DRAFT MITIGATED NEGATIVE DECLARATION

PURSUANT TO: CALIFORNIA ENVIRONMENTAL QUALITY ACT

PROJECT TITLE: Bridge Point Upland

LEAD AGENCY: City of Upland
460 N. Euclid Avenue
Upland, CA 91786

PROJECT SPONSOR: Bridge Development Partners, LLC
1600 E Franklin Ave., Suite D
El Segundo, CA 90245

PROJECT LOCATION: The Bridge Point Upland Project is located in the City of Upland north of Interstate 10 (I-10), south of State Route 210 (SR-210), west of Interstate 15 (I-15) and east of State Route 57 (SR-57). The Project is proposed on six lots, with an overall Project site of approximately 50.25 acres northeast of Central Avenue and Foothill Boulevard. The Project site is located on 1006-351-09, 1006-351-10, 1006-572-11, 1006-551-12, 1006-551-22, and 1006-574-10. The City's General Plan land use designation for the Project site is Commercial/Industrial Mixed-Use (C/IN-MU). The current zoning for the Project site is Commercial/Industrial Mixed-Use (C/I-MU).

PROJECT DESCRIPTION: The proposed Bridge Point Upland Project (proposed Project) is comprised of one warehouse/parcel delivery service building with an ancillary office/retail space on approximately 50.25 acres. Project entitlement includes a Design Review and Site Plan Review application; a Lot Line Adjustment; and a determination from the Airport Land Use Committee that the Project is compatible with the Cable Airport Land Use Compatibility Plan.

The Project building is proposed to be one level and total approximately 201,096 square feet (sf), of which approximately 191,096 sf would be warehouse/parcel delivery uses and 10,000 sf would be office/retail uses. The office/retail component would include an office area for employees, and a small area for visitors to pick up pre-ordered packages. To be conservative, the Initial Study and technical studies prepared for this Project analyzed a 276,250 sf building, which is 75,154 square feet more than the 201,096 sf building proposed and shown in Figure 3 of the Initial Study. Therefore, the Initial Study and technical analyses likely overestimate the environmental impacts of the Project that will be constructed substantially consistent with Figure 3.

The western building frontage would include 16 dock-hi doors for trucks, and 8 van loading doors would be located on both the northern and southern building frontages. The Project would require a minimum of 220 automobile parking spaces, and approximately 337 automobile parking spaces would be provided. Trailer parking for the warehouse building would include approximately 12 trailer stalls and an additional 1,104 van parking stalls would be located on-site.

The Project building would be approximately 44 feet and would include approximately 464,380 sf of landscaping, which would account for more than 21% landscape coverage, more than four times the City's minimum requirement of 5%. The warehouse/parcel delivery service building would be setback more than 200 feet on the southern building frontage and would exceed minimum setback requirements of 5 feet for front and side setbacks and rear setbacks of 10 feet. Trees and other vegetation would serve to screen the van loading areas on the southern side of the building from Foothill Boulevard.

Vehicular access to the Project would be provided via 13th Street, the north leg of Central Avenue/Foothill Boulevard, and two right-in/right-out driveways on Foothill Boulevard. The driveway on

13th Street and two easterly driveways on Foothill Boulevard would provide access to automobiles and vans only; trucks would access the site only via the driveway at the north leg of Central Avenue/Foothill Boulevard. Street improvements would be provided along Foothill Boulevard parallel to the Project frontage for curbs, gutters, sidewalks, street lights, traffic signal equipment and signing and striping as required. Street improvements would also be made to Central Avenue and 13th Street.

Construction of the proposed Project is expected to commence in the first Quarter of 2020 with a construction duration of approximately 7 months. Project construction would be completed in one phase with buildout by the third quarter of 2020. Total excavation and fill of soils for the proposed Project is mostly balanced with approximately 431 cubic yards (cy) of exported soil.

FINDINGS

The environmental analysis provided in this Initial Study indicates that the proposed Project will not result in any significant adverse unmitigable impacts on the environment. For this reason, the City of Upland determined that a Mitigated Negative Declaration is the appropriate CEQA document for the proposed project.

