these criteria:

- Comply with the infill criteria set forth in Criterion 3.6.2.
- Incorporate sound attenuation as necessary to comply with the interior noise level conditions in Criterion 3.2.2.
- Have a density no greater than allowed in accordance with Criterion 3.3.1.
- Dedicate an avigation easement to the City of Upland in accordance with Criterion 3.6.1.

Criterion 3.2.2, Maximum Acceptable Interior Noise Levels, states:

To minimize disruption of indoor activities by aircraft noise, new structures within any Compatibility Zone except D or E shall incorporate sound attenuation design features sufficient to meet the interior noise level criteria specified by this criterion.

- a) For the following land uses, the aircraft-related interior noise level shall be no greater than CNEL 40 dB.
 - 1) Any habitable room of single- or multi-family residences (including family day care homes with 14 or fewer children)

Airport Noise Exposure and CALUCP Consistency

According to the Noise and Vibration Technical Memorandum (Appendix G), the majority of the Project site is located within the 55–60 dB CNEL airport noise contour, with only a small portion of the northwest area within the 60–65 dB CNEL contour (Appendix G, Attachment E). Existing ambient noise levels at the site are dominated by roadway traffic along Foothill Boulevard, with modeled levels of 67–69 dBA CNEL, which exceed projected aircraft noise levels. As a result, airport noise is not the dominant contributor to the noise environment at the Project site.

Although the CALUCP identifies new residential uses within the future 60 dB CNEL contour as “normally incompatible,” Appendix G provides substantial evidence demonstrating that applicable CALUCP criteria can be met, including interior noise reduction, density limits, and required easements.

Interior Noise Compatibility

Appendix G confirms that standard building construction and typical sound-rated window assemblies can achieve 26 dB or more exterior-to-interior noise reduction. This attenuation is sufficient to meet the CALUCP requirement that interior aircraft-related noise levels not exceed 40 dB CNEL (Criterion 3.2.2). Because airport noise exposure at the Project site is 60 dB CNEL or lower across the majority of the site, required interior noise standards are fully achievable without the need for extraordinary design measures.

Special Circumstances (CALUCP §3.1.6)

Section 3.1.6 of the CALUCP allows a jurisdiction to find that a land use normally identified as “incompatible” may be considered compatible when site-specific circumstances reduce or eliminate the underlying compatibility concern. The noise analysis in Appendix G supports such a finding because:

- Airport noise exposure is moderate and occurs primarily in the 55–60 dB CNEL contour.
- Only a limited portion of the site intersects the 60–65 dB CNEL contour.
- Existing residential neighborhoods adjacent to the site already experience similar or greater airport and roadway noise levels.
- Interior noise standards can be fully met through standard construction techniques.

These location-specific factors demonstrate that the project satisfies CALUCP noise compatibility policies and qualifies for a special-circumstances compatibility finding under Section 3.1.6.

Conclusion

Based on the acoustic modeling and findings in Appendix G, and considering the CALUCP noise compatibility requirements, the proposed project would not expose future residents to excessive aircraft-related noise levels. Required interior noise standards are achievable, airport noise exposure is moderate, and the project meets applicable CALUCP criteria for residential use within Zone C3.

Therefore, airport-related noise impacts would be less than significant.

4.14 Population and Housing

Threshold 4.14 – Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			✓	
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				✓

Applicable General Plan Policies

- **Policy LU-1.3: Strategic Growth.** Concentrate growth in strategic locations that strengthens the City's economic base, offers new housing opportunities, maximizes available and planned infrastructure, and fosters the development and use of transit and multi-modal transportation. These areas include Historic Downtown Upland, Foothill Boulevard, the Southeast Quadrant, College Heights, Mountain Avenue, along the Interstate 10 corridor, and in the 9th Street Industrial area.
- **Policy LU-1.5: Range of Housing Types and Densities.** Provide high-quality housing in a range of types, densities, and unit sizes that meets the housing needs of residents of all income levels.
- **Policy LU-4.1: Infill Development.** Encourage mixed-use, infill development on brown-fields or underutilized parcels, particularly near public transit and within the historic downtown.

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

Impact Analysis – Less Than Significant

According to the 2025 population estimates provided by the California Department of Finance, there are 2.80 persons per household in Upland.²¹ Based on 72 dwelling units, the Project could increase the overall population of the City by approximately 202 persons (assuming all new residents will come from outside the city limits), an increase of .25% from the existing population. As discussed in Section 3.2, Project Description, the Project proposes to change the land use designation from Commercial/Industrial Mixed Use to Specific Plan to allow for residential

21 State of California Department of Finance E-5 Population and Housing Estimates for Cities, Counties, and the State 2021-2025 <https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2025/> accessed September 16, 2025

development. This aligns with the City of Upland's Housing Element goals by providing medium-high density residential development.

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

Impact Analysis – No Impact

The Project proposes to develop 4.42 acres of mostly vacant land into a residential project comprising 72 single-family detached homes. Therefore, implementing the Project would not displace a substantial number of existing housing units or necessitate the construction of replacement housing elsewhere. On the contrary, the Project contributes to the City's long-term urban planning by providing for development that fits into its regional growth strategies.

