

MEMORANDUM

DATE: October 1, 2025

To: Joshua Winter, Senior Planner, City of Upland

FROM: Dena Giacomini, Associate Environmental Planner, LSA Associates, Inc
Ashley Honer, Environmental Planner

SUBJECT: San Antonio Water Company Headquarters Project Initial Study/Mitigated Negative Declaration - Response to Comments

In accordance with Section 15074 of the CEQA Guidelines, prior to approving a project, the decision-making body of the lead agency must consider the proposed environmental document together with any comments received during the public review process. While CEQA does not require formal response to comments on the proposed Mitigated Negative Declaration (MND), as it does for an Environmental Impact Report (EIR), this memorandum provides a response to the written comments received on the proposed San Antonio Water Company Headquarters Project (Project) Initial Study/Mitigated Negative Declaration (IS/MND). The intent is to assist the City of Upland decisionmakers in their review of the Project.

The IS/MND was circulated for public review for a period of 32 days, from August 14, 2025, to September 15, 2025. During this period six comment letters were received: two comments from tribal representatives and four were received from individuals. The following pages present each comment and the corresponding response, enumerated to allow for cross-referencing of CEQA-related issues. Each comment letter is reproduced in full in **Attachment A** of this memorandum, followed by the respective responses.

Although CEQA does not provide guidance for responding to comments on MNDs; this memorandum follows the approach outlined in Section 15088 of the CEQA Guidelines, which applies to the responses to comments on EIRs. Accordingly, responses focus on comments related to the adequacy of the information and environmental analysis contained in the IS/MND.

Written responses to all written comments are provided below. In addition, mitigation measures identified in the Draft IS/MND are consolidated into the Mitigation Monitoring and Reporting Program (MMRP) included as **Attachment B**. If the City chooses to approve the IS/MND, they will also adopt the MMRP to ensure implementation of all required mitigation measures.

COMMENTS AND RESPONSES

This section includes responses to each substantive CEQA-related comment. Each comment letter is assigned a letter (A, B, C, etc.) and individual comments within each letter are numbered consecutively. For instance, comment A-1 is the first numbered comment in Letter A. Please note

that text within individual letters that has not been numbered does not raise environmental issues or relate to the adequacy of the information or analysis within the IS/MND, and therefore, no comment is enumerated or response required, per CEQA Guidelines Section 15132.

The following comment letters were submitted:

LETTER A

Mony Tok, City of Upland Resident
August 21, 2025

LETTER B

David Borger, City of Upland Planning Commissioner
August 24, 2025

LETTER C

Sam Genie, City of Upland Resident
August 19, 2025

LETTER D

Don Watte, City of Upland Resident
August 19, 2025

LETTER E

Brandy Salas, Tribal Administrative Coordinator, Gabrieleno Band of Mission Indians – Kizh Nation
August 15, 2025

LETTER F

Kirsten Tuosto, Tribal Archaeologist, Yuhaaviatam of San Manuel Nation
September 2, 2025

LETTER G

Wes Fifield, City of Upland Resident
August 18, 2025

LETTER H

Sam Wang, South Coast Air Quality Management District
September 11, 2025

LETTER I

Stephanie and Matthew Zilmer, City of Upland Resident
September 11, 2025

LETTER A

Mony Tok, City of Upland Resident August 21, 2025

Response A-1

This comment expresses concern regarding potential increases in traffic generated by the Project, specifically along East 20th Street. As described in the IS/MND, public access to the site will occur only via East 20th Street. All employee traffic, truck deliveries, and other operational traffic will use the new driveway on Campus Avenue. Importantly, Campus Avenue will not connect to East 20th Street, thereby eliminating the potential for traffic cut-through or increased noise along East 20th Street.

Visitor traffic using East 20th Street is expected to be minimal compared to overall Project operations and would consist primarily of occasional customers or members of the public visiting the headquarters office. In addition, the site design incorporates setbacks, perimeter walls, and landscaping that will reduce potential traffic-related noise and visual effects on adjacent residences.

As further detailed in Section 4.17, Transportation and Traffic and in Appendix G, of the IS/MND, a traffic impact analysis was prepared to evaluate potential transportation effects associated with the Project. The analysis determined that the Project would not result in any significant traffic impacts. All study intersections are forecast to operate at acceptable Levels of Service (LOS) under all analysis scenarios, including:

- Opening year (2027) conditions, with and without the Project; and
- Horizon year (2050) conditions, with and without the Project.

The Project is consistent with City of Upland General Plan circulation policies, and the circulation design ensures safe and efficient site access without creating adverse effects on the surrounding street network. Based on this analysis, the Project would not cause a significant traffic impact, and no changes to the Draft IS/MND are required.

Response A-2

This comment expresses concern regarding potential noise impacts that may result from Project-generated traffic. As described in Section 4.13, *Noise*, of the IS/MND, a noise assessment was conducted to evaluate potential increases in roadway noise levels associated with the Project. The analysis determined that traffic generated by the Project would not substantially increase noise levels at nearby sensitive receptors. Specifically, the projected combined traffic noise levels would remain below 60 dBA CNEL, which is considered acceptable for low-density residential land uses under the City of Upland General Plan Noise Element.

Additionally, the Project has been designed to reduce potential traffic and noise effects along East 20th Street by directing all employee, delivery, and operational traffic to the new Campus Avenue driveway. Campus Avenue will not connect through to East 20th Street, thereby eliminating cut-through traffic and reducing potential noise exposure for adjacent residential areas.

With respect to construction, short-term noise would occur intermittently during grading and building activities. These effects would be temporary and limited to the duration of construction. Furthermore, the construction site is surrounded by an existing concrete block wall, which will serve as a noise barrier and further reduce off-site noise exposure for nearby sensitive receptors. Construction activities will also be limited to the City's allowable hours of operation in compliance with the Upland Municipal Code. As such, construction-related noise impacts would be temporary, minimized through site design and compliance with City regulations, and therefore less than significant.

Accordingly, both operational and construction-related noise impacts associated with the Project would be less than significant, and no changes to the Draft IS/MND are required.

Response A-3

This comment expresses concern regarding potential roadway damage that may result from Project-related traffic. Roadway maintenance and pavement wear are generally considered matters of local public works and municipal services, and they are not defined as environmental issues subject to review under CEQA. For this reason, road maintenance is not evaluated as an impact under CEQA.

Nevertheless, as discussed in Section 4.17, *Transportation and Traffic*, of the IS/MND, the Project would not result in significant impacts to traffic operations on the surrounding roadway network. All study intersections are forecast to continue operating at satisfactory Levels of Service (LOS) under both opening year (2027) and horizon year (2050) conditions, with and without the Project. In addition, the Project design routes all employee, delivery, and operational traffic through the new Campus Avenue driveway, preventing cut-through traffic on East 20th Street and minimizing wear on local residential streets.

The City of Upland maintains authority over roadway conditions and pavement management. To the extent any road damage occurs over time, the City has existing procedures and programs in place for roadway repair and maintenance, which are not part of the CEQA environmental analysis. The Project would not cause a significant traffic impact under CEQA, and no changes to the Draft IS/MND are required.

Response A-4

This comment expresses concern regarding the potential for increased debris or waste falling from vehicles traveling to and from the Project site. As described in the IS/MND, all employee, delivery, and operational traffic will use the new driveway on Campus Avenue. Public access will be limited to East 20th Street, and Campus Avenue will not connect through to East 20th Street, thereby preventing cut-through traffic and minimizing potential off-site effects on residential roadways.

With respect to debris and waste, vehicles accessing the site will be subject to all applicable state and local regulations, including the California Vehicle Code, which requires that loads be properly secured and prevents the discharge of debris onto public roadways. Compliance with these regulations will minimize the potential for debris or waste to fall from vehicles.

As further detailed in Section 4.17, *Transportation and Traffic*, of the IS/MND, Project-related vehicle trips would not result in significant traffic or safety impacts. Similarly, the Project would not create substantial adverse environmental effects related to roadway debris or waste, as such occurrences are regulated by existing state law and enforced by local authorities. Debris from Project-related vehicles does not represent a significant environmental impact under CEQA, and no changes to the Draft IS/MND are required.

Response A-5

This comment expresses concern regarding incompatible land uses associated with the Project and surrounding residential areas and suggests that the Project be located in an Industrial area of Upland. As further detailed in Section 4.11, *Land Use and Planning*, of the IS/MND, the Project will include a General Plan amendment and a zone change to Public Utilities (PU) land use designation and Public/Institutional (PB/I) zoning. The PU designation provides areas for landfills, flood control/recharge facilities and public utilities including gas, electricity, and water. The purpose of the PB/I zone is to allow for public and quasi-public facilities that serve Upland residents and visitors. The PU designation and PB/I zone allow a maximum floor-area ratio (FAR) of 0.5. The Project would have a FAR of 0.07 and is consistent with the allowed uses of the PB/I zone and PU designation.