The City of Upland finds that the Bridge Point Upland Project WILL NOT result in a significant effect on the environment for the following reasons:

A. The proposed project would be compatible with the Upland General Plan and existing surrounding uses.

B. Criteria pollutant emissions from the proposed Project would remain below their respective thresholds. Although impacts would be considered less than significant, the proposed Project would be subject to SCAQMD Rules 402, 403, and 1113, as identified in mitigation below, to further reduce specific construction-related emissions.

C. The proposed project would not result in potentially significant impacts to sensitive animal and plant species, sensitive vegetation communities, jurisdictional areas (U.S. Army Corps of Engineers and California Department Fish and Wildlife), and spread of invasive plant species. Implementation of the mitigation measures listed below would reduce potential impacts to Cooper's hawk, Costa's hummingbird, and nesting bird species to below a level of significance.

D. The proposed project would not impact any historic resource listed on the National Register, on the local register, or the California Register of Historic Resources. Construction could potentially impact unknown archaeological resources, tribal cultural resources, or human remains. Mitigation identified below would reduce these potential impacts to a level of less than significant.

E. The proposed project would result in a potentially significant impact to a geologic unit or soil that is unstable. Implementation of mitigation measures below ensure adherence to all recommendations contained in the geotechnical investigation report prepared for the proposed Project and would reduce associated impacts to below a level of significance.

F. Construction of the proposed Project could potentially impact unknown paleontological resources. Mitigation identified below would reduce these potential impacts to a level of less than significant.

G. Although the proposed project would not result in potentially significant temporary noise impacts as a result of project construction, implementation of project design features listed

below would minimize potential temporary impacts. Operational noise (resulting from trucks and loading/unloading activities) levels would be in compliance with City of Upland property line noise limits. Offsite noise caused by proposed project traffic would be less than significant.

H. Although Project implementation would not result in a significant impact related to traffic, the San Bernardino County Management Program (CMP) recommends circulation improvements at any intersection which operates at an unsatisfactory level of service. Accordingly, implementation of the mitigation measure identified below would minimize circulation impacts at the Benson Avenue/Baseline Road intersection during the (a.m. peak hour) under year 2020 and 2040 Conditions.

I. The proposed project would not result in direct or indirect significant impacts to aesthetics, agriculture and forestry resources, energy, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation/traffic, utilities and service systems, and wildfires.

MITIGATION MEASURES

Implementation of project-specific mitigation measures identified below would reduce potentially significant impacts to below a level of significance.

Air Quality

AQ-1: Prior to the issuance of grading permits, the City Engineer shall confirm that the Grading Plan, Building Plans and Specifications require all construction contractors to comply with South Coast Air Quality Management District's (SCAQMD's) Rules 402 and 403 to minimize construction emissions of dust and particulates. The measures include, but are not limited to, the following:

- Portions of a construction site to remain inactive longer than a period of three months will be seeded and watered until grass cover is grown or otherwise stabilized.
- All on-site roads will be paved as soon as feasible or watered periodically or chemically stabilized.
- All material transported off site will be either sufficiently watered or securely covered to prevent excessive amounts of dust.
- The area disturbed by clearing, grading, earthmoving, or excavation operations will be minimized at all times.
- Where vehicles leave a construction site and enter adjacent public streets, the streets will be swept daily or washed down at the end of the work day to remove soil tracked onto the paved surface.

AQ-2: The applicant shall require by contract specifications that the interior and exterior architectural coatings (paint and primer including parking lot paint) products used would have a volatile organic compound rating of 50 grams per liter or less. Contract specifications shall be included in the construction documents for the Project, which shall be reviewed and approved by the City of Upland Building Department prior to the issuance of building permits.

AQ-3: Prior to the issuance of a certificate of occupancy, the Project Applicant shall demonstrate to the satisfaction of the City of Upland Planning Division that the following measures would be implemented during Project operations.