4.15 Public Services

Threshold 4.15 – Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?			✓	
1) Fire protection?			✓	
2) Police protection?			✓	
3) Schools?			✓	
4) Parks?			✓	
5) Other public facilities?			✓	

Applicable GP Policies

Public Facilities and Service Element:

- **Policy PFS-1.2: Growth and Level of Service.** Require new development to provide adequate facilities or pay its fair share of the cost for facilities needed to provide services to accommodate growth without adversely impacting current service levels.
- **Policy PFS-2.11: Emergency Vehicle Access.** Require new development to be accessible to emergency vehicles and to not impede the ability of service providers to provide adequate emergency response.
- **Policy PFS-2.12: Public and Private Roadways.** Ensure that new public and private roadways are adequate in terms of width, radius and grade to accommodate fire-fighting apparatus, while maintaining Upland's neighborhoods and small-town character.

Impact Analysis – Less Than Significant

Increased Demand for Public Services

As noted in Section 4.14, Population and Housing, the Project would add approximately 202 persons to the population of the City, assuming that all new residents come from outside the City limits. The number of persons in relation to the current population of 78,118 represents a 0.25% increase in population. During the review of the Project, a 0.25% increase in population was not found by the service providers to result in the need for new or altered facilities to meet and maintain acceptable service ratios, response times, or other performance objectives.

Payment of Capital Impact Fee

To implement the goals and objectives of the City General Plan (e.g., circulation, safety, parks, and recreation elements) and to mitigate the overburdening of existing capital facilities such as the City's roadway, park, and fire systems of facilities that are caused by new development in the City, certain public roads, parks, and fire stations must be constructed. The City has determined that a capital impact fee is needed to finance these public improvements and to pay for the development's fair share of the construction costs of these improvements. As required by Municipal Code Section 3.44.010, Capital Impact Fee, the Project Proponent is required to pay the capital impact fee as its fair share contribution to pay for the City's future construction of facilities. The payment of the capital impact fee alleviates the need for the Project Proponent to directly construct or physically alter governmental facilities for fire, police, schools, parks, or other physical facilities. Such facilities would be subject to CEQA review at the time the facilities are proposed for development.

Fire Protection

The San Bernardino County Fire District, Division 1 provides fire protection services to the Project site. The Project area is currently served by Fire Station No. 163, located approximately .80 roadway miles northeast of the Project site at Benson Avenue. Development of the Project would impact fire protection services by placing an additional demand on existing fire protection resources if its resources are not augmented. To offset the increased demand for fire protection services, the Project would be conditioned by the City to provide a minimum of fire safety and support fire suppression activities, including compliance with state and local fire codes, fire sprinklers, a fire hydrant system, paved access, and secondary access routes. The Fire Department, through the City's development review process, determined the Project would not significantly impact service ratios, response times, or other performance objectives.

Police Protection

The City of Upland Police Department (UPD) provides community policing to the Project Site from the City of Upland Police Department located at 1499 W 13th Street, approximately 1 mile northeast of the Project Site. According to the Upland Police Department 2024 Annual Report, the response times have decreased in 2024 from prior recent years. As discussed above, the Project may add approximately 202 persons to the population of the City, assuming that all new residents come from outside the City limits, representing a .25% increase in population. The continual monitoring of police staffing levels by the City would ensure the Project would not result in a significant reduction in police response times. In addition, the City maintains mutual aid agreements with police agencies in the surrounding cities and with the San Bernardino

County Sheriff's Department, which allow for the services of nearby police departments to assist the UPD during major emergencies.

Schools

The Project Site is served by the Upland Unified School District. Cabrillo Elementary School, Baldy View Elementary School, and Upland High School are all east of the Project site. Regardless of the number of additional students generated by the Project, both school districts are authorized by state law (Government Code §65995-6) to levy a new construction fee per square foot of industrial construction for the purpose of funding the reconstruction or construction of new school facilities. Pursuant to Section 65995(3) (h) of the California Government Code, the payment of statutory fees is *"deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning use, or development of real property, or any change in governmental organization or reorganization as defined in Section 56021 or 56073, on the provision of adequate school facilities."* Therefore, the payment of school impact fees for residential development would offset the potential impacts of increased student enrollment related to the implementation of the Project.

Parks

The Project could increase the overall population of the City by approximately 202 persons (assuming all new residents will come from outside the city limits). The Parks Department, through the City's development review process, determined that the payment of the Capital Impact Fee the Project itself would not result in the need to construct new or physically altered park facilities.

Other Public Facilities

Other public facilities would include, but not be limited to, public health and welfare services and library services. As stated above, a 0.25% increase in population, of and by itself, would not result in the need for new or altered facilities to meet and maintain acceptable service ratios, response times, or other performance objectives.

4.16 Recreation

Threshold 4.16 – Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			✓	
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?				✓

Applicable General Plan Policies

Open Space and Conservation Element

- **Policy OSC-3.3: New Parks and Recreational Facilities.** Ensure that the provision of parks and recreational facilities and services keeps pace with population growth and changing recreational needs in Upland.
- **Policy OSC-3.5: Quimby Act.** Continue to require residential subdivisions to provide at least 3 acres of parkland per 1,000 residents or pay an in-lieu fee or some combination thereof, pursuant to Section 66477 of the California Government Code (the Quimby Act).
- **Policy OSC-3.6: Infill Development.** Encourage new infill development projects to provide mini parks in infill areas to help meet the park standard, as long as they are at least one-half-acre in size and include sufficient amenities.

