

# **ARROW HIGHWAY RESIDENTIAL PROJECT**

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## ***CEQA Section 15183 Report***

***Prepared by:***



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***April 14, 2026***

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**CALIFORNIA ENVIRONMENTAL QUALITY ACT**  
**Statement of Reasons for Exemption from Additional**  
**Environmental Review and 15183 Checklist**  
**Pursuant to CEQA Guidelines Section 15183**

|                                                  |                                                                                                                                                                                                                                                             |
|--------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Project Title</b>                             | <i>Arrow Highway Residential Project</i>                                                                                                                                                                                                                    |
| <b>Project Location</b>                          | <i>911 and 927 West Arrow Highway,<br/>Upland, CA<br/>APN #s 1007-181-01 to -04; 1046-321-43</i>                                                                                                                                                            |
| <b>Project Description</b>                       | <i>Construction of 124 multi-family<br/>residential units within six buildings on a<br/>6.188-acre site</i>                                                                                                                                                 |
| <b>Project Applicant/Owner</b>                   | <i>Warmington Residential – Southern<br/>California Division<br/>3090 Pullman Street<br/>Costa Mesa, CA 92626</i>                                                                                                                                           |
| <b>Lead Agency Contact</b>                       | <i>Loralee Farris, Planning Manager<br/>Development Services Department<br/>City of Upland<br/>460 N. Euclid Ave, Upland, CA 91786<br/>Phone: (909) 931-4143<br/>Fax: (909) 931-4321<br/><a href="mailto:lfarris@uplandca.gov">lfarris@uplandca.gov</a></i> |
| <b>Project Site Zoning Designation</b>           | <i>RM20 – Multi-Family Residential (up to 20<br/>dwelling units per acre)</i>                                                                                                                                                                               |
| <b>Project Site General Plan<br/>Designation</b> | <i>MFR-L – Multi-Family Residential low (10-<br/>20 du/acre)</i>                                                                                                                                                                                            |

## **CEQA SECTION 15183**

CEQA Guidelines section 15183(a) provides that additional environmental review cannot be required for projects "... consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified ..." As a review streamlining measure, CEQA Section 15183(a) mandates that projects that are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified shall not require additional environmental review, except as necessary to examine whether there are project-specific significant effects that are peculiar to the Project or to its site.

In addition, CEQA Guidelines Section 15183(b) states that a public agency shall limit its examination of environmental effects to those the agency determines in an analysis, such as the following:

- ♦ Effects that are peculiar to the project or parcel on which the project would be located
- ♦ Effects that were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan with which the project is consistent
- ♦ Effects that are potentially significant off-site impacts and cumulative impacts that were not discussed in the prior EIR prepared for the general plan, community plan or zoning action
- ♦ Effects that are previously identified significant effects that, as a result of substantial new information that was not known at the time of EIR certification, are determined to have a more severe adverse impact than discussed in the prior EIR

## PROJECT APPROVALS

The Project applicant is requesting the following approvals from the City of Upland:

- ♦ Certification of a CEQA Section 15183 Report as adequate environmental documentation for the Project
- ♦ Approval of a Design Review through Development Plan Review No. DPR-25-0005
- ♦ Approval of Vesting Tentative Tract Map 20189
- ♦ Issuance of grading permits
- ♦ Issuance of building permits

## PROJECT DESCRIPTION

The Project includes a Vesting Tentative Tract Map 20819 and a Development Plan application of the following Project components for the 6.188-acre site located northwest of the West Arrow Highway/North San Antonio Avenue intersection at the addresses noted above.

## RESIDENTIAL COMPONENT

(Reference Exhibit A-1 – Project Site Plan)

The Project proposes to develop 124 units within 19 buildings, utilizing 6 floor plan models, on its 6.188-acre site. The Project will contain two- and three-story townhomes. This would equate to a gross density of 20.08 dwelling units/acre. The proposed composition of units is as follows:

| <i>Unit Grouping</i> | <i>Number of Units</i> | <i>Unit Square Footage</i> | <i>Bedrooms and Bathrooms Per Unit</i> |
|----------------------|------------------------|----------------------------|----------------------------------------|
| <i>Plan 1</i>        | <i>8</i>               | <i>1,459</i>               | <i>3 BD – 2.5 BA</i>                   |
| <i>Plan 2</i>        | <i>8</i>               | <i>1,476</i>               | <i>3 BD – 2.5 BA</i>                   |
| <i>Plan 3</i>        | <i>40</i>              | <i>1,440</i>               | <i>3 BD – 3 BA</i>                     |
| <i>Plan 4</i>        | <i>40</i>              | <i>1,710</i>               | <i>4 BD – 4 BA</i>                     |
| <i>Plan 5</i>        | <i>14</i>              | <i>1,501</i>               | <i>3 BD – 2.5 BA</i>                   |
| <i>Plan 6</i>        | <i>14</i>              | <i>1,539</i>               | <i>3 BD – 2.5 BA</i>                   |

## **OPEN SPACE COMPONENT**

The Project open space values below are based on a preliminary site plan dated May 12, 2026. Values are expected to remain similar in the final Project design.

- Required Common Open Space – 250 square feet/unit
- Total Provided Common Open Space – 42,790 square feet (345 square feet/unit)
- Provided Passive Open Space – 29,838 square feet (241 square feet/unit)
- Provided Active Open Space – 12,952 square feet (104 square feet/unit)
- Required Private Open Space – 100 square feet/unit with a minimum dimension of eight feet on any side
- Provided Private Decks/Balconies – 12,951 square feet (104 square feet/unit)

## **PARKING AND ACCESS COMPONENTS**

Parking is required pursuant to Chapter 17.11 of the Upland Municipal Code, as follows:

### **Required Parking Ratios**

- 1 Bedroom Units – 1 space /unit (in a garage)
- 2 Bedroom Units – 2 spaces/unit (in a garage)
- 3 Bedroom Units – 2.5 spaces/unit (including 2 in a garage)
- Guest Spaces – 1 space/6 units

### **Required Parking**

- 3 Bedroom Units – 84 Units – 168 garage spaces + 42 uncovered spaces
- 4 Bedroom Units – 40 Units – 80 garage spaces + 20 uncovered spaces
- Guest Spaces: 21 uncovered spaces
- Total – 331 spaces (248 garage spaces, 62 uncovered spaces, 21 uncovered guest spaces)

### **Provided Parking**

- Provided Parking: (2.7 spaces/unit)
- 331 total spaces (248 garage spaces; 62 uncovered spaces; 21 guest spaces. 5 accessible stalls included in total)

Vehicular access to the Project will be via a new access driveway from West Arrow Highway with emergency vehicle access (EVA) provided via an existing easement across the adjacent parcel to the east (APN: 1046-321-40).

## **LANDSCAPING COMPONENT**

(Reference Exhibit A-3 – Overall Landscape Plan)

The Project will contain landscape along the perimeter of the Project site, along both sides of the entry driveway to the Project, within the recreational amenity areas on the Project site, and at either end of the two largest buildings in the interior of the Project.

## **WALLS**

Project development will include a tan colored 6-foot-tall split-face block wall with pilasters and a precision decorative block cap that will extend along the entire non-Arrow Highway perimeter of the Project site. There also will be an entry monument at the Project entry adjacent to Arrow Highway. Section 17.15.180 of the Upland Municipal Code provides for an identification sign up to 24 square feet in area for each face, and not exceeding four feet in height, following the setbacks of the underlying zone.

## **PROJECT SITE AMENITIES**

The Project will include the following amenities in the southerly portion of the Project:

- A children's recreation area with a play structure, rubberized multi-color play surface
- Two picnic table areas with seating
- Bench seating
- Trash receptacles
- Two "Pet Stations"

The Project will also include paseos between the northerly buildings that include decorative concrete seat walls.

## **PROJECT SITE PREPARATION**

Project development will include demolishing the two existing residential buildings and several associated structures, removing existing trees, grading (38,000 cubic yards of cut; 700 cubic yards of fill), construction of retaining walls, wet/dry utilities, street work and flatwork. Also, the existing well on the Project site will be capped.

## **EXISTING SITE CONDITIONS**

The Project site is irregularly shaped as a “T” extending northward from West Arrow Highway. The site currently is occupied by two single-family residences in its southern portion and has paved portions along its southwestern and southeastern edges. Historic aerial images available as far back as 1938 depict the property as occupied by agricultural tree groves. By 1948, the groves in the northern portion of the Project site had been removed and the two residential structures had been constructed. All groves had been removed by 1959, and the two residential structures had been expanded. The paved areas had been constructed by 1964 and were designed as tennis courts, associated with Upland College, before they lost their charter in the 1960s. The Project site has remained largely unchanged since that time.

## **SURROUNDING LAND USES**

The Project site is bordered by single-family residential uses to the north; by single-family residential, multi-family residential, and public/institutional uses to the south; by single-family residential and public/institutional uses to the east; and by single-family residential uses to the west. Residential uses border more than 75 percent of the Project site.

## **OVERVIEW OF CEQA SECTION 15183 CHECKLIST**

California Public Resources Code Section 21083.3 and California Environmental Quality Act (CEQA) Guidelines Section 15183 provide an exemption from additional environmental review for projects consistent with the development density established by existing zoning, community plan or general plan policies for which an Environmental Impact Report (EIR) was certified, except as might be necessary to examine whether there are project-specific significant effects shall be limited to those effects that: (1) Are peculiar to the project or the parcel on

which the project would be located, and were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan, with which the project is consistent; (2) Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan, community plan or zoning action; or, (3) Are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR. Section 15183(c) further specifies that if an impact is not peculiar to the parcel or to the proposed project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, then an addition EIR need not be prepared for that project solely on the basis of that impact.

### ***GENERAL PLAN PROGRAM EIR/GPU ADDENDUM EIR***

As stated in the City of Upland General Plan 2035 (GPU 2035), adopted in September 2015, the General Plan establishes a new direction for the future of Upland. Last updated in its entirety in 1982, the 2015 General Plan Update provides a comprehensive and integrated “constitution” for growth and preservation in the City, which forms the basis for all other City plans, programs, ordinances and operations. GPU 2035, which specifically involves an update/reorganization of existing elements and addition of two elements, consists of the following nine State mandated and optional elements: Land Use; Community Character and Urban Design; Economic Sustainability; Circulation; Open Space and Conservation; Safety; Public Facilities and Services; Community Health; and Housing (adopted as part of a separate process). GPU 2035 anticipates that development would occur throughout the City and within the City’s Sphere of Influence (SOI). Additionally, the Focus Areas are locations in the City that have the potential to change significantly over the life of the General Plan.

Major components of GPU 2035 include the following:

- ♦ Update existing conditions, with year 2008 serving as the baseline year. ·
- ♦ Update General Plan development projections for population, employment, residential, and non-residential development to the year 2035, the projected horizon year. ·

- ♦ Add, delete, or modify existing General Plan Goals, Policies, and implementation actions.
- ♦ Update the Land Use Element with reorganized and new land use designations.
- ♦ Update remaining or add new General Plan Elements to reflect current conditions and account for new development projections.

The City of Upland's objectives for GPU 2035 are as follows:

- ♦ Update the City's baseline (i.e., existing) environmental conditions to the year 2008.
- ♦ Update the General Plan development projections for the year 2035, including projections for dwelling units, non-residential uses (square footage), population, and employment.
- ♦ Update the Land Use Element, including the establishment of Focus Areas with Policies specific to these areas.
- ♦ Create a new Community Character and Urban Design Element to identify, protect, and strengthen Upland's unique physical and visual resources, and guide the City's future physical development.
- ♦ Update the City's traffic model to reflect current conditions and plan for a multi-modal transportation system.
- ♦ Revise the General Plan noise and air quality databases based upon the updated traffic model.
- ♦ Update the General Plan for consistency with the proposed Cable Airport Land Use Compatibility Plan Update.
- ♦ Provide new Goals and Policies to address future development and growth within the City and SOI.
- ♦ Provide comprehensive and concise land use designations that better reflect the land use vision for the City.
- ♦ Incorporate sustainability Goals and Policies to balance current demands with future demands, as they pertain to the environment, economy, and social equity.

The GPU EIR also was designed to provide environmental documentation for the concomitant Zoning Code Update, the new City Climate Action Plan, and the Cable Airport Land Use Compatibility Plan Update.

*The Zoning Code Update was a comprehensive update to Upland Municipal Code (UMC) Title 17. The Zoning Code was updated to correspond to and implement*

*the updated General Plan. The Zoning Code Update included the following actions to implement the General Plan 2035:*

- ♦ Amend the Zoning Map and zoning district standards to ensure consistency with the Land Use Element; ·*
- ♦ Create new zoning districts and development standards to implement the proposed General Plan; ·*
- ♦ Include zoning standards to ensure the quality and environmental sustainability of future development; ·*
- ♦ Reorganize the Zoning Code to a more intuitive format, improving its clarity and consistency; and,*
- ♦ Integrate illustrations to enhance the Code's user friendliness. In addition to style and format changes, the Zoning Code Update includes various key revisions to existing standards and new or added provisions, which involve the following:*

The March 2025 Addendum to the General Plan EIR was prepared for the General Plan Update pertaining to the City's associated Housing Element Update for the 6<sup>th</sup> Cycle (2021-2029) and Zoning Code Update. The California Department of Housing and Community Development (HCD) assigned the City of Upland a "Regional Housing Needs Assessment" (RHNA) of 5,686 residential units to be achieved in a range of income categories. The City's Housing Element was adopted on September 23, 2024, after responding to multiple comments from HCD. The adopted 6<sup>th</sup> Cycle Housing Element identifies rezoning of approximately 157 acres on 261 parcels that would provide an opportunity to increase net housing in the City by approximately 3,114 dwelling units. These units are counted in addition to units available under existing zoning to assist the City to meet its required RHNA units. Based on a persons per dwelling unit factor of 2.69, this would equate to an added population of 8,377 persons.

## ***SUMMARY OF FINDINGS***

The Arrow Highway Project is consistent with the GPU EIR and GPU Addendum EIR analyses. In addition, the GPU EIR and GPU Addendum EIR adequately anticipated and described Project impacts, identified applicable Mitigation Measures needed to reduce Project specific impacts. The Project implements relevant Mitigation Measures, as contained in the topical analyses that follow.

The attached Section 15183 Exemption Checklist provides a comprehensive environmental evaluation for the Project. The evaluation concludes that the Arrow Highway Project qualifies for an exemption from additional environmental review because it is consistent with the current residential density and use allowed by the City Zoning Ordinance. Therefore, all required Findings can be made.

***1. The Project is consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified.***

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The Arrow Highway Project would develop 124 attached dwelling units with recreational amenities, parking and landscaping on a 6.188-acre site. The density of the Project is consistent with development density established by the City of Upland General Plan and the Upland Municipal Code. The Project would comply with all applicable Municipal Code requirements.

***2. There are no Project specific effects which are peculiar to the Project or its site, and which the GPU EIR failed to analyze as significant effects.***

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The Arrow Highway Project site is similar to the surrounding area, which is occupied by residential and public/institutional uses. The Project site is an infill site that does not support any peculiar environmental features, and the Project would not result in any peculiar effects. However, the GPU Addendum EIR did not conduct a Vehicle Miles Traveled (VMT) analysis in that CEQA did not require such an analysis at the time the GPU EIR was certified. However, the Arrow Highway Project traffic consultant did provide a Memorandum (reference Appendix B) that indicated the Project was considered sufficiently low generating to not require a full VMT analysis.

***3. There are no potentially significant off-site and/or cumulative impacts which the GPU EIR failed to evaluate.***

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The GPU Addendum EIR determined impacts associated with the CEQA-defined topic of Land Use would be less than significant because the General Plan Update for the 6<sup>th</sup> Cycle Housing Element “would not conflict with applicable land use plans, policies, or regulations, or result in land use conflicts.” No mitigation

measures were identified because implementation of applicable General Plan policies/actions and the Zoning Code update and CALUCP standards and guidelines would ensure all impacts pertaining to Land Use were less than significant.

The Arrow Highway Project is consistent with density and use characteristics and with development regulations considered by the GPU and GPU Addendum EIR and would represent a small part of the growth forecast for GPU 2035 build out. The adopted 6<sup>th</sup> Cycle Housing Element identifies rezoning of approximately 157 acres on 261 parcels that would provide an opportunity to increase net housing in the City by approximately 3,114 dwelling units. These units are counted in addition to units available under existing zoning to assist the City to meet its required RHNA units. Based on a persons per dwelling unit factor of 2.69, this would equate to an added population of 8,377 persons. The GPU Addendum EIR considered incremental impacts of the Project, and as explained in the Section 15183 Analysis, no potentially significant off-site or cumulative impacts have been identified that were not evaluated previously. There is no substantial new information which results in more severe impacts than anticipated by the GPU EIR.

As explained in the 15183 Analysis, no new information has been identified that would result in a determination of a more severe impact than what had been anticipated by the GPU EIR or GPU Addendum EIR.

***4. There is no substantial new information which results in more severe impacts than anticipated by the GPU EIR.***

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As explained in the 15183 Analysis, no new information has been identified that would result in a determination of a more severe impact than what had been anticipated by the GPU EIR.

***5. The Project will undertake feasible Mitigation Measures specified in the GPU EIR.***

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As explained in the 15183 Analysis, the Project will undertake feasible Mitigation Measures specified in the GPU EIR and as maintained in the GPU Addendum EIR. These GPU EIR Mitigation Measures will be implemented through Project design,

compliance with City, State, Regional Agency, and Federal regulations and ordinances, or through the City-assigned Conditions of Approval for the Project.

## **CEQA GUIDELINES SECTION 15183 ANALYSIS**

### **Overview**

The following is an analysis of potential environmental impacts resulting from development and operation of the Arrow Highway Project. Following the format of CEQA Guidelines Appendix G, environmental effects are evaluated to determine if the Project would result in a potentially significant impact triggering additional review under Guidelines Section 15183.

- ♦ Impact levels of impacts identified were identified for each CEQA Threshold category

A Project does not qualify for a Section 15183 exemption if it is determined that it would result in: 1) a peculiar impact that was not identified as a significant impact under the GPU EIR; 2) a more severe impact due to new information; or, 3) a potentially significant off-site impact or cumulative impact not discussed in the GPU EIR.

Following is a summary of the analysis of each potential environmental effect for each CEQA subject area. A list of technical studies and other references used to support the analysis is provided in Attachment A to this analysis.

# 1. AESTHETICS

## *Would the Project...*

- 1(a) Have a substantial adverse effect on a scenic vista?*
- 1(b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*
- 1(c) In nonurbanized areas substantially degrade the existing visual character or quality of the site and its surroundings (public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*
- 1(d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?*

### *1(a) Have a substantial adverse effect on a scenic vista?*

The GPU EIR and GPU Addendum EIR concluded this impact to be less than significant. Scenic vistas generally refer to views from a particular location or composite views along a public roadway or trail. Scenic vistas can be subjective and vary according to the person conducting the view but generally refers to views of natural lands but also may be compositions of natural and developed areas, or views of developed and unnatural lands. Visual resources and/or addition of residential structures may (or may not) adversely affect the vista. Determining the level of impact to a scenic vista requires assessment of changes to the vista in its entirety and to individual visual resources.

The GPU Addendum EIR indicated Upland and its Sphere of Influence were more than 95 percent developed. In addition, given this built out condition, it was anticipated that future development in the City would consist of infill and redevelopment projects. Implementation of the GPU 2035 Housing Element potentially could result in development of approximately 3,114 additional residential units. This development capacity was considered the most

intensive development presumption and was assumed in the GPU Addendum EIR impact analysis.

The Arrow Highway Project site is located in the southern portion of the City, which is noted as at a lower elevation with relatively flat land. The GPU EIR states that properties in the southern portion of the City are generally flat and do not enjoy the scenic vistas that properties in the northern portion of the City enjoy. The Project site elevation ranges from 1269 to 1285 feet above mean sea level. Therefore, future development according to that contemplated in the GPU EIR is not anticipated to significantly impact distant scenic vistas. Future development also would be subject to implementation of the City Zoning Code regulations, guidelines and development review process, which are intended to diminish any conflicts between urban development and visual resources/scenic vistas. The GPU EIR states that no further mitigation is required beyond implementation of General Plan policy, Zoning Code standards and requirements, and Cable Airport Land Use Compatibility Plan (CALUCP) standards and guidelines.

As discussed above, the GPU EIR and GPU Addendum EIR determined impacts on scenic vistas were less than significant. As the Arrow Highway Project also would have a less than significant impact for reasons provided above, the Project would be consistent with the GPU EIR analysis because the Project would not create new impacts, increase identified impacts, and there would be no new information of substantial importance than the information identified in either GLPU EIR or in the GPU Addendum EIR.

***1(b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?***

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The GPU EIR states that no officially designated State Scenic Highways traverse Upland. Therefore, implementation of the General Plan would not substantially damage scenic resources within a State scenic highway. GPU 2035 deleted the previous Scenic Highways Element in favor of taking a focused development strategy implemented through five “Focus Areas.” However, GPU 2035 identified a Goal that is “a City with vibrant, aesthetically pleasing, and functional corridors” and thereby stipulates Policies that address streetscape features and consistency, and street tree canopies. All future development in

Upland would be subject to consistency with these Policies. Together with City Zoning Code requirements, future development in compliance with GPU 2035 would ensure scenic resources within a scenic corridor would not be damaged.

The Arrow Highway Project site is not located within a Focus Area and not located adjacent to a designated scenic corridor. The Project would be consistent with the GPU EIR analysis because the Project would not create new impacts, increase identified impacts, and there would be no new information of substantial importance than the information identified in the GPU EIR or in the GPU Addendum EIR.

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***1(c) In nonurbanized areas substantially degrade the existing visual character or quality of the site and its surroundings (public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?***

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The GPU EIR states that implementation of the residential component of GPU 2035 (3,026 additional dwelling units) would gradually, but permanently, alter the visual character of the future development sites and their surroundings. The GPU Addendum EIR states that Housing Element revisions would contemplate development of 3,114 additional dwelling units in Upland. Undeveloped lands would be replaced with urban improvements (structures; hardscape; landscape; supporting infrastructure). The Project site is not located within any of the five Focus Areas explained previously. Each of these Areas would have individualized approaches to guide future growth and/or preservation.

The GPU EIR states all future development within the City would be evaluated on a project-by-project basis in order to verify compliance with GPU 2035 Policies and with Zoning Code standards. The GPU 2035 Policies are contained in the GPU EIR. These Policies pertain to the following, which are most relevant to the Project: Place Making; Contextual Design Themes; Enhanced Design Character; Cohesive Design; Site Design Principles; Building Design Principles; and Street Trees. GPU EIR Mitigation Measures pertaining to potential Aesthetics impacts are provided below.

The Arrow Highway Project site is located within an urbanized area and is surrounded by existing residential and public uses. Project site zoning was recently changed to RM-20, which would allow the Project density of 20.08 dwelling units per acre. The Project would comply with all Municipal Code requirements and GPU 2035 Goals and Policies pertaining to maintaining the quality of the Project area.

The Project would not detract from, or contrast with the existing aesthetic character or quality of the surrounding residential/public use areas for the following reasons. The Project is consistent with the City Zoning Code density allowed on-site. The Project site is located within an infill area developed with similar uses. In addition, the location, size, and design of the residential Upland Manor Project would be compatible with surrounding uses.

As previously discussed, the GPU EIR determined impacts on visual character or quality to be less than significant with the following Mitigation Measures. The Arrow Highway Project would have a less than significant impact for reasons discussed previously. Therefore, the Project would be consistent with the analysis in the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified in the GPU EIR or in the GPU Addendum EIR.

***1(d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?***

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The GPU EIR indicates that GPU 2035 Implementation would not create new sources of light/glare that could adversely affect views in the area. The GPU Addendum EIR maintains this same determination.

Project implementation would allow for future development of residential and non-residential land uses within the Focus Areas and throughout the City. New development could cause light and glare impacts through new light sources such as street lighting, interior and exterior building lighting including for safety purposes, vehicle headlights, illuminated signage, traffic signals, sports field lighting, and new glare sources such as reflective building materials, roofing materials, and windows. These new sources of light and glare would be most visible from development along adjacent roadways, and to receptors such as residents and traveling motorists. All lighting provided with the City's

future development would be subject to compliance with the Outdoor Lighting provisions of the City Municipal Code, establishing minimum requirements for outdoor lighting in order to reduce light trespass and glare and protect the health, property, and well-being of residents and visitors. Implementation of the Zoning Code provisions in the lighting of future developments would ensure proper design, installation, and operation of all exterior lighting, thereby reducing the potential for glare effects and light spillover onto adjacent properties. As such, consistency with the Zoning Code would ensure that potential impacts associated with light and glare would be less than significant. Future development within the City would be evaluated on a project-by-project basis in order to verify compliance with Zoning Code requirements.

The Arrow Highway Project vicinity has an urban character and high nighttime light levels from street lights and light fixtures attached to exterior building facades. Vehicle headlights from autos traversing adjacent to the Project site also contribute to nighttime lighting. Although glare is primarily a daytime phenomenon caused by sunlight reflecting from structures, roadways and vehicles, glare also can be created at night by vehicle headlights. Residential uses adjacent to the Project site would be the most sensitive to night lighting and glare.

As previously discussed, the GPU EIR determined light and glare impacts to be less than significant with compliance with GPU 2035 Policies and Municipal Code requirements. The Project would have a less than significant impact with no required mitigation for reasons detailed above. Therefore, the Project would be consistent with the analysis in the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified in the GPU EIR or in the GPU Addendum EIR.

### ***Mitigation Measures***

**AES-1** For future development located in or immediately adjacent to residentially zoned properties, construction documents shall include language that requires all construction contractors to strictly control the staging of construction equipment and the cleanliness of construction equipment stored or driven beyond the limits of the construction work area. Construction equipment shall be parked and staged within the project site, as distant from

the residential use, as reasonably possible. Staging areas shall be screened from view from residential properties.

**AES-2** Construction documents shall include language requiring that construction vehicles be kept clean and free of mud and dust prior to leaving the development site. Streets surrounding the development site shall be swept daily and maintained free of dirt and debris.

**AES-3** Construction worker parking may be located off-site with prior approval by the City. On-street parking of construction worker vehicles on residential streets shall be prohibited.

### ***Cumulative Impacts***

The City is urbanized and approximately 95 percent built out. Project implementation would result in growth within the City but not within the GPU 2035 identified Focus Areas. Cities surrounding Upland are developed and urbanized with similar density and character. New development within those cities would contribute to the region's urban character. New development would be reviewed on a project by-project basis, in order to ensure each City's development standards are met and new development is compatible with the existing and desired regional and local urban and natural environment. Additionally, implementation of GPU 2035 Policies and Actions would enhance the Upland's physical setting and reduce the incremental aesthetic impact on the region to a level of insignificance. Compliance with the Municipal Code development standards would ensure preservation of visual resources and compatibility. Moreover, Project implementation would not result in any regional aesthetic impacts that extend beyond the City's borders. Therefore, GPU 2035 and Arrow Highway Project implementation would not result in cumulatively considerable aesthetic impacts.

### ***Conclusion***

With regard to the topical issue area of Aesthetics, the following findings can be made.

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR or in the GPU Addendum EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR or in the GPU Addendum EIR.
4. **Mitigation Measures AES-1 through AES-3** contained within the GPU EIR and maintained by the GPU Addendum EIR would be required to ensure any Arrow Highway Project-specific impacts pertaining to Aesthetics would be reduced to a less than significant level.

## 2. AGRICULTURE/FORESTRY RESOURCES

### *Would the Project...*

- 2(a) *Convert Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, or other agricultural resources, to a non-agricultural use?*
- 2(b) *Conflict with existing zoning for agricultural use, or a Williamson Act contract?*
- 2(c) *Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production?*
- 2(d) *Result in the loss of forest land or conversion of forest land to non-forest use?*
- 2(e) *Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, or other agricultural resources, to non-agricultural use or conversion of forest land to non-forest use?*

- 2(a) ***Convert Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, or other agricultural resources, to a non-agricultural use?***

No Impact. The GPU EIR recognizes that no agricultural or timberland land use or zoning designations apply to the Project site. The Arrow Highway Project site is not used for agricultural purposes and is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance. Rather, the City General Plan and Zoning Code land use designations for the Project site are,

respectively, RM-20 (Multi-Family Residential (up to 20 dwelling units per acre) and MFR-L (Multi-Family Residential Low – 10-20 du/acre).

**2(b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?**

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No Impact. The Arrow Highway Project site is not used for agricultural purposes and is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance. Additionally, the Project site is not the subject of a Williamson Act contract.

**2(c) Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production?**

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No Impact. The Arrow Highway Project site is located within an urbanized area, bordered on all its sides by development. The Project site is not zoned for forest land, timberland, or Timberland Production.

**2(d) Result in the loss of forest land or conversion of forest land to non-forest use?**

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No Impact. The Arrow Highway Project site is not zoned for forest land, timberland, or Timberland Production. No forest land or timber land exists on the Project site.

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

---

No Impact. The GPU EIR recognizes that no agricultural or timberland land use or zoning designations apply to the Arrow Highway Project site. The Project site is not used for agricultural purposes and is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance. Furthermore, the Project site is not zoned for forest land, timberland, or Timberland Production.

Therefore, Arrow Highway Project development would not convert Farmland or other agricultural resources to non-agricultural use and would not convert forest land to non-forest use.

*Mitigation Measures*

None Required.

***Cumulative Impacts***

None.

***Conclusion***

With regard to the topical issue area of Agriculture/Forestry Resources, the following findings can be made.

1. No peculiar impacts to the Project or its site have been identified.
5. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR or in the GPU Addendum EIR.
6. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR or in the GPU Addendum EIR.
7. No Mitigation Measures contained within the GPU EIR and as similarly determined by the GPU Addendum EIR would be required because there would be no Project-specific impacts pertaining to Agriculture and Forestry Resources.

### 3. AIR QUALITY

#### *Would the Project...*

- 3(a) *Conflict with or obstruct implementation of the South Coast Air Quality Management Plan?*
- 3(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?*
- 3(c) *Expose sensitive receptors to substantial pollutant concentrations?*
- 3(d) *Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*
- 3(e) *Conflict with or obstruct implementation of the South Coast Air Quality Management Plan?*

#### **3(a) Conflict with or obstruct implementation of the South Coast Air Quality Management Plan?**

The GPU EIR determined that this impact level is less than significant, which also was the determination of the GPU Addendum EIR. This determination was made using the Air Quality Management Plan. South Coast Air Quality Management District (SCAQMD) updates the Air Quality Management Plan (AQMP) every few years. The most current AQMP is the 2022 Plan. The GPU EIR indicates that SCAQMD construction emissions thresholds are considered to be temporary in duration and have the potential to result in a significant air quality impact. Construction activities associated with GPU 2035 implementation would result in emissions of criteria air pollutants and precursors from site preparation (e.g., demolition, excavation, grading, and clearing); exhaust from off-road equipment, material delivery trucks, and worker commute vehicles; vehicle travel on roads; and other activities such as building construction, asphalt paving, application of architectural coatings, and trenching for utility installation). Future development of individual

projects would be reviewed by the City to ensure development occurs logically and consistently with GPU 2035 Policies and Actions.

The GPU 2035 Air Quality Element includes Policies and Actions that would reduce air quality impacts of future developments within the City. Development projects occurring in accordance with the Project would be required to comply with GPU 2035 Policies and Actions, and SCAQMD regulations, and would incorporate mitigation measures, as feasible, to reduce air quality impacts. The GPU 2035 Circulation, Land Use, Air Quality, Open Space and Conservation, and Health and Safety Elements contain Goals pertaining to regional mobility, reduced vehicle trips, energy efficiency, smart land use patterns, and emergency management, which are consistent with SCAG's Regional Transportation Plan goals and Compass Growth Visioning Regional Growth Principles. According to the GPU EIR, no further mitigation is required beyond implementation of the GPU Policies and Actions.

The GPU 2035 EIR states that projects that are consistent with population and employment forecasts identified in the SCAG Regional Comprehensive Plan and Guide are considered consistent with the AQMP because the Growth Management Chapter forms the basis of the AQMP land use and transportation control portions. The GPU EIR indicates that GPU 2035 growth projections are less than SCAG forecasts. Consistency with other SCAG regional planning documents is required. The GPU 2035 Circulation, Land Use, Air Quality, Open Space and Conservation, and Health and Safety Elements contain goals pertaining to regional mobility, reduced vehicle trips. Energy efficiency, smart land use patterns, and emergency management that are consistent with SCAG Regional Transportation Plan goals. GPU 2035 impacts are considered to be less than significant in that GPU 2035 does not conflict with or obstruct implementation of the South Coast Air Quality Management Plan. This furthermore supports the GPU EIR determination that this impact is less than significant.

Projects in the Air Basin with construction-related emissions that exceed any of the emission thresholds are considered to be significant under SCAQMD Guidelines. The "Air Quality and Greenhouse Gas Impact Study" prepared for the Project indicated the following CEQA significance thresholds for construction emissions are established for the Air Basin:

- ♦ Volatile Organic Compounds (VOC) – 75 pounds per day
- ♦ Nitrogen Oxide – 100 pounds per day
- ♦ Carbon Monoxide – 550 pounds per day
- ♦ Particulate Matter<sub>10</sub> – 150 pounds per day
- ♦ Particulate Matter<sub>2.5</sub> – 55 pounds per day
- ♦ Sulfur Dioxide – 150 pounds per day

The “Air Quality and Greenhouse Gas Impact Study” prepared for the Project indicated the following CEQA significance thresholds for operational emissions are established for the Air Basin.

- ♦ Volatile Organic Compounds (VOC) – 55 pounds per day
- ♦ Nitrogen Oxide – 55 pounds per day
- ♦ Carbon Monoxide – 550 pounds per day
- ♦ Particulate Matter<sub>10</sub> – 150 pounds per day
- ♦ Particulate Matter<sub>2.5</sub> – 55 pounds per day
- ♦ Sulfur Dioxide – 150 pounds per day

Localized project impacts significance assessment depends on whether ambient CO levels in the Project vicinity are above or below State and Federal CO standards. If ambient levels are below the standards, a project is considered to have a significant impact if project emissions result in an exceedance of one or more of these standards. If ambient levels already exceed a State or Federal standard, a project’s emissions are considered significant if they increase 1-hour CO concentrations by 1.0 ppm or more or 8-hour CO concentrations by 045 ppm or more. Following are applicable local emission concentration standards for CO:

- ♦ California State 1-hour CO standard of 20.0 ppm
- ♦ California State 8-hour standard of 9.0 ppm

GPU 2035 development air emissions may have the potential to exceed State and Federal air quality standards in the vicinity of the Arrow Highway Project, even though these pollutant emissions may not be sufficiently significant to create a regional impact to the South Coast Air Basin. SCAQMD has developed Localized Significant Thresholds (LST) to assess Project-related air emissions in the Project vicinity. The methodology to analyze local air emission impacts found that primary emissions of concern are Nitrogen Oxide, Carbon

Monoxide, Particulate Matter<sub>2.5</sub>, and Particulate Matter<sub>10</sub>. The SCAQMD CEQA Handbook identifies two key indicators of consistency:

- ♦ 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 Air Quality Management Plan.
- ♦ Whether the project will exceed the assumption in the Air Quality Management Plan in 2022 or increments based on the year of project buildout and phase.