It should be noted that according to CEQA, policy conflicts do not, in and of themselves, constitute a significant environmental impact. Policy conflicts are considered to be environmental impacts only when they would result in direct physical impacts or where those conflicts relate to avoiding or mitigating environmental impacts. As such, associated physical environmental impacts are discussed in this IS/MND under specific topical sections. The Project would not result in any direct physical impacts that cannot be mitigated to a less than significant level. As a result of the proposed rezone and General Plan amendment, the Project would not

conflict with any applicable land use plans, policies, or regulations that were adopted for the purpose of avoiding or mitigating an environmental effect. No change to the Draft IS/MND is required.

LETTER B

David Borger, City of Upland Planning Commissioner
August 24, 2025

Response B-1

This comment is asking for confirmation of language in the Transportation Impact Analysis regarding the proposed driveways associated with the Project. The description of the proposed driveways included on page 2 of the San Antonio Water Company Headquarters Project – Driveway Sensitivity Analysis Memorandum is correct. For clarity, the word *proposed* more accurately describes the Project improvements, as they are included in the current Project and analyzed in the IS/MND; the term *future* is generally used to describe projects or actions that are planned or programmed but are not part of the proposed Project. The Project will include only one driveway on 20th Street and one driveway on Campus Avenue. No change to the Draft IS/MND or Driveway Sensitivity Analysis Memorandum is required.

Response B-2

This comment requests that the Campus Avenue driveway be used as the primary access for all traffic, with the East 20th Street driveway used only for emergency access. As described in the IS/MND, the East 20th Street driveway is proposed for use by the public, including visitors and customers, while the Campus Avenue driveway is designated for SAWCo employee, maintenance, and delivery traffic. Campus Avenue will not connect through to East 20th Street, thereby preventing cut-through traffic and minimizing potential impacts on residential streets.

Further, consolidating all traffic to a single driveway, as suggested by the commenter, could create operational inefficiencies and increase the potential for circulation conflicts between public visitors and larger service or maintenance vehicles. The two-driveway design separates visitor access from employee and service traffic, thereby improving circulation efficiency and overall public safety. No changes to the Draft IS/MND are required.

LETTER C

Sam Genie, City of Upland Resident
August 19, 2025

Response C-1

This comment raises concerns regarding potential future growth and the parking of large vehicles and equipment at the Project site. The Project includes construction of a 3,698-square-foot headquarters and a 4,066-square-foot maintenance building, along with a maintenance yard,

driveways, parking areas, solar canopy, landscaping, and utility improvements. The headquarters building provides office and administrative functions, while the maintenance building accommodates storage, outdoor welding, motor repair, electrical rooms, ADA restroom, locker room, and a maintenance office/break room. Existing water storage, pump, and signal infrastructure will remain in place.

All operational vehicle and equipment parking will occur within designated areas on-site, with employee and service traffic routed via the Campus Avenue driveway and public access limited to the East 20th Street driveway. Campus Avenue will not connect through to East 20th Street, minimizing cut-through traffic on residential streets. During construction, equipment and materials will be staged within the project footprint, and the existing concrete block wall will provide noise and visual buffering for nearby residents. Construction activities will comply with applicable City regulations for noise, dust, and traffic management. No changes to the Draft IS/MND are required.

Response C-2

This comment raises concerns about work on the Project site resulting in loud noise. As discussed above and as further detailed in Section 4.13, *Noise*, of the IS/MND, the proposed project would not result in 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. The IS/MND analyzes potential noise impacts associated with construction activities and long-term noise impacts related to traffic and stationary sources. No change to the Draft IS/MND is required.

Response C-3

This comment raises concerns regarding potential water-related operational activities that could require SAWCo staff and equipment to be present at the headquarters. All vehicle and equipment movements are routed via the Campus Avenue driveway, while public access is limited to the East 20th Street driveway, preventing cut-through traffic on residential streets. As described in Section 4.17, *Transportation and Traffic*, and Section 4.13, *Noise*, of the IS/MND, the Project would not result in significant impacts from operational traffic or noise under normal or emergency conditions. The site's existing and proposed infrastructure, including parking, maintenance yards, and the concrete block perimeter wall, ensures that both routine and emergency operations can be conducted safely without causing environmental impacts to surrounding areas. No changes to the Draft IS/MND are required.

Response C-4

This comment raises concerns about incompatible land uses associated with the Project and surrounding residential areas. Please see response A-5 above which further discusses land use impacts under CEQA. No change to the Draft IS/MND is required.

LETTER D

Don Watte, City of Upland Resident

August 19, 2025

- Response D-1 This comment is asking for clarification on the parking provided and if the Project includes street parking. The visitor and customer parking lot would be located south of the citrus grove and north of the main headquarters building and would provide 14 surface parking spaces, including two ADA compliant parking spots. The employee parking area would be located east of the main headquarters building, would be covered by photovoltaic panels, and would include 14 surface parking spaces, including two ADA compliant parking spots. The Project would also provide eight covered truck parking spots west of the maintenance building. No street parking is proposed. No change to the Draft IS/MND is required.
- Response D-2 This comment is asking for clarification on the proposed access roads/driveways. Vehicular access to the Project site would be provided via two paved driveways with gates for security. One new 26-foot-wide driveway would be constructed off of East 20th Street along the northern property boundary that would access the visitor and customer parking area. An additional 26-foot-wide driveway would enter the Project site at the northeastern corner and would connect to the intersection of Campus Avenue and East 20th Street approximately 275 feet east of the Project site. This driveway would cross undeveloped land owned by the Southern California Edison company and require an easement. This driveway would enter the Project site at the northeastern corner and run south along the eastern property line to access the covered employee parking area, maintenance building, and covered truck parking area. This driveway would serve as a SAWCo maintenance vehicle private access road and would be secured by a 20-foot-wide, 6-foot-tall steel gate located just west of the Campus Avenue and East 20th Street intersection that would be open during business hours. No public access will be allowed through this new driveway. No change to the Draft IS/MND is required.
- Response D-3 This comment is asking for clarification on the proposed citrus grove. The Project would include a citrus grove buffer along the eastern half of the northern property line with 64 new citrus trees planted as part of the Project's landscape design. No change to the Draft IS/MND is required.
- Response D-4 This comment is asking if any landscaping improvements will occur on the parkway on 20th Street. The Project would include a citrus grove buffer along the eastern half of the northern property line, along with various trees and shrubs around the parking areas and the main headquarters building. Approximately 46,077 square feet of landscaped area would be provided. Up to two of the existing street trees would be removed to accommodate

the driveway off East 20th Street, and various shrubs and associated grassland would be removed to accommodate the driveway off Campus Avenue and East 20th Street. The three existing trees at the southwestern corner of the Project site would remain in place, and 51 new ornamental trees and 64 new citrus trees would be planted as part of the Project's landscape design. No change to the Draft IS/MND is required.

Response D-5 This comment is asking for clarification on the proposed site access. Please see responses above which provides multiple summaries of the Project driveways and site access. No change to the Draft IS/MND is required.

LETTER E

Brandy Salas, Tribal Administrative Coordinator, Gabrieleno Band of Mission Indians – Kizh Nation
August 15, 2025

Response E-1 This comment expresses concern and disagreement with the proposed mitigation measures in the Tribal Cultural Resources Section of the IS/MND and requests that other tribal entities remain separate from the Gabrieleno Band of Mission Indians – Kizh Nation mitigation measures. The City completed the tribal consultation process with both the Gabrieleno Band of Mission Indians – Kizh Nation and the San Manuel Nation in accordance with Assembly Bill (AB) 52 and Senate Bill (SB) 18. As a result of this consultation, Mitigation Measures (MM) TCR-1 through TCR-5 were developed to minimize potential impacts related to the discovery of unanticipated tribal cultural resources, human remains and associated funerary or ceremonial objects.

In accordance with State law, the City's consultation process is designed to ensure that the concerns and resources of all participating tribes are considered equally. The mitigation measures included in the Draft IS/MND reflect the input provided through this process and are intended to protect tribal cultural resources consistent with CEQA and applicable statutes.

LETTER F

Kirsten Tuosto, Tribal Archaeologist, Yuhaaviatam of San Manuel Nation
September, 2025

Response F-1 This comment expresses approval of the mitigation measures included in the Tribal Cultural Resources section of the IS/MND and concludes the tribal consultation process with the Yuhaaviatam of San Manuel Nation tribe. No change to the Draft IS/MND is required.

LETTER G

Wes Fifield, City of Upland Resident

August 18, 2025

Response G-1 This comment requests clarification regarding whether the Project proposes to connect East 20th Street and Campus Avenue. The Project does *not* include a connection between East 20th Street and Campus Avenue. Public access will occur only via East 20th Street, while all employee, delivery, and operational traffic will use the new driveway on Campus Avenue. This design prevents cut-through traffic on residential streets and ensures safe and efficient circulation for both public and operational uses.

LETTER H

Sam Wang, South Coast Air Quality Management District

September 11, 2025

Response H-1 This comment asserts that the Draft IS/MND states that excavated soil would be reused on site and that no import or export of soil would be required, and that in contrast, Appendix A – Air Quality and Greenhouse Gas Technical Memorandum states that the project would require removal of approximately 1,700 tons of roadway debris from the site and the import of approximately 900 cubic yards of soil during construction. This comment also states that these statements conflict with one another and that the Lead Agency clarify the import and/or export of materials and identify the appropriate landfill location and incorporate the corresponding haul distance into the modeling to accurately estimate hauling emissions.