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

Impact Analysis – Less Than Significant

The City has an established parkland-to-population requirement of 3.0 acres of parkland per 1,000 persons.²² The City's 2024 population is 78,864 persons and to meet the City's parkland-to-population ratio, the City would need 237 acres of parkland. The City's Recreation and Community Services Division currently operates and maintains a total of 18 parks and trails covering 286.10 acres of parkland. The project includes 2,858 square feet of common open space, providing onsite park land opportunities for future residents.

22 General Plan Update FIER, Parks and Recreational Facilities, <https://www.uplandca.gov/uploads/files/DevelopmentServices/Environmental%20Review%20Documents/FINAL%20GENERAL%20PLAN%20EIR%20with%20comments%20COMBINED.pdf>, pg. 5.20-4, accessed September 16, 2025

However, while the inclusion of onsite amenities would reduce impacts on local parks, Project residents would still use parks within the City's park system. The Quimby Act authorizes the legislative body of a city or county to require the dedication of land or to impose fees for park or recreational purposes as a condition of the approval of a tentative map, if specified requirements are met. Upland Municipal Code Section 3.44.020 establishes a park acquisition and development fee on issuance of all building permits for development within the boundaries of the City to pay for the acquisition and improvement to land designated for park use, which would contribute to reducing potential parkland impacts on a project-by-project basis. The project would be required to pay the applicable fee prior to the issuance of occupancy permits. Impacts would be less than significant.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

Impact Analysis – No Impact

The Project would not require the construction of new recreational facilities. Potential impacts to recreational facilities would be further offset by the contribution of Development Impact Fees to the City of Upland as a condition of Project approval. Additionally, the project includes 2,858 square feet of common open space, providing onsite park land opportunities for the future residents.

4.17 Transportation

Threshold 4.17 – Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?			✓	
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?			✓	
c) Substantially increase hazards due to a geometric design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			✓	
d) Result in inadequate emergency access?			✓	

The Analysis in this section is supported by the following technical report.

- Trip Generation and VMT Screening, TJW Engineering, Inc., March 26, 2025, and included as **Appendix F** in this Initial Study.

Applicable General Plan Policies

- **Policy CIR-1.1: Roadway system.** Require the City's roadways to: a. Provide accommodations for transit, bicyclists, and pedestrians within the public right-of-way.
- **Policy CIR-2.6: Accessible Transit.** Provide pedestrian access to all transit facilities and maintain pedestrian facilities that are safe, attractive, and well lit.
- **Policy CIR-2.10: Pedestrian System.** Maintain a network of sidewalks, crosswalks, and other pedestrian facilities throughout the City as specified in the County's Non-Motorized Transportation Plan.
- **Policy CIR-3.1: Connected Roadway Network.** Require future development or redevelopment to implement local street networks which allow travel by all modes and ensure connectivity with the larger City-wide roadway network.
- **Policy PFS-2.11: Emergency Vehicle Access.** Require new development to be accessible to emergency vehicles and to not impede the ability of service providers to provide adequate emergency response.

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

Impact Analysis – Less Than Significant

As outlined in CEQA Guidelines §15064.3, except as provided for roadway capacity transportation projects, a Project's effect on automobile delay shall not constitute a significant environmental impact. Therefore, to comply with CEQA Guidelines §15064.3, impacts associated with automobile delay are not analyzed in this Initial Study. The following analysis focuses on the components of the circulation system that reduce vehicle miles traveled (VMT) and thereby contribute to the reduction of greenhouse gas (GHG) emissions, as required by the California Global Warming Solutions Act of 2006 (AB 32).

Trip Generation

The following discussion is for informational purposes.

Trip generation calculates a project's additional traffic, while Level of Service (LOS) measures its impact on road performance. Since 2019, the focus has shifted from Level of Service (LOS) to Vehicle Miles Traveled (VMT) as the primary transportation impact metric. While a LOS analysis is not required under CEQA, the City's General Plan includes performance standards for intersections.

Based on the trip generation rates obtained from the Institute of Transportation Engineers (ITE) Trip Generation Manual (11th Edition, 2021), Land Use Code 210 - Single-Family Detached Residential, the Project is forecast to generate a net total of 679 daily trips, which includes 50 AM peak hour trips and 68 PM peak hour trips. **(See Appendix F).**

The proposed Project does not meet the City Guidelines criteria requiring an LOS analysis because:

- 1) The Project will generate fewer than 100 vehicle trips during either AM or PM peak hour.
- 2) There are fewer than 51 trips during the AM peak hour and, therefore, no more than 51 trips added to any intersection.
- 3) Project generated trips are expected to be distributed relatively evenly between the easterly and westerly legs of West Foothill Boulevard on either side of the Project driveway. Thus, the PM peak hour trips in either east or west direction will be less than 51 trips each and, therefore, not contribute more than 51 trips to any intersection. **(See Appendix F.)**

Transit Facilities

The Omnitrans' Route 66 bus stop near the intersection of Central Avenue/Foothill Boulevard approximately 360 feet west of the site that provides transit service in the Project vicinity.

Roadway Facilities

Any new project is required to conform to the street sections identified in the Circulation Element of the General Plan. The Project site is adjacent to Foothill Boulevard, which is classified as a Major Arterial as shown in Figure CIR-I, Roadway System, of the General Plan Circulation Element.

The Project will improve Foothill Boulevard with new pavement, a 7-foot-wide landscaped parkway, and a five-foot wide sidewalk along the Project frontage consistent with the General Plan and City standards.