- The proposed warehouse shall be constructed with the appropriate infrastructure to facilitate sufficient electric charging for trucks to plug in, in anticipation of future technology that allows trucks to operate partially on electricity.
- At least 6 percent of all vehicle parking spaces (including for trucks) shall be designed to accommodate future electric vehicle charging stations. Further, electrical hookups should be provided at the onsite truck stop for truckers to plug in any onboard auxiliary equipment. At a minimum, electrical panels should be appropriately sized to allow for future expanded use.
- Legible, durable, weatherproof signs shall be placed at truck access gates, loading docks, and truck parking areas that identify applicable California Air Resources Board (CARB) anti-idling regulations. At a minimum, each sign shall include (1) instructions for truck drivers to shut off engines when not in use; (2) instructions for drivers of diesel trucks to restrict idling to no more than 5 minutes; and (3) telephone numbers of the building facilities manager and CARB to report violations.
- All service equipment (e.g., forklifts, yard trucks, hostlers, etc.) used within the site shall be electric or powered by compressed natural gas.
- To promote alternative fuels and help support "clean" truck fleets, the developer/successor-in-interest shall provide building occupants with information related to the SCAQMD's Carl Moyer Program, or other such programs that promote truck retrofits or "clean" vehicles and information including, but not limited to, the health effect of diesel particulates, benefits of reduced idling time, CARB regulations, and importance of not parking in residential areas. Tenants shall be notified about the availability of (1) alternatively fueled cargo handling equipment; (2) grant programs for diesel- fueled vehicle engine retrofit and/or replacement; (3) designated truck parking locations in the project vicinity; (4) access to alternative fueling stations proximate to the site that supply compressed natural gas; and (5) the US Environmental Protection Agency's SmartWay program.

<u>Biological Resources</u>

BIO-1: **Nesting Bird Pre-Construction Survey:** Vegetation clearing and ground disturbing activities should be conducted outside of the nesting season (January 15 to August 31). If these activities occur during nesting season, then a qualified biologist will conduct a nesting bird survey within three days prior to any disturbance of the site, including tree and shrub removal, disking, demolition activities, and grading. If active nests are identified, the biologist shall establish suitable buffers around the nests depending on the level of activity within the buffer and species detected, and the buffer areas shall be avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests. Raptor species will have an avoidance buffer of 500 feet and other bird species will have an avoidance buffer of 300 feet. These buffers may be reduced in consultation with the CDFW. If active nests are not identified, vegetation clearing and ground disturbing activities may be commenced.

Cultural Resources

CR-1: **Retain a Native American Monitor/Consultant**: The Project Applicant shall retain and compensate for the services of a Tribal monitor/consultant who is both approved by the Gabrieleño Band of Mission Indians-Kizh Nation Tribal Government and is listed under the NAHC's Tribal Contact list for the area of the project location. This list is provided by the NAHC. The monitor/consultant would only be present on-site during the construction phases that involve ground disturbing activities. Ground disturbing activities are defined by the Gabrieleño Band of Mission Indians-Kizh Nation as activities that may include, but are not limited to, pavement removal, pot-holing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the Project area. The Tribal Monitor/consultant will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the Project site grading and excavation activities are completed, or when the Tribal Representatives and monitor/consultant have indicated that the site has a low potential for impacting Tribal Cultural Resources.

CR-2: **Unanticipated Discovery of Tribal Cultural and Archaeological Resources:** Upon discovery of any archaeological resources, cease construction activities in the immediate vicinity of the find until the find can be assessed. All archaeological resources unearthed by project construction activities shall be evaluated by the qualified archaeologist and tribal monitor/consultant approved by the Gabrieleño Band of Mission Indians-Kizh Nation. If the resources are Native American in origin, the Gabrieleño Band of Mission Indians-Kizh Nation shall coordinate with the San Manuel Band of Mission Indians (SMBMI), per Mitigation measure CR-3, and the landowner regarding treatment and curation of these resources. Typically, the Gabrieleño Band of Mission Indians-Kizh Nation will request reburial or preservation for educational purposes. Work may continue on other parts of the project while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section15064.5 [f]). If a resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource", time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be offered to a local school or historical society in the area for educational purposes.