At the time the Air Quality and Greenhouse Gas Technical Memorandum was prepared, it was not yet known whether the proposed project would require any import/export. As such, the removal of approximately 1,700 tons of roadway debris and the import of approximately 900 cubic yards of soil was assumed as a worst-case scenario. As stated on page 2-12 of the Draft IS/MND, the proposed project would not require the import or export of soil materials. As such, the construction emissions presented in Table 4.3.A of the Draft IS/MND are conservative, while actual project-related construction emissions would likely be less than the emissions shown in Table 4.3.A. As such, the proposed project would not exceed the SCAQMD's significance criteria for construction-related emissions and no changes to the Draft IS/MND are warranted.

Response H-2 This comments states that Draft IS/MND should be revised to state that the proposed project would be required to comply with South Coast Air Quality Management District (SCAQMD) rules, including Rule 201 – Permit to Construct, Rule 203 – Permit to Operate, Rule 401 – Visible Emissions, Rule 402 – Nuisance, Rule 403 – Fugitive Dust, Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines, Rule 1113 – Architectural Coating, Rule 1166 – Volatile Organic Compound

Emissions from Decontamination of Soil, Rule 1179 – Publicly Owned Treatment Works Operations, Regulation XIII – New Source Review, Rule 1401 – New Source Review of Toxic Air Contaminants, Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants, and Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines. The City acknowledges that the proposed project would be required to comply with all applicable SCAQMD rules and regulations. Given that the proposed project would be required to comply with all applicable rules and regulations, no changes to the Draft IS/MND are warranted.

Response H-3 This comment notes that South Coast AQMD serves as a Responsible Agency under CEQA if the implementation and portability of the proposed project requires permits from the agency related to the use of new stationary equipment. No new stationary equipment is proposed as part of the project. This comment is noted and no further response is necessary.

Response H-4 This comment states that the Draft IS/MND should be revised to address the SCAQMD's comments and provide the necessary evidence to sufficiently support the conclusions reached or provide reasons for not doing so. Additionally, this comment requests that the SCAQMD receive written responses to all comments contained herein and a notice of any scheduled public hearing(s). This comment is noted. For the reasons described above, no changes to the Draft IS/MND are warranted. The City will provide the SCAQMD with responses to their comments and a notice of public hearings.

LETTER I

Stephanie and Matthew Zilmer, City of Upland Resident September 11, 2025

Response I-1 This comment expresses concern regarding potential public access to Campus Avenue from the SAWCo headquarters site. The Project does not propose public access to Campus Avenue. The access road on Campus Avenue is designated for employees, deliveries, and operational traffic only. Public access to the site will occur solely via East 20th Street, and Campus Avenue will not connect through to East 20th Street.

This circulation design prevents cut-through traffic on residential streets and ensures safe and efficient operations. As detailed in Section 4.17, *Transportation and Traffic*, of the IS/MND, the Project's access and circulation design would not result in significant traffic impacts. No changes to the Draft IS/MND are required.

Response I-2 This comment requests clarification regarding the number of visitors anticipated at the new SAWCo headquarters and whether visitor overflow parking could occur on East 20th Street. As described in the Project plans,

the visitor and customer parking lot would be located south of the citrus grove and north of the headquarters building, and would provide 14 surface parking spaces, including two ADA-compliant spaces. Employee parking would be located separately, east of the headquarters building, with 14 surface parking spaces under photovoltaic panels, including two ADA-compliant spaces. In addition, eight covered truck parking spaces would be provided west of the maintenance building.

The visitor/customer parking lot is designed to accommodate the anticipated number of visitors to the headquarters. Visitor access is expected to be occasional and limited, primarily for customer service or scheduled meetings. No on-street parking along East 20th Street is proposed or required, and the on-site parking supply provided is adequate to serve the Project. No change to the Draft IS/MND is required.

Response I-3

This comment expresses concern regarding the location of the proposed visitor driveway on East 20th Street in relation to Winston Court and suggests relocating the driveway further west to offset the intersection. As shown on the conceptual site plan, the visitor driveway would be located east of the headquarters building and would provide direct access to the designated visitor/customer parking lot.

The Project's two-driveway design—with East 20th Street designated for visitors and Campus Avenue designated for employees, deliveries, and operational traffic—was specifically chosen to reduce circulation conflicts and enhance safety. Final driveway placement will be subject to the City of Upland's review and approval through the encroachment permit and design review processes, which ensure that access points meet City standards and safety requirements. Because the Draft IS/MND adequately analyzed the Project's circulation and no significant impacts were identified, no changes to the environmental document are required.

ATTACHMENTS

A: Comment letters

B: Mitigation Monitoring and Reporting Program

ATTACHMENT A

COMMENT LETTERS



FW: [EXTERNAL] Fw: Failure Notice San Antonio Water Company Headquarters

From Joshua Winter <jwinter@uplandca.gov>

Date Mon 8/25/2025 9:16 AM

To Dena Giacomini <Dena.Giacomini@lsa.net>

Comments for SAWCO.

Joshua Winter, Senior Planner
Planning Division | Development Services Department
City Of Upland
460 N. Euclid Ave, Upland, CA 91786

Counter Hours: Monday – Thursday from 8:00 am to 5:00 pm

P: (909) 931-4143 | F: (909) 931-4321 | jwinter@uplandca.gov



**CITY OF
UPLAND**

From: Mony Tok <monytok97@yahoo.com>

Sent: Thursday, August 21, 2025 8:30 PM

To: Joshua Winter <jwinter@uplandca.gov>

Subject: [EXTERNAL] Fw: Failure Notice

You don't often get email from monytok97@yahoo.com. [Learn why this is important](#)

WARNING: External email. Please verify sender before opening attachments or clicking on links.

Good Morning Mr. Winter,

I'm writing to you as a resident of Upland, I live on E 20th Street. I understand that San Antonio Water Company is planning to build their Headquarters at 400 E 20th Street. I would like to voice some concerns I have with this project:

1. Increase traffic for residents from the vehicles going in and out of the Headquarter.

A-1

2. Increase noise pollution from all the additional traffic.

A-2

3. Increase damage to the road due to the additional traffic..

A-3

4. Increase debris waste falling from vehicles going in and out of Headquarter.

A-4

Lastly, I would emphasize that this neighborhood is filled with young families that have children enjoying outdoor activities at different times of the day the traffic can be hazardous to those children. In addition, we have residents walking their dogs at all hours of the day or people doing exercise. I think it would serve the residents of Upland if the San Antonio Water Company project was located in an Industrial section of Upland and not a residential development.

A-5

I appreciate your time and attention on the work important matters.

Sincerely,

Mony Tok

[Sent from Yahoo Mail for iPhone](#)



FW: [EXTERNAL] San Antonio Water Company Headquarters Specific Plan Project

From Joshua Winter <jwinter@uplandca.gov>
Date Mon 8/25/2025 9:18 AM
To Dena Giacomini <Dena.Giacomini@lsa.net>

SAWCO IS/MND comments.

Joshua Winter, Senior Planner
Planning Division | Development Services Department
City Of Upland
460 N. Euclid Ave, Upland, CA 91786

Counter Hours: Monday – Thursday from 8:00 am to 5:00 pm
P: (909) 931-4143 | F: (909) 931-4321 | jwinter@uplandca.gov



**CITY OF
UPLAND**

From: David Borger <dlb91784@gmail.com>
Sent: Sunday, August 24, 2025 8:03 PM
To: Joshua Winter <jwinter@uplandca.gov>
Subject: [EXTERNAL] Villa Serena Specific Plan Project

You don't often get email from dlb91784@gmail.com. [Learn why this is important](#)

WARNING: External email. Please verify sender before opening attachments or clicking on links.

In reviewing the proposed plan I have two comments:

1. I believe the plan as presented revised the original plan to eliminate one entrance on 20th Street and have the entrance for service trucks off Campus however the following statement in the traffic report (page 2) indicates the Campus driveway to be future:
"As shown in Figure 1, the updated site plan shows the project can be accessed via two full-access driveways: • Project Driveway 1 on 20th Street: This westerly driveway along the northern property boundary provides access for SAWCO patrons and customers; and • Project Driveway 2 on Campus Avenue (previously Project Driveway 3 in November 2024 TIA): This easterly driveway is located on the northeastern corner of the project site and will provide a future connection with the intersection of Campus Avenue and 20th Street".
Is the statement incorrect?

2. Can the proposed plan be adjusted to have the Campus Ave. access be the primary access for all traffic and the 20th Street access be for emergency use? This would remove business

B-1

B-2

traffic from 20th Street.

David Berger
Planning Commissioner
City of Upland



FW: [EXTERNAL] San Antonio Water Headquarters Project Comment

From Joshua Winter <jwinter@uplandca.gov>
Date Mon 8/25/2025 10:55 AM
To Dena Giacomini <Dena.Giacomini@lsa.net>

SAWCO Comments.