The “Air Quality and Greenhouse Gas Impact Study” prepared for the Arrow Highway Project evaluated both criteria, as follows:

#### **Criterion 1 – Increase in Frequency or Severity of Violations**

Based on the air quality modeling analysis in the Impact Study, neither short-term Project development (construction) impacts, nor long-term Project operation will result in significant impacts based on the SCAQMD regional and local thresholds of significance. Therefore, the Arrow Highway Project is not projected to contribute to the exceedance of any air pollutant concentration standards and is found to be consistent with the Air Quality Management Plan for this criterion.

#### **Criterion 2 – Exceed Assumptions in the Air Quality Management Plan**

The emphasis of this criterion is to ensure the analyses conducted for the Arrow Highway Project are based on the same forecasts as the Air Quality Management Plan. The 2020-2045 SCAG Regional Transportation/Sustainable Communities Strategy includes chapters on challenges in a changing region, creates a plan for the region’s future, and sets a path for greater mobility and sustainable growth. This document responds directly to Federal and State requirements placed on SCAG. Local governments are required to use these as the basis of their plans for purposes of consistency with CEQA. For the Arrow Highway Project, the City of Upland General Plan Land Use Plan defines assumptions represented in the Air Quality Management Plan. The Arrow

Highway Project currently is designated as residential in the City of Upland General Plan and in the City Municipal Code. Thereby, the Project is not anticipated to exceed Air Quality Management Plan assumptions for the Project site and is found to be consistent with the Air Quality Management Plan for the second criterion.

The “Air Quality and Greenhouse Gas Impact Study” concludes that based on the above analysis, the Arrow Highway Project will not result in an inconsistency with the SCAQMD Air Quality Management Plan and therefore a less than significant impact will result.

The Arrow Highway Project would have a less than significant impact related to air quality plans for the reasons detailed above. As the Arrow Highway Project would be consistent with the analysis in the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR or GPU Addendum EIR.

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***3(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?***

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The GPU EIR concludes this impact would be significant and unavoidable, a determination maintained in the GPU Addendum EIR. GPU 2035 build out would result in a cumulatively considerable net increase of any criteria pollutant for which the GPU 2035 region is non-attainment under an applicable Federal or State ambient air quality standard, the GPU EIR states that buildout of GPU 2035 would result in significant and unavoidable impacts pertaining to the following.

- ♦ Short-Term Construction Emissions, which are anticipated to exceed SCAQMD thresholds
- ♦ Long-Term Mobile and Stationary Source Emissions, due to the magnitude of future anticipated development
- ♦ Cumulative Short-Term Construction and Long-Term Mobile and Stationary Source Emissions Impacts in that any project that cannot be mitigated to a level of less than significant also is significant on a cumulative basis.

Development in accordance with GPU 2035 would increase regional Ozone pollutants, specifically reactive organic compounds and nitrogen oxides. The GPU EIR contains Mitigation Measures included below that would reduce emissions of criteria pollutants. It is noted that mobile source SOX, PM10, and PM2.5 emissions would increase from existing conditions. The precise level of these impacts would be determined during review of individual projects and appropriate mitigation measures would be developed if necessary. However, according to the GPU EIR, due to the magnitude of development anticipated by GPU 2035, and associated mobile and stationary source emissions, impacts would be significant and unavoidable.

All other air quality impacts associated with buildout of GPU 2035 would be less than significant.

Mobile source emissions are based on trip generation and traffic data provided in the GPU EIR Traffic Impact Analysis and encompass vehicular emissions for all trips captured or generated within the City limits. GPU 2035 traffic forecasts were based on the proposed land use changes. As previously noted, mobile source emissions are the largest emissions source in the City. The GPU EIR states that GPU 2035 Policies and Actions would reduce mobile source emissions. Specifically, by reducing mobile source emissions by promoting employment opportunities within the City and encouraging employers to offer incentives for ridesharing. Additionally, it is a GPU 2035 Goal to provide an interconnected network of bicycle, pedestrians, and transit facilities that accommodate and encourage travel through non-automotive modes. GPU 2035 Policies would incorporate transit facilities into design of land use plans and facilitate the development of community-serving transit within the City. Additionally, GPU Policies focus on developing a pedestrian and bicycle system that would encourage alternate modes of transportation.

However, according to the GPU EIR buildout contemplated under GPU 2035 is not expected to expose sensitive receptors to substantial pollutant concentrations and is therefore considered a less than significant impact. GPU 2035 has Goals and Policies to improve air quality within the City by promoting land use patterns such as compact development and mixed use to reduce the number and length of motor vehicle trips, and require that proposed development projects be reviewed, in accordance with CEQA to ensure projects incorporate feasible measures that reduce construction and operational

emissions through project design. GPU 2035 would address localized impacts through implementation of Policies that require separation of sensitive land uses from pollutant sources, provide buffers from toxic air sources preparation of a health impact assessment (HIA).

Cumulative impacts from construction are identified as significant and unavoidable as are GPU 2035 impacts to regional air quality. Future site-specific development proposals would be evaluated for potential air emissions once development details have been determined and are available. Individual development projects may not result in significant air quality emissions. Although individual development projects have the potential to exceed SCAQMD thresholds, GPU 2035 Policies and Actions would help to reduce the significance of their impact on air quality. Development in accordance with the Arrow Highway Project would increase regional ozone precursor pollutants over current conditions, specifically reactive organic compounds and nitrogen oxides. CEQA review of individual development projects would include an evaluation to determine whether potential air pollutant emissions generated from growth could result in a significant impact to air quality. The significance level of these impacts would be determined during review and appropriate mitigation measures would be developed, if needed. Depending on the specific air quality impact, **Mitigation Measures AQ-9 through AQ-14** below would be required to reduce emissions of criteria pollutants. However, due to the magnitude of development anticipated by GPU 2035 and the certified 6<sup>th</sup> cycle Housing Element build out, and associated mobile and stationary source emissions, impacts would be significant and unavoidable in this regard.

As discussed in 3(a) above, the “Air Quality and Greenhouse Gas Impact Study” prepared for the Arrow Highway Project evaluated both SCAQMD CEQA Handbook criteria, as follows and conclude that:

- ♦ Based on the air quality modeling analysis in the Impact Study, neither short-term Project development (construction) impacts, nor long-term Project operation will result in significant impacts based on the SCAQMD regional and local thresholds of significance.
- ♦ The Arrow Highway Project currently is designated as residential in the City of Upland General Plan and in the City Municipal Code.

Thereby, the Arrow Highway Project is not anticipated to exceed Air Quality Management Plan assumptions for the Project site and is found to be consistent with the Air Quality Management Plan for the second criterion.

**Other Impact Study conclusions are as follows:**

The “Air Quality and Greenhouse Gas Impact Study” prepared for the Arrow Highway Project found that Project construction emissions would not exceed the SCAQMD daily emission thresholds at the regional level and therefore would be considered a less than significant impact. Therefore, a less than significant local air quality impact would result from Project development.

In addition, the Impact Analysis indicates the Arrow Highway Project does not exceed the SCAQMD daily emission threshold and regional operational emissions are considered to be less than significant.

The Arrow Highway Project would have a less than significant impact related to air quality plans for the reasons detailed above. As the Project would be consistent with the analysis in the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR or the GPU Addendum EIR.

***3(c) Expose sensitive receptors to substantial pollutant concentrations?***

Carbon monoxide (CO) emissions are a function of vehicle idling time, meteorological conditions and traffic flow. Under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthy levels (i.e., adversely affect residents, school children, hospital patients, the elderly, etc.). To identify CO hotspots, the SCAQMD requires a CO microscale hotspot analysis when a project increases the volume-to-capacity ratio (also called the intersection capacity utilization) by 0.02 (two percent) for any intersection with an existing level of service (LOS) D or worse. Because traffic congestion is highest at intersections where vehicles queue and are subject to reduced speeds, these hot spots are typically produced at intersection locations. However, forecast City-wide intersection capacity/queuing conditions were known. The City is located in the South Coast Air Basin, which is designated as an attainment area for State and Federal

CO standards. Three major control programs have contributed to the reduction of per-vehicle CO emissions: exhaust standards, cleaner burning fuels, and motor vehicle inspection/maintenance programs. A detailed CO analysis was conducted in the Federal Attainment Plan for Carbon Monoxide (CO Plan) for the SCAQMD's 2003 Air Quality Management Plan. Locations selected for microscale modeling in the CO Plan are worst-case intersections in the SCAB and would likely experience the highest CO concentrations. Of these locations, the Wilshire Boulevard/Veteran Avenue intersection experienced the highest CO concentration (4.6 ppm), which is well below the 35-ppm 1-hr CO Federal standard. The Wilshire Boulevard/Veteran Avenue intersection is one of the most congested intersections in Southern California with an average daily traffic (ADT) volume of approximately 100,000 vehicles per day. As the CO hotspots were not experienced at the Wilshire Boulevard/Veteran Avenue intersection, it can be reasonably inferred that CO hotspots would not be experienced at any locations within the City, due to traffic volumes generated by future development in accordance with the Project. In addition, General Plan 2035 Policies would ensure intersections would operate at acceptable Levels of Service. Therefore, optimizing traffic flow through the City and reducing traffic queuing and impacts would be less than significant in this regard.

The Arrow Highway Project site is surrounded by residential and public uses, which are considered to be sensitive receptors. As previously discussed, the Project would have a less than significant impact pertaining to exposure of sensitive receptors to substantial pollutant concentrations. Development (construction)-generated pollutants would be temporary in duration and decreased with implementation of GPU 2035 Policies, Municipal Code requirements, South Coast Air Quality Management District (SCAQMD) requirements, and identified Mitigation Measures. As the Project would have a less than significant impact for the reasons detailed above, the Arrow Highway Project would be consistent with the analysis in the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified in the GPU EIR or the GPU Addendum EIR.

## Carbon Monoxide Hot Spot Emissions

### Health Impacts

In addition, the Impact Study prepared for the Arrow Highway Project found that none of the criteria pollutants analyzed would exceed local emissions thresholds at the nearest sensitive receptors. The applicable significance thresholds are established for regional compliance with State and Federal ambient air quality standards, which are intended to protect public health from both acute and long-term health impacts. In that regional and local emissions of criteria pollutants during Project development would be below applicable thresholds, Project development would not contribute to long-term health impacts pertaining to nonattainment of ambient air quality standards. Therefore, significant adverse acute health impacts resulting from Project development and Project operation are not anticipated.

### Toxic Air Contaminant Impact

The greatest potential for toxic air contaminant emissions would be related to diesel particulate emissions associated with heavy equipment operations used during Project development. The “Air Quality and Greenhouse Gas Impact Study” prepared for the Arrow Highway Project indicated that, given the relatively limited number of heavy-duty construction equipment and Project development, the Project would not result in a long-term substantial source of toxic air contaminant emissions and corresponding individual risk of cancer. In addition, construction-based Particulate Matter emissions do not exceed any local or regional thresholds. Therefore, no significant short-term toxic air contaminant impacts would occur during Project development.

The SCAQMD has demonstrated that there are no “hot spots” anywhere in the South Coast Air Basin. The worst-case intersections in the Air Basin have no “hot spot” potential and therefore any local impacts in the Upland Manor Project vicinity will be less than significant. The Arrow Highway Project is anticipated to generate only 950 daily vehicular trips. The 1992 Federal Attainment Plan for Carbon Monoxide demonstrated that an intersection that had a daily traffic volume of approximately 100,000 vehicles would not violate the CO standard. Since the volume at Arrow Highway Project buildout would

be well below 100,000 vehicles and below the necessary volume to get close to causing a violation of the CO standard. Therefore, no CO “hot spot” modeling was performed and the resultant level of impact would be less than significant.

The GPU 2035 Healthy Community Element and Open Space and Conservation Element address reduction of emissions during construction. Policies would require Best Management Practices (BMP) to reduce construction-related emissions, City review of construction plans to determine if all feasible mitigation measures are included, improvement of indoor and outdoor air quality through identified measures, and compliance with applicable SCAQMD rules (e.g., Rule 403 pertaining to control of excessive dust emissions by regular watering and other measures) and regulations and other control measures to reduce construction emissions. The GPU EIR provides Mitigation Measures but states GPU 2035 implementation would facilitate future development and generate construction emissions that would potentially exceed SCAQMD thresholds and result in a significant and unavoidable impact.

The “Air Quality and Greenhouse Gas Impact Study” prepared for the Arrow Highway Project states that for CEQA purposes a sensitive receptor is a location where a sensitive individual could remain for 24 hours or longer. The closest existing sensitive receptors to the Project site are residential land uses located adjacent to the Project site on at least 75 percent of the Project site perimeter. The Impact Analysis accumulated and analyzed data pertaining to “On-Site Pollutant Emissions (pounds/day) resulting from Project development (construction) activities. No Nitrogen Oxides, Carbon Monoxide, or Particulate Matter impacts would exceed CCAQMD thresholds. Therefore, a less than significant local air quality impact would result in terms of potential exposure of sensitive receptors to substantial pollutant concentrations. In addition, the Impact Study found that regional and local emissions of criteria pollutants during Project operation activities would be below applicable thresholds, the Project would not contribute to long-term health impacts related to nonattainment of ambient air quality standards. Therefore, the resultant level of impact would be less than significant.

As previously discussed, the GPU EIR determined that effects from exposure of sensitive receptors to substantial pollutant concentrations were less than significant impacts. As the Arrow Highway Project would have a less than

significant impact for reasons discussed above, the Project would be consistent with the analysis in the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified in the GPU EIR or the GPU Addendum EIR.

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**3(d) *Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?***

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The GPU EIR states that construction activities occurring under the Arrow Highway Project could also generate airborne odors associated with the operation of construction vehicles (i.e., diesel exhaust) and the application of architectural coatings. The GPU EIR states these odors “are not generally considered offensive. Emissions would occur during daytime hours only and would be isolated to the immediate vicinity of the construction site and activity.” Therefore, a substantial number of people would not be affected, and the resultant level of impact would be less than significant.

The “Air Quality and Greenhouse Gas Impact Study” prepared for the Project recognizes that Arrow Highway Project development may emit odors that include application of materials such as asphalt pavement. Objectionable odors that may be produced during Project development are short-term in nature and odor emissions are expected to cease upon drying or hardening of the odor producing materials. Diesel exhaust and Volatile Organic Compounds would be emitted during Project development. These emissions would disperse rapidly from the Project site and therefore should not reach an objectionable level at the nearest sensitive receptors. Due to the short-term nature and limited amounts of odor producing materials being utilized, no significant impact related to odors would occur during Project development. Potential sources of odors during Project operation would include odor emissions from trash storage areas. Due to the distance of the nearest receptors from the Project site and with compliance with SCAQMD Rule 402 no significant impact related to odors would occur during Project operation.

As previously discussed, the GPU EIR determined that effects from exposure to odors were less than significant impacts. As the Arrow Highway Project would have a less than significant impact for reasons discussed above, the Project would be consistent with the analysis in the GPU EIR because it would not create

new impacts, increase impacts, and there is no new information of substantial importance than identified in the GPU EIR or the GPU Addendum EIR.

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## **Mitigation Measures**

**AQ-1** Prior to issuance of any Grading Permit, the Development Services Director and the Engineering/Land Development Division shall confirm that the Grading Plan, Building Plans, and specifications stipulate that, in compliance with SCAQMD Rule 403, excessive fugitive dust emissions shall be controlled by regular watering or other dust prevention measures, as specified in the SCAQMD's Rules and Regulations. In addition, SCAQMD Rule 402 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off site. Implementation of the following measures would reduce short-term fugitive dust impacts on nearby sensitive receptors:

- All active portions of the construction site shall be watered twice daily to prevent excessive amounts of dust;
- Non-toxic soil stabilizers shall be applied to all inactive construction areas (previously graded areas inactive for 20 days or more, assuming no rain), according to manufacturers' specifications;
- All excavating and grading operations shall be suspended when wind gusts (as instantaneous gust) exceed 25 miles per hour;
- On-site vehicle speed shall be limited to 15 miles per hour;
- All on-site roads shall be paved as soon as feasible, watered twice daily, or chemically stabilized;
- Visible dust shall not cross the property line;
- All material transported off-site shall be either sufficiently watered or securely covered to prevent excessive amounts of dust prior to departing the job site;
- Track-out devices shall be used at all construction site access points;
- All delivery truck tires shall be watered down and/or scraped down prior to departing the job site;
- A construction relations officer shall be appointed to act as a community liaison concerning on-site construction activity including resolution of issues related to fugitive dust generation;
- Streets shall be swept at the end of the day if visible soil material is carried onto adjacent paved public roads and use of SCAQMD Rule 1186 and 1186.1 certified street sweepers or roadway; and
- Replace ground cover in disturbed areas as quickly as possible.

**AQ-2** All trucks that are to haul excavated or graded material on-site shall comply with State Vehicle Code Section 23114 (Spilling Loads on Highways), with special attention to Sections 23114(b)(F), (e)(4) as amended, regarding the prevention of such material spilling onto public streets and roads. Prior to the issuance of grading permits, the Applicant shall demonstrate to the City how the project operations subject to that specification during hauling activities shall comply with the provisions set forth in Sections 23114(b)(F), (e)(4).

**AQ-3** Prior to issuance of any Building Permit, the Development Services Director and the Engineering/Land Development Division shall confirm that the Building Plans and specifications include the following measures to reduce VOC emissions resulting from application of architectural coatings: · Contractors shall use high-volume-low-pressure (HVLP) paint applicators with a minimum transfer efficiency of at least 50 percent; · use required coatings and solvents with a VOC content lower than required under Rule 1113; construct/build with materials that do not require painting; and use pre-painted construction materials.

**AQ-4** Prior to issuance of any Grading Permit, the Development Services Director and the Engineering/Land Development Division shall confirm that the Grading Plan, Building Plans and specifications stipulate that ozone precursor emissions from construction equipment vehicles shall be controlled by maintaining equipment engines in good condition and in proper tune per manufacturer's specifications, to the satisfaction of the City Engineer. Equipment, maintenance records and equipment design specifications data sheets shall be kept on site during construction. The City Inspector shall be responsible for ensuring that contractors comply with this measure during construction.

**AQ-5** Electricity from power poles shall be used instead of temporary diesel or gasoline powered generators to reduce the associated emissions. Approval shall be required by the City Building and Safety Division prior to issuance of grading permits.

**AQ-6** Each individual implementing development project shall submit a traffic control plan prior to the issuance of a grading permit. The traffic control plan shall describe in detail safe detours and provide temporary traffic control during construction activities for that project. To reduce traffic congestion, the plan shall include, as necessary, appropriate, and practicable, the following: temporary traffic controls such as a flag person during all phases of construction to maintain smooth traffic flow, dedicated turn lanes for movement of construction trucks and equipment on- and off-site, scheduling of construction activities that affect traffic flow on the arterial system to off-peak hour, consolidating truck deliveries, rerouting of construction trucks away from congested streets or sensitive receptors, and/or signal synchronization to improve traffic flow.

**AQ-7** Building and grading permits shall include a general note that restricts idling of construction equipment on site to no more than five minutes.

**AQ-8** Proposed development projects that are not exempt from CEQA shall have construction-related air quality impacts analyzed using the latest available air emissions model, or other analytical method determined in conjunction with the SCAQMD. The results of the construction-related air quality impacts analysis shall be included in the development project's CEQA documentation. To address potential localized impacts, the air quality analysis may incorporate SCAQMD's Localized Significance Threshold analysis or other appropriate analyses as determined in conjunction with SCAQMD. If such analyses identify potentially significant regional or local air quality impacts, the City shall require the incorporation of appropriate mitigation to reduce such impacts.

#### **Current State of Project Compliance with MM-AQ-8:**

MM AQ-8 mandates a project-specific air quality analysis for projects that are not otherwise exempt. Construction activities for the 124 multi-family unit project are below the Upland General Plan EIR's implicit or explicit screening thresholds that would necessitate a new, full LST and regional emissions analysis. To confirm consistency, the project's Air Quality and Greenhouse Gas Impact Study, performed by MD ACCOUSTICS, demonstrates that the project's temporary construction emissions and project operational emissions, are

anticipated to be less than the SCAQMD's established regional and localized significance thresholds for criteria pollutants. Since the Project's impacts are demonstrably less than significant and consistent with the assumptions of the General Plan EIR, the condition triggering the requirement for a new, full-scope analyses or incorporation of appropriate mitigation as defined in MM-AQ-8 is not met. Therefore, MM-AQ-8 is not applicable to the Project, is deemed cleared and no further action is required under this specific measure.

**AQ-9** Prior to issuance of Building Permits, the Development Services Director and the Engineering/Land Development Division shall confirm that the Building Plans, and specifications stipulate that proposed developments within the City shall include, to the extent feasible, the following measures: · All residential and commercial structures shall be required to incorporate high efficiency/low polluting heating, air conditioning, appliances, and water heaters. · All residential and commercial structures shall be required to incorporate thermal pane windows and weather-stripping. · All new residential, commercial, and industrial structures shall be required to incorporate light colored roofing materials where it would not conflict with other design objectives.

**AQ-10** Future development projects within the City that include employers with 250 employees or more shall comply with SCAQMD Rule 2202, which requires the implementation of employee commute reduction programs.

#### **Current State of Project Compliance with MM-AQ-10:**

MM-AQ-10 is based on the operational requirements of SCAQMD Rule 2202 (On-Road Motor Vehicle Mitigation Options), which applies to large non-residential employers generating significant mobile source emissions during peak commute hours. The proposed project is the construction of 124 multi-family residential units. Residential projects do not meet the definition of a "worksite" or "employer" subject to SCAQMD Rule 2202. While the project will have temporary field construction workers (who are exempt from the Rule 2202 employee count) to carry out project construction, the long-term operational use of the completed project will not create a single, centralized employer with an employee count of 250 or more. Therefore, the significant impact that MM-AQ-10 was designed to mitigate is avoided by the Project's inherent nature, and no further action is required under this specific measure.

**AQ-11** To identify potential implementing development project-specific impacts resulting from operational activities, proposed development projects that are not exempt from CEQA shall have long-term operational-related air quality impacts analyzed using the latest available air emissions model, or other analytical method determined in conjunction with the SCAQMD (only for projects that are subject to a discretionary action and that require a General Plan amendment and/or Zone Change). The results of the operational-related air quality impacts analysis shall be included in the development project's CEQA documentation. To address potential localized impacts, the air quality analysis may incorporate SCAQMD's Localized Significance Threshold analysis, CO Hot Spot analysis or other appropriate analyses as determined in conjunction with SCAQMD. If such analyses identify potentially significant regional or local air quality impacts, the City shall require the incorporation of appropriate mitigation to reduce such impacts.

#### **Current State of Project Compliance with MM-AQ-11:**

MM-AQ-11 mandates a project-specific operational air quality analysis only when a project is not CEQA exempt and requires specific legislative actions, such as a General Plan amendment and/or Zone Change. This measure is designed to capture projects that represent substantial shifts in land use intensity not fully anticipated by the certified General Plan EIR. The proposed construction of 124 multi-family residential units is being processed under CEQA Guidelines Section 15183, which inherently demonstrates the project's land use is fully consistent with existing General Plan and Zoning designations. Because the project does not trigger the specific legislative approval conditions that are prerequisite to the analysis requirement, MM AQ-11 is not applicable to the project, is deemed cleared and no further action is required under this specific measure.

**AQ-12** Prior to the issuance of Building Permits, the Development Services Director and the Engineering/Land Development Division shall confirm that the Building Plans and specifications require signage to be posted at loading docks and all entrances to loading areas prohibiting all on-site truck idling in excess of five minutes.

### **Current State of Project Compliance with MM-AQ-12:**

MM-AQ-12 was incorporated into the Upland General Plan Update EIR as a programmatic measure to ensure future development projects adhere to state-mandated air quality controls and mitigate cumulative operational emissions. The proposed construction of 124 multi-family residential units does not include any industrial or high-volume commercial loading docks, which significantly differentiates the project from the type of development that would generate the impacts necessitating this measure. Therefore, MM-AQ-12 is not applicable to the Project, is deemed cleared and no further action is required under this specific measure.

**AQ-13** New sensitive land uses such as residential, schools, hospitals, medical offices, day care facilities, and fire stations to be located within the City shall not be located closer than 500 feet to the I-10 or SR-210 freeways, pursuant to the recommendations set forth in the CARB Air Quality and Land Use Handbook. If new sensitive land uses cannot meet this setback, they shall be designed and conditioned to include mechanical ventilation systems with fresh air filtration. For operable windows or other sources of ambient air filtration, installation of a central heating, ventilation, and air conditioning (HVAC) system that includes high efficiency filters for particulates (Minimum Efficiency Reporting Value [MERV] 13 or higher) or other similarly effective systems shall be required.

### **Current State of Project Compliance with MM-AQ-10:**

MM AQ-13 requires a minimum 500-foot setback for new sensitive land uses, such as the proposed project, from the I-10 and SR-210 freeways, consistent with CARB Air Quality and Land Use Handbook recommendations. If new sensitive land use cannot meet this setback requirement, then the measure would typically require project-specific mitigation, such as enhanced mechanical ventilation or air filtration to protect future residents. A review of Project plans and site-specific mapping confirms that the Project site is located well over 500 feet from the nearest edge of the I-10/SR-210 freeway right-of-way. Because the project exceeds the minimum setback, the potential significant impact from freeway-related toxic air contaminants is inherently

avoided by the Project's location. Therefore, the MM is cleared, and no further action is required under this specific measure.

**AQ-14** New sensitive land uses such as residential, schools, hospitals, medical offices, day care facilities, and fire stations shall not be located closer than 1,000 feet from any existing or proposed distribution center/warehouse facility which generates a minimum of 100 truck trips per day, or 40 truck trips with transport refrigeration units (TRUs) per day, or TRU operations exceeding 300 hours per week, pursuant to the recommendations set forth in the CARB Air Quality and Land Use Handbook. If new sensitive land uses cannot meet this setback, they shall be designed and conditioned to include mechanical ventilation systems with fresh air filtration. For operable windows or other sources of ambient air filtration, installation of a central heating, ventilation, and air conditioning (HVAC) system that includes high efficiency filters for particulates (Minimum Efficiency Reporting Value [MERV] 13 or higher) or other similarly effective systems shall be required.

#### **Current State of Project Compliance with MM-AQ-10:**

MM-AQ-14 requires a mandatory 1,000-foot setback for new sensitive uses, such as the proposed Project, from large air-contaminant sources, specifically high-volume truck-dependent facilities. A site-specific review and analysis of the Project's vicinity confirms that there are no existing or proposed distribution center/warehouse facilities within a 1,000-foot radius that meet or exceed the following operational thresholds: 100 truck trips per day, 40 TRU trips per day, or 300 TRU hours per week. Because the project site is located outside the required 1,000-foot exposure buffer from the identified risk sources, the significant impact of proximity-related TAC and particulate matter exposure is factually avoided by the project's location. Therefore, the MM is cleared, and no further action is required under this specific measure.

### ***Cumulative Analysis***

In summary, the GPU EIR states that buildout of GPU 2035 would result in significant and unavoidable impacts pertaining to the following. All other air quality impacts associated with buildout of GPU 2035 would be less than significant.

- ♦ Short-Term Construction Emissions, which are anticipated to exceed SCAQMD thresholds
- ♦ Long-Term Mobile and Stationary Source Emissions, due to the magnitude of future anticipated development
- ♦ Cumulative Short-Term Construction and Long-Term Mobile and Stationary Source Emissions Impacts in that any project that cannot be mitigated to a level of less than significant also is significant on a cumulative basis.

The GPU EIR states that SCAQMD thresholds were established for individual projects and do not apply to cumulative development or multiple projects. The GP2035-related air quality emissions would be regional in nature and not confined to Upland city limits in that motor vehicle destinations would vary widely and cross jurisdictional boundaries. Alternative transportation modes would reduce mobile source emissions. Future site-specific development proposals would be evaluated for potential air emissions. Although individual development projects have the potential to exceed SCAQM thresholds, GPU 2035 Policies and Actions would help to reduce the significance of Air Quality impacts.

The “Air Quality and Greenhouse Gas Impact Study” prepared for the Arrow Highway Project indicated the Project area is out of attainment for both Ozone and PM 10 Particulate Matter. Development and operation of cumulative projects will further degrade local air quality and South Coast Air Basin air quality. The greatest cumulative impact on quality of the regional air cell will be the incremental addition of pollutants primarily from increased traffic from residential, commercial, and industrial developments and use of heavy equipment and trucks associated with development of such projects. Air quality will be temporarily degraded during development activities that occur separately or simultaneously. However, in accordance with the SCAQMD methodology, projects that do not exceed the SCAQMD criteria or can be mitigated to less than criteria levels are not significant and do not add to overall cumulative impacts. The Arrow Highway Project does not exceed any of the thresholds of significance and therefore is considered less than significant.

## ***Conclusion***

With regard to the topical issue area of Air Quality, the following findings can be made.

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR or in the GPU Addendum EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR or by the GPU Addendum EIR.
4. **Mitigation Measures AQ-1 through AQ-14** contained within the GPU EIR and maintained by the GPU Addendum EIR would be required to reduce any Arrow Highway Project-specific impacts pertaining to Air Quality to the extent possible with some impacts being reduced to a less than significant level. As indicated in the GPU EIR, short-term construction emissions, long-term mobile and stationary source emissions and cumulative short-term construction and long-term mobile and stationary source emissions cannot be mitigated to less than significant levels. However, the Arrow Highway Project contribution to Air Quality impacts would be less than significant, as demonstrated in the attached Air Quality and Greenhouse Gas Emissions Analysis.

## 4. BIOLOGICAL RESOURCES

### *Would the Project...*

- 4(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?*
- 4(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 Wildlife or U.S. Fish and Wildlife Service?*
- 4(c) Have a substantial adverse effect on state or federally protected wetlands (including, but limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*
- 4(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?*
- 4(e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*
- 4(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?*

**4(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?**

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The GPU EIR indicates that with implementation of the recommended **Mitigation Measures** below, GPU 2035 build out would have a less than significant impact, directly or through habitat modifications, on species identified as a candidate, sensitive, or special status.

The GPU EIR indicates that the following Special Status Plant species that could occur within flood control facilities in the City include Parry's spineflower (*Chorizanthe parryi* var. *parryi*); Nevin's barberry (*Berberis nevini*); and Plummer's mariposa lily (*Calochortus plummerae*).

The GPU EIR indicates that the following Special Status animal species that are known to occur in Upland's vicinity and have a moderate likelihood of occurrence within the City exist only within the flood control facilities where suitable habitat is present: Northwestern San Diego pocket mouse (*Chaetodipus fallax*); Coastal horned lizard (*Phrynosoma coronatum* (*blainvillii* population)); Coastal California gnatcatcher (*Polioptila californica*); and San Diego desert wood rat (*Neotoma lepida intermedia*)

The GPU EIR indicates that the following special status wildlife species are known to occur in Upland's vicinity and have a moderate likelihood of occurrence within urbanized areas of the City: Pallid bat (*Antrozous pallidus*); and Western mastiff bat (*Eumops perotis californicus*). In addition, one special status wildlife species, the Burrowing Owl (*Athene cunicularia*) is known to occur in Upland's vicinity and has a moderate likelihood of occurrence within the City. Burrowing Owl may be found within flood control facilities and vacant fields.

Development anticipated by GPU 2035 would occur throughout urbanized portions of the City, primarily on previously developed underutilized lands. Additionally, the anticipated development would not occur within the flood control facilities. Therefore, Project implementation could have an adverse effect, either directly or through habitat modifications, on the Burrowing Owl,

which is a California Species of Special Concern. Due to the conceptual nature of the development anticipated by the Project, site specific proposals would require individual assessments of potential impacts to biological resources, including impacts to special status plant and wildlife species and their habitats (i.e., Pallid bat, Western mastiff bat, and Burrowing Owl), as part of the future projects' CEQA review processes; refer to **Mitigation Measures BIO-1 through BIO-4**. If necessary, additional mitigation would be required on a project-by-project basis to avoid or lessen potential biological impacts to less than significant. Therefore, with implementation of the recommended mitigation, GPU 2035 build out would have a less than significant impact, directly or through habitat modifications, on species identified as a candidate, sensitive, or special status.

In order to further minimize potential impacts to special status species and habitats, the GPU 2035 has adopted a focused development strategy that would be implemented through five Focus Areas targeted for land use change, all in urbanized areas. Also, the GPU 2035 designates approximately 830 acres within the Parks/Open Space land use category, which are designated green areas. This designation encompasses various forms of open space, such as natural hillside areas and retention basins (as well as active and passive public parks).

GPU 2035 has established Goals that address potential impacts to candidate, sensitive, or special status species and their habitats. All future development within the City would be subject to implementation of the Policies and Actions outlined below in furtherance of these goals.

HANA RESOURCES conducted a field reconnaissance survey of the 6.188-acre Project site on April 8, 2025, to identify any potential for occurrence of sensitive species, vegetation communities, or habitats to support sensitive wildlife species. The survey and research found that forty-six special-status plant species have been known to occur within the Biological Survey Area (BSA) and database search area of two miles extending outward from the Project site. However, it was concluded that none of the 46 have the potential to occur on the Project site, given consideration of habitat quality, soil type, impact from previous land use, and date and location of prior CNDDb and Jepson eFlora occurrence records. The literature review resulted in findings of one vegetation community that has been known to occur within a two-mile radius

of the Project site; however, Riversidean Alluvial Fan Sage Scrub was not detected within the BSA and has no potential to occur within the Project site. Review of appropriate literature indicate no special status plant species were in the BSA and none have a potential to occur within the BSA. Therefore, no focused surveys are required for sensitive plant species.

HANA RESOURCES surveys for sensitive animal species and related habitats identified eleven sensitive wildlife species were identified in a literature review. One of these species has a moderate potential to occur within the BSA; three species have low potential to occur within the BSA; the remaining seven species were found to have no potential to occur. None of these species were observed during the biological reconnaissance survey.

The field survey resulted in ten bird species, one reptile species being observed/detected in the BSA, and evidence of three mammal species being observed within the BSA.

Following the general reconnaissance survey, a Phase I Habitat assessment and Phase II burrow survey for the Burrowing Owl was conducted on the Project site and its 500-foot buffer. Subsequent focused Burrowing Owl surveys were conducted in 2025 to confirm the presence or absence of owls and to site use within the Project site.

A search of the CNDDDB database did not reveal the Burrowing Owl as a species of potential occurrence within the BSA. However, the Burrowing Owl has been reported in the neighboring cities of Claremont, Ontario, and Rancho Cucamonga and some verified sightings less than five miles from the BSA have occurred as recently as 2023. This, together with the presence of suitable grassland habitat, ample ground squirrel burrows and potential man-made refuges on-site, has led Project biologists to consider the Burrowing Owl as a species with a moderate potential to occur on the Project site.

The Phase I habitat assessment, conducted concurrently with the General Habitat Reconnaissance Survey, detected suitable Burrowing Owl habitat within the BSA. Suitable habitat includes annual and perennial grasslands, deserts, and scrublands characterized by low growing, where trees and shrub canopy cover less than 30 percent of the ground surface. The majority of the BSA consists of an open field dominated by low-growing grass; a large dirt mound

characterized by loose soil and perennial grasses is present within the center of the BSA and was determined to contain suitable Burrowing Owl habitat. Occurrence of Burrowing Owl habitat within the BSA necessitated deployment of Phase II burrow surveys.

Several abandoned ground squirrel burrows were found within the central mound on the Project site, some of which were sufficiently large and deep to accommodate Burrowing Owl occupancy. Nearby man-made materials offered potential perching areas for Burrowing Owls. Site investigators also detected a potential man-made Burrowing Owl burrow (a pile of rubble) within the southern portion of the BSA in the open lot between residential properties. Therefore, it is possible more potential burrows may be located within this area. Burrowing Owl occupancy of burrows was verified by observation of at least one Burrowing Owl, or its molted feathers, cast pellets, prey remains, eggshell fragments, or excrement at or near a burrow entrance. Neither the presence nor sign of Burrowing Owls was detected during Phase II Burrow surveys.