Bicycle Facilities

There are no designated bike lanes on Foothill Boulevard adjacent to the Project site. However, according to the City's Bikeway Network, Class II (striped/marked with signage) and Class III (not striped/marked with signage) bike routes are planned on Foothill Boulevard along the Project's frontage, which would facilitate alternative modes of transportation in the project vicinity.²³

Pedestrian Facilities

There are currently no sidewalks along the Project's frontage with Foothill Boulevard. The Project includes plans to construct a new sidewalk for pedestrian access.

Conclusion

The analysis indicates that the Project does not conflict with any program, plan, ordinance, or policy related to the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Implementation of the proposed project would not interfere with existing transit services, pedestrian systems, or bicycle facilities, and this impact is considered less than significant. Therefore, no mitigation measures are required.

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

Impact Analysis – Less Than Significant

The City Guidelines provide screening criteria and requirements for VMT assessment of land use projects. The Low VMT Area screening criteria indicates that residential projects located within a low VMT-generating area may be presumed to have a less than significant impact on VMT. To determine if the proposed project is located within a low VMT area, the project location was entered into the online San Bernardino County Transportation Authority (SBCTA) VMT Screening Tool. The VMT Tool determined that the project is located within a low VMT area. Thus, per the City Guidelines, the project may be presumed to have a less-than-significant impact on VMT.

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

Impact Analysis – Less Than Significant

The Project features a 26-foot main driveway and a 24-foot emergency gated access from Foothill Boulevard, both constructed to City standards. This residential Project is compatible with

²³ City of Upland. City of Upland General Plan, Chapter 5- Circulation Element. Figure CIR-2, Bicycle Routes. September 2015.

the mix of residential, commercial, and light industrial uses that are allowed in the Commercial/Industrial Mixed-Use (C/I-MU) zoning district.

d) Would the project result in inadequate emergency access?

Impact Analysis – Less Than Significant

The Project features a 26-foot main driveway and a 24-foot emergency gated access from Foothill Boulevard, both constructed to City standards. These improvements provide adequate emergency access to the Project site.

4.18 Tribal Cultural Resources

Threshold 4.18	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place cultural landscape that is geographically defined in terms of the size and scope of landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?		✓		
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?			✓	

Applicable General Plan Policies

There are no policies that apply to the Project.

-
- a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?**
-

Impact Analysis – Less Than Significant with Mitigation Incorporated

Refer to Cultural Resources, Threshold 4.5 (a) regarding historical resources. The Project is not listed or eligible for listing in the California Register of Historical Resources or a local register of historical resources.

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

Impact Analysis – Less Than Significant

Assembly Bill (AB) 52 created a process for consultation with California Native American Tribes in the CEQA process. Tribal Governments can request consultation with a lead agency and give

input into potential impacts on tribal cultural resources before the agency decides what kind of environmental assessment is appropriate for a proposed Project.

The City of Upland commenced the AB 52 process by sending out consultation invitation letters to tribes previously requesting notification pursuant to Public Resources Code §21080.3.1. Comments were received from the Yuhaaviatam of San Manuel Nation. and the Gabrieleño Band of Mission Indians-Kizh Nation. As a result of the AB52 consultations held with the tribes, the following mitigation measures are recommended.

MM- TCR-1: Native American Monitoring Agreement. Prior to the commencement of any ground-disturbing activity, including, but not limited to, demolition, pavement removal, potholing, augering, grubbing, tree removal, boring, grading, excavation, drilling, and trenching, the Permit Applicant shall enter into a Tribal Monitoring Agreement with the Gabrieleño Band of Mission Indians – Kizh Nation for a Native American Monitor to be present on-site during all ground-disturbing activities associated with the Project, including both on-site and any off-site improvements required in connection with the Project.

The Yuhaaviatam of San Manuel Nation (YSMN), as a Consulting Tribe under Public Resources Code §21080.3.1(b), shall be offered the opportunity to participate in tribal monitoring. Monitoring by YSMN shall occur if requested in writing by YSMN prior to the commencement of ground-disturbing activities or upon discovery of potentially significant Tribal Cultural Resources during construction.

For purposes of this mitigation measure, a "Consulting Tribe" is defined as a tribe that initiated the AB 52 tribal consultation process for the Project, has not opted out of consultation, and has completed consultation with the City pursuant to Public Resources Code §21080.3.1(b).

The Monitoring Agreement shall include, but is not limited to, the following provisions:

- a) Provide a minimum of 30 days' advance notice to the Consulting Tribe(s) of all ground disturbing activities.
- b) Conduct a Pre-Grade Meeting with the Project archaeologist, Consulting Tribe(s), and grading contractor(s).
- c) In conjunction with the Archaeological Monitor(s) required by Mitigation Measure MM-CR-1 under Section 4.5, Cultural Resources, of this Initial Study/Mitigated Negative Declaration, the Native American Monitor(s) shall have the authority to temporarily divert, redirect, or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources.
- d) The onsite monitoring shall end when all ground-disturbing activities on the Project Site are completed, or when the Native American Tribal Monitor(s) have indicated that all upcoming ground disturbing activities at the Project Site have little to no potential for impacting Tribal Cultural Resources. The Project Proponent shall submit a fully executed copy of the Monitoring Agreement to the City of Upland Development Services Department (Planning Division) to ensure compliance with this mitigation measure. If there are multiple Consulting Tribes involved, a separate Monitoring Agreement is required for each. The Monitoring Agreement shall not modify any condition of approval or mitigation measure.

e) A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.

f) The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe.