Joshua Winter, Senior Planner
Planning Division | Development Services Department
City Of Upland
460 N. Euclid Ave, Upland, CA 91786

Counter Hours: Monday – Thursday from 8:00 am to 5:00 pm
P: (909) 931-4143 | F: (909) 931-4321 | jwinter@uplandca.gov



CITY OF UPLAND

From: Samuel Genie <samuel.genie.iclp@statefarm.com>
Sent: Tuesday, August 19, 2025 4:36 PM
To: Joshua Winter <jwinter@uplandca.gov>
Cc: Samuel Genie <samuelge09@yahoo.com>
Subject: [EXTERNAL] San Antonio Water Headquarters Project Comment

WARNING: External email. Please verify sender before opening attachments or clicking on links.

Hello,

I have some concerns about this project. I live across the street from the proposed project and have lived there over 17 years. First, this neighborhood is very family oriented with children playing, riding their bikes, walking their dogs. The project will be the Water department headquarters and looks like a place for future growth. It says that it will only house 10 employees and having a maintenance building and yard. However, is that a purpose to park bigger vehicles or bigger equipment? Are they going to work on equipment there causing loud noise? What if there is water issue and the water company would have to meet at headquarters with all of their staff and equipment? Our neighborhood would become the staging point. I understand there is a need for our utility services. However, this may not be the right place for it. Upland is a

| C-1
| C-2
| C-3
| C-4

wonderful city to raise and have a family. Our neighborhood demonstrates this. I think we should reconsider the long-term effects of this project in our residential community. Appreciate the opportunity to raise my concerns. Please reply to this email. Thank you.

C-4

Sam Genie



FW: [EXTERNAL] San Antonio Water Company Headquarters Project

From Joshua Winter <jwinter@uplandca.gov>

Date Mon 8/25/2025 10:57 AM

To Dena Giacomini <Dena.Giacomini@lsa.net>

SAWCO comments.

Joshua Winter, Senior Planner
Planning Division | Development Services Department
City Of Upland
460 N. Euclid Ave, Upland, CA 91786

Counter Hours: Monday – Thursday from 8:00 am to 5:00 pm

P: (909) 931-4143 | F: (909) 931-4321 | jwinter@uplandca.gov



**CITY OF
UPLAND**

From: Don Watte <dwatte@gmail.com>
Sent: Tuesday, August 19, 2025 4:19 PM
To: Joshua Winter <jwinter@uplandca.gov>
Subject: [EXTERNAL] San Antonio Water Company Headquarters Project

You don't often get email from dwatte@gmail.com. [Learn why this is important](#)

WARNING: External email. Please verify sender before opening attachments or clicking on links.

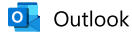
The project sounds like a nice addition to our neighborhood.

We just have a couple of questions:

1. Your letter states parking. Does this mean a parking lot for workers and no street parking? | D-1
2. The yellow line around the project on the map has a yellow line going east. I hope that does not mean an access road to Campus Ave? | D-2
3. What do you mean by Citrus Grove? | D-3
4. Is there going to be any improvements to the existing landscaping on the parkway on 20th Street? There are some nice trees and Lantana shrubs but the rest is weeds which are weedwacked a couple times a year. Maintenance has been minimal. Your Project deserves a better landscape image. | D-4
5. Will the entrance remain the same? There will not be a stop sign? Which entrance will be used to access parking and the buildings. | D-5

Thank you,

Don Watte
2026 Winston Ct
Upland



FW: [EXTERNAL] Re: San Antonio Water Company (SAWCO) Headquarters Project IS/MND

From Joshua Winter <jwinter@uplandca.gov>
Date Mon 8/25/2025 12:08 PM
To Dena Giacomini <Dena.Giacomini@lsa.net>

1 attachment (244 KB)
San Antonio Water Company _mitigation measures .pdf;

SAWCO Comments.

Joshua Winter, Senior Planner
Planning Division | Development Services Department
City Of Upland
460 N. Euclid Ave, Upland, CA 91786
Counter Hours: Monday – Thursday from 8:00 am to 5:00 pm
P: (909) 931-4143 | F: (909) 931-4321 | jwinter@uplandca.gov



From: Gabrieleno Administration <admin@gabrielenoindians.org>
Sent: Friday, August 15, 2025 12:13 PM
To: Joshua Winter <jwinter@uplandca.gov>
Subject: Re: [EXTERNAL] Re: San Antonio Water Company (SAWCO) Headquarters Project IS/MND

Dear Joshua Winter,

Thank you for your email and for providing the proposed mitigation measures. With respect, we do not agree with the mitigation as presented. Please note that our consultations and mitigation measures are specific to the Kizh Nation’s connection to the project location and to our tribal cultural resources in and around the project area.

Our mitigation measures do not represent, speak for, or apply to any other tribal entity. We respectfully request that all other tribal entities remain separate from our mitigation measures. The Kizh Nation’s traditions, ceremonies, and cultural resources are distinct and should not be conflated with those of other tribal entities.

We ask that you incorporate the mitigation measures we have provided below. Should you have any questions or require clarification, please do not hesitate to contact us.

Best regards,
Brandy Salas

Tribal Administrative Coordinator
Gabrieleño Band of Mission Indians - Kizh Nation
PO Box 393
Covina, CA 91723
Office: 844-390-0787
website: www.gabrielenoindians.org



The region where Gabrieleno culture thrived for more than twelve thousand years encompassed most of Los Angeles County, more than half of Orange County and portions of Riverside and San Bernardino counties. It was the labor of the Gabrieleno who built the missions, ranchos and the pueblos of Los Angeles. They were trained in the trades, and they did the construction and maintenance, as well as the farming and managing herds of livestock. The Gabrieleno are the ones who did all this work, and they really are the foundation of the early economy of the Los Angeles area. That's a contribution that Los Angeles has not recognized--the fact that in its early decades, without the Gabrieleno, the community simply would not have survived.

E-1

On Wed, Aug 13, 2025 at 4:19 PM Joshua Winter <jwinter@uplandca.gov> wrote:

[City of Upland Environmental Review](#)

Hopefully this one works.

Joshua Winter, Senior Planner
Planning Division | Development Services Department
City Of Upland
460 N. Euclid Ave, Upland, CA 91786

Counter Hours: Monday – Thursday from 8:00 am to 5:00 pm

P: (909) 931-4143 | F: (909) 931-4321 | jwinter@uplandca.gov



From: Gabrieleno Administration <admin@gabrielenoindians.org>
Sent: Wednesday, August 13, 2025 1:53 PM
To: Joshua Winter <jwinter@uplandca.gov>
Subject: [EXTERNAL] Re: San Antonio Water Company (SAWCO) Headquarters Project IS/MND

WARNING: External email. Please verify sender before opening attachments or clicking on links.

Hello Joshua

Thank you for your email. I am not able to open the links to the ISMND. Are you able to resend the link?

Best regards,
Brandy Salas

Tribal Administrative Coordinator
Gabrieleño Band of Mission Indians - Kizh Nation
PO Box 393
Covina, CA 91723
Office: 844-390-0787
website: www.gabrielenoindians.org

The region where Gabrieleño culture thrived for more than twelve thousand years encompassed most of Los Angeles County, more than half of Orange County and portions of Riverside and San Bernardino counties. It was the labor of the Gabrieleño who built the missions, ranchos and the pueblos of Los Angeles. They were trained in the trades, and they did the construction and maintenance, as well as the farming and managing herds of livestock. The Gabrieleño are the ones who did all this work, and they really are the foundation of the early economy of the Los Angeles area. That's a contribution that Los Angeles has not recognized—the fact that in its early decades, without the Gabrieleño, the community simply would not have survived.

On Wed, Aug 13, 2025 at 1:04 PM Joshua Winter <jwinter@uplandca.gov> wrote:

Good Afternoon,

In accordance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines, the City of Upland, acting as the Lead Agency is releasing for review and comment to all agencies, organizations and interested persons, a Draft Initial Study and proposed Mitigated Negative Declaration (IS/MND) for the San Antonio Water Company (SAWCO) Headquarters Project (Project).

Project Location: The Project is located at 400 East 20th Street in the City of Upland, in southwestern San Bernardino County, California (Assessor's Parcel Number [APN] 1044-091-22).

Project Description: The Project includes the construction of a new 3,698 square-foot SAWCO headquarters and associated improvements including a 4,066 square-foot maintenance building, maintenance yard, driveway, parking, solar cover, landscaping, citrus grove, and utility improvements. The existing water storage tank, pump station, and signal buildings and tower would remain in place. The buildings would be a maximum height of 23 feet and have a FAR of 0.07. Approximately ten people are expected to be employed onsite.

Public Review Period: The Draft IS/MND is being circulated for a public review period beginning August 14, 2023, and ending September 15, 2025, pursuant Section 15105(b) of the CEQA Guidelines. Persons responding are urged to submit their comments in writing. Comments should be mailed or delivered to the City, at the address below no later than 5:00 PM on September 15, 2025. Submittal of written comments via e-mail is also acceptable. Please submit comments to:

Via Mail: Attn: Joshua Winter, Senior Planner
City of Upland
Development Services Department/Planning Division
460 N. Euclid Avenue
Upland, CA 91786

Via Email: jwinter@uplandca.gov
Subject: Villa Serena Specific Plan Project
To ensure appropriate delivery of your email,
please reference "San Antonio Water Headquarters
Project" in the subject line of your email. Thank you.