However, due to the presence of suitable habitat and potential burrows, focused Phase III Burrowing Owl surveys were conducted in 2025 in accordance with CDFW survey guidance. A total of four (4) protocol-level surveys were completed during the breeding season (April through June). No Burrowing Owls or signs (e.g., pellets, whitewash, feathers, or prey remains) were detected during any of the surveys. Although no Burrowing Owls were observed, suitable habitat remains present within the Biological Study Area (BSA), and the site retains the potential to support the species in the future.

Based on the results of the 2025 focused surveys, Burrowing Owls are not currently present within the BSA. Therefore, implementation of the Project would not result in direct impacts to occupied burrows or individual Burrowing Owls at the time of the analysis. However, due to the presence of suitable habitat and the species' ability to recolonize available burrows, there remains potential for Burrowing Owls to occupy the site prior to construction. As such, ground-disturbing activities could result in impacts if Burrowing Owls establish on-site.

It should be noted that CDFW currently is conducting a comprehensive status review of the western Burrowing Owl. This survey is expected to take 12-18

months to complete. During the survey time frame, the Burrowing Owl will continue to receive full CESA protection, after which time CDFW will decide whether to formally list the species as threatened or endangered based on survey findings. As a candidate species under CESA, the western Burrowing Owl now is legally protected from “take.” Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibits “take” of western Burrowing Owl without an Incidental Take Permit.

The following are Recommendations of the Biological Resources Evaluation.

- ♦ **Preconstruction Surveys:** Although focused surveys conducted in 2025 did not detect Burrowing Owls, preconstruction surveys are required due to the presence of suitable habitat and the species’ potential to recolonize the site. Surveys must adhere to requirements under CESA (within 14 days and 24 hours prior to ground disturbance), according to CDFW’s 2012 Staff Report on Burrowing Owl Mitigation. These guidelines outline avoidance, minimization, and mitigation strategies, including pre-construction surveys, standardized buffer setbacks, take avoidance measures, translocation efforts (active relocation offsite), and construction of artificial burrows.
- ♦ **Prohibition of Take and Mitigation Measures:** Construction activities near occupied burrows during the nesting season (February 1-August 31) must not occur within 500 feet of active burrows until a qualified biologist confirms nesting completion. Outside of the nesting season, passive relocation of Burrowing Owls using one-way does and furrow collapse remains permissible but must be conducted in consultation with California Fish and Wildlife and consistent with current CESA guidelines.
- ♦ **Incidental Take Permits:** Alternative conservation strategies (rather than acquiring an ITP) should be developed in coordination with California Department of Fish and Wildlife to promote Burrowing Owl population recovery. Any Incidental Take Permits issued during the Burrowing Owl candidacy period must explicitly state that the Permit along with its associated obligations for the permittee will expire prior to the stated termination date if the Burrowing Owl is no longer a candidate species and is not listed for protection under CESA.

If Burrowing Owls are detected during preconstruction surveys, the Project applicant shall coordinate with CDFW and implement a Burrowing Owl

Management Plan consistent with the CDFW Staff Report on Burrowing Owl Mitigation (2012).

As discussed in **Mitigation Measures BIO-1 through BIO-4** below, the GPU EIR determined impacts on candidate, sensitive, or special status species were less than significant with Mitigation added. The Arrow Highway Project also would comply with GPU EIR Mitigations. Therefore, the Project would be consistent with the GPU EIR analysis because the Project would not create new impacts, increase identified impacts, and there would be no new information of substantial importance than the information identified in the GPU EIR or in the GPU Addendum EIR.

***4(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 Wildlife or U.S. Fish and Wildlife Service?***

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Overall, future developments anticipated by GPU 2035 build out would be subject to compliance with the established regulatory framework, **Mitigation Measures BIO-1 and BIO-2**, and implementation of the GPU 2035 Policies and Actions to protect water quality in the City's creeks and basins from contamination and ensure less than significant impacts to sensitive vegetation communities.

GPU 2035 states that future development in the City is anticipated to occur on vacant and underutilized lands interspersed throughout the City, as well as urbanized areas. Therefore, GPU 2035 implementation could have an adverse effect on a sensitive vegetation community, including riparian habitat and federally protected wetlands, if future development were located on a site that contained these resources. Because these habitats vary in value, the significance of impacts would also vary. Due to the conceptual nature of future development, the City would require biological assessments and reports, as part of the CEQA review process, for projects in known or suspected natural habitat areas prior to Project approval; reference **Mitigation Measures BIO-1 and BIO-2**. These reports would be used to establish significant natural habitat areas, in order to prevent disturbance and degradation of these areas. Site-specific jurisdictional delineations would be conducted, as needed. Impacts to wetlands and riparian vegetation within the Project area would be mitigated

and resources protected through avoidance, habitat restoration, and preservation in compliance with the regulatory (United States Army Corp of Engineers; Regional Water Quality Control Board, and California Department of Fish and Wildlife) requirements. More specifically, each individual project identified would be subject to compliance with ACOE regulations under Section 404 and CDFW regulations under Sections 1601 to 1603, in order to mitigate potential impacts to wetlands, riparian vegetation, or other habitats. Any disruption of wetlands or riparian habitat would require consultation with these agencies. The City would continue to coordinate with the Army Corps of Engineers and California Department of Fish and Wildlife to determine the best means of providing protection, on a project-by-project basis. Implementation of the site-specific **Mitigation Measures** as identified in the reports would be required as development occurs.

No riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service exists on the Project site.

As described in Section 4(a), focused biological surveys conducted in 2025 did not identify sensitive natural communities or special-status species dependent on riparian or other sensitive habitats within the Project site.

The GPU 2035 EIR states all identified biological impacts associated with GPU 2035 build out would be less than significant following compliance with the established Federal, State, and local regulatory framework, and the specified Mitigation Measures, and implementation of the General Plan 2035 Policies and Actions. Therefore, any related Project impact would remain less than significant.

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***4(c) Have a substantial adverse effect on state or federally protected wetlands (including, but limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?***

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No State or federally protected wetlands (including, but limited to, marsh, vernal pool, coastal, etc.) exist on the Project site. As described in Section 4(a),

focused biological surveys conducted in 2025 did not identify wetlands or other waters of the United States or State within the Project site.

The GPU 2035 EIR states all identified biological impacts associated with GPU 2035 build out would be less than significant following compliance with the established Federal, State, and local regulatory framework, and the specified **Mitigation Measures**, and implementation of the General Plan 2035 Policies and Actions. Therefore, any related Project impact would remain less than significant.

***4(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?***

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The GPU EIR states that due to the high degree of urbanization within City limits, no significant wildlife corridors are present in Upland. Therefore, GPU 2035 buildout would not interfere with established native resident or migratory wildlife corridors.

The GPU EIR also states that future development in accordance with the Project could result in removal or disturbance of native and ornamental landscaping, and other nesting habitat that support migratory bird species, including raptor and songbird species. Therefore, GPU 2035 implementation could interfere with the movement of a native resident or migratory wildlife species. Disturbing or destroying active nests is a violation of the Federal Migratory Bird Treaty Act. Nesting activity typically occurs from mid-February to mid-August. Removal of vegetation during the breeding season is considered a potentially significant impact. However, the development anticipated by the Project would be subject to compliance with **Mitigation Measures BIO-1 through BIO-3**, as indicated above. In addition, compliance with **Mitigation Measure BIO-4**, which addresses migratory birds, would also be required. **Mitigation Measure BIO-4** would be accomplished in one of two ways. First, efforts would be made to schedule all vegetation removal activities outside the nesting season to avoid potential impacts to nesting birds. This would ensure that no active nests would be disturbed and that habitat removal could proceed rapidly. Secondly, if initial vegetation removal occurs during the nesting season, all suitable

habitats would be thoroughly surveyed for the presence of nesting birds by a qualified biologist before commencement of clearing. If any active nests are detected, a buffer of at least 100 feet (300 feet for raptors) would be delineated, flagged, and avoided until the nesting cycle is complete as determined by the biological monitor to minimize impacts. Therefore, the GPU EIR concludes that following compliance with Migratory Bird Treaty and **Mitigation Measures BIO-1 through BIO-4**, and implementation of the Policies and Actions outlined above, impacts to migratory birds would be reduced to less than significant.

The Phase I Habitat Assessment of the Arrow Highway Project site, conducted concurrently with the general habitat reconnaissance survey, detected suitable Burrowing Owl habitat within the BSA. Suitable habitat includes annual and perennial grasslands, deserts, and scrublands characterized by low growing, where tree and shrub canopy cover less than 30 percent of the ground surface. The majority of the BSA consists of an open field dominated by low-growing grass; a large dirt mound characterized by loose soil and perennial grasses is present within the center of the BSA and was determined to contain suitable Burrowing Owl habitat. Occurrence of Burrowing Owl habitat within the BSA necessitated deployment of Phase II burrow surveys.

Several abandoned ground squirrel burrows were found within the central mound on the Project site, some of which were sufficiently large and deep to accommodate Burrowing Owl occupancy. Nearby man-made materials offered potential perching areas for Burrowing Owls. Site investigators also detected a potential man-made Burrowing Owl burrow (a pile of rubble) within the southern portion of the BSA in the open lot between residential properties. Therefore, it is possible more potential burrows may be located within this area. Burrowing Owl occupancy of burrows was verified by observation of at least one Burrowing Owl, or its molted feathers, cast pellets, prey remains, eggshell fragments, or excrement at or near a burrow entrance. Neither the presence nor sign of Burrowing Owls was detected during Phase II Burrow surveys.

However, due to the presence of suitable habitat and potential burrows, focused Phase III Burrowing Owl surveys were conducted in 2025 in accordance with CDFW survey guidance. A total of four (4) protocol-level surveys were completed during the breeding season (April through June 2025). No

Burrowing Owls or signs (e.g., pellets, whitewash, feathers, or prey remains) were detected during any of the surveys. Although no Burrowing Owls were observed, suitable habitat remains present within the BSA, and the site retains the potential to support the species in the future.

Based on the results of the 2025 focused surveys, Burrowing Owls are not currently present within the BSA; therefore, the Project would not interfere with active burrows or nesting sites at the time of analysis. However, because Burrowing Owls rely on ground burrows for breeding and shelter, and suitable habitat remains on-site, there is potential for the species to establish prior to construction. Ground-disturbing activities could temporarily impede use of the site as potential foraging or nesting habitat if Burrowing Owls colonize the site.

It should be noted that the California Department of Fish and Wildlife currently is conducting a comprehensive status review of the western Burrowing Owl. This survey is expected to take 12-18 months to complete. During the survey time frame, the Burrowing Owl will continue to receive full CESA protection, after which time Fish and Wildlife will decide whether to formally list the species as threatened or endangered based on survey findings. As a candidate species under CESA, the western Burrowing Owl now is legally protected from “take.” Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibits “take” of western Burrowing Owl without an Incidental Take Permit.

The following are Recommendations of the Biological Resources Evaluation.

- ♦ **Preconstruction Surveys:** Although focused surveys conducted in 2025 did not detect Burrowing Owls, preconstruction surveys are required due to the presence of suitable habitat and the species’ potential to recolonize the site. Surveys must adhere to requirements under CESA (within 14 days and 24 hours prior to ground disturbance), according to CDFW’s 2012 Staff Report on Burrowing Owl Mitigation.
- ♦ **Prohibition of Take and Mitigation Measures:** Construction activities near occupied burrows during the nesting season (February 1-August 31) must not occur within 500 feet of active burrows until a qualified biologist confirms nesting completion. Outside of the nesting season, passive relocation of Burrowing Owls using one-way doors and furrow collapse remains permissible but must be conducted in consultation with California Fish and Wildlife and consistent with current CESA guidelines.

- ♦ **Incidental Take Permits:** Alternative conservation strategies (rather than acquiring an ITP) should be developed in coordination with the California Department of Fish and Wildlife to promote Burrowing Owl population recovery. Any Incidental Take Permits issued during the Burrowing Owl candidacy period must explicitly state that the Permit along with its associated obligations for the permittee will expire prior to the stated termination date if the Burrowing Owl is no longer a candidate species and is not listed for protection under CESA.

With implementation of preconstruction survey requirements and avoidance measures, potential impacts to Burrowing Owl movement and use of the site as potential nesting habitat would be less than significant.

The GPU 2035 EIR states all identified biological impacts associated with GPU 2035 build out would be less than significant following compliance with the established Federal, State, and local regulatory framework, and the specified Mitigation Measures, and implementation of General Plan 2035 Policies and Actions. Therefore, any related Project impact would remain less than significant. As the Arrow Highway Project would have a less than significant impact with incorporation of noted **Mitigation Measures**, adherence with GPU 2035 Policies and Actions, and Municipal Code requirements, the Project would be consistent with the GPU EIR analysis because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified in the GPU EIR or the GPU Addendum EIR.

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**4(e) *Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?***

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The GPU 2035 EIR states all identified biological impacts associated with GPU 2035 build out would be less than significant following compliance with the established Federal, State, and local regulatory framework, and the specified Mitigation Measures, and implementation of the General Plan 2035 Policies and Actions. As described in Section 4(a), focused biological surveys conducted in 2025 did not identify special-status species or sensitive habitats that would conflict with applicable local policies or ordinances protecting biological resources. Therefore, any related Project impact would remain less than significant.

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**4(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?**

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The GPU EIR states that there are no Upland Municipal Code ordinances that specifically address biological resources. Therefore, no impact would occur in this regard. There would be no conflict with provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. The City is not located within the jurisdiction of a habitat conservation plan or natural community conservation plan. As described in Section 4(a), focused biological surveys conducted in 2025 did not identify biological resources subject to an adopted habitat conservation plan or natural community conservation plan. Therefore, no impact would occur in this regard.

As previously discussed, the GPU EIR determined less than significant impacts related to potential conflict with provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. As the Arrow Highway Project would have a less than significant impact with incorporation of recommended mitigation measures, adherence with GPU 2035 Policies and Actions, and Municipal Code requirements, the Project would be consistent with the GPU EIR analysis because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified in the GPU EIR or in the GPU Addendum EIR.

The Project would be consistent with the GPU EIR analysis and thereby would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State of California habitat conservation plan.

### ***Mitigation Measures***

**BIO-1** Prior to an application being deemed complete for future development projects in known or suspected habitat areas, a Biological Resources

Assessment shall be conducted by a qualified Biologist, in order to determine the potential presence/ absence of candidate, sensitive, or special status species, as well as the presence/ absence of habitat that would support these species.

#### **Current State of Project Compliance with MM-BIO-1:**

MM-BIO-1 is an analysis requirement that was a prerequisite for project consistency with the Upland General Plan EIR. This requirement has been fully satisfied and fulfilled by the preparation and submittal of a site-specific Biological Resources Evaluation (BRE), prepared by HANA RESOURCES, based on a site visit conducted on April 8, 2025. The BRE fully identified and evaluated the project site's potential biological resources, concluding that only the Burrowing Owl, was the only special-status species with a significant potential to occur that would require future focused surveys. Because the BRE has fulfilled the explicit purpose of MM BIO-1 by identifying required future studies, MM-BIO-1 is deemed cleared and no further action is required under this specific measure.

**BIO-2** Prior to any ground disturbance and if deemed necessary by the site-specific Biological Resources Assessment, a Focused Survey of the proposed development site shall be conducted by a qualified Biologist to determine the presence/absence of sensitive plant and wildlife species that are federally- or state-listed as endangered or threatened, having moderate to high potential for occurrence on the proposed development site.

#### **Current State of Project Compliance with MM-BIO-2:**

MM-BIO-2 requires focused surveys if deemed necessary by the BRE (MM-BIO-1). The completed BRE determined that the only relevant protected species requiring focused surveys is the Burrowing Owl. Therefore, compliance with MM BIO-2 is achieved by performing and clearing the Burrowing Owl surveys required by MM-BIO-3. To-date, protocol-level Burrowing Owl surveys for the project site have been performed, demonstrating compliance with the intent of this MM-BIO-2 for the only potentially affected sensitive species.

**BIO-3** Prior to any ground disturbance and if deemed necessary by the site-specific Biological Resources Assessment, a pre-construction Burrowing Owl Survey of the proposed development site shall be conducted to determine the presence/absence of the Burrowing Owl. The Survey shall be conducted by a qualified Biologist according to the standard protocol established in the Staff Report on Burrowing Owl Mitigation (California Department of Fish and Game [Wildlife], March 7, 2012). If Burrowing Owls are determined to be present on the development site, mitigation for potential impacts to owls shall follow the guidelines outlined in the Staff Report, including passive relocation during the non-breeding season.

**Current State of Project Compliance with MM-BIO-3:**

MM-BIO-3 specifies the final action necessary to ensure no impact to the Burrowing Owl. As required, a final pre-construction Burrowing Owl Survey will be conducted by a Qualified Biologist, following the standard protocol (CDFW Staff Report, March 2012), prior to ground disturbance. If Burrowing Owl is found to be absent from the work zone at that time the MM-BIO-2 will be cleared. If Burrowing Owls are found, the project is obligated to follow the mitigation for potential impacts to Burrowing Owl shall follow the guidelines outlined by the Staff Report, including passive relocation during the non-breeding season, which ensures the impact is reduced to a less-than-significant level. The obligation to implement the final pre-construction survey and subsequent mitigation, if necessary, satisfies the requirements of MM-BIO-3.

**BIO-4** To the extent feasible, all vegetation removal activities shall be scheduled outside the nesting season (typically February 15 to August 15) to avoid potential impacts to nesting birds. However, if initial vegetation removal occurs during the nesting season, all suitable habitat shall be thoroughly surveyed for the presence of nesting birds by a qualified biologist prior to commencement of clearing. If any active nests are detected, a buffer of at least 100 feet (300 feet for raptors) shall be delineated, flagged, and avoided until the nesting cycle is complete as determined by the biological monitor to minimize impacts.

### ***Cumulative Impacts***

Cumulative impacts of GPU 2035 identified in the GPU EIR are considered for cumulative development in San Bernardino County. As concluded, the potential exists for adverse effects on biological resources and/or interference with movement of migratory wildlife species due to the residential and nonresidential development anticipated throughout the City, in accordance with the Project. Therefore, GPU 2035 incremental effects involving biological resources are cumulatively considerable. Cumulative development elsewhere in the County could similarly result in adverse effects on biological resources and/or interference with movement of migratory wildlife species. However, as with GPU 2035 anticipated development, all cumulative development in the County would undergo environmental and design review on a project-by-project basis pursuant to CEQA, in order to evaluate potential impacts to biological resources. Future development with potential to impact biological resources would also be required to comply with the established Federal and State regulatory framework. Impacts to biological resources associated with Project implementation would be less than significant following compliance with the established Federal, State, and local regulatory framework, specified **Mitigation Measures BIO-1 through BIO-4**, HANA RESOURCES recommendations, and implementation of the General Plan 2035 Policies and Actions. Cumulative impacts to biological resources would continue to be mitigated on a project-by-project basis and in accordance with the established regulatory framework, through the established regulatory review process. Therefore, the combined cumulative impacts to biological resources associated with the Project's incremental effects and those of the cumulative projects would be less than significant.

## ***Conclusion***

With regard to the topical issue area of Biological Resources, the following findings can be made.

1. No peculiar impacts to the Project or its site have been identified.
8. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR or by the GPU Addendum EIR.
2. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR or by the GPU Addendum EIR.

- 3 **Mitigation Measures BIO-1 through BIO-4** contained within the GPU EIR and maintained by the GPU Addendum EIR would be required to ensure any Arrow Highway Project-specific impacts pertaining to Biological Resources would be reduced to a less than significant level.

## 5. CULTURAL RESOURCES

### *Would the Project...*

**5(a)** *Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?*

**5(b)** *Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?*

**5(c)** *Disturb any human remains, including those interred outside of dedicated cemeteries?*

**5(a)** *Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?*

The GPU EIR concluded this impact was less than significant. This determination was maintained in the GPU Addendum EIR.

A Historical Resource is defined in Public Resources code (Section 5020.1(f)) includes, but is not limited to, any object building, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, political, military, or cultural annals of California. CEQA Guidelines state that the term “historical resources” applies to any such resources listed in or determined to be eligible for listing in the California Register of Historical Resources, included in a local register of historical resources, or determined to be historically significant by the lead agency.

The GPU EIR indicates there are 902 structures with potential National, State, or Local historic significance located inside Upland City limits. Of these, 560 are located within one of the City’s nine designated Historic Districts. Three resources located in the City limits (i.e., Euclid Avenue, Old San Antonio Hospital, and Upland Carnegie Library) are listed on the National Register.

Additional residential and non-residential development is anticipated throughout the City, in accordance with GPU 2035 build out. GPU 2035 has

adopted a focused development strategy that would be implemented through five Focus Areas targeted for land use change. Historic resources may be vulnerable to future development activities resulting from Project implementation. Such activities may disturb or destroy a historic resource, causing a substantial adverse change in its significance.

Due to the conceptual nature of future development, site specific proposals would require individual assessments of potential impacts to historical resources, as part of the future projects' CEQA review processes. Pursuant to CEQA, a project with an effect that may cause a substantial adverse change in the significance of a historical resource may have a significant effect on the environment. All future development within the City would be subject to compliance with the established Federal and State regulatory framework, which is intended to mitigate potential impacts to historical resources. In furtherance of GPU 2035 goals and in order to protect and preserve the City's historic resources, all future development would be subject to compliance with GPU 2035 and City Municipal Code regulations.

Compliance with the established Federal and State regulatory framework, which includes conducting individual assessments of potential impacts to historical resources, as well as implementation of Zoning Code requirements and the GPU 2035 Policies ensure that Project implementation would not result in a substantial adverse change in the significance of a historical resource.

The GPU EIR states that no further mitigation is required beyond implementation of the GPU Policies. The GPU Addendum EIR maintains this determination.

Between April and August 2025, CRM TECH performed a cultural resources survey on the Project site. This included a historical/archaeological resources records search, initiation of a Native American Sacred Lands File records search requested of the State of California Native American Heritage Commission, pursuit of historical background research, and conduct of an intensive field survey. During the field survey, CRM TECH identified the four previously undocumented cultural resources of historical origin listed below.

- ♦ Site 4262-1H – A Mid-20<sup>th</sup> century single-family residence at 927 West Arrow Highway

- ♦ Site 4262-2H – A Mid-20<sup>th</sup> century single-family residence at 911 West Arrow Highway
- ♦ Site 4262-3H – A Mid-20<sup>th</sup> century recreational activity area
- ♦ Site 4262-4H – A Well-related structure and concrete channel

### **Sites 4262-1H and 4262-2H**

These two sites are comprised of mid-20<sup>th</sup> century single-family residences constructed in the late 1940s as part of the post-World War II boom in suburban expansion. They do not demonstrate a unique or particularly close association with that historic theme or pattern of events, nor are they known to be associated with any specific events of recognized significance. None of the owners and/or occupants identified in the history of these residences appears to have attained the level of importance required by the California Register. One of the last historic-period owners and occupants of the residence at 911 West Arrow Highway (Ray M. Musser) achieved prominence in Upland civic life, his accomplishments occurred in the modern era in the 1990s. State of California Historic Preservation Office for the California Register guidelines require that “sufficient time must have elapsed to assess both the person’s field of endeavor and his/her contribution to that field.” This largely precludes consideration of association with living persons or persons who gained distinction in modern times.

In addition, these residences demonstrate no special qualities in design or construction and do not stand out as important examples of any style, type, period, region, or method of construction, nor do they embody the work of any prominent architects, designers, or builders. Therefore, the Historical Resources Study conducted for the Project site concludes that Sites 4262-1H and 4262-2H “...do not appear eligible for listing in the California Register and thus do not qualify as ‘historical resources’ under CEQA provisions.”

### **Site 4262-3H**

This site represents an abandoned recreational activity area that was developed in the late 1950s and/or early 1960s for a nearby church or church-affiliated college, or both. There is no evidence that it was closely associated with any person or event of recognized significance in national, state, or local history.

In its current deteriorated condition, the site exhibits no distinctive merits in design, construction, or engineering, and does not exhibit any special aesthetic value. In addition, this site exhibits no potential for any important historical or archaeological data. Therefore, this site does not appear eligible for the California Register and does not constitute a “historical resource.”

#### **Site 4262-4H**

This site is comprised of remnants of well-related structures that are likely dated to 1949-1953. The historical background research did not identify any historic figures or events of recognized significance in close association with this site. This site retains little historic integrity to relate to its period of origin or to embody the distinctive characteristics of a type, period, region, or method of construction and thereby holds little potential for any important historical or archaeological data.

Sites 4262-1H through 4262-4H were determined not to meet CEQA definition of “historical resources” and no other potential “historical resources” were identified within or adjacent to the Project site. Thereby, CRM TECH concludes that no “historical resources” are known to be present within or adjacent to the Project site. Thus, Project development and operation will have no impact on any known historical resources.

As previously discussed, the GPU EIR determined impacts on historic resources to be less than significant with mitigation implementation. This indicated GPU 2035 would be consistent with the GPU EIR analysis. Implementation of the Arrow Highway Project also would result in less than significant impacts to historic resources and would be consistent with the GPU EIR analysis because the Project would not create new impacts, increase impacts, and would not introduce new information of substantial importance than that identified in the GPU EIR or in the GPU Addendum EIR.

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***5(b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?***

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The GPU EIR concluded that any adverse change in significance of an archaeological resource as a result of GPU 2035 build out would be less than significant impact with implementation of Mitigation Measure CR-1.

GPU EIR research showed that three prehistoric sites are located within the City limits, all of which are located along the banks of the San Antonio Creek channel. GPU 2035 does not propose development along the banks of the San Antonio Creek channel, where these archaeological resources are located. Therefore, GPU 2035 implementation would not cause a substantial adverse change in the significance of a known archaeological resource. GPU 2035 build out would result in development of vacant and underutilized lands throughout the City. Given the Project vicinity's Native American background, ground-disturbing activities associated with future development within the City could unearth unknown archaeological resources, potentially resulting in their disturbance or destruction.

As part of the GPU 2035 environmental review process, the City notified the appropriate tribes (on the contact list maintained by the NAHC) of the opportunity to conduct consultations for the purpose of mitigating potential impacts resulting from Project implementation. Of the seven tribes that were notified, one tribe, the Soboba Band of Luiseno Indians, responded. The Soboba Band concluded that the Project falls within the bounds of their Tribal Traditional Use Areas. In addition, the City territory is regarded as highly sensitive to the Soboba Band, since it is in proximity to known village sites and a shared use area that was used in ongoing trade between the Luiseno and Cahuilla tribes. Working in and around Tribal Traditional Use Areas intensifies the potential for encountering cultural resources during the construction/excavation phase. Therefore, ground-disturbing activities associated with future land development within the City could unearth unknown Soboba Band cultural resources, potentially resulting in their disturbance or destruction. Compliance with **Mitigation Measure CR-1**, which requires that all earth disturbing activities cease, in the event that archeological resources are unearthed, would ensure that Project implementation would not cause a substantial adverse change in the significance of an archaeological resource or site. General Plan 2035 Policies and Actions: None are applicable.

The CRM TECH survey conducted for the Project site found no prehistoric (i.e., Native American) resources had been recorded within the records search scope

for the Project site. The sites included residential and commercial buildings, roadways, and two California Points of Historical Interest, including the former Mule Car line and the “Madonna of the Trail” monument. None of these historic-period resources were found in the immediate vicinity of the Project site. Therefore, none of them requires further consideration in the survey for the Project site.

On April 11, 2025, CRM TECH submitted a written request to the State of California Native American Heritage Commission for a records search in the Commission’s Sacred Lands File. The Commission is the State of California’s trustee agency for the protection of “tribal cultural resources,” as defined by the California Public Resources Code (Section 21074) and is tasked with identifying and cataloging properties of Native American cultural value, including value, including places of special religious, spiritual, or social significance and known graves and cemeteries throughout California.

As previously discussed, the GPU EIR determined impacts on archaeological resources to be less than significant with mitigation implementation. This indicated GPU 2035 would be consistent with the GPU EIR analysis. Implementation of the Arrow Highway Project also would result in less than significant impacts to archaeological resources and would be consistent with the GPU EIR analysis because the Project would not create new impacts, increase impacts, and would not introduce new information of substantial importance than that identified in the GPU EIR or the GPU Addendum EIR.

***5(c) Disturb any human remains, including those interred outside of dedicated cemeteries?***

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The GPU EIR concludes that impacts to cultural resources and human remains resulting from Project implementation would be less than significant following compliance with the existing regulatory framework and recommended mitigation measures. No significant unavoidable impacts to cultural resources would occur as a result of GPU 2035 build out.

Given the history of Native American’s and their presence throughout Upland and the region, there is the potential for human remains, including those interred outside of formal cemeteries, to be encountered during earth removal

or disturbance activities resulting from Project implementation. Moreover, as discussed in the Archaeological Resources Section above, the Project area is regarded as highly sensitive to the Soboba Band, since it is in proximity to known village sites and a shared use area. Therefore, ground-disturbing activities, such as grading or excavation, resulting from Project implementation have the potential to disturb as yet unidentified human remains.

The Native American Graves Protection and Repatriation Act within the State of California, is enacted by the California Native American Historical, Cultural and Sacred Sites Act, and applies to Federal, State, and private lands. If human remains were found, those remains would require proper treatment in accordance with applicable laws. Public Resources Code Sections 5097, et seq., and Health and Safety Code Sections 7050.5-7055 describe the general provisions regarding human remains, including the requirements if any human remains are accidentally discovered during excavation of a site. Requirements and procedures set forth in Public Resources Code Section 5097.98 would be implemented if human remains are discovered, including notification of the County Coroner and Native American Heritage Commission, and consultation with the individual identified by the Native American Heritage Commission to be the “most likely descendant.” If human remains are found during excavation, excavation must stop in the vicinity of the find and any area that is reasonably suspected to have adjacent remains, until the County coroner investigates and the remains have been investigated, and appropriate recommendations have been made for the treatment and disposition of the remains. Following compliance with the established regulatory framework regarding human remains, including those interred outside of formal cemeteries, Project implementation would result in less than significant impact. The GPU 2035 Policies and Actions are applicable. No mitigation is required.

Based on an analysis of historical and archaeological records and site records surveys, it was determined the Project site does not contain a formal cemetery or any archaeological resources that might contain interred human remains. On April 11, 2025, CRM TECH submitted a written request on behalf of the Upland Manor Project to the State of California Native American Heritage Commission for a records search in the Commission’s Sacred Lands File. The Commission is the State of California’s trustee agency for the protection of

“tribal cultural resources,” as defined by the California Public Resources Code (Section 21074) and is tasked with identifying and cataloging properties of Native American cultural value, including value, including places of special religious, spiritual, or social significance and known graves and cemeteries throughout California.

### ***Mitigation Measures***

**CR-1** In the event that cultural resources (archeological or paleontological) are unearthed during excavation and grading activities of any future development project, the contractor shall cease all earth-disturbing activities within a 100-meter radius of the area of discovery and retain a qualified archaeologist/paleontologist to evaluate the significance of the finding and appropriate course of action. Salvage operation requirements pursuant to Section 15064.5 of the CEQA Guidelines shall be followed. After the find has been appropriately mitigated, work in the area may resume.

Impacts to cultural resources resulting from Project implementation would be less than significant following compliance with the existing regulatory framework and recommended Mitigation Measures. No significant unavoidable impacts to cultural resources would occur as a result of Project implementation.

### ***Cumulative Analysis***

For purposes of Cultural Resource impact analysis, cumulative impacts are considered for cumulative development in San Bernardino County. During the growth anticipated to occur with Project implementation, the potential exists for historic resources, as well as undiscovered archaeological/paleontological resources to be adversely impacted. Therefore, the GPU 2035 incremental effects involving cultural resources are cumulatively considerable. Future development projects in the City of Upland and County of San Bernardino could encounter cultural resources. Therefore, the potential exists for cumulative development to result in the adverse modification or destruction of historical, archaeological, and/or paleontological resources. Potential Cultural Resource impacts associated with the individual developments anticipated by the Project would be specific to each site. All new developments would be subject to compliance with the existing Federal, State, and local regulatory framework concerning the protection of historical, archaeological, and paleontological resources on a

project-by-project basis. In addition, implementation of the specified Mitigation Measures would reduce potential Project impacts to undocumented archaeological and paleontological resources to less than significant levels. Therefore, the combined cumulative impacts to cultural resources associated with the Project's incremental effects and those of the cumulative projects would be less than significant.

As previously discussed, the GPU EIR determined impacts to human remains as less than significant with mitigation. The Project is consistent with GP 2035 parameters and with the GPU EIR analysis because the Project would not create new impacts, increase impacts, and would not provide new information that identified within the GPU EIR or within the GPU Addendum EIR.

### ***Conclusion***

With regard to the topical issue area of Cultural Resources, the following findings can be made.

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR or the GPU Addendum EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR or by the GPU Addendum EIR.
4. **Mitigation Measure CR-1** contained within the GPU EIR and maintained by the GPU Addendum EIR would be required to ensure any Arrow Highway Project-specific impacts pertaining to Cultural Resources would be reduced to a less than significant level.

## 6. ENERGY

### *Would the Project...*

**6(a)** *Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

**6(b)** *Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

**6(a)** *Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

The GPU EIR analyzed Energy Conservation within its “Other CEQA Considerations” Section. At the time of certification of the GPU EIR, Energy Use was included within CEQA Guidelines Appendix F. Energy as a CEQA topical analysis category has been moved to the issue areas within CEQA Guidelines Appendix G.

### **Construction**

The GPU EIR stated GPU 2035 implementation involves no unusual characteristics that would necessitate the use of construction equipment that is less energy-efficient than at comparable construction sites. Therefore, implementation of the GPU 2035 Policies and Actions would ensure GPU 2035 would not result in inefficient, wasteful, or unnecessary fuel consumption. The GPU Addendum EIR concluded similarly.

### **Electricity and Natural Gas**

SCE has existing electricity infrastructure located throughout the City, which would serve future development associated with the GPU 2035 implementation. SCE also maintains a Distribution Plan that is updated every year. It is anticipated that service demands created by Project implementation are within the service

parameters of SCE current and future transmission and service infrastructure. SCE would update existing facilities or add new facilities in the *City* as needed throughout the life of the General Plan. SCE would not provide service to new developments if there were not adequate electricity supplies and infrastructure to maintain existing service levels and meet the anticipated electricity demands of the specific development requesting service.

All new construction in the State of California is subject to energy conservation standards set forth in Title 24, Parts 6 and 11 of the California Code of Regulations. These are prescriptive standards that establish maximum energy consumption levels for the heating and cooling of new buildings. Furthermore, GPU 2035 includes Policies related to conservation and energy efficiency. Implementation of these building practices would reduce the demand for electricity. As such, impacts would be less than significant in this regard. No further mitigation is required beyond implementation of the GPU 2035 Policies. The GPU Addendum EIR concluded similarly.

Future development would be reviewed on a project-by-project basis to determine if adequate natural gas infrastructure and supply is available to serve the GPU 2035 build out. All new developments that require new natural gas lines to be installed would be required to pay applicable fees to extend natural gas lines to serve a specific project site. SCE would not provide service to new developments if there were not adequate supplies and infrastructure to maintain existing service levels and meet the anticipated natural gas demands of the specific development requesting service. Furthermore, GPU 2035 includes Policies related to conservation and energy efficiency.

As such, impacts would be less than significant in this regard. No further mitigation is required beyond implementation of the GPU Policies.