MM-TCR-2: Unanticipated Discovery: The Permit Applicant or any successor in interest shall comply with the following for the life of the grading permit. If, during ground disturbance activities, unanticipated cultural resources are discovered, the following procedures shall be followed:

a) Ground disturbing activities shall cease in the immediate vicinity of the find (not less than the surrounding 100 feet) until the find can be assessed. Ground disturbing activities are allowed on the remainder of the Project Site.

b) In the event the unanticipated discovery includes human remains and/or cremations no photographs are to be taken except by the coroner, with written approval by the Consulting Tribes(s).

c) The project applicant or project Archeologist shall contact all Consulting Tribe (s) if any pre-contact cultural resources discovered during project implementation, and be provided information regarding the nature of the find, so as to provide Tribal input with regards to significance and treatment.

d) The Consulting Tribe(s) and the Project Archaeologist (retained by the Permit Applicant under Mitigation Measure MM-CR-1, Retain Professional Archaeologist, of this Initial Study/Mitigated Negative Declaration document), shall meet and confer, and discuss the find with respect to the following:

1. Determine if the resource is a Tribal Cultural Resource as defined by Public Resources Code §21074. If so:

2. Determine if the resource is listed or eligible for listing in the California Register on a "Local register of historical or resources" pursuant to Public Resources Code §5020.1 (k); or

3. Pursuant to Public Resources Code § 5024.1 (c) as it pertains to the Consulting Tribe(s):
(1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage, (2) Is associated with the lives of persons important in our past, (3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative

individual, or possesses high artistic values, or (4) Has yielded, or may be likely to yield, information important in prehistory or history.

e) If tribal cultural resources are identified during ground-disturbing activities and preservation in place is determined to be infeasible, the resources shall be treated in a culturally appropriate manner, with a preference for reburial on-site in a location acceptable to the Consulting Tribe(s), to the extent feasible.

If on-site reburial is not feasible, reburial shall occur at an appropriate off-site location identified in consultation with the Consulting Tribe(s).

If multiple Consulting Tribes are involved and cannot reach agreement regarding the treatment or disposition of the resources, the City shall consider the input of all Consulting Tribes, may seek guidance from the Native American Heritage Commission, and shall make a final determination that reasonably balances the interests of the Consulting Tribes and complies with applicable laws.

No tribal cultural resources shall be retained for curation or display or other purposes without the express written consent of the culturally affiliated Consulting Tribe(s).

f) If the resource(s) is both a tribal cultural resource and a historic resource, the Project Archaeologist, the Consulting Tribe (s), and the City of Upland Development Services Department (Planning Division) shall meet and confer and discuss the appropriate treatment (documentation, recovery, avoidance, etc.) for the cultural and historic resource. Treatment, at a minimum, shall be consistent with Public Resources Code § 21084.3 (b). The appropriate treatment shall be prepared in conjunction with the Archaeological Treatment plan required by Mitigation Measure MM-CR2 of this Initial Study/Mitigated Negative Declaration. Further ground disturbance shall not resume within the area of the discovery until the appropriate treatment has been accomplished.

MM-TCR-3: Final Report: If a Tribal cultural resource is also a historic resource defined above, the resource shall be included in the Final Report required by Mitigation Measure MM-CUL-2 of this Initial Study/Mitigated Negative Declaration document.

4.19 Utilities and Service Systems

Threshold 4.19 – Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or relocation of which could cause significant environmental effects?		✓		
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			✓	
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			✓	
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			✓	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			✓	

Applicable General Plan Policies

The following General Plan Policies were considered.

- **Policy PFS-8.5: Water Availability.** Consider the availability of sufficient, reliable water when reviewing new development.
- **Policy PFS-14.8: Recycled Materials in New Construction.** Encourage the use of recycled materials in new construction.

a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or relocation of which could cause significant environmental effects?

Impact Analysis – Less Than Significant with Mitigation Incorporated

Water and Sewer Improvements

Water and sewer service will be provided by the City of Upland's Public Works Department. The Project will connect to the existing 10- inch water line located in Foothill Boulevard, and sewer will connect to a proposed 8-inch sewer main in Foothill Boulevard, which then carries wastewater west to an existing line in Central Avenue.

Storm Drainage Improvements

The Project site's runoff currently flows from north to south to two discharge points along the southern edge of the site. Improvements to the site include subsurface storm drains, inlets and subsurface basins that will ultimately carry runoff to the same two discharge points. The Project proposes two Line systems for carrying runoff: A Line A system that will carry runoff from the northern part of the site to Basin A, and a Line B system that will carry runoff from the southern portion of the site to Basin B. Basin A conveys runoff to the southwestern discharge point and Basin B conveys runoff to the southeastern discharge point.

Electric Power Facilities

Electricity in Upland is provided by the Southern California Edison Company (SCE). SCE owns, operates, and maintains above-ground and underground facilities within the planning area. The majority of these facilities are located in street rights-of-way. Currently, above-ground power lines exist along Foothill Boulevard adjacent to the site.