To view the Initial Study/Mitigated Negative Declaration with technical appendices and the Notice of Availability for this project, please click here:
<https://www.uplandca.gov/environmental-review>

Feel free to reach out to me with any questions.

Regards,

Joshua Winter, Senior Planner
Planning Division | Development Services Department
City Of Upland

460 N. Euclid Ave, Upland, CA 91786

Counter Hours: Monday – Thursday from 8:00 am to 5:00 pm

P: (909) 931-4143 | F: (909) 931-4321 | jwinter@uplandca.gov



**CITY OF
UPLAND**



FW: [EXTERNAL] SB18: San Antonio Water Company Headquarters Project, 400 East 20th Street, APN: 1044-091-22-0000, City of Upland [CIT-UPL-2025-2]

From Joshua Winter <jwinter@uplandca.gov>
Date Tue 9/2/2025 9:44 AM
To Dena Giacomini <Dena.Giacomini@lsa.net>

FYI.

Joshua Winter, Senior Planner
Planning Division | Development Services Department
City Of Upland

460 N. Euclid Ave, Upland, CA 91786

Counter Hours: Monday – Thursday from 8:00 am to 5:00 pm
P: (909) 931-4143 | F: (909) 931-4321 | jwinter@uplandca.gov



**CITY OF
UPLAND**

From: Kristen Tuosto <Kristen.Tuosto@sanmanuel-nsn.gov>
Sent: Tuesday, September 2, 2025 9:30 AM
To: Joshua Winter <jwinter@uplandca.gov>
Subject: RE: [EXTERNAL] SB18: San Antonio Water Company Headquarters Project, 400 East 20th Street, APN: 1044-091-22-0000, City of Upland [CIT-UPL-2025-2]

Hello Joshua,

Thank you for providing this information. After reviewing the draft IS/MND, I have no concerns with how the mitigation measures are written.

This communication concludes YSMN’s input on this project, at this time, and no additional consultation pursuant to CEQA/SB18 is required unless there is an unanticipated discovery of cultural resources during project implementation. If you should have any further questions regarding this matter, please do not hesitate to contact me at your convenience, as I will be your Point of Contact (POC) for YSMN with respect to this project.

Thank you,
Kristen

From: Joshua Winter <jwinter@uplandca.gov>
Sent: Tuesday, August 12, 2025 2:00 PM
To: Kristen Tuosto <Kristen.Tuosto@sanmanuel-nsn.gov>

F-1

Subject: RE: [EXTERNAL] SB18: San Antonio Water Company Headquarters Project, 400 East 20th Street, APN: 1044-091-22-0000, City of Upland [CIT-UPL-2025-2]

Hi Kristen,

Yes. Apologies, I was only thinking of the ones modified.

MM CUL-1 Unknown Archaeological Resources. In the event that archaeological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified archaeologist from the San Bernardino County List of Qualified Archaeologists has evaluated the find in accordance with federal, State, and local guidelines to determine whether the find constitutes a “unique archaeological resource,” as defined in Section 21083.2(g) of the California Public Resources Code (PRC). Personnel of the Project shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the Project site. The found deposits shall be treated in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2. Prior to issuance of a grading permit, the Director of Planning Services, or designee, shall ensure that this mitigation measure is documented on the grading plans.

MM CUL-2 Human Remains. If human remains are encountered, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to State Public Resources Code (PRC) Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be Native American, the County Coroner would notify the Native American Heritage Commission (NAHC), which would determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The MLD recommendations may include scientific removal and nondestructive analysis of human remains and items associated with Native American burials, preservation of Native American human remains and associated grave goods in place, relinquishment of Native American human remains and associated items to the descendants for treatment, or any other culturally appropriate treatment. Prior to issuance of a grading permit, the Director of Planning Services or designee shall ensure that this mitigation measure is documented on the grading plans.

Joshua Winter, Senior Planner
Planning Division | Development Services Department
City Of Upland
460 N. Euclid Ave, Upland, CA 91786

Counter Hours: Monday – Thursday from 8:00 am to 5:00 pm

P: (909) 931-4143 | F: (909) 931-4321 | jjwinter@uplandca.gov



**CITY OF
UPLAND**

From: Kristen Tuosto <Kristen.Tuosto@sanmanuel-nsn.gov>

Sent: Friday, August 8, 2025 12:46 PM

To: Joshua Winter <jjwinter@uplandca.gov>

Subject: RE: [EXTERNAL] SB18: San Antonio Water Company Headquarters Project, 400 East 20th Street, APN: 1044-091-22-0000, City of Upland [CIT-UPL-2025-2]

Hello Joshua,

Are there no Cultural Resources Mitigations Measures (i.e., CUL MM) for this project?

Best,
Kristen

From: Joshua Winter <jwinter@uplandca.gov>

Sent: Tuesday, August 5, 2025 9:01 AM

To: Kristen Tuosto <Kristen.Tuosto@sanmanuel-nsn.gov>

Subject: RE: [EXTERNAL] SB18: San Antonio Water Company Headquarters Project, 400 East 20th Street, APN: 1044-091-22-0000, City of Upland [CIT-UPL-2025-2]

Gm Kristen,

We have revised the draft IS/MND for this project to include tribal mitigation requested. During our tribal notification process, we identified a conflict between requested mitigation, and mitigation requested from another tribe. As such, the following mitigation has been added to the Draft IS/MND:

TCR-1 Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities.

- A. The City shall contact interested tribes to determine if a Native American Monitor is requested prior to the commencement of any “ground-disturbing activity” for the subject Project at all Project locations (i.e., both on-site and any off-site locations that are included in the Project description/definition and/or required in connection with the Project, such as public improvement work). “Ground-disturbing activity” shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.
- B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.
- C. If monitoring is required, the monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or “TCR”), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the Project applicant/lead agency upon written request to the Tribe.
- D. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the tribal representative from a designated point of contact for the Project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the Project site or in connection with the Project are complete; or (2) a determination and written notification by the tribal representative to the Project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the Project site possesses the potential to impact TCRs.

TCR-2 Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funeral/Non-Ceremonial).

The San Manuel Nation Cultural Resources Department shall be contacted of any pre-contact and/or historic-era cultural resources discovered during project implementation and be provided information regarding the nature of the find so as to provide tribal input with regards to significance and treatment. In the event the material is determined to be significant, Mitigation Measure TCR-4 shall apply.

TCR-3 Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funeral/Non-Ceremonial). Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. In the event the material is determined to be significant, Mitigation Measure TCR-4 shall apply.

TCR-4 Monitoring and Treatment Plan. In the event of any inadvertent discovery of any tribal cultural material, or pre-contact/historic-era resource determined to be significant, the City shall require the preparation of a Monitoring and Treatment Plan. The monitoring and treatment plan shall be prepared by a qualified archeologist in consultation with and subject to the approval of the City and the consulting Native American tribes. The City and consulting Native American tribes shall engage in mutual good faith efforts to develop the Monitoring and Treatment Plan. The monitoring and treatment plan shall identify the manner and process in which any suspected tribal cultural material is evaluated, recorded, removed, or curated, including the final disposition of any such material.

If the manner and process of evaluation, recording, removing, and/or disposing of tribal cultural material cannot be resolved between consulting Native American parties, the City shall, in good faith, determine and approve the appropriate actions to be included in the Monitoring and Treatment Plan.

TCR-5 Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects.

- A. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.
- B. If Native American human remains and/or grave goods are discovered or recognized on the Project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed.
- C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).
- D. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.
- E. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

Let me know if you have any questions, and confirmation for the closure of consultation.

Regards,

Joshua Winter, Senior Planner
Planning Division | Development Services Department

City Of Upland

460 N. Euclid Ave, Upland, CA 91786

Counter Hours: Monday – Thursday from 8:00 am to 5:00 pm

P: (909) 931-4143 | F: (909) 931-4321 | jwinter@uplandca.gov



**CITY OF
UPLAND**

From: Kristen Tuosto <Kristen.Tuosto@sanmanuel-nsn.gov>

Sent: Wednesday, June 18, 2025 10:49 AM

To: Joshua Winter <jwinter@uplandca.gov>

Subject: RE: [EXTERNAL] SB18: San Antonio Water Company Headquarters Project, 400 East 20th Street, APN: 1044-091-22-0000, City of Upland [CIT-UPL-2025-2]

Hello Joshua,

I am sorry this did not get forward to me.

But you are correct, we have low concerns for this area. YSMN requests that the following language be made a part of the project/permit/plan conditions:

CUL MMs

1. In the event that cultural resources are discovered during project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease and a qualified archaeologist meeting Secretary of Interior standards shall be hired to assess the find. Work on the other portions of the project outside of the buffered area may continue during this assessment period. Additionally, the Yuhaaviatam of San Manuel Nation Cultural Resources Department (YSMN) shall be contacted, as detailed within TCR-1, regarding any pre-contact and/or historic-era finds and be provided information after the archaeologist makes his/her initial assessment of the nature of the find, so as to provide Tribal input with regards to significance and treatment.
2. If significant pre-contact and/or historic-era cultural resources, as defined by CEQA (as amended, 2015), are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, the drafts of which shall be provided to YSMN for review and comment, as detailed within TCR-1. The archaeologist shall monitor the remainder of the project and implement the Plan accordingly.
3. If human remains or funerary objects are encountered during any activities associated with the project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code §7050.5 and that code enforced for the duration of the project.