### **Transportation**

GPU 2035 also includes Policies and Actions encouraging transit-oriented and mixed-use development to reduce daily vehicle trips and vehicle miles traveled (VMT). The Project is not anticipated to result in any unusual characteristics that would result in excessive long-term operational fuel consumption.

The availability of public transit for City residents, employees, and visitors would ensure that GPU 2035 would not result in the inefficient, wasteful, or unnecessary consumption of transportation energy. Overall, fuel consumption associated with vehicle trips generated by future development within Upland would not be considered inefficient, wasteful, or unnecessary in comparison to other cities in the region.

### Building Energy

California Code of Regulations, Title 24, Part 6, is California's Energy Efficiency Standards for Residential and Non-residential Buildings. Title 24 was established by the California Energy Commission (CEC) in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption and provide energy efficiency standards for residential and non-residential buildings. In 2010, the CEC updated Title 24 standards with more stringent requirements. The 2010 Standards were expected to substantially reduce the growth in electricity and natural gas use.

Impacts to electricity and natural gas supplies and infrastructure resulting from Project implementation would be less than significant following compliance with the existing regulatory framework and implementation of GPU 2035 Policies and Actions. No significant unavoidable impacts to electricity and natural gas services and facilities would occur as a result of GPU 2035. The GPU Addendum EIR concluded similarly.

GPU 2035 does not involve any unusual characteristics that would result in excessive long-term operational building energy demand. The GPU 2035 includes numerous energy efficiency Goals and Policies that address energy demand.

As discussed above, there would not be inefficient, wasteful, or unnecessary energy usage associated with Project implementation. The availability of public transit would ensure there would not be inefficient, wasteful, or unnecessary consumption of transportation energy. Future development anticipated by GPU 2035 would adhere to, and exceed, all Federal, State, and local requirements for energy efficiency, including Title 24 of the California Code of Regulations regarding building energy efficiency standards. GPU 2035 would not result in the inefficient, wasteful, or unnecessary consumption of building energy. Therefore,

the Project would not be considered inefficient, wasteful, or unnecessary in comparison to other similar developments in the region.

As discussed previously, the GPU EIR did not analyze Energy as a separate CEQA Threshold of Significance topic. Energy was analyzed within the “Other CEQA Considerations” Section of the GPU EIR. It was determined that GPU EIR build out would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Therefore, development of the Arrow Highway Project, due to its mandatory compliance with GPU 2035 Goals, Policies and Actions, also would not result in wasteful, inefficient, or unnecessary consumption of energy resources and the resultant level of impact would be less than significant as concluded in the GPU EIR or in the GPU Addendum EIR.

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***6(b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?***

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As indicated previously, many State of California regulations pertaining to efficient energy use focus on building energy efficiency, renewable energy generation, alternate energy sources, and water conservation. These regulations include compliance with Title 24 of the California Government Code. In addition, GPU 2035 contains several Policies and Actions that would ensure that the Project would comply with State of California and City of Upland plans for renewable energy and energy efficiency. These Policies and Actions for new private development pertain to the following: greenhouse gas reduction in new development; minimum Green Building standards; incentives for constructing green buildings; compliance with CalGreen standards; compliance with Energy Efficiency Standards; energy efficiency in new development construction; renewable energy; and use of deciduous trees.

As discussed previously, the GPU EIR did not analyze Energy as a separate CEQA Threshold of Significance topic. Energy was analyzed within the “Other CEQA Considerations” Section of the GPU EIR. It was determined that GPU EIR build out would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Therefore, development of the Arrow Highway Project, due to its mandatory compliance with GPU 2035 Goals, Policies and Actions, also would not conflict with State of California or City of Upland plans for renewable energy or energy efficiency.

### ***Mitigation Measures***

None Required.

### ***Cumulative Impacts***

None.

### ***Conclusion***

With regard to the topical issue area of Energy, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR or the GPU Addendum EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR or the GPU Addendum EIR.
4. No Mitigation Measures contained within the GPU EIR and maintained by the GPU Addendum EIR would be required because there would be no Project-specific impacts pertaining to Energy.

## 7. GEOLOGY AND SOILS

### *Would the Project...*

- 7(a)(i) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving – 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?*
- 7(a)(ii) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving – Strong seismic ground shaking?*
- 7(a)(iii) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving – Seismic-related ground failure, including liquefaction?*
- 7(a)(iv) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving – Landslides?*
- 7(b) Result in substantial soil erosion or the loss of topsoil?*
- 7(c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?*
- 7(d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?*
- 7(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?*
- 7(f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

***7(a)(i) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving – 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?***

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GPU 2035 contains Policies and Actions that, when complied with, would protect the community from risks associated with fault rupture, among other seismic and geologic hazards. Compliance with the Alquist-Priolo Earthquake Fault Zoning Act and implementation of the Policies and Actions specified below would ensure that Project implementation would result in a less than significant impact due to exposure of people or structures to potential substantial adverse effects involving rupture of a known earthquake fault.

GPU 2035 implementation could expose additional people and structures to potential substantial adverse effects, including risk of loss, injury, or death involving rupture of a known earthquake fault. A small northern portion of the City and portions of the City Sphere of Influence are within a State-mapped Earthquake Fault Zone specifically involving the Cucamonga-Sierra Madre Fault. GPU 2035 has adopted a focused development strategy that would be implemented through five Focus Areas located in the southern portion of the City. Therefore, most of the anticipated development would occur outside of the Earthquake Fault Zone. However, the anticipated development would also occur on vacant and underutilized lands interspersed throughout the City, including its northern portion and Sphere of Influence.

Before any development is permitted within the AP Earthquake Fault Zone, the City would require a geological investigation to demonstrate that proposed buildings would not be constructed across active faults. Any structure for human occupancy would be prohibited over the trace of the fault and set back from the fault (generally 50 feet). Thus, potential hazards associated with fault rupture could be avoided through the selection of safe development sites. Additionally, because the safety and stability of engineered structures such as buildings and bridges, depend on strong, stable foundations, potential fault rupture hazards could be minimized through prudent civil engineering practice such as constructing appropriate foundation systems and modifying unstable ground to increase stability through grading, compacting, and reinforcing soils. For developments occurring where potential fault rupture hazards exist,

specially adapted construction standards would be necessary for public safety and welfare. The City (or County) would issue a construction permit in hazard areas only when the developer agrees to an appropriate level of mitigation against potential hazards.

Overall, potential hazards associated with fault rupture could be avoided through the selection of safe development sites and minimized through prudent civil engineering practice. Where potential fault rupture hazards exist, specially adapted construction standards would be necessary and construction permits would be issued only when the developer agrees to an appropriate level of mitigation against potential hazards.

The Arrow Highway Project is not located in a fault rupture hazard zone identified according to the Alquist-Priolo Earthquake Fault Zoning Act. Therefore, Upland Manor impacts related to directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving 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. As with the GPU EIR analysis, the impact level for Upland Manor would be less than significant. This determination was maintained in the GPU Addendum EIR.

As previously discussed, the GPU EIR determined impacts pertaining to directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving – 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 to be less than significant. Implementation of the Arrow Highway Project also would result in less than significant impacts in this regard and would be consistent with the GPU EIR analysis because the Project would not create new impacts, increase impacts, and would not introduce new information of substantial importance than that identified in the GPU EIR or in the GPU Addendum EIR.

***7(a)(ii)Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving – Strong seismic ground shaking?***

Upland, like the rest of southern California, is located within a seismically active region as a result of being located near the active margin between the North American and Pacific tectonic plates, and in proximity to various faults. Proximity of a fault or faults is a primary consideration when determining the impact of ground shaking on a community. For Upland, three known faults (Cucamonga-Sierra Madre, Red Hill, and San Jose Faults) traverse the City and various other active fault systems are within 30 miles of the City. Upland is also situated in an alluvial plain with thickness approaching 1,000 feet in certain areas. This geologic condition tends to amplify seismic waves and could intensify the magnitude of their effect.

Numerous controls would be imposed on future development through the permitting process that would lessen potential risks involving strong ground shaking. Design, construction, and engineering of buildings and structures within the City would be subject to compliance with the City's Building Code, which adopted the 2010 CBC in its entirety; refer to UMC Chapter 15.08. The City's Building Code provides minimum standards to safeguard property and public welfare by regulating the design, construction, quality of materials, use and occupancy, location and maintenance of buildings, equipment structures, and grading within the City. Therefore, the effects of ground shaking would be sufficiently mitigated for future buildings designed and constructed in conformance with the City's Building Code and through prudent civil engineering practice. Other GPU 2035 Policies require site-specific soils and/or geologic reports for development in areas where potentially serious geologic risks exist and Policy require monitoring and enforcement of mitigation measures identified in such reports.

Overall, compliance with the City's Building Code and implementation of GPU 2035 Policies and Actions, along with the application of prudent civil engineering practice, would ensure that GPU 2035 build out would result in a less than significant impact due to exposure of people or structures to potential substantial adverse effects involving strong seismic ground shaking.

The Geotechnical Investigation conducted for the Arrow Highway Project/Project site indicates several large, active fault systems, including the San Andreas, Whittier-Elsinore, and Newport-Inglewood faults, are located in the Southern California region. The type and magnitude of seismic hazards affecting a site are dependent on distance to the causative fault and intensity

and magnitude of the seismic event. The seismic hazard may be primary (e.g., surface rupture; ground shaking) or secondary (e.g., liquefaction; ground lurching).

The Project site is located on the northern portion of the Santa Ana sub-block. The San Jose fault is located 1.8 miles from the Project site. The Cucamonga fault is located 3 miles from the Project site. The Sierra Madre fault is located 4.7 miles from the Project site. The Chino fault is located 6.7 miles from the Project site. The San Jacinto fault is located 13.8 miles from the Project site. The Elsinore fault is located 15.3 miles from the Project site. The San Andreas fault is located 16.1 miles from the Project site.

Active faults are not known to exist within the Project site. A review of Special Publication 42 demonstrated the Project site is not located within a California State designated earthquake fault zone. Therefore, the potential for fault surface rupture on the Project site is “very low.”

Compliance with GP 2035 Policies and Actions, California Building Code, and City Municipal Code requirements would ensure that the Project would not result in a significant impact.

As previously discussed, the GPU EIR determined impacts on geological resources pertaining to directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving – strong seismic ground shaking to be less than significant. Implementation of the Arrow Highway Project also would result in less than significant impacts to energy and would be consistent with the GPU EIR analysis because the Project would not create new impacts, increase impacts, and would not introduce new information of substantial importance than that identified in the GPU EIR or the in GPU Addendum EIR.

***7(a)(iii) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving – Seismic-related ground failure, including liquefaction?***

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The GPU EIR indicates compliance with GP 2035 Policies and Actions, California Building Code, and City Municipal Code requirements would ensure that the

Project would not result in a significant impact pertaining to directly or indirectly causing potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction.

The Geological Investigation conducted for the Arrow Highway Project/Project Site indicates liquefaction effects can manifest in ways including: 1) loss of bearing; 2) lateral spread; 3) dynamic settlement; and 4) flow failure. Lateral spreading has typically been the most damaging mode of failure. Generally, the more recent a sediment has been deposited, the more likely it will be susceptible to liquefaction. Other factors that must be considered are groundwater; confining stresses; relative density; and intensity and duration of seismically induced ground shaking.

The Project site is not within a State-identified zone of required investigation for liquefaction. The geotechnical investigation indicated "...it is our opinion that the potential for liquefaction is minimal at the site." In addition, the geotechnical investigation states "...the potential for dry sand settlement is anticipated to be low and within foundation design tolerances."

No groundwater was encountered to a depth of 12 feet below ground surface. Groundwater data from the nearest well, located 2.6 miles west of the Project site, indicates groundwater depth is approximately 128 feet below ground surface.

The geotechnical investigation concluded that "...based on soil type and gravel content of the soils encountered, the potential for hydro-collapse in the underlying young alluvial fan deposits is minimal and should be within foundation tolerances upon the completion of the recommended unsuitable soil removals."

The geotechnical investigation states "...it is anticipated that the majority of materials onsite are 'very low' to 'low' in expansion potential."

As previously discussed, the GPU EIR determined impacts on geological resources pertaining to directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving - Seismic-related ground failure, including liquefaction to be less than significant.

Implementation of the Arrow Highway Project also would result in less than significant impacts to energy and would be consistent with the GPU EIR analysis because the Project would not create new impacts, increase impacts, and would not introduce new information of substantial importance than that identified in the GPU EIR or in the GPU Addendum EIR.

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***7(a)(iv) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving – Landslides?***

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The GPU EIR concludes that all potential geologic impacts of GPU 2035 would be less than significant resulting from compliance with State and City requirements, including GPU 2035 Policies and Actions, City Building Code regulations, and soils reports required of new developments.

The Project site is relatively flat, with elevations ranging approximately 12 feet across the 6.188-acre Project site. Therefore, the potential for landslides is very low.

Compliance with GP 2035 Policies and Actions, California Building Code, and City Municipal Code requirements would ensure that the Project would not result in a significant impact pertaining to directly or indirectly causing potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including landslides. The resultant level of impact would be less than significant.

As previously discussed, the GPU EIR determined less than significant impacts from exposure to seismic-related hazards and strong ground shaking. As the Arrow Highway Project would have a less than significant impact with incorporation of recommendations made in the Geological Investigation, adherence with GPU 2035 Policies and Actions, and Municipal Code requirements, the Project would be consistent with the GPU EIR analysis because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified in the GPU EIR or in the GPU Addendum EIR.

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

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Construction associated with future development would be subject to compliance with the National Pollutant Discharge Elimination System (NPDES) Construction Permit requirements. As discussed in detail in Section 5.13, Hydrology, Drainage, and Water Quality, dischargers whose projects disturb one or more acres of soil or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit Order 2009-0009-DWQ). Construction activity subject to this Permit includes clearing, grading, and disturbances to the ground such as stockpiling or excavation. The Construction General Permit requires development and implementation of a Storm Water Pollution Prevention Plan (SWPPP), which must list Best Management Practices (BMP) the discharger will use to protect storm water runoff and the placement of those BMP. Construction associated with future development would also be subject to compliance with the UMC Grading Permit regulations that address erosion control. specify that every 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, which is intended to avoid potentially damaging, hazardous, and unsightly conditions in the course of land development. Compliance with GPU 2035 Policies and Actions, the NPDES, SCAQMD, and Upland Municipal Code requirements would ensure that Project implementation would not result in substantial soil erosion or loss of topsoil.

As discussed previously, the GPU EIR determined impacts from soil erosion and topsoil loss to be less than significant. As the Upland Manor Project would have a less than significant impact for reasons detailed above, the Project would be consistent with the GPU EIR analysis because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified in the GPU EIR or in the GPU Addendum EIR.

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

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The GPU EIR identifies this impact as less than significant. The GPU EIR states that liquefaction and lurching pose a probable menace in those parts of Upland that have been subjected to groundwater withdrawal. The single area in Upland that may be susceptible to slope stability hazards (mudslides and landslides) is San Antonio Heights within the City Sphere of Influence, which is located in soil associations having slopes that vary between 15 and 20 percent. In addition, certain circumstances such as a seismic incident and water saturated soils could increase the likelihood of a landslide occurring in the San Antonio Heights area.

Depressed or declining water levels in Management Zone 1 (MZ1), which involves the western portion of the Chino Basin, have resulted in subsidence and ground fissuring in Upland. Whether caused by natural or human activities, the effects of subsidence range from severe, such as the disappearance of whole sections of land, to relatively modest resulting in damage to a variety of human structures. Buildings are weakened and collapse, railway lines and roads are twisted and broken, and underground sewer, power, and water lines are torn apart. As discussed above, the Optimum Basin Management Program (OBMP) proposes implementing activities that will lead to optimal management of the Chino Basin and ultimately minimize land subsidence. The OBMP also proposes a Ground Level Monitoring Program that involves ground level surveys, in order to determine if and how much subsidence has occurred in the Basin.

Expansive soils are typically those of high clay content that swell and shrink during wet and dry climatic events, respectively. The City is underlain by thick alluvium, which is characterized by water laid soil deposits, such as silt, clay, or sand. Therefore, development anticipated by GPU 2035 could be located on expansive soil, which can result in damage to overlying structures and infrastructure. Numerous controls would be imposed on future development through the permitting process that would lessen potential risks involving ground failure, unstable geologic units/soils, and expansive soils. Design,

construction, and engineering of buildings and structures within the City would be subject to compliance with the City Building Code, which would sufficiently mitigate future buildings designed and constructed in conformance with the City's Building Code through prudent civil engineering practice. Also, all future developments would be subject to compliance with UMC Chapter 15.52, Grading Restrictions, which is intended to avoid potentially damaging, hazardous, and unsightly conditions in the course of land development by requiring conformance to the California Building Code.

In addition, the Upland Municipal Code requires preparation of a Preliminary Soils Report for every subdivision. Soils Reports are required to include recommendations for foundation type and design criteria including provisions to mitigate the effects of liquefaction, differential settlement, and varying soil strength, among other potential hazards. GPU 2035 proposes a Policy that requires site-specific soils and/or geologic reports for development in areas where potentially serious geologic risks. Overall, compliance with the Upland Municipal Code and implementation of GPU 2035 Policies and Actions would ensure that Project implementation would result in a less than significant impact due to exposure of people or structures to potential substantial adverse effects involving ground failure and unstable geologic units/soils.

The Geological Investigation conducted for the Arrow Highway Project/Project site indicates that liquefaction effects can manifest in ways including: 1) loss of bearing; 2) lateral spread; 3) dynamic settlement; and 4) flow failure. Lateral spreading has typically been the most damaging mode of failure. Generally, the more recent a sediment has been deposited, the more likely it will be susceptible to liquefaction. Other factors that must be considered are groundwater; confining stresses; relative density; and intensity and duration of seismically induced ground shaking.

The Project site is not within a State-identified zone of required investigation for liquefaction. The geotechnical investigation indicated "...it is our opinion that the potential for liquefaction is minimal at the site." In addition, the geotechnical investigation states "...the potential for dry sand settlement is anticipated to be low and within foundation design tolerances."

No groundwater was encountered to a depth of 12 feet below ground surface. Groundwater data from the nearest well, located 2.6 miles west of the Project site, indicates groundwater depth has been approximately 128 feet below ground surface.

The Geotechnical Investigation concluded that "...based on soil type and gravel content of the soils encountered, the potential for hydro-collapse in the underlying young alluvial fan deposits is minimal and should be within foundation tolerances upon the completion of the recommended unsuitable soil removals." Furthermore, the Geotechnical Investigation states "...it is anticipated that the majority of materials onsite are 'very low' to 'low' in expansion potential."

The Arrow Highway Project will be required to comply with State and City requirements, including the City of Upland Grading Ordinance and Building Code. In addition, compliance with City GPU 2035 Policies and Actions will ensure the Project will not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on-site or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. The resultant level of impact would be less than significant.

As discussed previously, the GPU EIR determined impacts pertaining to soil instability to be less than significant. As the Arrow Highway Project would have a less than significant impact with incorporation of GPU 2035 Policies and Actions, City of Upland Standard Conditions, and Upland Municipal Code regulations, the Project would be consistent with the GPU EIR analysis because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified in the GPU EIR or in the GPU Addendum EIR.

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

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The Geotechnical Investigation states "...it is anticipated that the majority of materials onsite are 'very low' to 'low' in expansion potential." The Arrow

Highway Project will be required to comply with State and City requirements, including the City of Upland Grading Ordinance and Building Code. In addition, compliance with City GPU 2035 Policies and Actions will ensure the Upland Manor Project will not be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), thereby not creating substantial direct or indirect risks to life or property. The resultant level of impact would be less than significant.

As discussed previously, the GPU EIR determined impacts from expansive soils to be less than significant. As the Arrow Highway Project would have a less than significant impact for reasons detailed above, the Project would be consistent with the GPU EIR analysis because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified in the GPU EIR or in the GPU Addendum EIR.

***7(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?***

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The GPU EIR indicates that individual development projects would be reviewed on a project-by-project basis to determine if adequate conveyance and treatment capacity is available to serve the proposed development. Development projects would be required to pay applicable fees for sewage treatment and disposal to the appropriate recipients. The GPU 2035 proposes Goals to ensure adequate infrastructure is available to convey and treat wastewater generated. Future development would be subject to implementation of the GPU 2035 Policies and Actions that would ensure adequate infrastructure and treatment facilities are available prior to new development occurring. Thus, potential impacts to wastewater treatment facilities and services would be less than significant.

The Arrow Highway Project development will occur on a 6.188-acre infill site that is surrounded by residential and public uses that are connected to sewer lines. Therefore, the Project will also connect to existing sewer lines and septic systems will not be necessary. The resultant level of impact will be less than significant.

As discussed previously, the GPU EIR determined impacts pertaining to wastewater disposal systems to be less than significant. As the Arrow Highway Project would have a less than significant impact for reasons detailed above, the Project would be consistent with the GPU EIR analysis because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified in the GPU EIR or the GPU Addendum EIR.

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

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The GPU EIR indicates that strata associated with late Pleistocene alluvial deposition, which has a moderate potential for paleontological resources, may be exposed during deep excavations. GPU 2035 implementation would result in the development of vacant and underutilized lands. Ground-disturbing activities associated with future land development within the City could unearth previously unknown paleontological resources, resulting in their disturbance or destruction. Therefore, Project implementation could directly or indirectly destroy a unique paleontological resource or site. Compliance with **Mitigation Measure CR-1**, which requires that all earth-disturbing activities cease, in the event that paleontological resources are unearthed, would ensure that Project implementation would result in a less than significant impact involving the potential destruction of a unique paleontological resource or site.

The Arrow Highway Project will be required to comply with GPU 2035 Policies and Actions pertaining to paleontological resources and to implement **Mitigation Measure CR-1**. Such compliance will ensure that Project development would not directly or indirectly destroy a unique paleontological resource on the Project site. The resultant level of impact would be less than significant.

As discussed previously, the GPU EIR determined impacts pertaining to unique paleontological resources or sites or unique geologic features would be less than significant with implementation of **Mitigation Measure CR-1**. As the Arrow Highway Project also would have a less than significant impact, with noted Mitigation implemented, for reasons detailed above, the Project would be consistent with the GPU EIR analysis because it would not create new

impacts, increase impacts, and there is no new information of substantial importance than identified in the GPU EIR or in the GPU Addendum EIR.

### ***Mitigation Measures***

As discussed previously, the GPU EIR concluded this impact related to Geology and Soils will be less than significant with implementation of **Mitigation Measure CR-1**.

### ***Cumulative Analysis***

As concluded above, the Project's impacts related to seismic, geologic, and soil conditions would be less than significant following compliance with the established regulatory framework, which includes the Alquist-Priolo Earthquake Fault Zoning Act, and Upland Municipal Code (including the Building Code), NPDES, as well as through prudent civil engineering practice. In addition, the increased exposure of people and structures to potential hazards resulting from Project implementation would be specific to Upland. Therefore, the GPU 2035 incremental effects involving seismic, geologic, and soil conditions are not cumulatively considerable. Therefore, the combined cumulative impacts due to exposure of people or structures to potential substantial adverse effects involving seismic, geologic, and soil conditions (i.e., those associated with the Project's incremental effects and those of the cumulative projects) would be less than significant.

### ***Conclusion***

With regard to the topical issue area of Geology and Soils, the following findings can be made.

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR or the GPU Addendum EIR.

3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR or the GPU Addendum EIR.
4. **Mitigation Measure CR-1** contained within the GPU EIR and maintained in the GPU Addendum EIR would be required to ensure any Arrow Highway Project-specific impacts pertaining to Geology and Soils (Paleontological Resources) would be reduced to a less than significant level.

## 8. GREENHOUSE GAS EMISSION

### *Would the Project...*

8(a) *Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

8(b) *Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

**8(a) *Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?***

The GPU EIR indicated that potential impacts from greenhouse gas emissions were less than significant, particularly in a cumulative context and with implementation of City Climate Action Plan Strategies, Policies and Actions.

State CEQA Guidelines Section 15064.4 states that “the determination of the significance of greenhouse gas emissions (GHG) calls for careful judgment by the lead agency, consistent with the provisions in Section 15064. A lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of greenhouse gas emissions resulting from a project” Section 15064.4(b) further states that a lead agency should consider the following non-exclusive factors when assessing the significance of GHG emissions:

- The extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting.
- Whether the project emissions exceed a threshold of significance that the lead agency applies to the project.
- The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

State CEQA Guidelines Section 15064(h)(1) states that “the lead agency shall consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable.” A cumulative impact may be significant when the project’s incremental effect, though individually limited, is cumulatively considerable.

The City of Upland, as part of GPU 2035, prepared a Climate Action Plan (CAP). The CAP is intended to address the main sources of GHG emissions. The purpose of the CAP is to guide the development, enhancement, and ultimately the implementation of actions that will reduce the City’s GHG emissions. The CAP has been designed to support the following functions:

- Describe Upland’s emissions sources
- . Provide projections of future emissions based on growth allowed by the General Plan.
- Provide clear guidance to City staff regarding when and how to implement key provisions of the Plan.
- Recommend strategies, measures, and actions to achieve GHG reductions.
- Demonstrate Upland’s commitment to comply with State GHG reduction efforts.
- Define a strategy for turning this plan into action and transparently tracking and reporting progress toward the GHG reduction goals.
- Preserve local land use control over how GHG reductions are accomplished in the City.
- Streamline the environmental review process.

The CAP further contains detailed strategies pertaining to the following:

- ♦ Transportation and Land Use
- ♦ Energy Use and Conservation
- ♦ Water Use and Efficiency
- ♦ Solid Waste Reduction and Recycling
- ♦ Municipal Operations

The CAP GHG reduction strategies and measures were based on GPU 2035 Goals, Policies, and Actions, and were designed to include performance criteria that would allow the City to achieve its GHG reduction target of 16 percent below 2008 levels by 2020. As proposed, the CAP meets this target, with a

projected 26.9 percent reduction. This 26.9 percent reduction includes credit for a portion of the GHG emission reductions that occur through legislation that is being implemented at the statewide level. The CAP includes other supporting measures that contribute to the GHG emission reductions of other related measures. Other measures could not be quantified, due either to a lack of substantial evidence or limitations inherent in quantifying the effect of less tangible programs and policies.

It was determined that GPU 2035 would result in a less than significant impact regarding GHG emissions with implementation of CAP reduction Strategies, Goals, Policies, and Actions. These policies and actions would result in a reduction of approximately 195,490 MTCO<sub>2</sub>eq (26.9 percent) below 2020 Business as Usual (BAU) GHG emissions, which is consistent with the State reduction goals set forth in AB 32.

Greenhouse Gas emissions impacts associated with GPU 2035 implementation would be less than significant through implementation of CAP Strategies Policies and Actions. No significant unavoidable GHG emissions impacts would occur as a result of GPU 2035t implementation.

It should be noted that neither the CEQA statutes, Office of Planning and Research guidelines, nor any draft proposed changes to CEQA Guidelines prescribe thresholds of significance or a specific methodology for performing a greenhouse gas impact analysis. Therefore, significance criteria remain with the discretion of the Lead Agency. The “Air Quality and Greenhouse Gas Impact Study” prepared for the Project calculated greenhouse gas emissions using CalEEMod Version 2022.1.1.29 modeling for Project development (construction) and Project operation activities. The South Coast Air Quality Management District has drafted interim thresholds of 3,000 Metric Tons of Carbon Dioxide Equivalent (MTCO<sub>2</sub>e) per year. This interim threshold was used in the above noted study for the Project.

#### **Project Development (Construction)**

The “Air Quality and Greenhouse Gas Impact Study” performed for the Arrow Highway Project calculated total Project construction (demolition; site preparation; grading; building construction; paving; architectural coating) emissions amortized over a 30-year period at an estimated 18.6 metric tons of CO<sub>2</sub>e per year.

### Project Operation

The “Air Quality and Greenhouse Gas Impact Study” calculated Project operational emissions over the life of the Project to be 1,519.12 18.6 metric tons of CO<sub>2</sub>e per year. These emissions do not exceed the County of San Bernardino Climate Action Plan or South Coast Air Quality Management District screening threshold of 3,000 metric tons of CO<sub>2</sub>e per year.

Therefore, since the Arrow Highway Project is consistent with GPU EIR, its GHG impacts would be less than significant. Compliance with State and City requirements would ensure the resultant level of impact would be less than significant.

As discussed previously, the GPU EIR determined that impacts to be less than significant. As the Arrow Highway Project would have a less than significant impact as discussed in the Air Quality and Greenhouse Gas Analysis prepared for the Project, the Project would be consistent with the GPU EIR analysis because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified in the GPU EIR or the GPU Addendum EIR.

### ***8(b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?***

The City of Upland relies on Assembly Bill 32 implementation guidance (e.g., the California Air Resources Board Scoping Plan) as a benchmark for the GPU EIR assessing GHG impacts - - expressed as “Will the project’s [GP2035] GHG emissions impede compliance with the GHG emissions reductions mandated in AB 32? The City prepared a Climate Action Plan as part of its GP2035.

Consistency with the California Attorney General’s Mitigation Measures With implementation of the proposed CAP Climate Action Strategies and associated measures and actions, the proposed General Plan 2035 would comply with measures that are consistent with the California Office of the Attorney General’s recommended measures to reduce GHG emissions. The CAP incorporates practices consistent with the Attorney General’s recommended measures which include water, energy, solid waste, land use, and

transportation efficiency measures. Consistency with the CARB Scoping Plan CARB Scoping Plan Measures/Recommended Actions include those related to transportation, electricity consumption, natural gas usage, water conservation, green buildings, and recycling and waste management. The proposed CAP incorporates several Climate Action Strategies and associated measures and actions that would be consistent with and help implement the CARB Scoping Plan in order to obtain AB 32 goals, as well as the Governor's Executive Order.

CAP reduction measures specified in the GPU EIR and GPU 2035 would result in a total of approximately 195,490 MTCO<sub>2</sub>eq (26.9 percent) below 2020 BAU GHG emissions. The proposed General Plan 2035 would be consistent with the proposed CAP, as CAP strategies, objectives, and measures are consistent with and build upon the proposed General Plan 2035 Goals, Policies, and Actions. Therefore, the GPU 2035 would be consistent, and would not conflict with an applicable GHG reduction plan, policy, or regulation. Impacts in this regard are less than significant. No further mitigation is required beyond implementation of the GPU Policies and Actions and CAP Strategies, Policies, and Actions.

As discussed previously, the GPU EIR determined that impacts to be less than significant. As the Arrow Highway Project would have a less than significant impact as discussed in the Air Quality and Greenhouse Gas Analysis prepared for the Project, the Project would be consistent with the GPU EIR analysis because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified in the GPU EIR or in the GPU Addendum EIR.

### ***Mitigation Measures***

None Required.

### ***Cumulative Analysis***

GPU implementation would result in a less than significant impact regarding GHG emissions with implementation of CAP reduction Strategies, Goals, Policies, and Actions. These policies and actions would result in a reduction of approximately 195,490 MTCO<sub>2</sub>eq (26.9 percent) below 2020 BAU GHG emissions, which is consistent with the State reduction goals set forth in AB 32. Project development

and operational activities are consistent with City of Upland CAP projections and with South Coast Air Quality Management District thresholds of 3,000 metric tons of CO<sub>2</sub>e per year. Therefore, the resultant level of impact cumulatively would be less than significant.

### ***Conclusion***

With regard to the topical issue area of Greenhouse Gas Emissions, the following findings can be made.

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR or the GPU Addendum EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR or the GPU Addendum EIR.
4. No Mitigation Measures contained within the GPU EIR or within the GPU Addendum EIR would be required because there would be no Project-specific impacts pertaining to Greenhouse Gas Emissions.

## 9. HAZARDS AND HAZARDOUS MATERIALS

### *Would the Project...*

- 9(a) *Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*
- 9(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?*
- 9(c) *Emit hazardous emissions or handle hazardous or acutely hazardous material, substances, or waste within one-quarter mile of an existing or proposed school?*
- 9(d) *Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65062.5 and, as a result, would it create a significant hazard to the public or the environment?*
- 9(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?*
- 9(f) *Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*
- 9(g) *Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?*

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

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The GPU EIR concluded that this impact would be less than significant, given that all future developments in the City of Upland would be subject to compliance with City GPU 2035 Policies and Actions and Municipal Code regulations. The GPU Addendum EIR maintains this determination.

The GPU EIR states that while the risk of exposure to hazardous materials cannot be eliminated, compliance with measures established by Federal, State, and local regulatory agencies would adequately offset the negative effects related to the generation, use, storage, and transport of hazardous materials in the City. Compliance with these measures would also ensure that future development does not create unacceptable risk to residents with regard to hazardous materials. In addition, GPU 2035 has Goals that would further minimize risk of exposure. These Goals include a transportation system that accommodates efficient movement of freight vehicles on appropriate routes; a community protected from harmful effects of hazardous materials and waste; and government, businesses and households protected from and prepared for natural or man-made disasters. GPU 2035 identifies Policies and Actions in furtherance of these Goals. All future developments in the City would be subject to compliance with the established Federal and State regulatory framework, including the Municipal Code regulations, and implementation of the General Plan 2035 Policies and Actions, ensuring the potential risk of exposure to hazardous materials is reduced to less than significant.

As previously discussed, overall compliance with measures established by Federal, State and local regulatory agencies would sufficiently offset the negative effects related to the reasonably foreseeable upset and accident conditions involving the release of hazardous materials in the City. Implementation of the aforementioned General Plan Policies and Actions would further minimize potential impacts involving the accidental release of hazardous materials. As GPU 2035 would have a less than significant impact for reasons detailed above, the Arrow Highway Project would be consistent with the GPU EIR analysis because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified in the GPU EIR or in the GPU Addendum EIR.

**9(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?***

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The GPU EIR states that overall, compliance with measures established by Federal, State and local regulatory agencies would sufficiently offset the negative effects related to the reasonably foreseeable upset and accident conditions involving the release of hazardous materials in the City. Implementation of the aforementioned General Plan Policies and Actions would further minimize potential impacts involving the accidental release of hazardous materials. The resultant level of impact would be less than significant. No further mitigation is required beyond implementation of the GPU Policies and Actions. The GPU Addendum EIR maintains this determination.

The GPU EIR identifies potential sources of hazardous materials releases to be underground storage tanks, accidents during transport causing a “spill” of a hazardous materials and/or natural disasters causing the unauthorized release of a substance. If not cleaned up immediately and completely, these and other types of incidents could cause contamination of soil, surface water and groundwater, in addition to any toxic vapors that might be generated. Depending on the nature and extent of the contamination, groundwater supplies could become unsuitable for use as a domestic water source. Human exposure to contaminated soil or water could have potential health effects depending on a variety of factors, including the nature of the contaminant and the degree of exposure. Accidental releases would most likely occur in the commercial and industrial areas and along transportation routes leading to and from these areas. Arrow Highway is not designated as a major transportation corridor in the City. The level of risk associated with hazardous materials would be evaluated on a project-by-project basis during the development process.

Compliance with the established regulatory framework, including the ZCU regulations, and implementation of the General Plan 2035 Policies and Actions specified above, would ensure that potential impacts are reduced to less than significant. Any potential hazardous materials release pertaining to soil, surface water, and/or groundwater contamination would be confirmed and, if

necessary, characterized and remediated to the standards set by the applicable Federal State, and local regulatory agencies.

As discussed previously, the GPU EIR determined impacts from hazards to the public or the environment through reasonably foreseeable upset and accident conditions involving release of hazardous materials would have a less than significant impact for reasons detailed above, the Arrow Highway Project would be consistent with the GPU EIR analysis because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified in the GPU EIR or the GPU Addendum EIR.