Natural Gas Facilities

Natural gas is provided by Southern California Gas Company. The Gas Company owns, operates, and maintains numerous underground gas lines in most of the public streets, including high-pressure transmission lines. Upland does not have natural gas fields or wells in the community. Extension of service is based on the initiation of a service contract whose policies and extension rules are on file with the California Public Utilities Commission. The Project will connect to the existing Southern California Gas natural gas distribution facilities available in the vicinity of the Project Site.

Telecommunication Facilities

Telecommunication facilities include a fixed, mobile, or transportable structure, including all installed electrical and electronic wiring, cabling, and equipment, all supporting structures, such as utility, ground network, and electrical supporting structures, and a transmission pathway and associated equipment to provide cable TV, internet, telephone, and wireless telephone services to the Project site. Services that are not provided via satellite will connect to existing facilities maintained by the various service providers.

Conclusion

Construction or installation of the infrastructure and utilities needed to serve the Project will result in a ground disturbance that may impact Biological Resources, Cultural Resources, Geology and Soils (Paleontological Resources), and Tribal Cultural Resources (See Mitigation Measures MM BIO-1, MM BIO-2, MM CUL-1, MM CUL-2, and PALEO-1.)

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

Impact Analysis – Less Than Significant

The Project site encompasses 4.42 acres and is currently designated for Commercial use under the City of Upland General Plan. Consistent with the City's 2020 Urban Water Management Plan (UWMP), commercial lands have an average demand of approximately 2.70 AFY per acre.

Under existing designations, the 4.42-acre site would therefore generate a demand of approximately 11.9 AFY (≈ 3.88 million gallons per year).

The proposed Specific Plan would redesignate the site to allow 72 detached residential condominium units (47 units in PA-1 on 3.14 acres and 25 units in PA-2 on 1.28 acres). Detached condominium units are most consistent with the UWMP's single-family category, which has an average demand of 3.39 AFY per acre. Applying this factor, the proposed Specific Plan would result in a demand of approximately 14.98 AFY (≈ 4.88 million gallons per year). This represents a net increase of about 3.1 AFY (≈ 1.0 million gallons per year) compared to existing conditions. Assuming an 80 percent return factor, the increase in wastewater generation would be ≈ 2.45 AFY (≈ 0.80 million gallons per year).

As a cross-check, the U.S. Energy Information Administration (EIA) reports average California household water use equivalent to about 1,025 gallons per household per year. Applying this unit demand to the 72 proposed units yields a comparable annual demand of $\approx 73,800$ gallons per year. This value is consistent with the UWMP-based estimate when expressed on a per-unit basis.

The City's 2020 UWMP accounts for future land use changes, climate adjustments, and conservation requirements, and confirms that adequate supplies are available from the Chino Bernardino Basin Area (SBBA) groundwater adjudication, with imported water and recycled water supplies as needed. (See Section 4.10, Hydrology and Water Quality). Consistent with Water Code Sections 10910–10915 and CEQA Guidelines Section 15155, projects may rely on adopted Urban Water Management Plans (UWMPs) as the primary evidence of long-term water supply availability. The City of Upland's 2020 UWMP identifies adequate potable water supplies to meet projected demands during normal, single-dry, and multiple-dry years through a combination of groundwater, imported water, and recycled water sources. The Project's incremental increase in potable water demand (approximately 3.1 AFY) is accounted for within the UWMP's demand projections and represents a negligible increase relative to the City's overall water supply portfolio. Impacts would therefore be less than significant.

-
- c) Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**
-

Impact Analysis – Less Than Significant

The proposed Project involves a General Plan Amendment and Zone Change to redesignate 4.42 acres of vacant commercial land to a Specific Plan area allowing for the development of 72 single-family detached condominiums. Wastewater generated by the project would be collected by the City of Upland's sewer system and conveyed to the Inland Empire Utilities Agency (IEUA) for treatment.

Wastewater Treatment Facilities and Capacity

The City of Upland is served by IEUA, which operates four regional water recycling facilities (WRFs). The largest facility serving Upland is the Regional Water Recycling Plant No. 1 (RP-1), located in Ontario. RP-1 has a permitted capacity of approximately 44 million gallons per day (mgd). As of IEUA's most recent Urban Water Management Plan, the average daily flow to RP-1 is approximately 30 mgd, leaving surplus treatment capacity of about 14 mgd to accommodate projected growth within its service area, including Upland.

Wastewater Generation: Commercial vs. Residential

To assess the Project's impact on wastewater demand, standard generation factors are applied:

- Commercial Land Use: ~2,000 gallons per day (gpd) per acre (varies by intensity).
 - For 4.42 acres: ≈ 8,840 gpd.
- Residential – Single-Family Detached Condominiums: ~180 gpd per unit.
 - For 72 units: ≈ 12,960 gpd.

Thus, the Project would result in a net increase of approximately 4,120 gpd (0.0041 mgd) of wastewater compared to the vacant commercial designation. Given that the capacity of the Regional Water Recycling Plant No. 1 is 44 million gpd, the increase is negligible.

d) Would the project generate solid waste more than state or local standards, or more than the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Impact Analysis – Less Than Significant

Construction Related Impacts

The California Green Building Standards Code (CALGreen) requires all newly constructed buildings to prepare a Waste Management Plan and divert construction waste through recycling and source reduction methods.²⁴ The City of Upland Building and Safety Department reviews and approves all new construction projects required to submit a Waste Management Plan. Mandatory compliance with CALGreen solid waste requirements.