TCR MMs

1. The Yuhaaviatam of San Manuel Nation Cultural Resources Management Department (YSMN) shall be contacted, as detailed in CUL-1, of any pre-contact and/or historic-era cultural resources discovered during project implementation, and be provided information regarding the nature of the find, so as to provide Tribal input with regards to significance and treatment. Should the find be deemed significant, as defined by CEQA (as amended, 2015), a Cultural Resources Monitoring and Treatment Plan shall be created by the archaeologist, in coordination with YSMN, and all subsequent finds shall be subject to this Plan. This Plan shall allow for a monitor to be present that represents YSMN for the remainder of the project, should YSMN elect to place a monitor on-site.
2. Any and all archaeological/cultural documents created as a part of the project (isolate records, site records, survey reports, testing reports, etc.) shall be supplied to the applicant and Lead Agency for dissemination to YSMN. The Lead Agency and/or applicant shall, in good faith, consult with YSMN throughout the life of the project.

Note: Yuhaaviatam of San Manuel Nation realizes that there may be additional tribes claiming cultural affiliation to the area; however, Yuhaaviatam of San Manuel Nation can only speak for itself. The Tribe has no objection if the agency, developer, and/or archaeologist wishes to

consult with other tribes in addition to YSMN and if the Lead Agency wishes to revise the conditions to recognize additional tribes.

In the future, to avoid missing notices, please cc me and/or CulturalResourcesManagement@sanmanuel-nsn.gov.

Please provide a draft and the final copy of the project/permit/plan conditions so that YSMN may review the included language. If you should have any further questions with regard to this matter, please do not hesitate to contact me at your convenience, as I will be your Point of Contact (POC) for YSMN with respect to this project.

Thank you,
Kristen

From: Joshua Winter <jwinter@uplandca.gov>

Sent: Wednesday, June 18, 2025 9:47 AM

To: Kristen Tuosto <Kristen.Tuosto@sanmanuel-nsn.gov>

Subject: RE: [EXTERNAL] SB18: San Antonio Water Company Headquarters Project, 400 East 20th Street, APN: 1044-091-22-0000, City of Upland [CIT-UPL-2025-2]

Hi Kristen,

I had sent an AB-52 Notice regarding this project as well (attached) - but did not receive any response within the 30-day time frame. I had assumed San Manuel would want to see their typical mitigation based on your comments below as this project will have ground disturbing activity.

I want to ensure that we are on the same page that consultation is closed – and confirm no mitigation is required.

Let me know!

Joshua Winter, Senior Planner
Planning Division | Development Services Department

City Of Upland

460 N. Euclid Ave, Upland, CA 91786

Counter Hours: Monday – Thursday from 8:00 am to 5:00 pm

P: (909) 931-4143 | F: (909) 931-4321 | jwinter@uplandca.gov



**CITY OF
UPLAND**

From: Kristen Tuosto <Kristen.Tuosto@sanmanuel-nsn.gov>

Sent: Wednesday, March 12, 2025 12:56 PM

To: Joshua Winter <jwinter@uplandca.gov>

Subject: [EXTERNAL] SB18: San Antonio Water Company Headquarters Project, 400 East 20th Street, APN: 1044-091-22-0000, City of Upland [CIT-UPL-2025-2]

WARNING: External email. Please verify sender before opening attachments or clicking on links.

Dear Joshua Winter,

Thank you for contacting the Yuhaaviatam of San Manuel Nation (formerly the San Manuel Band of Mission Indians) regarding the above referenced project. YSMN appreciates the opportunity to review the project documentation, which was received by our Cultural Resources Management Department on March 6, 2025. The project is located within Serrano ancestral territory, and therefore of interest to the Tribe. However, San Manuel sees no conflicts with the zoning changes at this time. However, when specific projects are planned and implemented, YSMN might have comments and/or request formal consultation with the Lead Agency pursuant to CEQA and CA PRC 21080.3.1.

If the proposed plan change would allow for any ground-disturbing development that might be approved via an expedited process for which tribal consultation pursuant to CEQA would not be initiated, then please let me know so that we may discuss the matter further.

If no such action is anticipated, then this communication concludes YSMN's input on this project, at this time. If you should have any further questions with regard to this matter, please do not hesitate to contact me at your convenience.

Regards,
Kristen

Kristen Tuosto

Tribal Archaeologist

Kristen.Tuosto@sanmanuel-nsn.gov

O:(909) 864-8933 x50-3421

M:(909) 725-1357

26569 Community Center Dr Highland, California 92346

[Redacted]

From: Wes Fifield <wes@panoramadev.com>
Sent: Monday, August 18, 2025 4:33 PM
To: Joshua Winter
Subject: [EXTERNAL] San Antonio Water Headquarters Project Comments

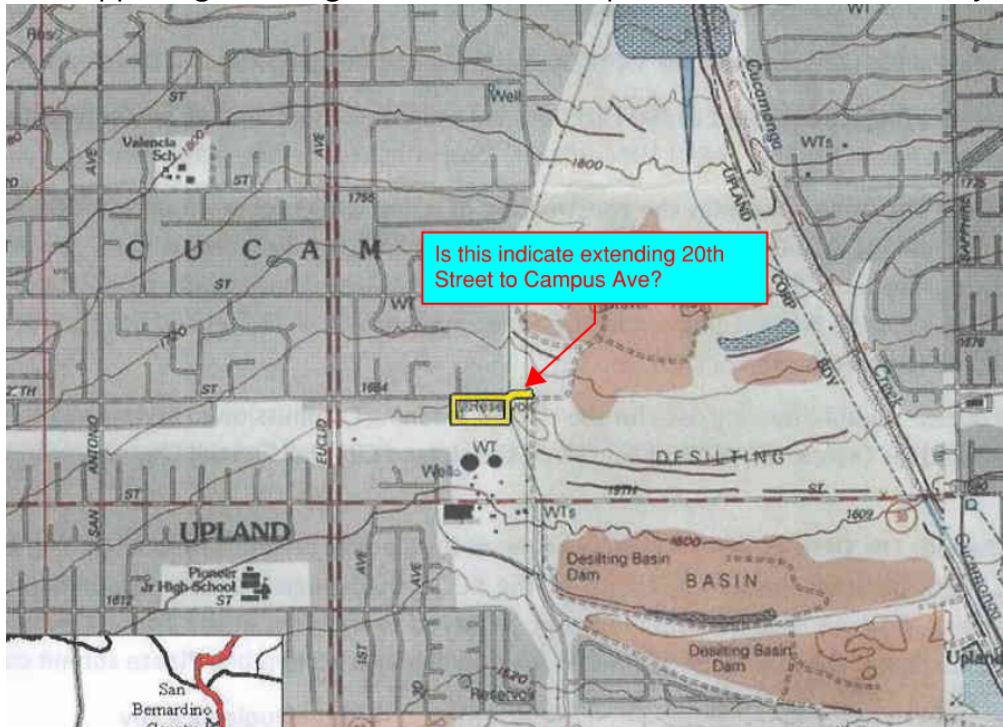
Follow Up Flag: Follow up
Flag Status: Flagged

WARNING: External email. Please verify sender before opening attachments or clicking on links.

Joshua,

I received a notice in the mail about the above property at 400 East 20th Street. As part of this proposed development the map seems to show 20th Street extending to the east and connecting with Campus Ave. Is this the case? I think there will be significant objections to this happening. Please give me a written response to this email. Thank you.

G-1



Sincerely,

Wes Fifield
Panorama Development, LLC
2005 Winston Court
Upland, CA
91784

(909) 931-3363 Office

wes@panoramadev.com

CA Broker License #01008134



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

jwinter@uplandca.gov

Joshua Winter, Senior Planner
City of Upland, Planning Division
460 North Euclid Avenue
Upland, CA 91786

September 11, 2025

**Initial Study/Draft Mitigated Negative Declaration (IS/Draft MND) for the
San Antonio Water Company Headquarters Project (Proposed Project)
(SCH No: 2025080639)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The City of Upland is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has provided a brief summary of the project information and prepared the following comments which are organized by topic of concern.