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***9(c) Emit hazardous emissions or handle hazardous or acutely hazardous material, substances, or waste within one-quarter mile of an existing or proposed school?***

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The Project site is not located within one-quarter mile of an existing or proposed school. Therefore, Arrow Highway Project development will result in no impact, and the Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR or within the GPU Addendum EIR.

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***9(d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65062.5 and, as a result, would it create a significant hazard to the public or the environment?***

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The GPU EIR indicates that no listed properties on the Cortese List, compiled pursuant to Government Code Section 65962.5, are located within the City. It is noted that 36 regulatory properties were historically noted on the Cortese List per the SWRCB (refer to Table 5.14-1); however, have received case closure by the SWRCB and are no longer on the list. Future development is not anticipated to result in impacts pertaining to sites listed on the Cortese List, as these sites have achieved a case closure status with the SWRCB. A less than significant impact would result in this regard.

The Phase I and Phase II Health Risk Assessment conducted for the Project site. The Phase I Environmental Site Assessment was conducted to identify, to the extent feasible, adverse environmental conditions including recognized environmental conditions (REC) on the Project site. REC is defined as the following:

- ♦ The presence of hazardous substances or petroleum products in, or, or at the Subject Property due to a release to the environment;
- ♦ The likely presence of hazardous substances or petroleum products in, on, or at the Subject Property due to a release or likely release to the environment; or,
- ♦ The presence of hazardous substances or petroleum products in, on, or at the Subject Property under conditions that pose a material threat of a future release to the environment.

The Phase I Assessment identified the following as items of note:

A 24-inch diameter steel casing with a 12-foot diameter access port was seen in the vacant strip of land east of 911 West Arrow Highway. This feature appeared to be a water supply well, but the Phase I ESA recommended additional research to determine its former use. This feature must be abandoned in accordance with applicable regulatory requirements before redevelopment can occur.

The potential for asbestos-containing materials and Lead-based paint exists because the structures on the Project site were developed in the late 1940s and 1950s.

To address the two aforementioned environmental concerns, Stantec performed a Phase II ESA on December 11, 2024, that consisted of collection of shallow soil samples on the Project site. Twelve soil borings to approximately one foot below ground surface were conducted across the Project site. Soil samples were analyzed for Organochlorine Pesticides, arsenic, and lead.

In addition, the Project site is located in Environmental Protection Agency Radon Zone 2 and is considered to have medium potential for radon. A Radon Survey would have to be conducted, but the Phase I ESA states “because there

are no occupied subgrade areas, further investigation of indoor radon issues does not appear to be warranted.”

Stantec performed a Phase II ESA on December 11, 2024, that consisted of collection of shallow soil samples on the Project site that included the advancement of twelve soil borings to approximately 1-foot below ground surface across the Project site. Levels of 4,4-DDE detected were below the United States Environmental Protection Agency Regional Screening Level. No other OCP were detected as being above their corresponding laboratory reporting limits.

As previously discussed, the GPU EIR determined that impacts from existing hazardous materials sites were less than significant. The Arrow Highway Project thereby would have a less than significant impact and would be consistent with the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR or within the GPU Addendum EIR.

***9(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?***

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Cable Airport is located in the southwest portion of the City, northeast of the Foothill Boulevard/Monte Vista Avenue intersection. Encompassing 105 acres, Cable Airport provides private aircraft tie-down, aircraft rentals, and flying lessons. The airport is classified as an uncontrolled field, given that there is no one in the tower directing traffic into and out of the airport. During special events (i.e., the Air Fair), the FAA sets up a temporary control tower for the day. At all other times, pilots are responsible for watching other aircraft in the pattern. Pilots are required to follow rules for operating out of uncontrolled fields. The Cable Airport Comprehensive Airport Land Use Plan (CALUP) was adopted by the West Valley Planning Agency Airport Land Use Commission in December 9, 1981.

The Upland City Council approved a 2015 CALUP on September 14, 2025. The CALUP contains procedural policies and land use compatibility criteria

designed to promote compatibility between Cable Airport and surrounding land uses. The “Cable Airport Land Use Compatibility Plan” was prepared in conjunction with the 2008-2015 update to the City General Plan. Specifically, the CALUP “seeks to protect the public from the adverse effects of aircraft noise, to ensure that people and facilities are not concentrated in areas susceptible to aircraft accidents, and to ensure that no structures affect navigable airspace. This plan shall generally address only those areas and issues, which are affected by, or affect, aircraft operations and establishes Clear Zones, Safety Areas, and Noise Impact Zones. CALUP contains standards that define land uses, which are not compatible within the Clear Zones and Safety Areas. The objective of Clear Zones is to ensure that land uses around the airport will be compatible with airport operations. Residential uses exist adjacent to the Airport to the southeast, which is between the Project site and the Airport. The 2015 CALUP indicates that the Project is located in Zone E, which is characterized as a “Low Noise Impact” zone and a Low Risk Level for potential airport accidents.

The GPU EIR states that overall, implementation of the CALUCP, GPU 2035 Policies and Actions, and City Municipal Code regulations would ensure that the Project would result in a less than significant safety hazard for people residing or working in the Project area.

As previously discussed, the GPU EIR determined impacts related to public airports to be less than significant. The Arrow Highway Project would have a less than significant impact for the reasons discussed above. The Project would be consistent with the analysis in the GPU EIR because the Project would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR or within the GPU Addendum EIR.

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***9(f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?***

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As required by State law, and as indicated in the GPU EIR, Upland established emergency preparedness procedures in its Emergency Operations Plan in order to respond to extraordinary situations associated with natural disasters, technological incidents, and national security emergencies. This Plan is

designed to include the City of Upland as part of the California Standardized Emergency Management System (SEMS). The Emergency Operations Plan assures preparation and maintenance of appropriate and current standard operating procedures (SOP), emergency operating procedures (EOP), resource lists, and checklists that detail how assigned responsibilities are performed to support Emergency Operations implementation and to ensure successful response during a major disaster. In addition to the City's Emergency Operations Plan, the City of Upland has an Emergency Operations Center, department-specific emergency operations plans, and long-range emergency preparedness planning. The City also provides emergency preparedness education to the public. The City Manager's Office in cooperation with the San Bernardino County Fire, Office of Emergency Services oversees the City of Upland Emergency Management Program. An Emergency Services Officer works closely with the city and whole community to ensure all functions of Emergency Management are effectively implemented.

The GPU EIR states that all future development in Upland would be subject to implementation of the Safety Element and Public Facilities and Services Element Policies and Actions. Thus, impacts regarding potential interference with an adopted emergency response or evacuation plan would be less than significant. The Arrow Highway Project thereby would have a less than significant impact and would be consistent with the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR or the GPU Addendum EIR.

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***9(g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?***

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The City contains potential fire threats, both from wildfire to the north in the San Bernardino National Forest and urban fire from existing development. The risk of wildland fires is related to a combination of factors, including winds, temperatures, humidity levels and fuel moisture content. Of these four factors, wind is the most crucial. Steep slopes also contribute to fire hazards by intensifying the effects of wind and making fire suppression difficult. Upland's drainage and open space areas, the foothills to the north, and warm and dry summers create a situation that results in potential wildland fires. Where there

is easy human access to dry vegetation, fire hazards increase because of the greater chance of human carelessness.

GPU 2035 identifies Goals to guide development and protect residents to the maximum extent possible from wildland fires. In furtherance of these Goals, all future development in Upland would be subject to implementation of the Safety Element and Public Facilities and Services Element Policies and Actions specified above. The City would also continue to update/provide maps delineating areas where risk exists and provide education regarding wildland fire risks and fire safety strategies. Continued coordination with adjacent jurisdictions and participation in regional, state, and federal programs would further minimize wildland fire-related risks. Overall, compliance with the Uniform Fire Code, established regulatory framework, Municipal Code requirements, and implementation of GPU 2035 Policies and Actions, would ensure Project implementation would not expose people or structures to a significant risk involving wildland fires. A less than significant impact would occur in this regard.

As discussed, the GPU EIR determined impacts from wildland fires to be less than significant. The Arrow Highway Project is not located within a designated High Fire Hazard Zone, is not located in the northern portion of the City and is surrounded by urban development. Compliance with all City GPU 2035 Goals, Policies and Actions will be required, which will ensure the level of impact would be less than significant. The Arrow Highway Project thereby would have a less than significant impact and would be consistent with the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR or the GPU Addendum EIR.

### ***Mitigation Measures***

None Required.

### ***Cumulative Analysis***

An increase in population within the City would occur from Project implementation. This may increase demand on public health and safety services

in the City. As noted above, impacts related to hazards and hazardous materials would be reduced to less than significant following compliance with established regulatory framework, including the GPU 2035 Policies and actions, and Municipal Code regulations. Potential impacts involving exposure to wildland fire hazards would be similarly reduced to less than significant following compliance with the Uniform Fire Code. As with projects resulting from Project implementation, cumulative projects would be required to evaluate their respective hazards and hazardous materials impacts on a project-by-project basis. Development occurring within the region would be required to comply with Federal, State and local regulations regarding the generation, use, storage, and transport of hazardous materials, as well as exposure to wildland fires. The additional contribution by the Arrow Highway Project would be less than significant regarding public health and safety impacts at a cumulative level. Thus, Project implementation would not result in cumulatively considerable impacts related to Hazards and Hazardous Materials.

### ***Conclusion***

With regard to the topical issue area of Hazards and Hazardous Materials, the following findings can be made.

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR or by the GPU Addendum EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR or by the GPU Addendum EIR.
4. No Mitigation Measures contained within the GPU EIR or within the GPU Addendum EIR would be required because there would be no Project-specific impacts pertaining to Hazardous Materials.

## 10. HYDROLOGY AND WATER QUALITY

### *Would the Project...*

- 10(a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*
- 10(b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*
- 10(c)(i) 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 which would result in a substantial erosion or siltation on- or off-site?*
- 10(c)(ii) 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 which would result in flooding on- or off-site?*
- 10(c)(iii) 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 which would 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?*
- 10(c)(iv) 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 which would impede or redirect flood flows?*
- 10(d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?*
- 10(e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

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***10(a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?***

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The GPU EIR indicates that contaminated groundwater may exist from the active and non-active landfills located within the City. Potential accidental releases as a result of impacting groundwater during site disturbance activities would be analyzed on a project-by-project basis. Implementation of the GPU 2035 Policies and Actions would reduce impacts associated with contaminated groundwater to less than significant.

Future development associated with GPU 2035 implementation could contribute to water quality degradation in the City and to its Sphere of Influence. Runoff from disturbed areas would likely contain silt and debris, resulting in a long-term increase in the sediment load of the storm drain system serving the City and Sphere of Influence. There is also the possibility for chemical releases at future construction sites. Substances such as oils, fuels, paints, and solvents may be transported to nearby drainages, watersheds, and groundwater in storm water runoff, wash water and dust control water. The significance of these water quality impacts would vary depending upon the level of construction activity, weather conditions, soil conditions, and increased sedimentation of drainage systems within the area.

New development and significant reconstruction projects within the City would be required to comply with Upland Municipal Code guidelines, regulations, and funds to meet all stated goals and objectives of the Federal Clean Water Acts of 1972 and 1977 and the Federal Water Quality Act of 1987, as applicable to the City, as well as providing for full compliance with all applicable requirements of the State of California Water Resources Control Board, as implemented by the California Regional Water Quality Control Board, Santa Ana Region. In accordance with the Upland MC Section 13.32.050, Interpretation and applicability, waste discharge requirements Municipal Code related to the NPDES program, as ordered by the Santa Ana Regional Water Quality Control Board will be applied to all project and permit applications identified in the NPDES permit or successor permits, including any applicable requirements relating to the development or redevelopment of property within the City and its jurisdiction.

GPU 2035 requires continued compliance with Federal, State, and regional governments and agencies to protect and improve the quality of local and regional groundwater resources available to the City and its Sphere of Influence. New development projects would be required to meet Federal, State, and local water quality standards and implement mitigation (if necessary) to reduce impacts associated with future development/redevelopment activities. Compliance with Federal, State, regional, and UMC regulatory requirements, and implementation of GPU 2035 Policies and Actions, would ensure that Project implementation would not violate water quality standards or waste discharge requirements.

Development of the Arrow Highway Project will require preparation of a Storm Water Pollution Prevention Plan (SWPPP) that would implement erosion control Best Management Practices. The SWPPP will be prepared in accordance with National Pollutant Discharge Elimination System (NPDES) stipulations.

The Preliminary Hydrology and Hydraulics Study prepared for the Project/Project site indicates that the Arrow Highway Project site will be graded to flow via curb and gutter to 3 curb inlet catch basins and 2 grated inlets that route storm water to an underground infiltration system that also will function as a detention system. The infiltration system will be sized to treat and infiltrate the water quality design capture volume prior to any discharge from the Project site. When the infiltration system is at capacity, runoff will overflow within the catch basins near the Project entry and into the parkway drain that discharges into West Arrow Highway. After entering West Arrow Highway, runoff will follow historic drainage patterns.

The Study analyzed existing according to the San Bernardino Hydrology Manual for peak flow rate and time of concentration for 25-year and 100-year storm events. The detention routing calculation verified that the proposed drainage mitigates to the 100-year storm event design peak flowrate per existing conditions.

Project development will generate a higher peak runoff flowrate. "According to the Hydrology and Hydraulics Study prepared for the Project, detention routing analysis demonstrates that the 100-year storm mitigated runoff peak flow will be lower than downstream receiving water design conditions. The Project will have no hydrologic or hydraulic impacts on the existing

downstream drainage facilities. In the event that the design storm is exceeded, runoff will overflow through the catch basin to the parkway drain and continue along the flow downstream following existing conditions.”

The Preliminary Hydrology and Hydraulics Study prepared for the Project/Project site indicated Project grading is designed to route all on-site generated runoff via street flow toward inlets at low points of the Project site. The inlets will be equipped with FloGard Catch basin filters for pretreatment before entering the underground infiltration system. The infiltration system is designed to infiltrate the Design Capture Volume with a drawdown time of 48 hours. When the infiltration system is at capacity, runoff will overflow in the junction structure near the Project entry and through a proposed parkway drain into West Arrow Highway. Runoff will then follow historic drainage patterns.

The Study further indicated that the Homeowners Association (HOA) will be responsible for development of a report to the City of Upland on an annual basis. The HOA will complete a quarterly or semi-annual inspection of the Project and inspect specified BMP, as contained in the Water Quality Management Plan, including an annual inspection of catch basin inlet messaging, catch basin filters, and underground infiltration system to determine sediment accumulation and if its level exceeds six inches in the system inverts, schedule cleaning by flush and vacuum pumping of the system. The HOA will report on inspection results, maintaining and repairing facilities. The records must be maintained on file by the Owner for at least five years from the date generated. Until the HOA is established, the original builder-owner is responsible for these inspections and report development.

Pollutants expected to be pollutants of concern, based on and uses and Project site activities are the following: pathogens (bacterial/virus); nutrients-phosphorus and nitrogen; sediment; metals; oil and grease; trash/debris; pesticides/herbicides; and organic compounds.

The Water Quality Management Plan (contained in the Appendices to this document) contains an extensive listing of Best Management Practices pertaining to the following:

- ♦ Pollution Prevention via implementation of Non-Structural Source Control Practices

- Education of Property Owners, Tenants and Occupants on Stormwater BMP
- Activity Restrictions
- Landscape Management BMP
- BMP Maintenance
- Litter/Debris Control Programs
- Employee Training
- Catch Basin Inspection Program
- Vacuum Sweeping of Private Streets and Parking Lots
- Compliance with all other applicable NPDES permits
- Provision of storm drain system stenciling and signage
- Use of efficient irrigation systems and landscape design, water conservation, smart controllers, and source control
- ♦ Preventative Low Impact Development (LID) Site Design Practices
  - Minimization of impervious areas
  - Maximization of natural infiltration capacity
  - Preservation of existing drainage patterns and time of concentration
  - Disconnection of impervious areas
  - Re-vegetation of disturbed areas
  - Minimization of unnecessary compaction in stormwater retention;/infiltration basin/trench areas
  - Utilization of vegetated drainage swales in place of underground piping or impervious lined swales
- ♦ BMP Inspection and Maintenance
  - Annual Education of Property Owners, Tenants, Occupants on Stormwater BMP.
  - Bi-Monthly Landscape Management BMP
  - BMP Maintenance - Weekly trash removal; Inspection prior and after rainy season
  - Litter/Debris Control Program – Weekly
  - Employee Training – First hire/Annually
  - Catch Basin Inspection Program – Twice monthly, prior and after rainy season
  - Inspections/Cleaning of Oldcastle FloGard Catch Basin Insert Filters
    - Twice annually

- Inspections/cleanings of ADS StormTech Chambers Infiltration System – at least twice annually and before start of rainy season

As discussed, the GPU EIR determined that GPU 2035 implementation would result in a less than significant impact to water quality degradation and no further mitigation would be required beyond implementation of the GPU Policies and Actions. As the GPU 2035 and the Arrow Highway Project would have less than significant impacts to water quality standards through compliance with relevant GPU 2035 Policies and Actions, and would be required to comply with all State and City water quality requirements, the Project would be consistent with the GPU EIR analysis because the Project would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR or within the GPU Addendum EIR.

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

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The GPU EIR states that although impacts to natural groundwater recharge are not anticipated, impacts to groundwater supplies as a result of increased development would occur. According to the GPU Addendum EIR implementation of the certified 6<sup>th</sup> cycle Housing Element would result in an additional 3,114 residential dwelling units, a reasonable buildout of 3,856 dwelling units on 6<sup>th</sup> cycle Housing Element re-zoned parcels, and 6,402,019 square feet of non-residential development. Projected development and increased population would result in an ultimate increase in the demand for water supplies, including groundwater.

Future development would be reviewed on a project-by-project basis to ensure adequate water supplies are available to accommodate future projects. The City of Upland has established permanent conservation measures and a shortage contingency plan to provide for increasingly serious stages of water shortages and to define voluntary and mandatory conservation measures that would be implemented during these stages. The Upland Municipal Code provides the City Council with the authority to implement the provisions when

the demand for water consumption exceeds the available supply, or threatens to do so, provided there are no immediate resources available to remedy the situation. The Upland Municipal Code establishes conservation measures that are to be implemented during various stages of shortage (year-round, moderate, high, and severe). Specific restrictions would be implemented at each stage.

All future developments would be subject to implementation of relevant GPU 2035 Policies. Compliance with the Upland Municipal Code requirements and implementation of GPU 2035 Policies would ensure that Project implementation would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge. The impact level would be less than significant.

As indicated in the Preliminary Hydrology and Hydraulics Study prepared for the Project/Project site, Arrow Highway Project grading is designed to route all on-site generated runoff via street flow toward inlets at low points of the Project site. The inlets will be equipped with FloGard Catch basin filters for pretreatment before entering the underground infiltration system. The infiltration system is designed to infiltrate the Design Capture Volume with a drawdown time of 48 hours. When the infiltration system is at capacity, runoff will overflow in the junction structure near the Project entry and through a proposed parkway drain into West Arrow Highway. Runoff will then follow historic drainage patterns.

As discussed, the GPU EIR determined that GPU 2035 implementation would result in a less than significant impact to management of groundwater supplies and no further mitigation would be required beyond implementation of the GPU Policies and Actions. As the GPU 2035 and the Arrow Highway Project would have less than significant impacts to groundwater quality standards through compliance with relevant GPU 2035 Policies and Actions, and would be required to comply with all State and City groundwater quality requirements, the Project would be consistent with the GPU EIR analysis because the Project would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR or within the GPU Addendum EIR.

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**10(c)(i)      *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 which would result in a substantial erosion or siltation on- or off-site?***

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A storm drain or stormwater conveyance system are private and public drainage facilities, other than sanitary sewers, through which surface water runoff (typically in urban areas) is transported to another location where the water is discharged to a natural drainage or water course (most likely) or to a treatment facility. The main purpose of the storm drain system is to prevent flooding by transporting water away from developed areas. Growth and urbanization place increased pressure on storm drain capacities. Subsequent development associated with GPU 2035 implementation could contribute to runoff, which may exceed the capacity of the existing drainage system. Growth and urbanization place increased pressure on storm drain capacities. In general, increased urbanization increases the amount of impervious (paved) surfaces, thus reducing the amount of water that would normally infiltrate into the soil. Rainfall, irrigation runoff, and nuisance flows accumulate on impervious surfaces and flow downstream via the storm drain system to surface waters. As a result, storm drains have become increasingly important component in managing water quality impacts in addition to reducing flooding. The City of Upland currently has three Master Plans of Drainage. The Master Plan of Drainage determines drainage impacts of storm flows to existing storm drain facilities and identify facilities required to intercept and convey the tributary storm flows. The potential increase in imperviousness associated with GPU 2035 implementation could impact existing storm drain and flood control facilities. New development projects associated with implementation of the proposed Project would be required to ensure project-specific and citywide drainage systems have adequate capacity to accommodate new development. In addition, the GPU 2035 identifies Goals, Policies and Actions pertaining to drainage and runoff: which would ensure that project-related storm water mitigation techniques are employed and monitored. Future development projects would also be required to pay the storm drain development impact fee to finance public storm drain improvements in accordance with Upland Municipal Code Chapter 3.44. Compliance with Code requirements and implementation of GPU 2035 Policies would ensure that Project implementation would not create or contribute to runoff that would exceed the storm water drainage systems.

As indicated above, the Homeowners Association (HOA) will be responsible for development of a report to the City of Upland on an annual basis. The HOA will complete a quarterly or semi-annual inspection of the Project and inspect specified BMP, as contained in the Water Quality Management Plan, including an annual inspection of catch basin inlet messaging, catch basin filters, and underground infiltration system to determine sediment accumulation and if its level exceeds six inches in the system inverts, schedule cleaning by flush and vacuum pumping of the system. The HOA will report on inspection results and maintain and repair facilities. The records must be maintained on file by the Owner for at least five years from the date generated. Until the HOA is established, the original builder-owner is responsible for these inspections and report development.

As indicated in the Preliminary Hydrology and Hydraulics Study prepared for the Project/Project site, Arrow Highway Project grading is designed to route all on-site generated runoff via street flow toward inlets at low points of the Project site. The inlets will be equipped with FloGard Catch basin filters for pretreatment before entering the underground infiltration system. The infiltration system is designed to infiltrate the Design Capture Volume with a drawdown time of 48 hours. When the infiltration system is at capacity, runoff will overflow in the junction structure near the Project entry and through a proposed parkway drain into West Arrow Highway. Runoff will then follow historic drainage patterns.

As discussed, the GPU EIR determined that GPU 2035 implementation would result in a less than significant impact and no further mitigation would be required beyond implementation of the GPU Policies and Actions. This determination was maintained in the GPU Addendum EIR. As the GPU 2035 and the Arrow Highway Project would have less than significant impacts to water quality and drainage standards through compliance with relevant GPU 2035 Policies and Actions, and would be required to comply with all State and City requirements, the Project would be consistent with the GPU EIR analysis because the Project would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR and within the GPU Addendum EIR.

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**10(c)(ii) *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 which would result in flooding on- or off-site?***

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As shown in the GPU EIR, there are no areas of the City located within a 100-year flood zone. Future development associated with Project implementation would be subject to the Upland Municipal Code applies to all special flood hazard areas within the City of Upland as identified by FEMA. The GPU EIR indicates that future development would be subject to implementation of Policies pertaining to this topic. Compliance with the Municipal Code and implementation of relevant GPU 2035 Policies would ensure that Project implementation would not result in the placement of housing or structures within a 100-year flood hazard area. The Upland Municipal Code establishes requirements for any structure proposed to be constructed, located, extended, converted, or altered within a special flood hazard area and specifically states that no development will be permitted in any special flood hazard area in the City until standards that meet appropriate national Flood Insurance Protection (NFIP) requirements are adopted or a letter of map revision (LOMR) is granted. No development within a special flood hazard area is allowed unless the applicant has obtained all necessary permits from those governmental agencies whose approval is required by federal, state, or local law.

The Arrow Highway Project does not propose altering any drainage patterns. Project storm water flows would be routed to the local and regional storm water system and drainage facilities. All applicable standards would be applied to future development projects to ensure that they are not constructed in a way that would alter a stream or river or result in substantial erosion or flooding. Therefore, less than significant impacts would occur in this regard. Also, refer to flooding and dam inundation impacts discussions below. The GPU EIR states that no further mitigation is required beyond implementation of the GPU Policies and Actions.

As discussed, the GPU EIR determined that GPU 2035 implementation would result in a less than significant impact and no further mitigation would be required beyond implementation of the GPU Policies and Actions. As the GPU 2035 and the Arrow Highway Project would have less than significant impacts to alteration of existing drainage patterns through compliance with relevant

GPU 2035 Policies and Actions, and would be required to comply with all State and City requirements, the Project would be consistent with the GPU EIR analysis because the Project would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR or within the GPU Addendum EIR.

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***10(c)(iii) 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 which would 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?***

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GPU 2035 implementation could potentially result in an additional 3,114 residential dwelling units and 6,402,019 square feet of non-residential development. The GPU EIR states that subsequent development associated with GPU 2035 implementation could contribute to the runoff, which may exceed the capacity of the existing drainage system.

The potential increase in imperviousness associated with GPU 2035 implementation could impact existing storm drain and flood control facilities. New development projects associated with implementation of the proposed Project would be required to ensure project-specific and citywide drainage systems have adequate capacity to accommodate new development.

GPU 2035 contains Goals and Policies that would ensure that GPU 2035-related storm water mitigation techniques are employed and monitored. Future development projects would also be required to pay the storm drain development impact fee to finance public storm drain improvements in accordance with UMC Chapter 3.44. Compliance with the UMC and implementation of GPU 2035 Policies would ensure that Project implementation would not create or contribute to runoff that would exceed the storm water drainage systems and maintain an impact level of less than significant.

As the GPU 2035 and the Arrow Highway Project would have less than significant impacts to alteration of drainage patterns through compliance with relevant GPU 2035 Policies and Actions, and would be required to comply with

all State and City requirements, the Project would be consistent with the GPU EIR analysis because the Project would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR and within the GPU Addendum EIR.

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***10(c)(iv) 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 which would impede or redirect flood flows?***

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As shown in the GPU EIR, there are no areas of the City located within a 100-year flood zone. Future development associated with Project implementation would be subject to the Upland Municipal Code regulations, which applies to all special flood hazard areas within the City of Upland as identified by FEMA. The Upland Municipal Code establishes requirements for any structure proposed to be constructed, located, extended, converted, or altered within a special flood hazard area and specifically states that no development will be permitted in any special flood hazard area in the City until standards that meet appropriate national Flood Insurance Protection (NFIP) requirements are adopted or a letter of map revision (LOMR) is granted. No development within a special flood hazard area is allowed unless the applicant has obtained all necessary permits from those governmental agencies whose approval is required by federal, state, or local law.

The GPU 2035 combined with cumulative projects would have the potential to affect hydrology and drainage of the area. The projects would contribute storm water flows to the local and regional storm water system and drainage facilities. However, each individual project would be required to submit individual analyses to their respective jurisdictions for review and approval before issuance of grading or building permits. Each analysis must illustrate how peak flows generated from each related project site would be accommodated by the existing and/or proposed storm drainage facilities. Therefore, the impacts would not be cumulatively considerable, and impacts in this regard are less than significant. The GPU EIR indicates that future development would be subject to implementation of Policies pertaining to this topic. Compliance with the Municipal Code and implementation of relevant GPU

2035 Policies would ensure that Project implementation would not result in alteration of drainage patterns that would affect flood flows.

The Arrow Highway Project does not propose altering any drainage patterns. Project storm water flows would be routed to the local and regional storm water system and drainage facilities. All applicable standards would be applied to future development projects to ensure that they are not constructed in a way that would alter a stream or river or result in substantial erosion or flooding. Therefore, less than significant impacts would occur in this regard. Also, refer to flooding and dam inundation impacts discussions below. The GPU EIR states that no further mitigation is required beyond implementation of the GPU Policies and Actions. Compliance with the Municipal Code and implementation of relevant GPU 2035 Policies would ensure that GPU 2035 implementation would not result in alteration of flood flows. Compliance with the Upland Municipal Code and implementation of GPU 2035 Policies would ensure that Project implementation would not create or contribute to runoff that would exceed the storm water drainage systems and maintain an impact level of less than significant.

As the GPU 2035 and the Arrow Highway Project would have less than significant impacts to the alteration of 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 which would impede or redirect flood flows through compliance with relevant GPU 2035 Policies and Actions, and would be required to comply with all State and City requirements, the Project would be consistent with the GPU EIR analysis because the Project would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR or within the GPU Addendum EIR.

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

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Seiches, or waves generated by an earthquake in inland bodies of water such as lakes and seas, depend upon numerous factors which include the shape, depth, and size of the respective body of water. The GPU EIR identifies San Antonio Dam as located within Upland's Sphere of Influence, but indicates the

Dam is not particularly likely to produce a seiche, or seiches, due to seasonal rates of precipitation. However, as in the case of the possibility of dam inundation described above, unusual circumstances (i.e., abnormally high seasonal precipitation concurrent with a major seismic event) could arise that might produce a seiche. Although no major population surrounds San Antonio Dam, motion within a usually still body of water could increase the risk of spillover and dam failure, which could result in inundation. The number of inundations and flooding that would occur within the planning area would be reduced by the number and capacity of settling basins that are located south of the dam, which are designed to accommodate conditions above the 100-year flood category. The topography in the City generally slopes from the foothills of the San Bernardino National Forest southerly to the I-10 Freeway. Slope stability, or the potential for mudflow, is, for the most part, a minor problem in the City of Upland. All future construction associated with Project implementation would be required to meet all applicable Federal, State, and local building, seismic, water quality, flood, and drainage standards. In addition, the GPU 2035 includes Goals, Policies, and Actions to address flooding and flood hazards within the City. The GPU EIR anticipates that with implementation of these Goals, Policies, and Actions and compliance with the UMC, seiche and mudflow hazards within the planning area would be reduced to a less than significant level. In addition, the GPU 2035 identifies a Policy, which specifically addresses dam failure.

In the event of an emergency, the City's Emergency Operations Plan would be implemented. The Emergency Operations Plan is intended to provide guidance for the City's planned response to extraordinary emergency situations, associated with natural disasters, terrorism, technological incidents, and nuclear defense operations. The Emergency Operations Plan concentrates on the management, and concepts and response procedures related to large-scale disasters. Implementation of the General Plan 2035 Policies and Actions, and compliance with the procedures identified in the Emergency Operations Plan would reduce potential impacts involving dam inundation to a less than significant level.

As discussed, the GPU EIR determined that GPU 2035 implementation would result in a less than significant impact and no further mitigation would be required beyond implementation of the GPU Policies and Actions. All future construction associated with Project implementation would be required to

meet all applicable Federal, State, and local building, seismic, water quality, flood, and drainage standards. It is anticipated that with implementation of GPU 2035 Goals, Policies, and Actions and compliance with the UMC, seiche and mudflow hazards within the planning area would be reduced to a less than significant level.

As the GPU 2035 and the Arrow Highway Project would have less than significant impacts pertaining to potential dam inundation and flood hazards through compliance with relevant GPU 2035 Policies and Actions, and would be required to comply with all State and City requirements, the Project would be consistent with the GPU EIR analysis because the Project would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR or within the GPU Addendum EIR.

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***10(e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?***

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New development and significant reconstruction projects within the City would be required to comply with Upland Municipal Code which provides guidelines, regulations, and funds to meet all stated goals and objectives of the Federal Clean Water Acts of 1972 and 1977 and the Federal Water Quality Act of 1987, as applicable to the City, as well as providing for full compliance with all applicable requirements of the State of California Water Resources Control Board, as implemented by the California Regional Water Quality Control Board, Santa Ana Region. In accordance with the Upland Municipal Code, waste discharge requirements related to the NPDES program, as ordered by the Santa Ana Regional Water Quality Control Board shall be applied to all project and permit applications identified in the NPDES permit or successor permits, including any applicable requirements relating to the development or redevelopment of property within the City and its jurisdiction.

The City of Upland requires preparation of a Water Quality Management Plan for the Arrow Highway Project. The Water Quality Management Plan prepared for the Project/Project site (contained in the Appendices to the Preliminary Hydrology and Hydraulics Study) contains an extensive listing of Best Management Practices as listed under **10(a)** above.

Compliance with relevant GPU 2035 Policies and Actions, as well as with Upland Municipal Code requirements will ensure any conflict with or obstruction to implementation of a water quality control plan or sustainable groundwater management plan will not occur.

As discussed, the GPU EIR determined that GPU 2035 implementation would result in a less than significant impact and no further mitigation would be required beyond implementation of the GPU Policies and Actions. The Arrow Highway Project would have less than significant impacts to water quality and drainage standards through compliance with relevant GPU 2035 Policies and Actions, and would be required to comply with all State and City requirements,

As previously discussed, the GPU EIR determined impacts related to conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan would be less than significant. As the Arrow Highway Project would be consistent with the GPU EIR analysis, the Project would be consistent with the GPU EIR analysis because the Project would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR or within the GPU Addendum EIR.

### ***Mitigation Measures***

None Required.

### ***Cumulative Analysis***

The GPU EIR states that Impacts related to hydrology, drainage, and water quality resulting from GPU 2035 implementation would be less than significant following compliance with the existing regulatory framework and implementation of General Plan 2035 Policies and Actions. No significant unavoidable cumulative hydrology, drainage, and water quality impacts would occur as a result of GPU 2035 implementation.

## ***Conclusion***

With regard to the topical issue area of Hydrology and Water Quality, the following findings can be made.

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR or by the GPU Addendum EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR or by the GPU Addendum EIR.
4. No Mitigation Measures contained within the GPU EIR or within the GPU Addendum EIR would be required because there would be no Project-specific impacts pertaining to Hydrology and Water Quality.

## 11. LAND USE AND PLANNING

### *Would the Project...*

*11(a) Physically divide an established community?*

*11(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?*

### *11(a) Physically divide an established community?*

The GPU EIR states that the majority of the City's new development would occur through infill development and adaptive reuse, primarily in the Focus Areas. Given Upland's urbanized nature, those parcels anticipated to accommodate development are generally surrounded by existing development and thus would not physically divide an established community. Moreover, GPU 2035 proposes Goals and Policies in the Land Use Element that emphasize connectivity between land uses and development that is integrated with the surrounding neighborhoods. Therefore, Project implementation would have a less than significant impact with regard to division of an established community no further mitigation is required beyond implementation of the GPU Policies.

The Arrow Highway Project proposes a residential density that is consistent with Upland Zoning Code allowance of RM-20. The Project does not propose new major roadways, water supply systems, or utilities to the site.

As previously discussed, the GPU EIR concluded physically dividing an established community as a less than significant impact with no further mitigation required beyond implementation of the GPU Policies. Therefore, the Arrow Highway Project would be consistent with the Land Use and Planning analysis in the GPU EIR because the Project would not create new impacts, increase impacts, and there is no new information of substantial importance than identified in the GPU EIR or in the GPU Addendum EIR.

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***11(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?***

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As indicated in GPU 2035 and the GPU EIR, implementation of the GPU is anticipated to result in approximately 30,300 dwelling units and approximately 12.2 million square feet of non-residential land uses to the projected horizon year 2035. The GPU EIR concluded the environmental impact of City growth would be less than significant.