Operational Related Impacts

CalRecycle, Solid Waste Information System (SWIS), Mid-Valley Sanitary Landfill (36-AA-0055), <https://www2.calrecycle.ca.gov/SolidWaste/Site/Search>, accessed September 2025.

According to the California Emissions Estimator Model (CalEEMod), the proposed project is estimated to generate approximately 65.7 tons of solid waste per year (equivalent to an average of less than 0.20 tons per day). Solid waste generated in Upland is collected by the City's contracted hauler and disposed of at permitted regional landfill facilities regulated under

²⁴ 2022 California Green Building Standards Code, Title 24, Part 11 (CALGreen)<https://codes.iccsafe.org/s/CAGBC2022P1/chapter-5-nonresidential-mandatory-measures/CAGBC2022P1-Ch05-SubCh5.4-Sec5.408.1.1#:~:text=not%20by%20both,-.2022%20California%20Green%20Building%20Standards%20Code%2C%20Title%2024%2C%20Part%2011,separate%20chapters%20for%20easier%20use.>

the CalRecycle Solid Waste Information System (SWIS). The primary facility serving Upland is the Mid-Valley Sanitary Landfill (SWIS No. 36-AA-0055), which has a maximum permitted throughput of 1,200 tons per day, a remaining capacity of approximately 11,063,811 cubic yards (as of January 2023), and an anticipated closure date of January 1, 2072.²⁵

Given the relatively minor contribution of the proposed project compared to the landfill's daily capacity and long-term remaining disposal capacity, there is adequate solid waste capacity to serve the project's needs in addition to existing and projected regional demand.

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

Impact Analysis – Less Than Significant

Burrtec Waste Industries currently provides solid waste collection services to the City of Upland as required by Upland Municipal Code Chapter 13.28(Solid Waste Management). Burrtec provides these services in compliance with all applicable federal, state, and local statutes and regulations related to the management and reduction of solid waste.²⁶

25 CalRecycle, Solid Waste Information System (SWIS), *Mid-Valley Sanitary Landfill (36-AA-0055)*, <https://www2.calrecycle.ca.gov/SolidWaste/Site/Search>, accessed September 2025,

26 City of Upland, Trash & Recycling Services – Burrtec Waste Industries, accessed September 2025, <https://www.uplandca.gov/trash>.

4.20 Wildfire

Threshold 4.20 – Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
If located in or near a state responsibility areas of lands classified as very high fire hazard severity zones, would the Project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?				✓
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				N/A
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				N/A
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, because of runoff, post-fire slope instability, or drainage changes?				N/A