Summary of Proposed Project Information in the IS/Draft MND

Based on the IS/Draft MND, the the Proposed Project involves construction of a new 3,698-square-foot San Antonio Water Company (SAWCO) headquarters and associated improvements, including a 4,066-square-foot maintenance building, maintenance yard, driveway, parking, solar cover, landscaping, citrus grove, and utility upgrades.¹ The headquarters building would provide office space, meeting and conference rooms, a lobby, an archive room, a break room, two Americans with Disabilities Act (ADA)–compliant restrooms, a quiet room, a copy room, and a work area. The maintenance building would include storage space, an outdoor welding area, a motor repair room, electrical rooms, an ADA restroom, a locker room, and a maintenance office/break room. Both buildings would be all-electric (no natural gas), limited to a maximum height of 23 feet, and developed at a floor area ratio (FAR) of 0.7. Approximately 10 employees are anticipated to work at the site.² Site improvements would include a citrus grove buffer along the eastern half of the northern property line, as well as trees and shrubs around the parking areas and headquarters building. Landscaping would total approximately 46,077 square feet. Existing facilities on the parcel include a 1-million-gallon water storage tank (northwest corner), a pump station (southwest corner), and a signal building with tower (southeast corner). These existing facilities would remain. Currently, approximately five SAWCO Operations Department employees use the site daily for equipment and material storage.³ Construction is expected to begin in spring 2025 and conclude by the end of 2026. The project would generate approximately 1,700 tons of roadway debris to be exported and would require import of approximately 900 cubic yards of soil. No natural gas use is anticipated during construction.⁴Based on a review of aerial

¹ IS/Draft MND – Page

²² Appendix A – Page 138.

³ *Ibid.*

⁴ *Ibid.*

photographs, South Coast AQMD staff found that the nearest sensitive receptor (e.g., residential development) is located 90 feet from the project site.⁵

South Coast AQMD Comments

Contradiction in Project Hauling Assumptions

The IS/Draft MND states that excavation for the Project would reach a maximum depth of 4–6 feet below ground surface, disturbing approximately 123,501 square feet of soil. It further indicates that excavated soil would be reused on site and that no import or export of soil would be required (Section 2.2.6 of IS/Draft MND – Demolition and Construction). In contrast, Appendix A – Air Quality and Greenhouse Gas Technical Memorandum states that the Project would require removal of approximately 1,700 tons of roadway debris from the site and the import of approximately 900 cubic yards of soil during construction. These statements directly conflict with one another. Therefore, it is recommended that the Lead Agency to; 1) clarify whether the Project would involve import and/or export of materials; and 2) identify the appropriate landfill location and incorporate the corresponding haul distance into the CalEEMod modeling to accurately estimate hauling emissions.

H-1

South Coast AQMD Air Permits and Role as a Responsible Agency

If implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, etc., air permits from South Coast AQMD will be required. The final CEQA document, should include a discussion about the potentially applicable rules that the Proposed Project needs to comply with. Those rules may include, for example, Rule 201 – Permit to Construct,⁶ Rule 203 – Permit to Operate,⁷ Rule 401 – Visible Emissions,⁸ Rule 402 – Nuisance,⁹ Rule 403 – Fugitive Dust,¹⁰ Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,¹¹ Rule 1113 – Architectural Coating,¹² Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil,¹³ Rule 1179 – Publicly Owned Treatment Works Operations,¹⁴ Regulation XIII – New Source Review,¹⁵ Rule 1401 – New Source Review of Toxic Air Contaminants,¹⁶ Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,¹⁷ Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,¹⁸ etc. It is important to note that when air permits from South Coast AQMD are required, the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD.

H-2

⁵ Appendix A – Page 139.

⁶ South Coast AQMD. Rule 201 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

⁷ South Coast AQMD. Rule 203 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>

⁸ South Coast AQMD. Rule 401 available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>

⁹ South Coast AQMD. Rule 402 available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>

¹⁰ South Coast AQMD. Rule 403 available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403>

¹¹ South Coast AQMD. Rule 1110.2 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf

¹² South Coast AQMD. Rule 1113 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>

¹³ South Coast AQMD. Rule 1166 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>

¹⁴ South Coast AQMD. Rule 1179 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1179.pdf>

¹⁵ South Coast AQMD. Regulation XIII available at: <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii>

¹⁶ South Coast AQMD. Rule 1401 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>

¹⁷ South Coast AQMD. Rule 1466 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>

¹⁸ South Coast AQMD. Rule 1470 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>

CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals.

For these reasons, the final CEQA document should be revised to include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide the evaluation of their air quality and greenhouse gas impacts, and identify South Coast AQMD as a Responsible Agency for the Proposed Project as this information will be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at <https://www.aqmd.gov/home/permits>.

H-3

Conclusion

The Lead Agency is recommended to revise the CEQA analysis to address the aforementioned comments and provide the necessary evidence to sufficiently support the conclusions reached. If the requested information and analysis are not included in the final CEQA document, either the Final MND or other type of CEQA document, the Lead Agency should provide reasons for not doing so. Pursuant to California Public Resources Code Section 21092.5(b) and CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process and notify each public agency when any public hearings are scheduled. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided. In addition, if the Lead Agency decides to adopt the Final MND, please provide South Coast AQMD with a notice of any scheduled public hearing(s).

H-4

Thank you for the opportunity to provide comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Jivar Afshar, Air Quality Specialist, at jafshar@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

Sam Wang

Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

SW:JA

SBC250814-03
Control Number

Joshua Winter

From: Stephanie Zilmer <zilmer@roadrunner.com>
Sent: Thursday, September 11, 2025 12:36 PM
To: Joshua Winter
Subject: [EXTERNAL] San Antonio Water Headquarters Project

Follow Up Flag: Follow up
Flag Status: Flagged

[You don't often get email from zilmer@roadrunner.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

WARNING: External email. Please verify sender before opening attachments or clicking on links.

Hello,

We live on 2nd Ave with 20th as a cross street so this development on the end of 20th Street is a concern for us.

We would like to be sure that this SAWCo headquarters will not open public driving access to Campus. We see in their plans that they will have a access road opening to Campus to their employee parking. | I- 1

How many visitors does SAWCo anticipate having yearly? Will extra visitors be parking on 20th street if their visitor parking gets full? | I-2
They only mention how many employees will work there.

As we look at the conceptual site plan, the driveway to the visitor parking lot feeds directly into Winston Ct. With the road grade of 20th increasing near the end of the block and having additional traffic at this intersection, it would be safer if this driveway would be positioned further west so their driveway would be offset from Winston Ct. | I-3

We understand that this headquarters will be going in but we don't want to change our living location into a roadway for suppliers of SAWCo.

This immediate area is still primarily residential with expensive single family homes.

Stephanie and Matthew Zilmer

ATTACHMENT B

MITIGATION MONITORING AND REPORTING PROGRAM

MITIGATION MONITORING AND REPORTING PROGRAM

This Mitigation Monitoring and Reporting Program (MMRP) is formulated based upon the findings of the Initial Study/Mitigated Negative Declaration (IS/MND) prepared for the San Antonio Water Company (SAWCo) Headquarters Project (Project). The MMRP, which is found in Table 1, lists mitigation measures recommended in the IS/MND prepared for the Project and identifies mitigation monitoring requirements. The Final MMRP must be adopted when the City of Upland (City) makes a final decision on the Project.

This MMRP has been prepared to comply with the requirements of State law (Public Resources Code Section 21081.6). State law requires the Lead Agency to adopt an MMRP when mitigation measures are required to avoid significant impacts. The MMRP is intended to ensure compliance with the mitigation measures identified in the IS/MND during implementation of the Project.

The MMRP is organized in a matrix format. The first two columns identify the potential impacts and corresponding mitigation measures. The third column, entitled "Timeframe for Implementation," refers to when monitoring will occur to ensure that the mitigating action is completed. The fourth column, entitled "Responsibility for Implementation," refers to the party responsible for implementing the mitigation measure. The fifth column, entitled, "Oversight of Implementation," refers to the party responsible for oversight or ensuring that the mitigation measure is implemented.

This page intentional left blank.

Mitigation Monitoring and Reporting Program

Impact	Mitigation Measures	Timeframe for Implementation	Responsibility for Implementation	Oversight of Implementation
4.4 Biological Resources				
<p>The Project could have a substantial adverse effect, either directly or through habitat modifications, on burrowing owls.</p>	<p>MM BIO-1: Burrowing Owl Clearance Survey. Fourteen days prior to the commencement of Project activities, a qualified biologist will conduct a Presence/Absence survey of suitable habitat on the Project site as well as survey for signs of scat/burrow usage. If burrowing owls/active burrows are directly observed within the Project site during the preconstruction survey, a suitable buffer will be placed around the active burrow as determined by a qualified biologist and avoided until the individuals leave of their own accord. Additionally, if burrowing owl is found during the preconstruction survey, the Project proponent will need to inform the California Department of Fish and Wildlife (CDFW) and the United States Fish and Wildlife Service (USFWS) and prepare a Burrowing Owl Protection and Relocation Plan for approval by these agencies prior to initiating ground disturbance.</p>	<p>Fourteen days prior to the commencement of Project activities</p> <p>Prior to initiating ground disturbance</p>	<p>Project Proponent/ Qualified Biologist</p>	<p>City of Upland Development Services Director, or designee</p>
<p>The Project could have a substantial adverse effect, either directly or through habitat modifications, on native birds protected under the Migratory Bird Treaty Act.</p>	<p>MM BIO-2: Nesting Bird Clearance Survey. The Project’s construction activities will occur, if feasible, between September 16 and January 31 (outside of nesting bird season) in an effort to avoid impacts to nesting birds. If activities must occur within nesting bird season (February 1 to September 15), a qualified biologist will conduct a pre-construction survey no more than 3 days (72 hours) prior to any construction activities and vegetation removal. Should nesting birds be found, an exclusionary buffer will be established by the qualified biologist. The buffer will be clearly marked in the field by construction personnel under guidance of the qualified biologist. No construction activities will be allowed within this zone until the qualified biologist determines that the young have fledged, or the nest is no longer active.</p> <p>To the greatest extent feasible, tree trimming/removal activities will be performed outside of the nesting season for birds (February 1–September 15). If trimming or removal of trees during the nesting bird season cannot be avoided, a qualified biologist will monitor tree trimming and removal activities, if nests are found present during the pre-construction survey.</p>	<p>Prior to any construction activities and vegetation removal</p> <p>During construction activities</p>	<p>Project Proponent/ Qualified Biologist/ Construction Contractor</p>	<p>City of Upland Development Services Director, or designee</p>