The Arrow Highway Project is a residential development of 124 attached residential units, open space amenities, landscaping, and parking on 6.188 acres. The residential density and product types are consistent with City of Upland zoning for the Project site. The Arrow Highway Project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, including GPU 2035 Policies and Actions.

GPU 2035 has refined and supplemented Goals, Policies, and Actions regarding future development within Upland. The GPU contains Goals, Policies, and Actions, and the City Zoning Code, Climate Action Plan, and Cable Airport Land Use Compatibility Plan contain standards and guidelines that continue to support current procedures followed by the City when development applications are reviewed, and referral to appropriate Federal and State agencies is necessary to ensure consistency between City and other agency regulations and requirements. The GPU EIR presents an analysis of GPU 2035 consistency with specific Federal and State regulations/plans and concludes the GPU 2035 is consistent with the relevant regulations/plans. Therefore, a less than significant impact would occur in this regard.

In addition, the GPU EIR contains an analysis of GPU 2035 consistency with Federal and State Regulations Plan or Policy Consistency Statement Federal Regulations Clean Air Act. The City Zoning Code contains standards to protect air quality consistent with the Clean Air Act. The GPU EIR contains Goals, Policies, and Actions designed to protect water resources and to enhance water quality and is therefore consistent with the Clean Water Act. GPU 2035 contains Goals, Policies, and Actions to required development in accordance with GUP 2035 to implement storm water management practices during and

after construction in accordance with the NPDES permit program. Therefore, the GPU 2035 is consistent with the NPDES program. All future developments in Upland are required to be in compliance with Federal Endangered Species Act, which would include requiring mitigation of any significant impacts on any rare or endangered species. The City requires all future developments to comply with provisions of the California Endangered Species Act, including requiring mitigation of any significant impacts to any rare or endangered species. Any impacts to wetlands resulting from development in accordance with GPU 2035 would require preparation of a delineation report and jurisdictional determination by the United States Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife. Potential impacts to wetlands would be subject to compliance with the California Department of Fish and Wildlife streambed alteration agreement and Federal and State laws that protect jurisdictional waters of the United States. These agreements require avoidance of wetlands and implementation of mitigation measures for any related wetlands impacts.

In addition, each individual proposed development within the region would be subject to compliance with the relevant Federal and State regulations, as well as SCAG's 2012-2035 RTP/SCS goals and adopted growth forecasts. No further mitigation is required beyond implementation of GPU 2035 Policies and Actions, and CALUCP and Municipal Code standards and guidelines.

As previously discussed, the GPU EIR determined impacts pertaining to conflicts with land use plans, policies, regulations to be less than significant. As the Arrow Highway Project would have a less than significant impact for reasons provided above, the Project would be consistent with the analysis in the GPU EIR because the Project would not create new impacts, increase impacts, and there is no new information of substantial importance than identified in the GPU EIR or in the GPU Addendum EIR.

### ***Mitigation Measures***

None Required.

### ***Cumulative Analysis***

Each individual proposed development would be subject to compliance with their respective General Plans and Municipal Codes. Consistency with each relevant land use plan, policy, or regulation would be verified through the established development review processes, as well as the CEQA environmental review processes, on a project-by-project basis. Therefore, the Project's incremental impact, when considered in combination with development within the subregion, would not result in cumulatively considerable land use impacts. Furthermore, projects within the SCAG region that are regionally significant, as determined by SCAG, would be reviewed for conformity with regional goals, further reducing potential cumulative impacts to a less than significant level.

### ***Conclusion***

With regard to the topical issue area of Land Use and Planning, the following findings can be made.

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR or by the GPU Addendum EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR or by the GPU Addendum EIR.
4. No Mitigation Measures contained within the GPU EIR or within the GPU Addendum EIR would be required because there would be no Project-specific impacts pertaining to Land Use and Planning.

## 12. MINERAL RESOURCES

### ***Would the Project...***

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

***12(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?***

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

No Impact.

***12(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?***

No Impact.

The General Plan EIR recognizes that no mineral resource land use/zoning designations apply to the Project site. The Project site is surrounded by residential and public uses. Therefore, development of the Arrow Highway Project would not result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state and would not 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.

### ***Mitigation Measures***

None Required.

## ***Cumulative Impacts***

*None identified.*

## ***Conclusion***

With regard to the topical issue area of Mineral Resources, the following findings can be made.

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR or by the GPU Addendum EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR or by the GPU Addendum EIR.
4. No Mitigation Measures contained within the GPU EIR or within the GPU Addendum EIR would be required because there would be no Project-specific impacts pertaining to Mineral Resources.

## 13. NOISE

### ***Would the project result in:***

***13(a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?***

***13(b) Generation of excessive groundborne vibration or groundborne noise levels?***

***13(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?***

***13(a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?***

City of Upland noise regulations are included in Upland Municipal Code Chapter 9.40, also known as the Noise Ordinance. The Noise Ordinance permits noise generated by construction activities between the hours of 7:00 AM and 6:00 PM on weekdays. Construction noise is prohibited on Sundays and holidays. The Noise Ordinance governs operational noise generated between two properties and does not regulate noise from transportation sources, such as traffic, aircraft, and railways. The Upland Municipal Code establishes noise exterior noise standards for residential uses

Sensitive populations are more susceptible to the effects of noise and air pollution than are the general population. Land uses considered sensitive by the State of California include schools, playgrounds, athletic facilities, hospitals, rest homes, rehabilitation centers, long-term care, and mental care facilities. Some jurisdictions also consider day care centers, single-family dwellings, mobile home parks, churches, and libraries to be sensitive to noise.

Generally, a sensitive receptor is identified as a location where human populations (especially children, senior citizens, and sick persons) are present, and where there is a reasonable expectation of continuous human exposure to noise.

Short-term construction noise is a localized activity and would affect only land uses that are immediately adjacent to a specific project site. Each construction project would have to comply with the City Noise Ordinance, as well as mitigation measures that may be prescribed pursuant to CEQA provisions that require significant impacts to be reduced to the extent feasible. Thus, a less than significant impact would occur.

A project is considered to have a significant noise impact where it causes an adopted noise standard to be exceeded for the project site or for adjacent sensitive receptors. In addition to being concerned about the absolute noise level that might occur when a new source is introduced into an area, it is also important to consider the existing noise environment. In community noise assessments, it is “generally not significant” if no noise-sensitive sites are located within the project vicinity, or if permanent increases in community noise levels associated with implementation of the Project would not exceed +3 dB at noise-sensitive locations in the Project vicinity. Significant Impact Assumed to Occur if the Ambient Noise Level is Increased by: < 60 dBA > 60 dBA 5.0 dBA or more 3.0 dBA or more.

Typical activities associated with construction are a highly noticeable temporary noise source. Noise from construction activities is generated by two primary sources: 1) the transport of workers and equipment to construction sites, and 2) the noise related to active construction equipment.

GPU 2035 has identified as a Goal to protect the City from interior and exterior noise levels that cause harm to safety, health and well-being. To this end, GPU 2035 Policies require construction projects to adhere to the City’s construction hours and to incorporate measures to minimize impacts to nearby sensitive uses. Through the environmental review process for individual projects, additional mitigation may also be required to further reduce construction-related noise impacts to a less than significant level.

According to the GPU EIR, compliance with the City's Noise Ordinance and implementation of General Plan 2035 Policies would reduce short-term construction noise impacts to less than significant and no further mitigation is required beyond implementation of the GPU Policy and compliance with the City's Noise Ordinance.

The Noise Impact Study conducted for the Upland Manor Project indicated there will be a small increase in traffic noise of 0.3 dBA at 50 feet from the centerlines of Arrow Highway and North San Antonio and a small increase in traffic noise of 0.1 dBA at 50 feet from the centerline of North Mountain Avenue. According to the Federal Highway Administration, a change in noise level of 0-1 dB is considered imperceptible. Therefore, anticipated changes in traffic noise levels due to Project development and operation are considered imperceptible. Thereby, the Project complies with the General Plan Policy, SAF-1.2, which has an allowable increase of 1 dB for existing noise levels of 65 dBA to 75 dBA.

### **Stationary Sources**

In 2035, the GPU EIR indicates that residential uses will comprise the largest land use category in the City, with 5,335 acres or 56.5 percent of the total land in the City. A total of 88.3 percent of the residential land would contain single family uses; 11.7 percent would contain multi-family uses. Future development of residential lots would create stationary noise typical of any new residential development. Noise that is typical of single-family residential areas includes children playing, pets, amplified music, pool and spa equipment operation, mechanical equipment, woodworking, car repair, and home repair. Noise from residential stationary sources would primarily occur during the "daytime" activity hours.

Typical mechanical equipment associated with stationary sources includes heating, ventilation, and air conditioning units (HVAC). Actual activity levels would vary from season to season and day to day, and noise level reference data for the HVAC units are only available for high activity levels more characteristic of conditions during daytime hours on a warm summer day. Typical HVAC units would operate in unoccupied mode throughout the entire nighttime period, using a temperature threshold for cooling that is unlikely to be triggered during those hours. HVAC-related noise levels would be

substantially lower during the nighttime hours than during the loudest daytime hour. As discussed above, temporal variations in noise emissions from the HVAC units are expected to be complex and cannot be accurately distilled into a single diurnal pattern. It is reasonable to expect that, for at least a single daytime hour during warmer times of the year, all or nearly all of the HVAC units could be operating simultaneously and nearly continuously.

GPU 2035 implementation would introduce new land uses requiring periodic landscaping and maintenance. Noise generated by maintenance equipment such as gasoline-powered lawnmowers or leaf-blowers could be a nuisance to nearby sensitive receptors. Maintenance activities would be conducted during daytime hours for brief periods of time and would increase ambient noise levels.

According to the GPU EIR, compliance with the City's Noise Ordinance and implementation of GPU 2035 Policies would reduce short-term stationary source noise impacts to less than significant and no further mitigation is required beyond implementation of the GPU Policy and compliance with the City's Noise Ordinance. The GPU Addendum EIR maintains this determination.

### **Construction Noise Impact**

Construction noise is considered a short-term impact and would be considered significant if construction activities occur outside allowable times. Construction noise will have a temporary or periodic increase in the ambient noise level above the existing within the Project vicinity. The Noise Impact Study prepared for the Arrow Highway Project stated that construction is anticipated to occur during permissible hours from 7:00 a.m. to 6:00 pm. on weekdays, in compliance with City Municipal Code Section 9.40.100. The Noise Impact Study classifies this to have a less than significant impact. The Noise Impact Study does make several Recommendations that are consistent with GPU 2035 Policies pertaining to Noise, as follows:

- ♦ Project construction shall occur during the hours of 7:00 a.m. to 6:00 p.m. on weekdays.
- ♦ All construction equipment shall be equipped with appropriate mufflers.
- ♦ The contractor shall locate equipment staging areas as far away as possible from the sensitive receptors.

- ♦ Vibratory rollers shall not operate within 20 feet of existing buildings. All other heavy equipment shall not operate within 10 feet of existing buildings.
- ♦ Idling equipment shall be turned off when not in use.
- ♦ Equipment shall be maintained so that vehicles and their loads are secured from rattling and banging.

Furthermore, Stationary noise impacts would be considered significant if they result in exceedances of City of Upland Municipal Code regulations. Project operation may result in stationary noise related to HVAC Systems and Transformers. The City Municipal Code states it is unlawful for HVAC equipment to exceed the base ambient noise level by 5 dBA. The base ambient noise level of the surrounding residential properties is 45 dBA Leq during 10:00 p.m. to 7:00 a.m. HVAC equipment is anticipated to be 46 dBA when operating simultaneously as a worst-case scenario and would not increase the base ambient noise level by more than 5 dB. The Noise Impact Study classifies this to have a less than significant impact.

In addition, the Noise Impact Study states Project operational noise will result from HVAC units located in the side yards of the residential units. This equipment will be located at least 23 feet from the CMU wall that lines the residential property line to the east, and at least 34 feet from the property line at the south. Maximum sound power level from a single unit is 78 dBA. At 23 feet away, the sound pressure level is estimated to be 42 dBA on the residential side of the wall. At 34 feet away, the sound pressure is estimated to be 39k dBA on the residential side of the wall. For the worst case scenario of 12 HVAC units operating simultaneously near the southwester property line, the sound level is 46 dBA on the residential side of the wall. Also, operational noise complies with Section 9.40.100 of the Upland Municipal Code which states, ‘...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 in any manner so as to create any noise which would cause the noise level at the property line of any property to exceed the ambient noise base level by five dB(A).’ The noise due to the HVAC units operating simultaneously will not exceed the night-time base ambient noise level of 45 + 5 dBA. The impact level is therefore less than significant.

As previously discussed, the GPU EIR determined short-term and stationary-source impacts to excessive noise levels as less than significant with implementation of **Mitigation Measure NOI-1**.

The GPU EIR concludes that all mobile and stationary source impacts would be reduced to less than significant levels through implementation of the GPU 2035 Policies and Actions, and compliance with the City's Noise Ordinance. Further, in addition to the development standards proposed for each respective zone, the Upland Zoning Code has design standards and guidelines to provide an added level of definition for the intended development character that. require the location of site uses to be coordinated with adjoining properties to avoid creating nuisances such as noise, particularly when development is adjacent to sensitive uses such as residential development. The Arrow Highway Project would also have a less than significant impact because it would not create new impacts, increase impacts, and there is no new information of substantial importance that identified in the GPU EIR or in the GPU Addendum EIR.

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***13(b) Generation of excessive groundborne vibration or groundborne noise levels?***

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The types of construction vibration impact include human annoyance and building damage. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. Building damage can be cosmetic or structural. Ordinary buildings that are not particularly fragile would not experience any cosmetic damage (e.g., plaster cracks) at distances beyond 25 feet. This distance can vary substantially depending on the soil composition and underground geological layer between vibration source and receiver. Construction activities that may occur as a result of Project implementation have the potential to generate low levels of groundborne vibration.

The GPU EIR states that implementation of GPU 2035 Policies, compliance with the City's Noise Ordinance and implementation of GPU 2035 **Mitigation Measure NOI-1**, would ensure that programmatic-level construction vibration impacts would be less than significant. Individual development projects would be reviewed for project-specific impacts during any required environmental review. If project-specific significant impacts are identified, applicable

mitigation measures would be imposed on the project as conditions of approval.

The technical study prepared for the Project states that Construction vibration would be significant if vibration exceeds levels that would result in structural damage to existing buildings. Construction activity is not anticipated to occur within 20 feet of neighboring structures. At a distance of 20 feet a vibratory roller would yield a worst-case 0.268 PPV (inches/second), which will be perceptible, but is below the threshold of any risk of damage. Vibratory rollers shall not operate within 20 feet of existing buildings. All other heavy equipment shall not operate within 10 feet of existing buildings.

As previously discussed, the GPU EIR determined that impacts to excessive groundborne vibration was a less than significant impact, with implementation of the General Plan 2035 Policies, compliance with the City's Noise Ordinance and implementation of **Mitigation Measure NOI-1**. The Arrow Highway Project would have a less than significant impact. Therefore, the Project would be consistent with the analysis in the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified in the GPU EIR or in the GPU Addendum EIR.

***13(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?***

Cable Airport, which is located in the southwestern portion of the City, is the single source of air traffic affecting City noise levels. Aircraft flyovers are heard occasionally in the City; however, the aircraft do not contribute a significant amount of noise heard in the City according to the GPU EIR. Noise contours prepared as part of the Cable Airport Land Use Compatibility Plan (CALUCP) indicate that the 2013 55 to 60 dBA CNEL noise contours extended northeast into various residential uses, while the 60 to 75+ dBA CNEL contours were confined to the commercial and industrial areas surrounding and in close proximity to the airport. Overall, implementation of the CALUCP, General Plan 2035 Policies and Actions, and Upland Municipal Code regulations would

ensure that GPU 2035 implementation would not expose people residing or working in the GPU 2035 area to excessive aircraft-related noise levels. A less than significant impact would occur in this regard.

The Arrow Highway Project site is not within these specified noise corridors. No further mitigation is required beyond implementation of the GPU Policies and Actions, and compliance with the City's Noise Ordinance. As a result, the level of impact is less than significant. Therefore, the Upland Manor Project would be consistent with the GPU EIR analysis because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified in the GPU EIR or in the GPU Addendum EIR.

### ***Mitigation Measure***

**NOI-1** During construction, the City shall require future developments to implement the following measures to reduce the potential for human annoyance and architectural/structural damage resulting from elevated groundborne noise and vibration levels.

- ♦ Pile driving within a 50-foot radius of historic structures shall utilize alternative installation methods where possible (e.g., pile cushioning, jetting, predrilling, cast-in-place systems, resonance-free vibratory pile drivers)
- ♦ The preexisting condition of all designated historic buildings within a 50-foot radius of proposed construction activities shall be evaluated during a preconstruction survey. The preconstruction survey shall determine conditions that exist before construction begins for use in evaluating damage caused by construction activities. Fixtures and finishes within a 50-foot radius of construction activities susceptible to damage shall be documented (photographically and in writing) prior to construction. All damage shall be repaired back to its preexisting condition.
- ♦ Vibration monitoring shall be conducted prior to and during pile driving operations occurring within 100 feet of the historic structures. Every attempt shall be made to limit construction-generated vibration levels in accordance with Caltrans recommendations during pile driving and impact activities in the vicinity of the historic structures.

### **Current State of Project Compliance with MM-NOI-1:**

MM-NOI-1 requires specific construction procedures, pre-construction surveys, and vibration monitoring within a 50-foot and 100-foot radius of designated historic structures. The proposed project does not include pile driving or any other high-vibration construction activities (e.g., blasting or deep dynamic compaction) capable of generating damaging ground vibration within a 50-foot radius of designated historic structures. Second, a review of the site and surrounding conditions confirms that no designated historic structures are located within the 100-foot sensitive radius defined by the measure. Because the project avoids both the vibration-generating activity and the susceptible receptor type, the underlying significant impact of architectural and structural damage from construction vibration does not occur. Therefore, MM-NOI-1 is not applicable to the project, is deemed cleared and no further action is required under this specific measure.

### ***Cumulative Analysis***

With GPU 2035 implementation, some residential uses would experience noise levels that would exceed the allowable Land Use Compatibility Criteria. However, implementation of GPU 2035 Policies and Actions compliance with the City Noise Ordinance would result in Noise and Vibration being a less than significant impact. If project-specific significant impacts are identified, specific mitigation measures would be placed on the project as conditions of approval to ensure compliance with the appropriate Land Use Criteria Compatibility Criteria.

### ***Conclusion***

With regard to the topical issue area of Noise, the following findings can be made.

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR or by the GPU Addendum EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR or by the GPU Addendum EIR.

- 4 **Mitigation Measure NOI-1** contained within the GPU EIR or in the GPU Addendum EIR would be required to ensure any Arrow Highway Project-specific impacts pertaining to **Noise** would be reduced to a less than significant level.

## 14. POPULATION AND HOUSING

### *Would the Project...*

**14(a)** *Induce substantial unplanned population growth in an area, either directly or indirectly?*

**14(b)** *Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

**14(a)** *Induce substantial unplanned population growth in an area, either directly or indirectly?*

As indicated in GPU 2035 and the GPU Addendum EIR, implementation of the GPU is anticipated to result in approximately 30,300 dwelling units (an increase in the City's housing stock of 3,114 dwelling units) and approximately 12.2 million square feet of non-residential land uses to the projected horizon year 2035. Overall, the General Plan 2035's forecast population growth would occur over an approximately 22-year period and would not require substantial development of unplanned or unforeseen public services or utility/service systems. The forecast population growth would comply with SCAG growth forecasts. Additionally, all future developments would be subject to implementation of the specified General Plan 2035 Policies and Actions. Therefore, GPU 2035 implementation would result in less than significant impacts involving population growth.

The Arrow Highway Project is a residential development of 124 attached residential units, open space amenities, landscaping, and parking on 6.188 acres. The residential density and product types are consistent with City of Upland zoning for the Project site. The Arrow Highway Project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, including GPU 2035 Policies and Actions. The Project is consistent with Upland Zoning Code density requirements. Therefore, Project development would not induce substantial unplanned population growth in Upland. In addition, the Project does not propose any physical or regulatory change that would remove a restriction to or encourage population growth in Upland.

As discussed, the GPU EIR determined population growth impacts to be less than significant. As the Arrow Highway Project would also have a less than significant impact for reasons discussed above, the Project would be consistent with the analysis in the GPU EIR because the Project would not create new impacts, increase impacts, and there is no new information of substantial importance than identified in the GPU EIR or in the GPU Addendum EIR.

***14(b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?***

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The GPU EIR would not displace housing or people through removal of existing uses, since this is not proposed. Therefore, GPU 2035 would not necessitate construction of replacement housing in this regard. The GPU EIR states that no further mitigation is required beyond implementation of the GPU Policies.

California Senate Bill 330 requires any housing that is removed must be replaced at a specified ratio. Two residences on the Project site will be demolished, but 124 residences will be developed, thereby ensuring that any existing housing that would be demolished as part of Project development would be mitigated to a less than significant level.

As discussed, the GPU EIR determined displacement impacts to be less than significant. As the Upland Manor Project would also have a less than significant impact for reasons discussed above, particularly since the Project would involve replacing two homes to be demolished with 124 new residences, the Project would be consistent with the analysis in the GPU EIR because the Project would not create new impacts, increase impacts, and there is no new information of substantial importance than identified in the GPU EIR or in the GPU Addendum EIR.

***Mitigation Measures***

None Required.

### ***Cumulative Analysis***

Cumulative impacts involving population, housing, and employment are analyzed in the GPU EIR in terms of consistency with SCAG growth assumptions for the SANBAG Subregion (i.e., County of San Bernardino). SCAG forecasts the Subregion will grow to 847,000 households (968,664 dwelling units extrapolated), with a resultant population of approximately 2,750,000 persons, and 1,059,000 jobs by 2035.7 With an existing population of approximately 2,076,274 persons, the Subregion's population is forecast to grow approximately 32 percent between 2013 and 2035. The GPU 2035 household, population, and employment forecasts for the City would not cause SCAG's 2035 forecasts to be exceeded. Additionally, the emphasis regarding growth has been placed primarily on achieving a balance of employment and housing opportunities, and the Project would improve the area's jobs/housing balance. The combined cumulative impacts to population growth from the GPU 2035 incremental effects and those of the cumulative projects in the subregion would be less than significant.

As concluded above, the Project could induce population growth both through housing and employment generating land use. Therefore, the GPU 2035 incremental effects involving population growth are cumulatively considerable. The Project would not displace substantial numbers of people or housing or create a housing demand that would necessitate construction of replacement housing elsewhere. Therefore, the GPU 2035 incremental effects involving displacement and replacement housing are not cumulatively considerable.

### ***Conclusion***

With regard to the topical issue area of Population and Housing, the following findings can be made.

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR or by the GPU Addendum EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR or by the GPU Addendum EIR.

4. No Mitigation Measures contained within the GPU EIR or within the GPU Addendum EIR would be required because there would be no Project-specific impacts pertaining to Population and Housing.

## 15. PUBLIC SERVICES

### *Would the Project...*

**15(a)** *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:*

- Fire protection?
- Police protection?
- Schools?
- Parks?
- Other public facilities?

**15(a)** *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:*

- Fire protection?
- Police protection?
- Schools?
- Parks?
- Other public facilities?

---

### **Water Supply**

According to the certified GPU Addendum EIR, the City of Upland is approximately 95 percent built out. GPU 2035 implementation would result in additional development, resulting in an increase in the City's population and

businesses, and thus, an overall increase in total water demand. The City's 2020 Water Management Plan anticipates the City's population to reach over 92,862 by 2045 with a projected water demand of 25,003 acre-feet by 2045. This estimate is based on the City currently being largely built out and the anticipation that most future development will be comprised of full utilization of existing vacant land and reuse and redevelopment of older, lower density, and underutilized properties.

The City of Upland has developed a diverse portfolio of water supplies that includes groundwater from three groundwater basins (Chino Basin; Six Basins; Cucamonga Basin), local surface water from San Antonio Creek, and imported water from the Metropolitan Water District of Southern California (MWD) conveyed through inland Empire Utilities Agency (IEUA). Local groundwater and surface water supplies are available directly to the City or through the City's shareholder ownership in two small water companies. IEUA provides recycled water.

The City of Upland Urban Water Management Plan was prepared in accordance with the Urban Water Management Planning Act, which has very specific requirements for the 2020 Urban Water Management Plan (UWMP) and has added modifications to the 2015 UWMP. Additionally, the City's 2020 UWMP integrates water supply and land use planning in Upland through presentation of a description of historical and project water use, conservation targets and water use efficiency activities to maintain and further reduce water use, water supply sources, a comparison of water supplies and water demands during normal, single dry and multiple dry years, contingency planning for water shortages, and UWMP coordination and adoption details.

In addition to water supply, the Upland 2020 UWMP addresses efficient use of water, demand management measures, implementation strategies and schedules, and other relevant information and programs.

The Upland 2020 UWMP indicates that there are sufficient water supplies and water shortage contingency plans to protect existing and future water needs. The 2020 UWMP states that based on MWD supply, City groundwater supplies, groundwater purchases from the San Antonio Water Company, recycled water supply, and limited local surface supply, "...the region can provide reliable water supplies under all years of the multiple dry year hydrology" and that

“MWD has documented that deliveries within its service area are projected to be 100 percent reliable in multiple dry years.” (UWMP Table ES-5). Furthermore, the 2020 UWMP states that “the imported supply was 100 percent reliable curing the previous two multiple year droughts...[and] MWD has stated that its supplies will be fully reliable during the next multiple year drought under most if not all conditions.” (UWMP Table 6)

The GPU EIR states that with adherence to the UMC and WMP, and implementation of GPU 2035 Policies and Actions, potential impacts to water infrastructure associated with GPU 2035 implementation would be less than significant.

The Arrow Highway Project will necessitate water service. However, in that the residential density is contemplated in the City Zoning Code and the increased numbers of housing units fall within SCAG projections, the Project would not result in an adverse physical effect on the environment because the Project would not require new or significantly altered services or facilities to be constructed. The Project will be required to obtain service verification from the appropriate water agency. Therefore, the Arrow Highway Project would not result in the need for significantly altered services or facilities related to water service. In that the Project would be consistent with SCAG projections and because the Project would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR or within the GPU Addendum EIR.

### Fire Protection

Implementation of the GPU 2035 would allow additional residential and non-residential development, resulting in an increase in the City’s population and businesses, and thus, an overall increase in demand for fire protection services.

At the time the GPU EIR was certified, fire protection services were provided by the Upland Fire Department. Effective July 22, 2017, the City of Upland now obtains fire protection and emergency services from the San Bernardino County Fire Department. The GPU EIR indicated that future development would be reviewed on a project-by-project basis and new developments would be

required to comply with all applicable Fire Code and Ordinance requirements for construction, access, water mains, fire flows, and hydrants. Individual projects are reviewed by the San Bernardino County Fire Department to determine the specific fire requirements applicable to the specific development. This would ensure new developments would not reduce staffing, response times, or existing service levels within the City. Furthermore, future developments would be required to pay the applicable fire service fees in place at the time.

GPU 2035 has Goals and Policies that would ensure sufficient levels of staff in order to maintain quality fire protection and emergency medical services to the community are provided as measures by the Fire Department's performance indicators and provide additional response units, staffing and related capital improvements, as needed, to ensure quality service to the community as development and growth occur in the City. Thus, future developments within the City would be subject to implementation of applicable GPU 2035 Policies, which would ensure that fire protection personnel, facilities, and equipment are available to serve new development. With implementation of GPU 2035 Policies and Actions and adherence to Upland Municipal Code requirements, potential impacts associated with increased demand on fire protection services with implementation of GPU 2035 would be reduced to a less than significant level.

As previously discussed, the GPU EIR determined less than significant impacts from new fire protection services and facilities would result from GPU 2035 buildout. As the Arrow Highway Project would have a less than significant impact for reasons discussed above, the Project would be consistent with the GPU EIR analysis because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified in the GPU EIR or in the GPU Addendum EIR.

### **Police Protection**

As individual projects are proposed within the City, the Upland Police Department service levels and staffing requirements would be evaluated to determine if additional staffing and/or facilities would be required. As growth associated with GPU 2035 would occur over an approximately 20-year period, the Upland Police Department would effectively plan for increases in

population and police protection service demand. The City charges development impact fees for new development within the City, including for law enforcement. Development Impact fees for general government, fire and police are established upon issuance of all building permits for development within the City to pay for public improvements.

GPU 2035 proposes Goals and Policies that would ensure adequate public facilities, infrastructure, staffing, services, and related capital improvements are available and that the community is kept safe through law enforcement and crime prevention. Therefore, future developments within the City would be subject to implementation of GPU 2035 Policies and Actions, which would ensure that police protection personnel, facilities, and equipment are available to serve new development. Compliance with GPU 2035 Policies and Actions and adherence to the Upland Municipal Code, the GPU EIR concludes potential impacts associated with increased demand on police protection services with GPU 2035 implementation would be reduced to a less than significant level.

As previously discussed, the GPU EIR determined less than significant impacts from new police protection services and facilities would result from GPU 2035 buildout. As the Arrow Highway Project would have a less than significant impact for reasons discussed above, the Project would be consistent with the GPU EIR analysis because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified in the GPU EIR or in the GPU Addendum EIR.

### **Schools**

It should be noted that growth associated with GPU 2035 is anticipated to occur over several years, based on a variety of factors, including market demand; thus, any increase in demand for school services would occur gradually as additional development is added to the area. Furthermore, although the Project anticipates growth within certain areas of the City and Sphere of Influence, the exact location, timing, and amount of development that would occur is not currently known. It is anticipated that future students generated by the addition of new residential uses will attend multiple schools serving the City. In order to maintain adequate classroom seating and facilities standards, individual development projects would be required to pay statutory fees to the school districts serving the Project area in order to compensate for the impacts

of development on school capacities. Payment of fees to the School Districts is considered full mitigation for development project impacts, including impacts related to 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, or other performance objectives for schools. Therefore, project applicants would be required to pay the statutory fees, so that space can be constructed, if necessary, at the nearest sites to accommodate the impact of project-generated students, reducing impacts to a less than significant level.

GPU 2035 proposes Policies to ensure educational services and facilities meet demands of existing and new development. Policies and Actions and payment of statutory fees to the school districts, potential impacts associated with increased student generation with implementation of GPU 2035 would be reduced to a less than significant level.

As previously discussed, the GPU EIR determined less than significant impacts from new school services and facilities would result from GPU 2035 buildout. As the Arrow Highway Project would have a less than significant impact for reasons discussed above, the Project would be consistent with the GPU EIR analysis because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified in the GPU EIR or in the GPU Addendum EIR.

## **Parks**

Implementation of GPU 2035 would allow additional residential development, potentially resulting in an increase in the City's and SOI's population and thus, creating an overall increase in demand for parks and recreational facilities. The City's 6<sup>th</sup> certified 6<sup>th</sup> cycle Housing Element anticipates development of approximately 3,114 dwelling units within the City, with a resultant population growth of approximately 8,135 persons. By 2035, the Planning Area's population is anticipated to grow to approximately 81,462 persons.

GPU 2035 does not propose modifications to existing land designated for parks and recreation. However, the City anticipates additional parkland and open space would occur as part of future development projects, which would

further contribute to available parkland in order to serve future residents associated with Project implementation.

GPU 2035 has Goals and Policies that would support provision and enhancement of parks and recreational facilities within Upland and the Upland Municipal Code establishes a park acquisition and development fees to be remitted prior to issuance of Building Permits. These Policies and Actions support a system of parks, recreational facilities, trails, and programs that would meet the needs of current and anticipated residents, further reducing parkland impacts. Impacts would be less than significant in this regard.

As previously discussed, the GPU EIR determined less than significant impacts from new park facilities would result from GPU 2035 buildout. As the Upland Manor Project would have a less than significant impact for reasons discussed above, the Project would be consistent with the GPU EIR analysis because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified in the GPU EIR or the GPU Addendum EIR.

### ***Mitigation Measures***

None Required.

### ***Cumulative Analysis***

Development projects would be required to pay fees in place at the time toward the provision of additional staffing, equipment, or facilities, as needed. This would ensure that new developments would not reduce the staffing, response times, or existing service levels. Impacts to public services associated with GPU EIR/Addendum EIR implementation would be less than significant following implementation of the GPU 2035 Policies and compliance with Upland Municipal Code regulations. Cumulative impacts would be assessed on a project-by-project basis and mitigated through the established regulatory review process. Therefore, the combined cumulative impacts to Public Services associated with GPU 2035 incremental effects and those of the cumulative projects would be less than significant.

## ***Conclusion***

With regard to the topical issue area of Public Services, the following findings can be made.

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR or by the GPU Addendum EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR or by the GPU Addendum EIR.
4. No Mitigation Measures contained within the GPU EIR or within the GPU Addendum EIR would be required because there would be no Project-specific impacts pertaining to Public Services.

## 16. RECREATION

### *Would the Project...*

**16(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?*

**16(b)** *Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

**16(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?*

The project has been designed to incorporate common open space, providing onsite park land opportunities for future residents. Specifically, the project site includes on-site amenities that consist of recreational play areas, tot lot, picnic tables, barbecues, benches, and paseos. However, while the inclusion of on-site amenities would reduce impacts on local parks, project residents would still use parks within the City's park system.

Ordinance No. 1811 was approved by the City Council in 2006 and established the requirement for the dedication of park land or the payment of fees in lieu thereof, pursuant to the Quimby Act. Ordinance No. 1811 established the City's Park Standard devoted to parks and/or recreational purposes of at least three (3) acres per 1,000 persons residing in a subdivision that is subject to Quimby Fees. Over the years, Park Fees have been collected Citywide from residential subdivisions and placed into the Park Development Fund on a cumulative basis. Based on an analysis of park and recreational facilities, the City has a standard of 3.00 acres per 1,000 residents citywide, and currently provides 3.62 acres per 1,000 residents. There are currently 286.1 acres devoted to public park and recreational facilities in the City.

The GPU EIR Addendum, prepared in coordination with the 6<sup>th</sup> Cycle Housing Element Rezoning Program, which incorporated the rezoning of the subject

parcels contained within the Arrow Highway Residential Project to Residential Multi-Family Low (RM-20), concluded that impacts to parks and recreation facilities would be less than significant. The project will be required to comply with Upland Municipal Code Section 3.44.020, pertaining to the payment of park acquisition and development impact fees on the issuance of all building permits. Thus, with the payment of applicable fees, the Project would not increase demand for parks and recreation facilities or create the need for additional facilities.

***16(b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?***

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Implementation of GPU 2035 would allow additional residential development, potentially resulting in an increase in the City and Sphere of Influence population and thus, an overall increase in demand for parks and recreational facilities. The GPU Addendum EIR anticipates the development of approximately 3,114 dwelling units within the Planning Area, with a resultant population growth of approximately 8,377 persons, assuming a persons per dwelling unit factor of 2.69. By 2035, the Planning Area's population is anticipated to grow to approximately 81,462 persons. Based on the City's established parkland-to-population requirement of 3.0 acres of parkland per 1,000 persons, the City would need 244 acres of parkland to serve the population anticipated by GPU 2035 build out. GPU 2035 does not propose modifications to existing land designated for parks and recreation. However, the City anticipates additional parkland and open space would occur as part of future development projects, which would further contribute to available parkland in order to serve future residents associated with Project implementation. The Upland Municipal Code establishes a park acquisition and development fee to be paid on issuance of all building permits for development within the boundaries of the City to pay for acquiring of and improvement to land designated for park use, which would contribute to reducing potential parkland impacts on a project-by-project basis. The GPU 2035 includes Policies and Actions that further support the provision and enhancement of parks and recreational facilities within the City. These Policies and Actions support a system of parks, recreational facilities, trails, and programs that would meet the needs of current and anticipated residents, further reducing parkland impacts. Impacts would be less than significant in this regard.