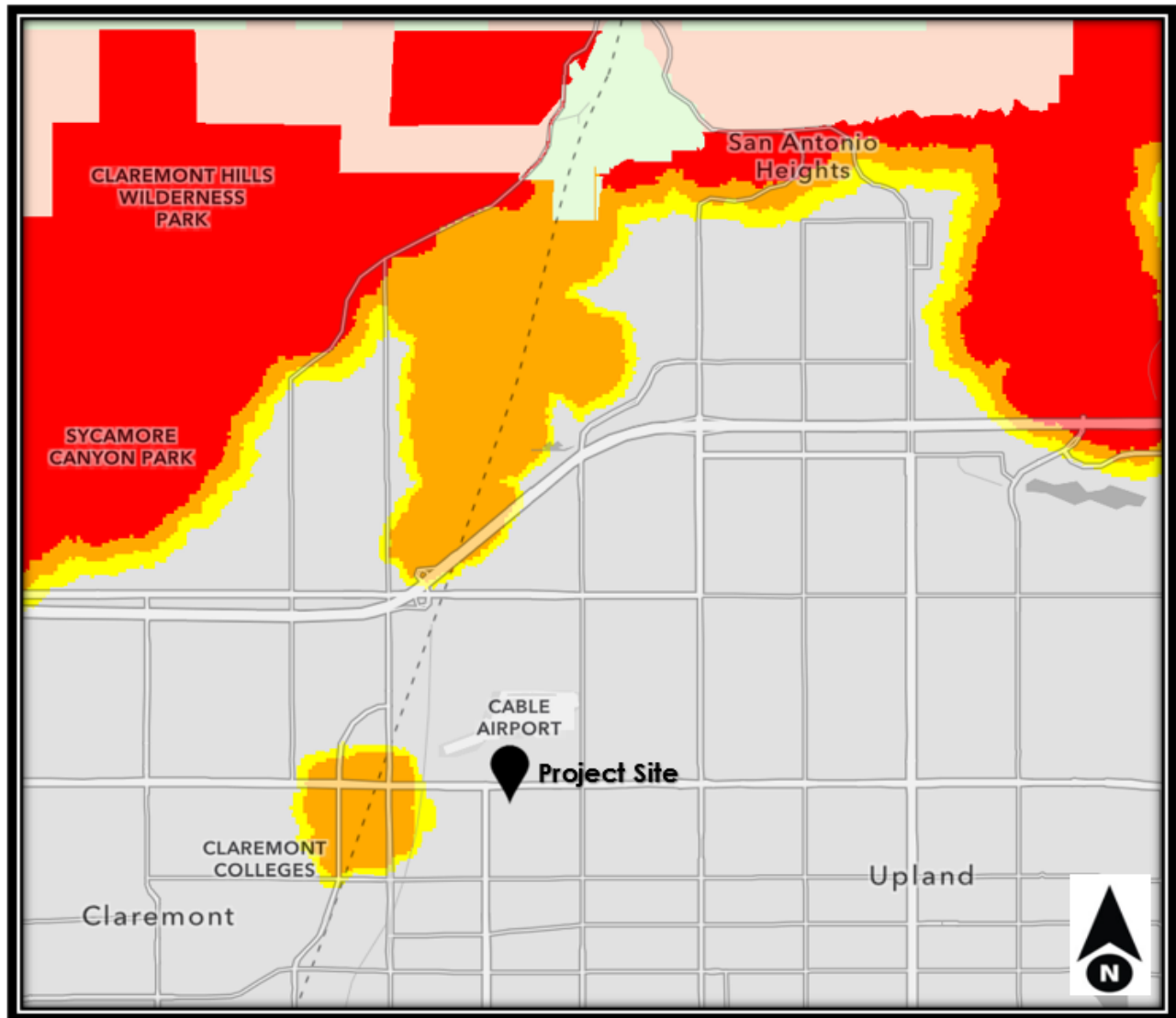
Impact Analysis – No Impact

Responses to these questions are applicable if the Project site is “located in or near a state responsibility area of lands classified as very high fire hazard severity zones.”

According to the California Fire Hazard Severity Zone Viewer maintained by CAL FIRE, the Project site is **not** located within a high wildfire hazard area.²⁷ The Project is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. (**Figure 4.20-1, Fire Hazard Severity Zones.**) As such, Thresholds 4.20 (a) through 4.20 (e) require no further action.

²⁷ Source: <https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/>, accessed August 18, 2025

Figure 4.20-1 Fire Hazard Severity Zones



Fire Hazard Severity Zones in Local
Responsibility Area, as Recommended
by the State Fire Marshal, 2025

Fire Hazard Severity Zone

- Very High
- High
- Moderate

Fire Hazard Severity Zones in State
Responsibility Area, Effective April 1,
2024

FHSZ_Description

- Very High
- High
- Moderate

Source: <https://experience.arcgis.com/experience/5065c998b4b0462f9ec3c6c226c610a9>

4.21 Mandatory Findings of Significance

Threshold 4.21 – Would the Project:	Potentially Significant or Significant Impact	Less Than Significant Impact with Mitigation	Less Than Significant Impact	No Impact
a) Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		✓		
b) Have impacts that are individually limited, but cumulatively considerable? (Cumulatively considerable" means that the incremental effects of a Project are considerable when viewed in connection with the effects of past projects, the effects or other current projects, and the effects of probable future projects)?		✓		
c) Have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?		✓		

-
- a) Would the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?**
-

Impact Analysis – Less Than Significant with Mitigation Incorporated

As indicated in this Initial Study, project development may adversely impact Air Quality, Biological Resources, Cultural Resources, Geology and Soils (Paleontological Resources), and Tribal Cultural Resources. The following mitigation measures are required to reduce impacts to less than significant levels: AIR-1, BIO-1, BIO-2, CUL-1, CUL-2, and PALEO-1.

-
- b) Would the project have impacts that are individually limited, but cumulatively considerable? (Cumulatively considerable" means that the incremental effects of a Project are considerable when viewed in connection with the effects of past projects, the effects or other current projects, and the effects of probable future projects)?**
-

Impact Analysis – Less Than Significant with Mitigation Incorporated

The cumulative impacts analysis provided here is consistent with Section 15130(a) of the CEQA Guidelines, in which the study of the cumulative effects of a project is based on two determinations:

- Is the combined impact of this project and other projects significant?
- If so, is the Project's incremental effect cumulatively considerable, causing the combined impact of the projects evaluated to become significant? **The cumulative impact must be analyzed only if the combined effects are significant and the Project's incremental effect is found to be cumulatively considerable** (CEQA Guidelines §15130(a)(2) and (3)). **(emphasis added)**.

The City's General Plan EIR identified significant and unavoidable cumulative impacts in certain resource areas, including regional air quality and greenhouse gas emissions. These impacts are a result of regional growth and development beyond the control of any single project. The proposed Buffalo Grove Specific Plan Project would incrementally contribute to these cumulative conditions; however, the Project would comply with all applicable federal, state, and local regulations (including SCAQMD rules, Title 24 Energy Efficiency Standards, CALGreen, and the City's 2020 UWMP). Therefore, the project's contribution would not be cumulatively considerable under CEQA.

For all other topical areas, the General Plan EIR did not identify significant and unavoidable cumulative impacts. The analyses in this ISMND demonstrate that the Project's individual impacts are less than significant and, accordingly, the Project would not result in cumulatively considerable impacts.

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

Impact Analysis – Less Than Significant with Mitigation Incorporated

Under this threshold, the types of impacts analyzed consist of those that affect human health and well-being. As indicated by this Initial Study, the Project may cause or result in certain potentially significant environmental impacts that directly or indirectly affect human beings with respect to air quality, agriculture and forestry resources, geology and soils, energy, hazards, and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation, utilities and service systems, and wildfire. In instances where impacts have been identified, mandatory compliance with federal, state, or local law is currently in place that effectively reduces environmental impacts. Potentially significant impacts related to these resources are mitigated by Mitigation Measure **MM AIR-1**. Therefore, the potential adverse environmental impacts of the Project, in combination with the impacts of other past, present, and future projects, would not contribute to cumulatively significant effects.