Mitigation Monitoring and Reporting Program

Impact	Mitigation Measures	Timeframe for Implementation	Responsibility for Implementation	Oversight of Implementation
4.5 Cultural Resources				
<p>The Project could cause a substantial adverse change in the significance of an unidentified archaeological resource if such resources are encountered during construction.</p>	<p>MM CUL-1: Unknown Archaeological Resources. In the event that archaeological resources are discovered during excavation, grading, or construction activities, work shall cease within 50 feet of the find until a qualified archaeologist from the San Bernardino County List of Qualified Archaeologists has evaluated the find in accordance with federal, State, and local guidelines to determine whether the find constitutes a “unique archaeological resource,” as defined in Section 21083.2(g) of the California Public Resources Code (PRC). Personnel of the Project shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the Project site. The found deposits shall be treated in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2. Prior to issuance of a grading permit, the Director of Planning Services, or designee, shall ensure that this mitigation measure is documented on the grading plans.</p>	<p>During excavation, grading, or ground-disturbing construction activities</p>	<p>Project Proponent/ Qualified Archaeologist/ Construction Contractor</p>	<p>City of Upland Development Services Director, or designee</p>
<p>The Project could disturb human remains if such resources are encountered during construction.</p>	<p>MM CUL-2: Human Remains. If human remains are encountered, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to State Public Resources Code (PRC) Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be Native American, the County Coroner would notify the Native American Heritage Commission (NAHC), which would determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The MLD recommendations may include scientific removal and nondestructive analysis of human remains and items associated with Native American burials, preservation of Native American human remains and associated grave goods in place, relinquishment of Native American human remains and associated items to the descendants for treatment, or any other culturally appropriate treatment. Prior to issuance of a grading permit, the Director of Planning Services or designee shall ensure that this mitigation measure is documented on the grading plans.</p>	<p>During excavation, grading, or ground-disturbing construction activities</p>	<p>Project Proponent/ County Coroner/ Construction Contractor</p>	<p>City of Upland Development Services Director, or designee</p>

Mitigation Monitoring and Reporting Program

Impact	Mitigation Measures	Timeframe for Implementation	Responsibility for Implementation	Oversight of Implementation
4.7 Geology and Soils				
<p>The Project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature if encountered during construction.</p>	<p>MM GEO-1: Paleontological Resources Impact Mitigation Program. Should paleontological resources be encountered during Project subsurface construction activities, all ground-disturbing activities within 25 feet shall be redirected and a qualified paleontologist contacted to assess the situation, consult with agencies as appropriate, and make recommendations for the treatment of the discovery. For purposes of this mitigation, a “qualified paleontologist” shall be an individual with the following qualifications: (1) a graduate degree in paleontology or geology and/or a person with a demonstrated publication record in peer-reviewed paleontological journals; (2) at least two years of professional experience related to paleontology; (3) proficiency in recognizing fossils in the field and determining their significance; (4) expertise in local geology, stratigraphy, and biostratigraphy; and (5) experience collecting vertebrate fossils in the field. If the paleontological resources are found to be significant and Project activities cannot avoid them, measures shall be implemented to ensure that the Project does not cause a substantial adverse change in the significance of the paleontological resource. Measures may include monitoring, recording the fossil locality, data recovery and analysis, a final report, and accessioning the fossil material and technical report to a paleontological repository. Upon completion of the assessment, a report documenting methods, findings, and recommendations shall be prepared and submitted to the City of Upland for review. If paleontological materials are recovered, this report also shall be submitted to a paleontological repository such as the University of California Museum of Paleontology, along with significant paleontological materials. Public educational outreach may also be appropriate.</p>	<p>During excavation, grading, or ground-disturbing construction activities</p>	<p>Project Proponent/ Qualified Paleontologist/ Construction Contractor</p>	<p>City of Upland Development Services Director, or designee</p>
4.18 Tribal Cultural Resources				
<p>The Project could disturb tribal cultural resources if such resources are encountered during construction.</p>	<p>MM TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities.</p> <p>A. The City shall contact interested tribes to determine if a Native American Monitor is requested prior to the commencement of any “ground-disturbing activity” for the subject Project at all Project locations (i.e., both on-site and any off-site locations that are included in the Project description/definition and/or required in connection with the Project, such as public improvement work). “Ground-disturbing activity” shall include,</p>	<p>During excavation, grading, or ground-disturbing construction activities</p>	<p>Project Proponent/ Native American Monitor</p>	<p>City of Upland Development Services Director, or designee</p>

Mitigation Monitoring and Reporting Program

Impact	Mitigation Measures	Timeframe for Implementation	Responsibility for Implementation	Oversight of Implementation
	<p>but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.</p> <p>B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.</p> <p>C. If monitoring is required, the monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the Project applicant/lead agency upon written request to the Tribe.</p> <p>D. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the tribal representative from a designated point of contact for the Project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the Project site or in connection with the Project are complete; or (2) a determination and written notification by the tribal representative to the Project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the Project site possesses the potential to impact TCRs.</p>			
<p>The Project could disturb non-funeral/non-ceremonial tribal cultural resources if such resources are encountered during construction.</p>	<p>MM TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funeral/Non-Ceremonial). The San Manuel Nation Cultural Resources Department shall be contacted of any pre-contact and/or historic-era cultural resources discovered during project implementation and be provided information regarding the nature of the find so as to provide tribal input with regards to significance and treatment. In the event the material is determined to be significant, Mitigation Measure TCR-4 shall apply.</p>	<p>During excavation, grading, or ground-disturbing construction activities</p>	<p>Project Proponent/ Native American Monitor/ Construction Contractor</p>	<p>City of Upland Development Services Director, or designee</p>

Mitigation Monitoring and Reporting Program

Impact	Mitigation Measures	Timeframe for Implementation	Responsibility for Implementation	Oversight of Implementation
<p>The Project could disturb non-funeral/non-ceremonial tribal cultural resources if such resources are encountered during construction.</p>	<p>MM TCR-3: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funeral/Non-Ceremonial). Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. In the event the material is determined to be significant, Mitigation Measure TCR-4 shall apply.</p>	<p>During excavation, grading, or ground-disturbing construction activities</p>	<p>Project Proponent/ Native American Monitor/ Construction Contractor</p>	<p>City of Upland Development Services Director, or designee</p>
<p>The Project could disturb tribal cultural resources if such resources are encountered during construction.</p>	<p>MM TCR-4: Monitoring and Treatment Plan. In the event of any inadvertent discovery of any tribal cultural material, or pre-contact/historic-era resource determined to be significant, the City shall require the preparation of a Monitoring and Treatment Plan. The monitoring and treatment plan shall be prepared by a qualified archeologist in consultation with and subject to the approval of the City and the consulting Native American tribes. The City and consulting Native American tribes shall engage in mutual good faith efforts to develop the Monitoring and Treatment Plan. The monitoring and treatment plan shall identify the manner and process in which any suspected tribal cultural material is evaluated, recorded, removed, or curated, including the final disposition of any such material.</p> <p>If the manner and process of evaluation, recording, removing, and/or disposing of tribal cultural material cannot be resolved between consulting Native American parties, the City shall, in good faith, determine and approve the appropriate actions to be included in the Monitoring and Treatment Plan.</p>	<p>During excavation, grading, or ground-disturbing construction activities</p>	<p>Project Proponent/ Qualified Archeologist/ Consulting Native American Tribes</p>	<p>City of Upland Development Services Director, or designee</p>
<p>The Project could disturb tribal human remains and associated funerary or ceremonial objects if such resources are encountered during construction.</p>	<p>MM TCR-5: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects.</p> <p>A. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.</p> <p>B. If Native American human remains and/or grave goods are discovered or recognized on the Project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed.</p> <p>C. Human remains and grave/burial goods shall be treated alike per California</p>	<p>During excavation, grading, or ground-disturbing construction activities</p>	<p>Project Proponent/ Native American Monitor/ Construction Contractor</p>	<p>City of Upland Development Services Director, or designee</p>

Mitigation Monitoring and Reporting Program

Impact	Mitigation Measures	Timeframe for Implementation	Responsibility for Implementation	Oversight of Implementation
	Public Resources Code section 5097.98(d)(1) and (2). D. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods. E. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.			

Source: LSA 2025.