The Project proposes to provide recreational amenities on-site as part of Project development. Construction of these recreational amenities would not increase use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. As the Arrow Highway Residential Project would have a less than significant impact for reasons discussed above, the Project would be consistent with the GPU EIR analysis because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified in the GPU EIR or in the GPU Addendum EIR.

### ***Mitigation Measures***

None Required.

### ***Cumulative Analysis***

The City of Upland maintains a performance standard of 3 acres of parkland for every 1,000 residents. The current City population is estimated to be 78,841, which would require approximately 236.5 acres of parkland to maintain the City's parkland performance standard. There are 286.1 acres of developed parkland in the City. Therefore, the City currently exceeds its parkland performance standard by 49.6 acres and thereby has sufficient recreational amenities for Upland's existing population plus an additional 16,533 persons.

The Project's incremental effects involving parks and recreational facilities would not be cumulatively considerable. Individual development projects would be reviewed to determine their potential impact on parks and recreational facilities within the City and would be required to comply with Upland Municipal Code requirements, which establishes a park acquisition and development fee on issuance of all building permits for development within the boundaries of the City to pay for acquiring of and improvement to land designated for park use. This would contribute to reducing potential parkland impacts on a project-by-project basis. Implementation of GPU 2035 Policies and Actions would further ensure the provision of parks and recreational facilities to serve future growth associated with the GPU 2035. GPU 2035 would pursue opportunities to provide new facilities, improve and enhance existing facilities, pursue joint use

agreements, and expand other recreational opportunities through trails, community gardens, and greenspace. Implementation of the General Plan Policies and Actions would ensure that parks and recreation demands are addressed as development projects are considered. Therefore, the combined cumulative impacts to parks and recreational facilities associated with the GPU 2035 incremental effects and those of the cumulative projects would be less than significant.

### ***Conclusion***

With regard to the topical issue area of Recreation, the following findings can be made.

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR or by the GPU Addendum EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR or by the GPU Addendum EIR.
4. No Mitigation Measures contained within the GPU EIR or within the GPU Addendum EIR would be required because there would be no Project-specific impacts pertaining to Recreation.

## 17. TRANSPORTATION

### *Would the Project...*

**17(a)** *Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*

**17(b)** *Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?*

**17(c)** *Substantially increase hazards due to a geometric design feature or incompatible uses?*

**17(d)** *Result in inadequate emergency access?*

**17(a)** *Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*

The Upland GPU EIR does not use a Vehicle Miles Traveled methodology to evaluate this impact; rather, a Level of Service analysis was used.

The GPU EIR states this is a less than significant impact with Mitigation. This determination was maintained in the GPU Addendum EIR. The GPU EIR indicates that Arrow Highway is designated as a Secondary Arterial roadway, which stipulates that such roadway designation provides service for moderate length trips and can carry traffic volumes between 10,000 and 30,000 vehicles daily. Secondary arterials typically have curb-to-curb roadway widths from 35-85 feet. Arrow Highway has pedestrian sidewalks.

Arrow Highway is a four-lane, divided roadway west of Mountain Avenue and a four-lane undivided roadway between Mountain Avenue and San Antonio Avenue where the Project site is located. Between San Antonio Avenue and Euclid Avenue, Arrow Highway becomes a two-lane, divided roadway. East of Euclid Avenue, Arrow Highway is a two-lane undivided roadway with a posted

speed limit of between 35 and 45 miles per hour. Arrow Highway is part of the regional transportation system in the Congestion Management Plan (CMP). All CMP roadway segments are forecast to operate at an acceptable level of service under GPU 2035 conditions.

In addition, Arrow Highway is depicted in the GPU EIR as being the location of a proposed Class II/III Bikeway Facility Classification, which signifies an on-street bicycle path. A Class II facility is a marked route delineated by signs and a striped bicycle lane. When on-street parking is allowed, the bike lane is striped between the parking lane and the traffic lane. A Class III facility is similar to a Class II facility, with the exception that the bicycle lane is not striped along the facility and typically is delineated with signage.

The GPU EIR indicates that “with mitigation incorporated, all study intersections and roadway segments are forecast to operate acceptably under General Plan 2035 conditions.” This conclusion is further substantiated in the Traffic Impact Analysis (Level of Service) prepared for the Arrow Highway Project.

Future proposals for development would be evaluated on a case-by-case basis for their potential impacts to transportation and traffic and, if necessary, additional mitigation would be recommended and traffic fees imposed to further minimize potential impacts. No intersection or roadway fees are specified for arrow highway or for Arrow/San Antonio.

As previously discussed, the GPU EIR determined less than significant impacts from conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities would result from GPU 2035 buildout. As the Arrow Highway Project would have a less than significant impact for reasons discussed above, the Project would be consistent with the GPU EIR analysis because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified in the GPU EIR or the GPU Addendum EIR.

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***17(b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?***

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The Upland GPU EIR does not use a Vehicle Miles Traveled methodology to evaluate this impact, as indicated above.

California Senate Bill 743 was adopted in 2013. This legislation required the Governor's Office of Planning and Research (OPR) to identify new metrics for identifying and mitigating transportation impacts within CEQA. For land use projects, OPR has identified Vehicle Miles Traveled (VMT) as the metric for transportation analysis under CEQA. The regulatory changes to the CEQA Guidelines that implement Senate Bill 743 were approved in December 2018, with an implementation date of July 1, 2020, as the new metric.

The GPU EIR/GPU Addendum EIR does not analyze transportation impacts according to a Vehicle Miles Traveled framework. However, subsequently to certification of the GPU EIR, the City of Upland Guidelines required a Level of Service Analysis when either AM or PM peak hour trip generation exceeds 100 vehicle trips or when the Project will add 51 or more AM or PM peak hour trips to any intersection. Based on Institute of Transportation Engineers Trip Manual (2021) standard rates for Single-Family Attached Housing, the Project is expected to generate a net total of 950 daily trips, which include 63 AM peak hour trips and 75 PM peak hour trips.

Although the Project does not meet the City Guidelines thresholds requiring an LOS analysis, the Project will (1) generate fewer than 100 vehicle trips during either the AM or PM peak hour and (2) generate fewer than 51 inbound and fewer than 51 outbound trips to any single intersection for either AM or PM peak hour.

A Level of Service analysis of the following three intersections was conducted for the Project:

- North San Antonio Avenue/West Arrow Highway
- North Mountain Avenue/West Arrow Highway
- Project Driveway/West Arrow Highway

These three intersections were analyzed for the following Project scenarios:

- Existing Traffic Conditions
- Opening Year Traffic Conditions
- Opening Year Plus Project Traffic Conditions

The Level of Service analysis found the three study intersections were projected to operate at acceptable Levels of Service during AM and PM weekday peak hours, 7:00-9:00 AM and 4:00 PM-6:00 PM, respectively, for the Existing Traffic Conditions, Opening Year Traffic Conditions, and Opening Year Plus Project Traffic Conditions. The City General Plan has established Level of Service “D” (traffic delay of 25.01-35 seconds) as the lowest acceptable Level of Service for peak-hour signalized and unsignalized intersection movements.

The Project did conduct a Project Trip Generation Analysis and Vehicle Miles Traveled Screening. The City of Upland Guidelines provide screening criteria and requirements for VMT assessment of land use projects. Screening Step 2: Low VMT Area indicates that a residential project located within a low VMT-generating area may be presumed to have a less than significant impact. The Project location was assessed using the San Bernardino County Transportation Authority online VMT Screening Tool that determined the Project is located within a low VMT generating area.

As the Arrow Highway Project did conduct a VMT analysis and concluded the Arrow Highway Project was in a low VMT generating area, the Project is consistent with analysis required by CEQA Guidelines Section 15064.3, subdivision (b). Furthermore, the Project will be required to comply with **Mitigation Measure TRA-1**, as applicable and as provided in the GPU EIR. The Project would not create new impacts or increase impacts and would comply with CEQA requirements by providing new required information than that identified in the GPU EIR or in the GPU Addendum EIR.

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***17(c) Substantially increase hazards due to a geometric design feature or incompatible uses?***

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The GPU EIR states implementation of GPU 2035 “would result in the development of new residential and non-residential land uses that may require traffic/circulation improvements. However, it is not anticipated that development of new uses would result in inadequate circulation/infrastructure design or incompatible uses...future development projects would be evaluated on a case-by-case basis to verify that the circulation/infrastructure is designed according to minimum City standards.”

Implementation of GPU 2035 Policies and Actions and Municipal Code requirements would further ensure adequate circulation/infrastructure design and compatibility between the various transportation modes utilizing the same roadway system.”

The Arrow Highway Project has one primary full access vehicular entry to/from Arrow Highway and full vehicular circulation around the residential buildings. The San Bernardino County Fire Department, Planning Division, and Traffic Engineer will review the Project plans to ensure Project development and operation would not result in hazards due to a geometric design feature or incompatible use. In addition, the Project is required to comply with Municipal Code and City Ordinance requirements pertaining to vehicular circulation. The Arrow Highway Project would have a less than significant impact regarding this threshold and thereby be consistent with the overall analysis in the GPU EIR because the Project would not increase impacts identified in the GPU EIR or in the GPU Addendum EIR.

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***17(d) Result in inadequate emergency access?***

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The GPU EIR states that future development projects would be subject to review through the City’s development review process, which would be conducted in coordination with the County of San Bernardino Fire Department, to verify compliance with all applicable Fire Code and Building Code requirements for construction and access, as well as the City’s minimum site access standards. A GPU 2035 Policy requires that new development be accessible to emergency vehicles and not impede the ability of service providers to provide adequate emergency response. The San Bernardino County Fire Department would review individual projects to verify compliance with this Policy and emergency access requirements applicable to the specific development. In addition, the City and San Bernardino County Fire Department would review any modifications to existing roadways to ensure that adequate emergency access and emergency response would be maintained. The GPU EIR thereby states that GPU 2035 implementation would result in a less than significant impact involving the provision of adequate emergency access.

As discussed previously, the GPU EIR concluded this impact related to emergency access be less than significant. As the Arrow Highway Project would not conflict with the City requirement to provide adequate emergency

access, the Project would be consistent with the analysis in the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified in the GPU EIR or in the GPU Addendum EIR.

### ***Mitigation Measures***

**TRA-1** Prior to issuance of each Building Permit, future development projects that are determined through preparation of a Traffic Impact Analysis (Policy CIR-1.5) to impact the specified intersection, shall make a fair contribution toward implementation of the following improvements. These development projects shall be required to contribute to the implementation of mitigation measures, including but not limited to those identified in the General Plan EIR, by the payment of fair share costs, constructing the required improvement, providing right-of-way, or other actions as required by the City.

- 16th Street (Baseline)/Benson Avenue (AM) Intersection. The eastbound thru-right lane shall be split to provide a separate eastbound right turn lane and optimize the signal timing at this intersection. Additional right-of-way shall be acquired to accommodate this improvement.
- 16th Street (Baseline)/Mountain Avenue (PM) Intersection. The intersection cycle length and splits shall be optimized to provide more time to the left turn approaches.
- Foothill Boulevard/Mountain Avenue (PM) Intersection. The intersection splits shall be optimized to provide more time at the eastbound and westbound approaches.
- Foothill Boulevard/Euclid Avenue (PM) Intersection. The intersection splits shall be optimized to provide more time at the eastbound and westbound approaches.
- 8th Street/Campus Avenue (AM and PM) Intersection. A traffic signal shall be installed at this location.
- I-10 EB Ramps/Mountain Avenue (PM) Intersection. The intersection cycle length and splits shall be optimized at this intersection.
- I-10 WB Off Ramp/Second Avenue (AM and PM) Intersection. A traffic signal shall be installed at this location.
- I-10 EB Ramps/Euclid Avenue (AM) Intersection. The intersection splits shall be optimized to provide more time at the eastbound and westbound approaches.

## ***Cumulative Analysis***

Cumulative traffic impacts are analyzed in terms of impacts within the City and impacts to the traffic system in neighboring communities. The GPU 2035 Circulation Element considers the impact of traffic traveling through and within the City. Cumulative forecasts were developed for the City using growth rates forecasted in the SCAG regional travel model. GPU 2035 implementation would increase residential and non-residential uses, which would result in study intersections operating at a deficient LOS based on the established performance criteria.

All 42 study intersections would operate acceptably under GPU 2035 conditions with the exception to the following eight:

- ♦ 16th Street (Baseline)/Benson Avenue (AM)
- ♦ 16th Street (Baseline)/Mountain Avenue (PM)
- ♦ Foothill Boulevard/Mountain Avenue (PM)
- ♦ Foothill Boulevard/Euclid Avenue (PM)
- ♦ 8th Street/Campus Avenue (AM and PM)
- ♦ I-10 EB Ramps/Mountain Avenue (PM)
- ♦ I-10 WB Off Ramp/Second Avenue (AM and PM)
- ♦ I-10 EB Ramps/Euclid Avenue (AM)

With implementation of the recommended mitigation, all of the study intersections would operate acceptably under GPU 2035 conditions. All roadway segments are forecast to operate at an acceptable daily LOS under GPU 2035 conditions. Therefore, Project implementation would not result in cumulatively considerable transportation and traffic impacts.

## ***Conclusion***

With regard to the topical issue area of Transportation, the following findings can be made.

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR or by the GPU Addendum EIR.

3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR or by the GPU Addendum EIR.
4. **Mitigation Measure TRA-1** contained within the GPU EIR and maintained within the GPU Addendum EIR would be required to ensure any identified Arrow Highway Project-specific impacts pertaining to Transportation would be reduced to a less than significant level.

## 18. TRIBAL CULTURAL RESOURCES

### *Would the project...*

**18(a)(i)** *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 the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is 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)?*

**18(a)(ii)** *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 the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?*

**18(a)(i)** *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 the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is 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)?*

### Native American Background

The GPU EIR states that the Native American Tongva (Gabrieliño) tribal group lived in the Upland area before the Spanish arrived in about 1770 AD. Given the Project area's Native American background, ground-disturbing activities associated with future development within the City could unearth unknown archaeological resources, potentially resulting in their disturbance or destruction. GPU 2035 was subject to compliance with the provisions of SB 18. Accordingly, as part of development of the GPU 2035, the City notified the appropriate tribes (on the contact list maintained by the Native American Heritage Commission) of the opportunity to conduct consultations for the purpose of mitigating potential impacts resulting from Project implementation. Of the seven tribes that were notified, one tribe, the Soboba Band of Luiseno Indians, responded. The Soboba Band concluded that the Project falls within the bounds of their Tribal Traditional Use Areas. In addition, the City area is regarded as highly sensitive to the Soboba Band, since it is in proximity to known village sites and a shared use area that was used in ongoing trade between the Luiseno and Cahuilla tribes. Working in and around Tribal Traditional Use Areas intensifies the potential for encountering cultural resources during the construction/excavation phase. Therefore, ground-disturbing activities associated with future land development within the City could unearth unknown Soboba Band cultural resources, potentially resulting in their disturbance or destruction. Compliance with **Mitigation Measure CR-1**, which requires that all earth disturbing activities cease, in the event that archeological resources are unearthed, would ensure that Project implementation would not cause a substantial adverse change in the significance of an archaeological resource or site.

As discussed previously, the GPU EIR concluded this impact related to tribal cultural resources be less than significant with implementation of **Mitigation Measure CR-1**. As the Arrow Highway Project would not conflict with the City requirement to protect tribal cultural resources, the Project would be consistent with the analysis in the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified in the GPU EIR or in the GPU Addendum EIR.

**18(a)(ii) 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 the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?**

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Given the history of Native Americans and their presence throughout Upland and the region, there is the potential for human remains, including those interred outside of formal cemeteries, to be encountered during earth removal or disturbance activities resulting from Project implementation. Moreover, as discussed in the Cultural Resources Section above, the GPU 2035 area is regarded as highly sensitive to the Soboba Band, since it is in proximity to known village sites and a shared use area. Therefore, ground-disturbing activities, such as grading or excavation, resulting from Project implementation have the potential to disturb as yet unidentified human remains. GPU EIR **Mitigation Measure CR-1** implementation would ensure any potential impact would be less than significant.

The Native American Graves Protection and Repatriation Act within the State of California, is enacted by the California Native American Historical, Cultural and Sacred Sites Act, and applies to Federal, State, and private lands. If human remains were found, those remains would require proper treatment in accordance with applicable laws. Public Resources Code Sections 5097, et seq., and Health and Safety Code Sections 7050.5-7055 describe the general provisions regarding human remains, including the requirements if any human remains are accidentally discovered during excavation of a site. The requirements and procedures set forth in Public Resources Code Section 5097.98 would be implemented if human remains are discovered, including notification of the County Coroner and Native American Heritage Commission, and consultation with the individual identified by the Native American Heritage Commission to be the “most likely descendant.” If human remains are found

during excavation, excavation must stop in the vicinity of the find and any area that is reasonably suspected to have adjacent remains, until the County coroner investigates and the remains have been investigated, and appropriate recommendations have been made for the treatment and disposition of the remains. Following compliance with the established regulatory framework regarding human remains, including those interred outside of formal cemeteries, GPU 2035 implementation would result in a less than significant impact. The GPU Addendum EIR maintains this determination.

### ***Mitigation Measures***

As discussed previously, the GPU EIR concluded this impact related to tribal cultural resources would be less than significant with implementation of **Mitigation Measure CR-1**. As the Arrow Highway Project would not conflict with the City requirement to protect tribal cultural resources, the Project would be consistent with the analysis in the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified in the GPU EIR or in the GPU Addendum EIR.

**CR-1** In the event that cultural resources (archeological or paleontological) are unearthed during excavation and grading activities of any future development project, the contractor shall cease all earth-disturbing activities within a 100-meter radius of the area of discovery and retain a qualified archaeologist/paleontologist to evaluate the significance of the finding and appropriate course of action. Salvage operation requirements pursuant to Section 15064.5 of the CEQA Guidelines shall be followed. After the find has been appropriately mitigated, work in the area may resume.

### ***Cumulative Analysis***

Future development projects in the City of Upland and County of San Bernardino could encounter cultural resources. Thus, the potential exists for cumulative development to result in the adverse modification or destruction of historical, archaeological, and/or paleontological resources. Potential cultural resource impacts associated with the individual developments anticipated by the Project would be specific to each site. All new developments would be subject to compliance with the existing Federal, State, and local regulatory framework

concerning the protection of historical, archaeological, and paleontological resources on a project-by-project basis. Additionally, implementation of the specified Mitigation Measure would reduce potential Project impacts to undocumented archaeological and paleontological resources to less than significant levels. Therefore, the combined cumulative impacts to cultural resources associated with GPU 2035 incremental effects and those of the cumulative projects would be less than significant.

### ***Conclusion***

The GPU EIR did not analyze Tribal Cultural Resources as a separate CEQA topic of investigation. Rather, portions of its Cultural Resources analysis contained information about potential impacts related to Native American tribes. With regard to the topical issue area of Tribal Cultural Resources, the following findings can be made.

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR or by the GPU Addendum EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR or by the GPU Addendum EIR.
4. **Mitigation Measure CR-1** contained within the GPU EIR and maintained by the GPU Addendum EIR would be required to ensure any Arrow Highway Project-specific impacts pertaining to Tribal Cultural Resources would be reduced to a less than significant level.

## 19. UTILITIES AND SERVICE SYSTEM

### *Would the Project...*

- 19(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 telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*
- 19(b)** *Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?*
- 19(c)** *Result in a determination by the wastewater treatment provider, which serves or may serve the project that has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*
- 19(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?*
- 19(e)** *Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

- 19(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 telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*

GPU 2035 has a Goal for the City to provide functional, well-maintained and adequate public facilities, infrastructure and services and a that would ensure Development Impact Fees are evaluated on a regular basis to ensure that increased demands on infrastructure and services as a result of new development are adequately funded, would reduce potential impacts to water infrastructure associated with new development to a less than significant level. The GPU EIR

states that with adherence to the Upland Municipal Code and Water Management Plan, together with implementation of GPU 2035 Policies and Actions, potential impacts to utilities associated with GPU implementation would be reduced to less than significant.

The Arrow Highway Project would develop 124 attached residential units on 6.188 acres. In so doing, the Project would include constructing new water lines, wastewater disposal lines, and electric, natural gas and television/internet connections for each unit. The construction of these utilities occurs with every residential development and would not cause unanticipated or significant environmental effects. The Project is consistent with the residential zoning designation for the site.

As the Project would have a less than significant for reasons discussed previously, the Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR or within the GPU Addendum EIR.

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***19(b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?***

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The GPU EIR indicated this impact was less than significant. The GPU Addendum has maintained this determination.

The City of Upland has prepared the Upland 2010 Urban Water Management Plan (UWMP), which served as a source document for the General Plan and has an updated 2020 UWMP. The Upland 2010 UWMP takes into consideration groundwater, imported, recycled and surface water supplies, as well as wastewater disposal estimates. In addition to water supply, the Upland 2010 UWMP addresses efficient use of water, demand management measures, implementation strategies and schedules, and other relevant information and programs. The 2010 UWMP identifies anticipated water demand using SCAG's 2035 projected population, as well as comparing the demand projections to the City's WMP. Specifically, the UWMP assumes a service area population of 82,050 persons and associated water demand of 20,062 acre-feet in 2035. The Upland

2010 UWMP indicates that there are sufficient water supplies and water shortage contingency plans to protect existing and future water needs. The City has identified future water supply projects to increase its water supply quantities while reducing dependence on imported water.

The City of Upland has also established permanent conservation measures and a shortage contingency plan to provide for increasingly serious stages of water shortages and to define voluntary and mandatory conservation measures that would be implemented during these stages. The Upland Municipal Code establishes conservation measures that are to be implemented during various stages of shortage (year-round, moderate, high, and severe). Specific restrictions would be implemented at each stage. The City General Plan anticipates a City population of 81,462 persons in 2035, which is slightly less (approximately 0.7 percent) than the 2035 population anticipated by the Upland 2010 UWMP (82,050 persons). Using a persons per dwelling unit factor of 2.69, the 6<sup>th</sup> cycle Housing Element estimated would total an added City population of 8,377 persons. Therefore, the GPU EIR anticipates that adequate water supplies would be available to serve the growth anticipated in GPU 2035. Future development would be reviewed by the City on a project-by-project basis to ensure adequate water supplies are available to accommodate future projects.

GPU 2035 has Goals to provide a reliable and adequate supply of water and support the use of water conservation measures and provision of recycled water. Future development would also be subject to compliance with Senate Bills 610 and 221. Senate Bill 610 requires preparation of a WSA for certain projects to evaluate water supplies that are or will be available during normal, single-dry and multiple-dry years during a 20-year projection to meet existing and planned future demands, including the demand associated with the project. Senate Bill 221 requires that the City condition approval of a subdivision map upon proof of sufficient water supply. In addition, future development within the City would be subject to implementation of GPU 2035 Policies and Actions that would ensure water supplies are available to serve new development.

With adherence to Senate Bills 610 and 221, the Upland Municipal Code and Water Management Plan, and GPU 2035 Policies and Actions, potential impacts associated with increased water demand resulting from GPU 2035 implementation would be reduced to a less than significant level. As the Project would have a less than significant impact for reasons specified above, the Arrow

Highway Project would be consistent with the GPU EIR analysis because the Project would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR or within the GPU Addendum EIR.

According to the GPU Addendum EIR, the City of Upland is approximately 95 percent built out. GPU 2035 implementation would result in additional development, resulting in an increase in the City's population and businesses, and thus, an overall increase in total water demand. The City's 2020 Water Management Plan anticipates the City's population to reach over 92,862 by 2045 with a projected water demand of 25,003 acre-feet by 2045. This estimate is based on the City currently being largely built out and the anticipation that most future development will be comprised of full utilization of existing vacant land and reuse and redevelopment of older, lower density, and underutilized properties.

The City of Upland has developed a diverse portfolio of water supplies that includes groundwater from three groundwater basins (Chino Basin; Six Basins; Cucamonga Basin), local surface water from San Antonio Creek, and imported water from the Metropolitan Water District of Southern California (MWD) conveyed through inland Empire Utilities Agency (IEUA). Local groundwater and surface water supplies are available directly to the City or through the City's shareholder ownership in two small water companies. IEUA provides recycled water.

The City of Upland Urban Water Management Plan was prepared in accordance with the Urban Water Management Planning Act, which has very specific requirements for the 2020 Urban Water Management Plan (UWMP) and has added modifications to the 2015 UWMP. Additionally, the City's 2020 UWMP integrates water supply and land use planning in Upland through presentation of a description of historical and project water use, conservation targets and water use efficiency activities to maintain and further reduce water use, water supply sources, a comparison of water supplies and water demands during normal, single dry and multiple dry years, contingency planning for water shortages, and UWMP coordination and adoption details.

In addition to water supply, the Upland 2020 UWMP addresses efficient use of water, demand management measures, implementation strategies and schedules, and other relevant information and programs.

The Upland 2020 UWMP indicates that there are sufficient water supplies and water shortage contingency plans to protect existing and future water needs. The 2020 UWMP states that based on MWD supply, City groundwater supplies, groundwater purchases from the San Antonio Water Company, recycled water supply, and limited local surface supply, "...the region can provide reliable water supplies under all years of the multiple dry year hydrology" and that "MWD has documented that deliveries within its service area are projected to be 100 percent reliable in multiple dry years." (UWMP Table ES-5). Furthermore, the 2020 UWMP states that "the imported supply was 100 percent reliable during the previous two multiple year droughts...[and] MWD has stated that its supplies will be fully reliable during the next multiple year drought under most if not all conditions." (UWMP Table 6)

The GPU EIR states that with adherence to the UMC and WMP, and implementation of GPU 2035 Policies and Actions, potential impacts to water infrastructure associated with GPU 2035 implementation would be less than significant.

The Arrow Highway Project will necessitate water service. However, in that the residential density is contemplated in the City Zoning Code and the increased numbers of housing units fall within SCAG projections, the Project would not result in an adverse physical effect on the environment because the Project would not require new or significantly altered services or facilities to be constructed. The Project will be required to obtain service verification from the appropriate water agency. Therefore, the Arrow Highway Project would not result in the need for significantly altered services or facilities related to water service. In that the Project would be consistent with SCAG projections and because the Project would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR or within the GPU Addendum EIR.

***19(c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that has adequate capacity to***

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***serve the project's projected demand in addition to the provider's existing commitments?***

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Project implementation would result in additional development, resulting in an increase in the City's population and businesses, and thus, an overall increase in wastewater generation. As stated, the City of Upland owns and maintains local sewer lines within the City. Based on an increase of 3,114 dwelling units contemplated in the GPU EIR and 6,402,019 square feet of non-residential square footage anticipated with Project implementation, the City estimates the additional sewerage flow would be 1.32 mgd over existing conditions, or an annual increase of approximately 0.066 mgd per year over 20 years. The GPU EIR states that the City does not anticipate a significant impact to sewer facilities associated with GPU 2035 implementation, as demands on the local sewer system can be mitigated. Individual development projects would be reviewed on a project-by-project basis to ensure that adequate infrastructure is available to serve the proposed development. If necessary, improvements would be identified and implemented as part of the proposed development. In addition, the City maintains sewer connection fees that are periodically adjusted and approved by the City Council. The purpose of the fee is to finance expansion of the City sewerage collection system necessary to mitigate the impact of new development in the City upon the system. The fee is used to finance public improvements and to pay for the development's fair share of the construction costs of the improvements. Also, GPU 2035 contains Goals to ensure adequate infrastructure is available to convey and treat generated wastewater. Future development would be subject to implementation of the General Plan 2035 Policies and Actions specified below, which would ensure potential impacts to wastewater facilities and services are reduced to a less than significant level.

The GPU EIR determined that impacts associated with wastewater disposal and treatment facilities to be less than significant. The GPU Addendum EIR maintained this determination. As the Arrow Highway Project would have a less than significant for reasons discussed previously, the Project would be consistent with the analysis within the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified within the GPU EIR or the within GPU Addendum EIR.

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***19(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?***

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The GPU 2035 anticipated growth would increase the volume of solid waste generated in the City and SOI that would be diverted to existing landfills, thus contributing to the acceleration of landfill closures or the use of more distant sites. In order to reduce landfill waste by at least 50 percent, future development would be required to comply with applicable State and local regulations. Per City of Upland requirements, future development would adhere to all source reduction programs set forth in the Source Reduction and Recycling Element (SRRE) for the disposal of solid waste including yard waste. Methods set forth in the SRRE include source reduction, recycling, and composting. Implementation of these methods would minimize operation waste and debris generated by new development and reduce the amount deposited in landfills. Currently, through its waste diversion programs, the City is diverting fewer pounds per resident and employee to the landfills than the established targets.

Burrtec Waste Industries, Inc. provides solid waste collection service to the City of Upland and the Sphere of Influence. These services include residential, commercial, and industrial waste services, recycling services, and composting devices. The City, in collaboration with Burrtec Waste, provides residential customers with separate containers for recyclables. The City also provides several free services to local residents including bulky-item pickup service, missing or damaged barrel replacement, holiday tree curbside pick-up service, Household Hazardous Waste collection, free motor oil and filter containers for recycling transport, free mulch giveaway, 24-hour Refuse and Recycling Recording and Waste Watcher newsletters.

Solid waste from the City is transferred to the West Valley Transfer Station/Material Recovery Facility in Fontana. Recyclables are sorted and processed at the material recovery facility. From the material recovery facility, waste is then distributed to landfills within San Bernardino County. The particular landfill used for waste disposal depends upon the nature of the waste stream and limitations on daily disposal tonnage at each facility. In 2011, Upland disposed of approximately 49,398 tons of solid waste. Solid waste collected from the City is primarily disposed of at the Mid-Valley Sanitary Landfill, which is located on Alder Avenue in the City of Rialto. The landfill has a daily permitted capacity of

7,500 tons/day. In 2011, the City disposed of approximately 47,066 tons of solid waste in this landfill (approximately 129 tons per day). This represents approximately 1.7 percent of this landfill's permitted daily capacity. The Mid-Valley Sanitary Landfill is currently slated for closure in 2033, when its maximum permitted capacity of 101,300,000 cubic yards of solid waste is expected to be reached. Other landfills available to solid waste from Upland are the following: Azusa Land Reclamation Co. Landfill; Badlands Sanitary Landfill; California Street Landfill; Chiquita Canyon Sanitary Landfill; El Sobrante Landfill; *Lancaster Landfill* and Recycling Center; Olinda Alpha Sanitary Landfill; Puente Hills Landfill; San Timoteo Sanitary Landfill; and Simi Valley Landfill and Recycling Center.

All development projects would be required to comply with Federal, State, and local statutes and regulations related to solid waste. Therefore, GPU implementation would result in less than significant impacts. The Arrow Highway Project would be required to comply with City, State and Federal requirements pertaining to solid waste disposal as specified in the GPU EIR.

The GPU EIR concluded that this impact would be less than significant. All solid waste facilities, including landfills, require solid waste facility permits to operate. The primary landfill and other landfills available to the City of Upland have remaining capacity to serve the Arrow Highway Project. Therefore, the Arrow Highway Project would be consistent with the GPU EIR analysis because it would not create new impacts, increase impact, and there is no new information of substantial importance than identified in the GPU EIR or in the GPU Addendum EIR.

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

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To meet the requirements of the California Integrated Waste Management Act, the City of Upland adopted a Source Reduction and Recycling Element (SRRE). The SRRE describes policies and programs that will be implemented by the City to achieve waste disposal reductions. According to CalRecycle, in 2011 the City disposed of approximately 49,400 tons of solid waste. This represents 3.6 pounds per resident per day and 11.2 pounds per employee per day, which is less than the target of 5.2 pounds per resident per day and 14.8 pounds per employee per day. For 2011, the City implemented 43 jurisdiction waste

diversion programs within the categories of composting, facility recovery, household hazardous waste, policy incentives, public education, recycling, source reduction, special waste materials, and transformation.

Solid waste disposal within the City is subject to the requirements established in Upland Municipal Code (UMC) Chapter 13.28, Solid Waste and Recyclables Collection Services. UMC Chapter 13.28 establishes the terms and conditions for solid waste and recyclables collection services in order to promote the public health, welfare, and safety of the community by establishing reasonable regulations relating to the storage, accumulation, collection, and processing of solid waste and recyclables, and the disposal of solid waste.

The anticipated growth would increase the volume of solid waste generated in the City that would be diverted to existing landfills, thus contributing to the acceleration of landfill closures or the use of more distant sites. In order to reduce landfill waste by at least 50 percent, future development would be required to comply with applicable State and local regulations. Per the City of Upland requirements, future development would adhere to all source reduction programs set forth in the Source Reduction and Recycling Element (SRRE) for the disposal of solid waste including yard waste. Methods set forth in the SRRE include source reduction, recycling, and composting. Implementation of these methods would minimize operation waste and debris generated by new development and reduce the amount deposited in landfills. Currently, through its waste diversion programs, the City is diverting fewer pounds per resident and employee to the landfills than the established targets.

The GPU 2035 has a Goal to minimize solid waste and to collect, store, transport, and recycle solid waste in safe, sanitary, and environmentally acceptable ways. GPU Policies Policy strive to exceed the State's goal of diverting solid waste from landfills. GPU 2035 Policies address types of waste; encourage recycling and educating the public on opportunities for waste reduction. Future development within the City would be subject to implementation of GPU 2035 Policies, which would reduce solid waste being diverted to landfills. In addition, future developments would be reviewed on a project-by-project basis to ensure that solid waste disposal services and landfill facilities would be available to serve the development. All development projects would be required to comply with Federal, State, and local statutes and regulations related to solid waste. Therefore, GPU implementation would result in less than significant impacts. The

Arrow Highway Project would be required to comply with City, State and Federal requirements pertaining to solid waste disposal as specified in the GPU EIR or in the GPU Addendum EIR.

The GPU EIR concluded that this impact would be less than significant. The GPU Addendum EIR maintained this determination. All solid waste facilities, including landfills, require solid waste facility permits to operate. The primary landfill and other landfills available to the City of Upland have remaining capacity to serve the Arrow Highway Project. Therefore, the Arrow Highway Project would be consistent with the GPU EIR analysis because it would not create new impacts, increase impact, and there is no new information of substantial importance than identified in the GPU EIR or in the GPU Addendum EIR.

### ***Mitigation Measures***

None Required.

### ***Cumulative Analysis***

For purposes of impacts to wastewater conveyance systems and treatment facilities, the City does not anticipate a significant impact to sewer facilities associated with implementation of GPU 2035, as demands on the local sewer system can be mitigated. As stated, the growth anticipated by GPU 2035 would be less than anticipated by SCAG. Compliance with the Upland Municipal Code and implementation of GPU 2035 Policies and Actions would also ensure that wastewater infrastructure and treatment capacity would be available to serve future development. Thus, GPU 2035 would have a less than significant impact to wastewater infrastructure and treatment capacity and would not result in a cumulatively considerable impact in this regard. Cumulative development could result in increased wastewater generation requiring treatment. As stated, the District wastewater treatment facilities are based on the regional growth forecasts adopted by SCAG. Available capacity would be limited to levels associated with this growth. Service would not be provided if capacity was not available to serve the proposed development. Therefore, GPU 2035 combined with cumulative development, would not result in a cumulatively considerable impact to wastewater conveyance and treatment facilities.

Cumulative impacts associated with wastewater generation would be assessed on a project-by-project basis and mitigated through the established regulatory

review process. The combined cumulative impacts to wastewater conveyance and treatment capacity associated with the Project's incremental effects and those of the cumulative projects would be less than significant. No further mitigation is required beyond implementation of the GPU Policies and Actions.

For purposes of impacts to water supplies and infrastructure, cumulative impacts are considered for cumulative development served by the same water purveyors and infrastructure. Water supplies would be available to serve GPU 2035 implementation from existing and planned resources. Compliance with the Upland Municipal Code and implementation of General Plan 2035 Policies and Actions would also ensure that water infrastructure would be available to serve future development. Thus, GPU 2035 would have a less than significant impact on water supplies and infrastructure and would not result in a cumulatively considerable impact in this regard.

GPU 2035 would not result in significant impacts to solid waste services and landfills currently serving the City and SOI and its incremental effects involving solid waste would not be cumulatively considerable. Although GPU 2035 would not significantly impact existing landfill capacity, the increase in solid waste generation from the GPU 2035 and related cumulative projects together could significantly impact the finite resources associated with solid waste disposal. Individual development projects and related cumulative projects would be required to meet current recycling goals, reducing the amount of solid waste requiring disposal at landfills. Future developments would be reviewed on a project-by-project basis and solid waste impacts would be evaluated based on existing and planned disposal facilities and capacities available. All development projects would be required to comply with Federal, State, and local statutes and regulations related to solid waste. Pursuant to the California Integrated Waste Management Act of 1989 (AB 939), every city and county in the State is required to divert 50 percent of solid waste generated in its jurisdiction away from landfills. Implementation of source reduction measures, such as recycling and converting waste to energy, that would be implemented on a project-by-project basis would serve to divert solid waste away from landfills. Implementation of GPU 2035 Policies would further ensure that solid waste impacts are minimized. Therefore, the combined cumulative impacts to solid waste facilities associated with GPU 2035 incremental effects and those of the cumulative projects would be less than significant.

## ***Conclusion***

With regard to the topical issue area of Utilities and Service Systems, the following findings can be made.

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR or by GPU Addendum EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR or by GPU Addendum EIR.
4. No Mitigation Measures contained within the GPU EIR or within the GPU Addendum EIR would be required because there would be no Project-specific impacts pertaining to Utilities and Service Systems.

## 20. WILDFIRE

***If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, Would the Project...***

**20(a)** *Substantially impair an adopted emergency response plan or emergency evacuation plan?*

**20(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?*

**20(c)** *Require the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*

**20(d)** *Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

The GPU EIR does not address Wildfire impacts as a separate topic of threshold analysis. Information below originates from GPU EIR Section 5.14 (Hazards and Hazardous Materials).

The City of Upland contains potential fire threats, both from wildfire to the north in the San Bernardino National Forest and urban fire from existing development. Upland's drainage and open space areas, the northern foothills, and warm and dry summers create a situation that results in potential wildland fires. Development in accordance with GPU 2035 could occur within or adjacent to wildland areas, thereby exposing people and structures to significant risk involving wildland fires. To minimize exposure of people and structures to potential risk of wildland fires, the City would continue to enforce compliance with the Uniform Fire Code and Upland Municipal Code standards pertaining to minimum road widths, clearance areas, and provision of adequate fire protection services. GPU 2035 identifies Goals to guide development and protect residents to the maximum extent possible from wildland fires.

In furtherance of these Goals, all future development in Upland would be subject to implementation of the Safety Element and Public Facilities and Services Element Policies and Actions. The City would also continue to update/provide maps delineating areas where risk exists and provide education regarding wildland fire risks and fire safety strategies. Continued coordination with adjacent jurisdictions and participation in regional, state, and federal programs would further minimize wildland fire-related risks. Overall, compliance with the Uniform Fire Code, established regulatory framework, and Municipal Code regulations, and implementation of the General Plan 2035 Policies and Actions, would ensure Project implementation would not expose people or structures to a significant risk involving wildland fires. A less than significant impact would occur in this regard.

Potential impacts involving exposure to wildland fire hazards would be similarly reduced to less than significant following compliance with the Uniform Fire Code, established regulatory framework, and GPU 2035 Policies and Actions. CAL FIRE and the State Board of Forestry (Board) regulate wildland fire protection in California through the 2010 Strategic Fire Plan (Fire Plan), June 2010. The mission of the Board is to lead California in developing policies and programs that serve the public interest in environmentally, economically, socially sustainable forest and rangeland management, and a fire protection system that protects and serves the people of the state. In concert with the mission of the Board, the mission of CAL FIRE is to serve and safeguard the people and protect the property and resources of California. The central goals of the Fire Plan that are critical to reducing and preventing the impacts of fire revolve around both suppression efforts and fire prevention efforts. The major components are:

- Improved availability and use of information on hazard and risk assessment;
- Land use planning: including general plans, new development, and existing developments;
- Shared vision among communities and the multiple fire protection jurisdictions, including county-based plans and community-based plans such as Community Wildfire Protection Plans (CWPP);
- Establishing fire resistance in assets at risk, such as homes and neighborhoods;
- Shared vision among multiple fire protection jurisdictions and agencies;
- Levels of fire suppression and related services; and

- Post fire recovery. The principal policies that are critical to reducing and preventing the impacts of fire revolve around both suppression efforts and fire prevention efforts.

Major policy components are:

- Land use planning that ensures increased fire safety for new development;
- Creation of defensible space for survivability of established homes and neighborhoods;
- Improving fire resistance of homes and other constructed assets;
- Fuel hazard reduction that creates resilient landscapes and protects the wildland and natural resource values;
- Adequate and appropriate levels of wildland fire suppression and related services; and
- Commitment by individuals and communities to wildfire prevention and protection through local fire planning.

As discussed previously, the GPU EIR concluded this impact related to wildfire impacts be less than significant with implementation of **Mitigation Measure CR-1**. As the Arrow Highway Project would not conflict with the City requirement to protect tribal cultural resources, the Project would be consistent with the analysis in the GPU EIR because it would not create new impacts, increase impacts, and there is no new information of substantial importance than identified in the GPU EIR or in GPU Addendum EIR.

***20(a) Substantially impair an adopted emergency response plan or emergency evacuation plan?***

---

As a jurisdiction included in the San Bernardino County Operational Area Multi-Jurisdictional Hazard Mitigation Plan, the City of Upland originally adopted a Local Hazard Mitigation Plan in 2005 and subsequently amended that Plan in 2016. Currently, the City is preparing an update to its 2016 Local Hazard Mitigation Plan (which will include content from the updated 2016 Plan), with anticipated completion of the update in Summer 2026. The Plan is intended to help reduce or eliminate losses of life and property in the event of an emergency or disaster. Once the City Council approves and adopts the updated Plan, the City's eligibility to apply for Federal Emergency Management Agency (FEMA) grants for hazard mitigation projects and monetary relief during emergency situations.

The updated Plan has six distinct goals:

- Protect against threats from natural hazards to life, injury, and property damage within the Upland community
- Increase public awareness of potential hazard events
- Preserve critical services and functions by protecting key facilities and infrastructure for the community
- Protect natural systems from current and future conditions
- Coordinate mitigation activities among City departments, neighboring jurisdictions, and with State and Federal agencies
- Prepare for long-term changes in hazard conditions

The main updated elements from the 2016 Plan include the following:

- Updated demographic information for Upland residents
- Updated hazard categories
- Descriptions of recent hazard events
- Updated threat assessment that incorporates recent data
- Updated Capabilities Assessment to reflect the most recent framework
- New and revised hazard mitigation actions to better meet current City priorities

The Hazard Mitigation Plan meets the requirements of the Disaster Mitigation Act of 2000, which requires local governments to adopt a mitigation plan in order to receive federal disaster mitigation funds. The Mitigation Plan must identify hazards, risks and mitigation actions, and provide technical support for recommended mitigation efforts. As required by State law, Upland has established emergency preparedness procedures in its Emergency Operations Plan in order to respond to extraordinary situations associated with natural disasters, technological incidents, and national security emergencies. This Plan is designed to include the City of Upland as part of the California Standardized Emergency Management System (SEMS). The Emergency Operations Plan assures the preparation and maintenance of appropriate and current standard operating procedures (SOPs)/emergency operating procedures (EOPs), resource lists, and checklists that detail how assigned responsibilities are performed to support Emergency Operations implementation and to ensure successful response during a major disaster. In addition to the City's Emergency Operations Plan, the City of Upland also has an Emergency Operations Center, department-specific emergency operations plan, and long-range emergency preparedness planning. The City also provides emergency preparedness education to the public.

GPU 2035 does not propose any changes to the City of Upland's Emergency Operations Plan. Rather, GPU 2035 identifies goals to guide development and protect residents to the maximum extent possible. Thus, no impacts would occur in this regard. GPU 2035 proposes Goals pertaining to emergency response and evacuation. In furtherance of these Goals, all future development in Upland would be subject to implementation of the Safety Element and Public Facilities and Services Element Policies and Actions specified above. Thus, impacts regarding potential interference with an adopted emergency response or evacuation plan would be less than significant. No further mitigation is required beyond implementation of the GPU Policies and Actions.

The Arrow Highway Project site is surrounded by urban development and is not located within or near a state responsibility area or land classified as a very high fire hazard severity zone. Therefore, the context of this Threshold of Significance does not pertain directly to the Project.

***20(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?***

---

The City contains potential fire threats, both from wildfire to the north in the San Bernardino National Forest and urban fire from existing development. The risk of wildland fires is related to a combination of factors, including winds, temperatures, humidity levels and fuel moisture content. Of these four factors, wind is the most crucial. Steep slopes also contribute to fire hazards by intensifying the effects of wind and making fire suppression difficult. Upland's drainage and open space areas, the foothills to the north, and warm and dry summers create a situation that results in potential wildland fires. Where there is easy human access to dry vegetation, fire hazards increase because of the greater chance of human carelessness.

The Arrow Highway Project site is surrounded by urban development and is not located within or near a state responsibility area or land classified as a very high fire hazard severity zone. Therefore, the context of this Threshold of Significance does not pertain directly to the Project. The impact level would be less than significant.

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***20(c) Require the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?***

---

The San Bernardino Unit Strategic Fire Plan, dated August 2, 2011, identifies and prioritizes pre fire and post fire management strategies and tactics meant to reduce the loss of values at risk within the San Bernardino Unit of CAL FIRE. The Plan is intended for use as a planning and assessment tool only. Pre-Fire Management Strategies are included that pertain to fire prevention, engineering and structure ignitability, information and education, and vegetation management. The City of Upland is located within San Bernardino Unit Battalion 5.

The Arrow Highway Project site is surrounded by urban development and is not located within or near a state responsibility area or land classified as a very high fire hazard severity zone. Therefore, the context of this Threshold of Significance does not pertain directly to the Project.

---

***20(d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?***

---

Because the City is located along the southern foothills of the San Bernardino Mountains where natural fuel sources exist, the City is at risk from wildland fires. Upland's drainage and open space areas, the northern foothills, and warm and dry summers create a situation that results in potential wildland fires. Moderate to very high fire hazards exist within the open space and residential areas near the San Antonio drainage, along the City's western boundary, the areas north/south of SR-210 (east of Euclid Avenue), and the City's Sphere of Influence (SOI) area. Development in accordance with the Project could occur within or adjacent to wildland areas, thereby exposing people and structures to significant risk involving wildland fires. Project implementation would result in land use changes in the southwest portion of the City, where moderate to very high fire hazards exist. No land use change is proposed north/south of SR-210 or within the City's SOI area, where moderate to very high fire hazards also exist. To minimize exposure of people and structures to potential risk of wildland fires, the City would continue to enforce compliance with the Uniform Fire Code and

UMC standards pertaining to minimum road widths, clearance areas, and provision of adequate fire protection services. The GPU 2035 identifies Goals to guide development and protect residents to the maximum extent possible from wildland fires.

In furtherance of these Goals, all future development in Upland would be subject to implementation of the Safety Element and Public Facilities and Services Element Policies and Actions specified above. The City would also continue to update/provide maps delineating areas where risk exists and provide education regarding wildland fire risks and fire safety strategies. Continued coordination with adjacent jurisdictions and participation in regional, state, and federal programs would further minimize wildland fire-related risks. Overall, compliance with the Uniform Fire Code, established regulatory framework, and Upland Municipal Code, and implementation of GPU 2035 Policies and Actions, would ensure Project implementation would not expose people or structures to a significant risk involving wildland fires. A less than significant impact would occur in this regard.

The Arrow Highway Project site is surrounded by urban development and is not located within or near a state responsibility area or land classified as a very high fire hazard severity zone. Therefore, the context of this Threshold of Significance does not pertain directly to the Project.

### ***Mitigation Measures***

None Required.

### ***Cumulative Analysis***

For this topic, the cumulative impacts are analyzed in terms of impacts within the City of Upland. An increase in population within the City would occur from GPU 2035 implementation. Potential impacts involving exposure to wildland fire hazards would be similarly reduced to less than significant following compliance with the Uniform Fire Code, established regulatory framework, and GPU 2035 Policies and Actions. As with projects resulting from Project implementation, cumulative projects would be required to evaluate their respective hazards and hazardous materials impacts on a project-by-project basis. Development

occurring within the region would be required to comply with Federal, State and local regulations regarding exposure to wildland fires. The additional contribution by GPU 2035 would be less than significant regarding public health and safety impacts at a cumulative level. Therefore, GPU 2035 implementation would not result in cumulatively considerable public health or safety impacts.

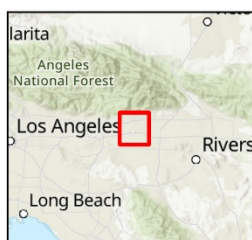
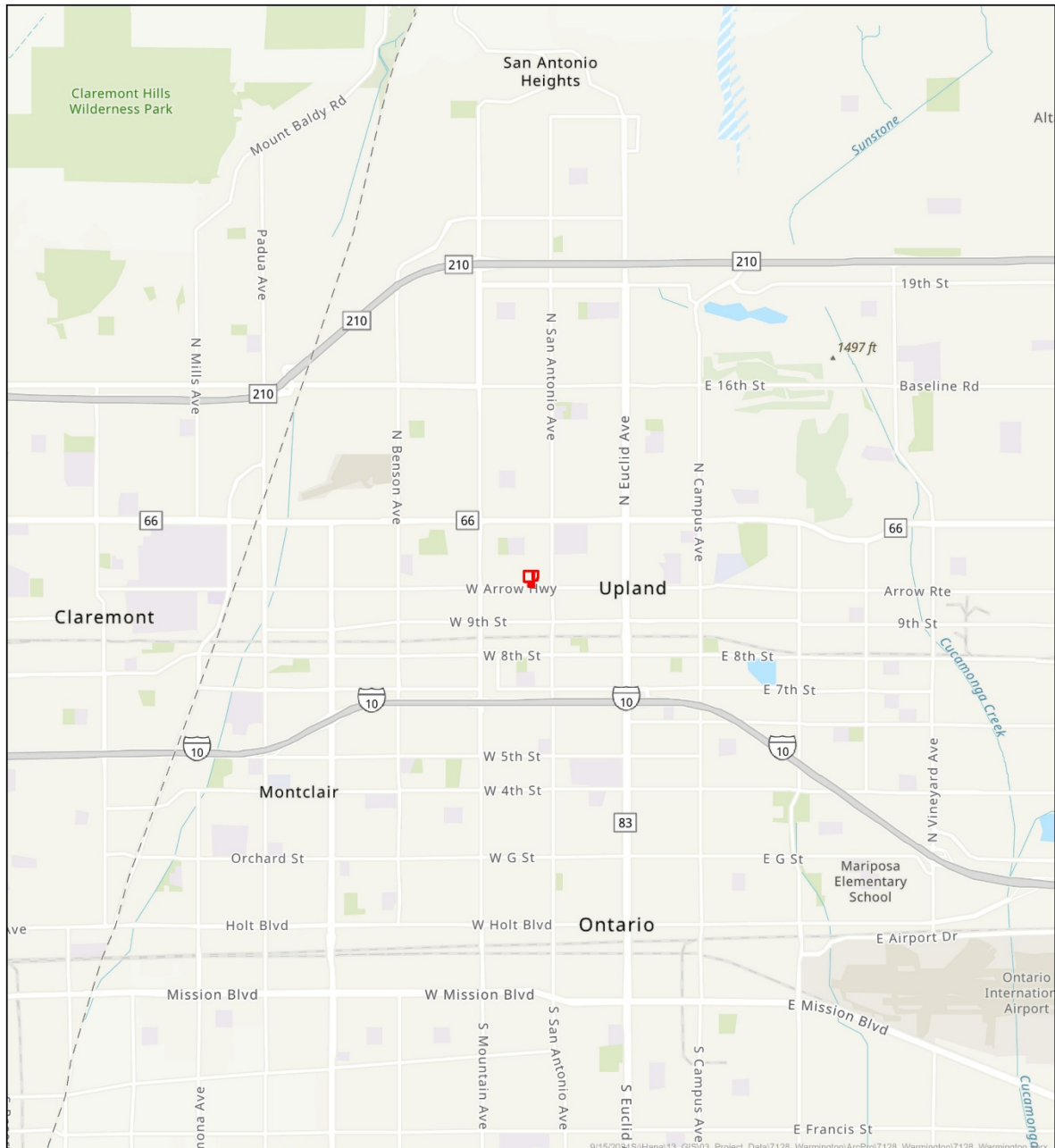
### ***Conclusion***

With regard to the topical issue area of Wildfire, the following findings can be made.

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR or by the GPU Addendum EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR or by the GPU Addendum EIR.
4. No Mitigation Measures contained within the GPU EIR or within the GPU Addendum EIR would be required because there would be no Project-specific impacts pertaining to Wildfire.

*APPENDIX A*  
***EXHIBITS***

Exhibit A-1  
PROJECT LOCATION MAP



Warmington - Arrow Highway Development



Exhibit I: Site Vicinity

Project Area (6.1 Acres)

Scale: 1:75,000



Exhibit A- 2  
PROJECT SITE PLAN

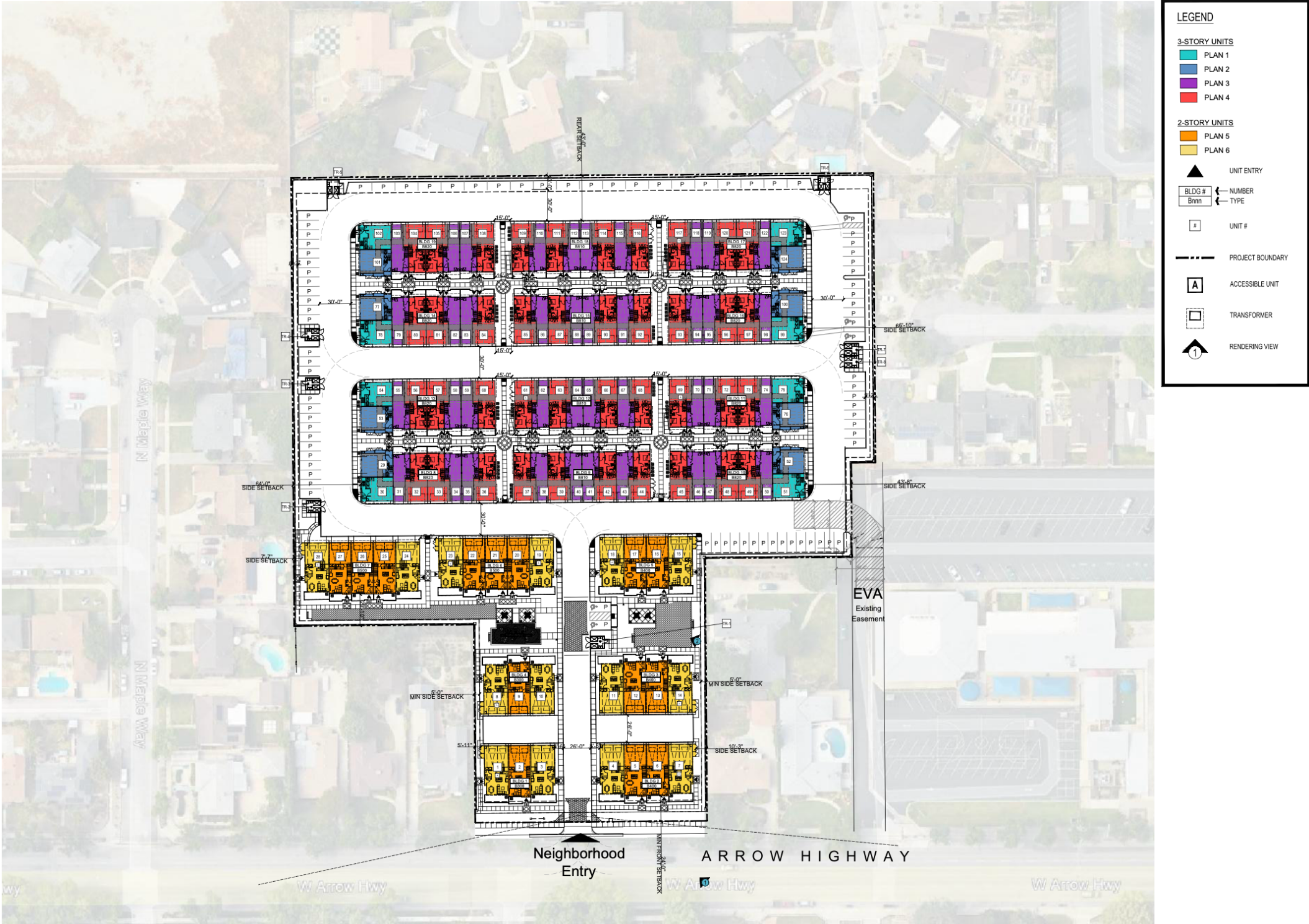
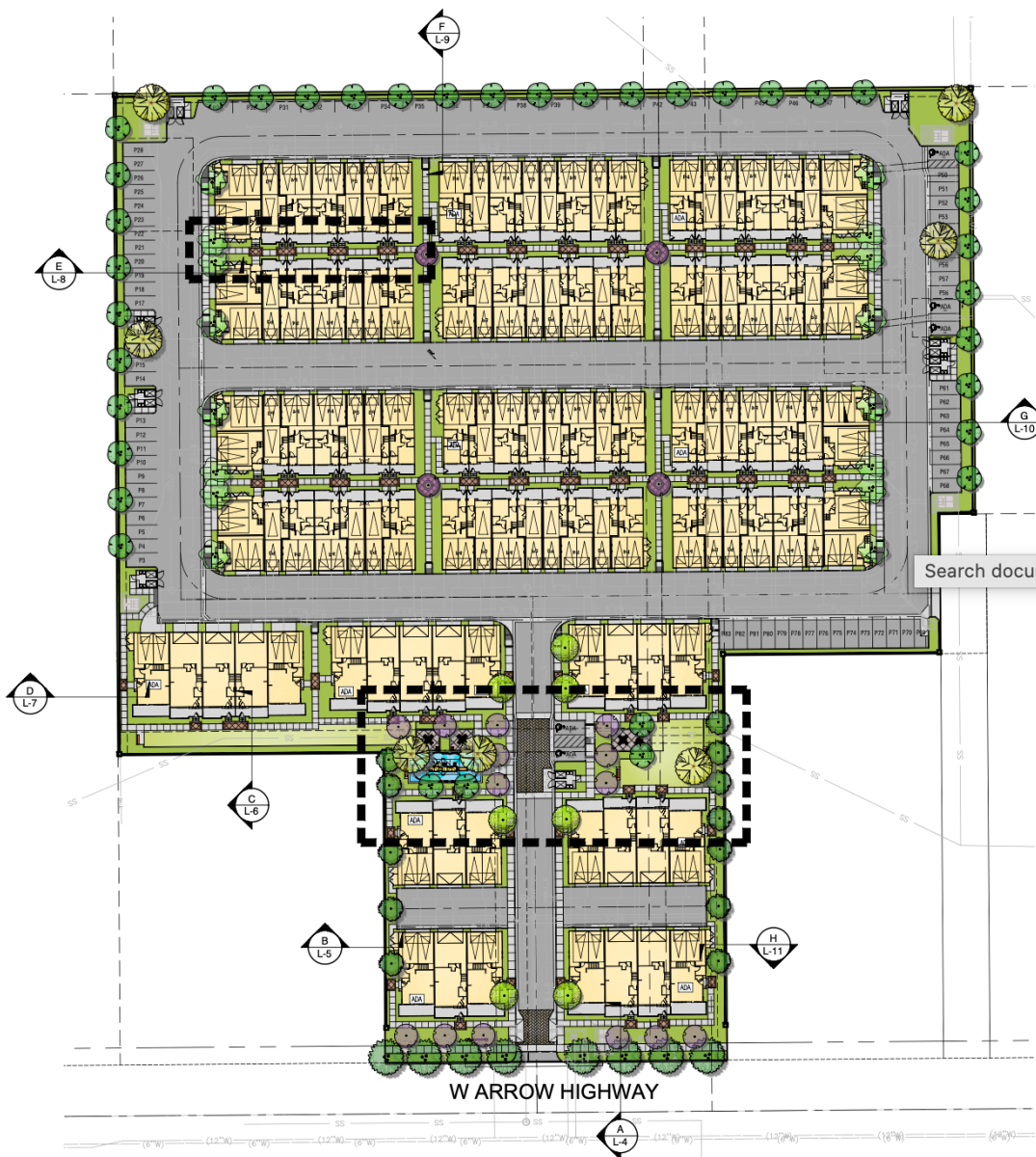


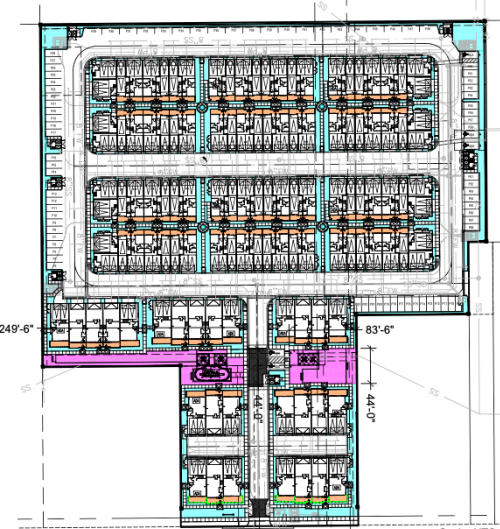
Exhibit A- 3  
PROJECT LANDSCAPE PLAN



| PLANT SCHEDULE |                                                                       |          |        |     |         |
|----------------|-----------------------------------------------------------------------|----------|--------|-----|---------|
| SYMBOL         | BOTANICAL / COMMON NAME                                               | SIZE     | WUCOLS | QTY | REMARKS |
| TREES          |                                                                       |          |        |     |         |
|                | CINNAMOMUM CAMPHORA<br>CAMPHOR TREE                                   | 36" BOX  | M      | 16  |         |
|                | KOELERUTERIA PANICULATA<br>GOLDEN RAIN TREE                           | 36" BOX  | L      | 7   |         |
|                | LAGERSTROEMIA INDICA X FAURIEI<br>"MUSKOGEE"<br>MUSKOGEE GRAPE MYRTLE | 24" BOX  | M      | 14  |         |
|                | LOPHOSTEMON CONFERTUS<br>BRISBANE BOX                                 | 24" BOX  | M      | 36  |         |
|                | PLATANUS RACEMOSA<br>CALIFORNIA SYCAMORE                              | 36" BOX  | M      | 7   |         |
|                | PODOCARPUS GRACILIOR<br>FERN PINE                                     | 24" BOX  | M      | 12  |         |
|                | ULMUS PARVIFOLIA 'DRAKE'<br>DRAKE LACEBARK ELM                        | EXISTING | L      | 8   |         |

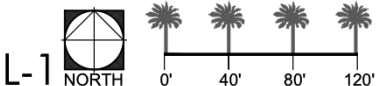
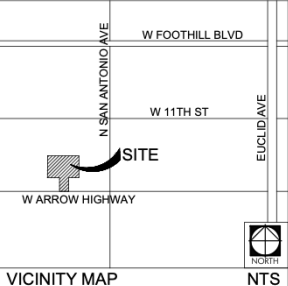
LANDSCAPE CONCEPT:  
TO CREATE A SPACE THAT HARMONIZES WITH THE LOCAL LANDSCAPE, THIS LANDSCAPE WILL CONSIST OF CALIFORNIA-FRIENDLY, LOW AND MEDIUM WATER USE PLANT MATERIAL. ALL PLANTS HAVE BEEN CHOSEN FROM THE LOW OR MEDIUM WATER USE CATEGORY ACCORDING TO WUCOLS. PLANTS HAVE BEEN CHOSEN TO CREATE A UNIFORM THEME ACROSS THE SITE CONSISTING OF MEDITERRANEAN AND CALIFORNIA FRIENDLY PLANT MATERIAL. MAINTENANCE AND LONGEVITY OF PLANT MATERIAL HAS BEEN TAKEN INTO CONSIDERATION. ROOT PANELS AND BARRIERS WILL BE UTILIZED ON ALL BE USED IN ALL LANDSCAPE AREAS NT WITH ALL STANDARDS AND SPECIFICATIONS. CONFORM TO THE CURRENT CITY OF UPLAND STANDARDS AND THE SPECIFIC PLANT LANDSCAPE REQUIREMENT GUIDELINES.

| WATER EFFICIENT LANDSCAPE WORKSHEET                                                                                   |                   |                          |                            |                      |                                                       |             |  |
|-----------------------------------------------------------------------------------------------------------------------|-------------------|--------------------------|----------------------------|----------------------|-------------------------------------------------------|-------------|--|
| PROJECT: UPLAND 132 CONCEPT LUAL LANDSCAPE PLAN - OVERHALL                                                            |                   |                          |                            |                      | DATE: 2025-05-12                                      |             |  |
| This worksheet is filed out by the project engineer and is a required element of the Landscape Documentation Package. |                   |                          |                            |                      |                                                       |             |  |
| Reference Evapotranspiration (ET0)                                                                                    |                   |                          |                            |                      | 54.7                                                  |             |  |
| Conversion Factor                                                                                                     |                   |                          |                            |                      | 0.62                                                  |             |  |
| Hydrozone #                                                                                                           | Plant Factor (PF) | Irrigation Method        | Irrigation Efficiency (IE) | ETAP (ET0 x PF x IE) | Landscaping Area (sq. ft.)                            | ETAP x Area |  |
| Regular Landscape Areas                                                                                               |                   |                          |                            |                      |                                                       |             |  |
| Low water use plantings                                                                                               | 0.3               | Drip                     | 0.81                       | 0.37                 | 16372                                                 | 6064        |  |
| Medium water use plantings                                                                                            | 0.5               | Drip                     | 0.81                       | 0.62                 | 20019                                                 | 12353       |  |
| High water use turf                                                                                                   | 0.7               | Drip                     | 0.81                       | 0.86                 | 3801                                                  | 3265        |  |
| Low use plantings                                                                                                     | 0.3               | Rotary Nozzles or Rotors | 0.75                       | 0.40                 | 0                                                     | 0           |  |
| Med use plantings                                                                                                     | 0.5               | Rotary Nozzles or Rotors | 0.75                       | 0.67                 | 0                                                     | 0           |  |
| High water use turf                                                                                                   | 0.7               | Rotary Nozzles or Rotors | 0.75                       | 0.93                 | 0                                                     | 0           |  |
| TOTALS                                                                                                                |                   |                          |                            |                      | 46,187                                                | 21762       |  |
|                                                                                                                       |                   |                          |                            |                      |                                                       | 736,013     |  |
| Special Landscape Areas                                                                                               |                   |                          |                            |                      |                                                       |             |  |
| Turf areas                                                                                                            |                   |                          |                            | 1                    | 0                                                     | 0           |  |
| Impervious w/ recycled water                                                                                          |                   |                          |                            | 1                    | 0                                                     | 0           |  |
| Water features                                                                                                        |                   |                          |                            | 1                    | 0                                                     | 0           |  |
| TOTALS                                                                                                                |                   |                          |                            |                      | 0                                                     | 0           |  |
|                                                                                                                       |                   |                          |                            |                      | ETWU Total (Gallons/year)                             | 736,013     |  |
|                                                                                                                       |                   |                          |                            |                      | Maximum Allowed Water Allowance (MAWA) (Gallons/year) | 748,396     |  |
| MAWA                                                                                                                  |                   |                          |                            |                      |                                                       |             |  |
| MAWA = CTO * Conv Factor * (ETAT * LA) + (1 ETAT) * SLA                                                               |                   |                          |                            |                      |                                                       |             |  |
| MAWA = 54.7 * 0.62 * 40,187 + 0.45 * 0                                                                                |                   |                          |                            |                      |                                                       |             |  |
| MAWA = 748,396                                                                                                        |                   |                          |                            |                      |                                                       |             |  |
| ETAP Calculations                                                                                                     |                   |                          |                            |                      |                                                       |             |  |
| Regular Landscape Areas                                                                                               |                   |                          |                            | All Landscape Areas  |                                                       |             |  |
| Total LA x Area                                                                                                       |                   |                          |                            | Total LA x Area      |                                                       |             |  |
| 40,187                                                                                                                |                   |                          |                            | 40,187               |                                                       |             |  |
| Average ETAP                                                                                                          |                   |                          |                            | Siterwide ETAP       |                                                       |             |  |
| 0.54                                                                                                                  |                   |                          |                            | 0.54                 |                                                       |             |  |



Common Open Space  
- private patio space: 12,872 sq ft / 124 units = 104 sqft per dwelling  
- passive open space: 31,466 sq ft  
- active open space: 9,669 sq ft  
Total Outdoor spaces: 41,135 sq ft / 124 units = 332 sqft per dwelling

SHEET INDEX  
SHEET LP-1 : OVERALL LANDSCAPE PLAN  
SHEET LP-2 : ENLARGEMENTS  
SHEET LP-3 : WALL AND FENCE PLAN  
SHEET LP-4: SECTION A  
SHEET LP-5: SECTION B  
SHEET LP-6: SECTION C  
SHEET LP-7: SECTION D  
SHEET LP-8: SECTION E  
SHEET LP-9: SECTION F  
SHEET LP-10: SECTION G  
SHEET LP-11: SECTION H



UPLAND 132



310 NORTH JOY STREET | CORONA, CA 92879  
T: 951.737.1124 | F: 951.737.6551

OVERALL LANDSCAPE PLAN  
PREPARED FOR REGENT LAND COMPANY

1968 SOUTH COAST HWY, SUITE 3043 LAGUNA BEACH, 92653  
11/11/2025

*APPENDIX B*

***REFERENCES***

The following is the list of Project specific technical studies uses and City of Upland documents to support the Project's environmental analysis. All technical studies are available at the City of Upland Development Services Department, Planning Division, 460 North Euclid Avenue, Upland CA, 91786.

For a complete list of technical studies, references, Goals, Policies, Actions, and significance guidelines used to support the analysis of the Upland General Plan Update Final Certified Program EIR and GPU Addendum EIR, please visit the City of Upland website at [www.upland.gov](http://www.upland.gov).

*Alta California Geotechnical Inc., "Geotechnical Investigation, North Maple Way & West Arrow Highway, City of Upland, San Bernardino County, California," January 20, 2025*

*Alta California Geotechnical Inc., "Summary of Additional Infiltration Testing, North Maple Way & West Arrow Highway, City of Upland, San Bernardino County, California," July 8, 2025*

*C & V Consulting, Inc., "Preliminary Hydrology &Hydraulics Study – W. Arrow Highway & N. San Antonio Avenue, City of Upland, County of San Bernardino." May 2025*

*C & V Consulting, Inc., "Vesting Tentative Tract Map No. 20819"*

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