CR-3: **Monitoring and Treatment Plan:** If significant pre-contact cultural resources, as defined by CEQA (as amended, 2019), are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, in coordination with San SMBMI and the Gabrieleño Band of Mission Indians-Kizh Nation (Tribes) per Mitigation measure CR-2, and all subsequent finds shall be subject to this Plan. This Plan shall allow for a monitor to be present that represents SMBMI for the remainder of the project, should SMBMI elect to place a monitor on-site.

CR-4: **Unanticipated Discovery of Human Remains and Associated Funerary Objects**: 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 PRC 5097.98, are also to be treated according to this statute. Health and Safety Code 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and excavation halted until the Coroner has determined the nature of the remains. If the Coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission (NAHC) and PRC 5097.98 shall be followed.

CR-5: **Resource Assessment & Continuation of Work Protocol:** Upon discovery, the tribal and/or archaeological monitor/consultant/consultant will immediately divert work at minimum of 150 feet and place an exclusion zone around the burial. The monitor/consultant(s) will then notify the Tribes, the qualified lead archaeologist, and the construction manager who will call the Coroner. Work will continue to be diverted while the Coroner determines whether the remains are Native American. The discovery is to be kept confidential and secure to prevent any further disturbance. If the finds are determined to be Native American, the coroner will notify the NAHC as mandated by state law who will then appoint a Most Likely Descendent (MLD). If the Gabrieleno Band of Mission Indians – Kizh Nation is designated MLD, the following treatment measures shall be implemented. To the Tribe, the term "human remains" encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the burial of funerary objects with the deceased, and the ceremonial burning of human remains. These remains are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects.

CR-6: **Treatment Measures**: Prior to the continuation of ground disturbing activities, the land owner shall arrange a designated site location within the footprint of the Project for the respectful reburial of the human remains and/or ceremonial objects. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribes will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the Project cannot be diverted, it may be determined that burials will be removed. The Tribes will work closely with the qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribes, documentation shall be taken which includes at a minimum detailed descriptive notes and sketches. Additional types of documentation shall be approved by the Tribes for data recovery purposes. Cremations will either be removed in bulk or by means as necessary to ensure completely recovery of all material. If the discovery of human remains includes four or more burials, the location is considered a cemetery and a separate treatment plan shall be created. Once complete, a final report of all activities is to be submitted to the Tribes and the NAHC. The Tribes do NOT authorize any scientific study or the utilization of any invasive diagnostics on human remains.

Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the project site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered. There shall be no publicity regarding any cultural materials recovered.

CR-7: Archaeological/Cultural Reports: 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 Project Applicant and City for dissemination to the Tribes. The City and/or Project Applicant shall, in good faith, consult with Tribes throughout the life of the Project.

Geology and Soils

GEO-1: Prior to issuance of a grading permit, the developer shall, to the satisfaction of the City Public Works Director, show that precise grading plan(s) include(s) all recommendations contained in the geotechnical investigation report prepared for the proposed Project. The performance standard for this measure is to assure that all recommended grading and structures for the project conform to City standards.

GEO-2: Prior to the issuance of any grading permits, or any permit authorizing ground disturbance, the Project applicant shall, to the satisfaction of the City Planning Division, demonstrate that a qualified paleontological monitor has been retained to be present during excavation or any mass grading activities. In the event that fossils or fossil-bearing deposits are discovered during construction, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation and, if necessary, salvage. An appropriate buffer area shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. excavations within 50 feet of the find shall be temporarily halted or diverted. The paleontologist shall document the discovery as needed in accordance with Society of Vertebrate Paleontology standards, evaluate the potential resource, and assess the significance of the find under the criteria set forth in CEQA Guidelines Section 15064.5. The paleontologist shall notify the appropriate agencies to determine procedures that would be followed before construction is allowed to resume at the location of the find. If in consultation with the paleontologist, City staff and the project applicant determine that avoidance is not feasible, the paleontologist shall prepare an excavation plan for reducing the effect of the project on the qualities that make the resource important. The plan shall be submitted to the City for review and approval and the project applicant shall implement the approval plan.

Noise

NOI-1: A construction management plan shall be implemented prior to Grading Permit issuance which shall contain the following elements:

- Construction contracts shall specify that all construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers and other state required noise attenuation devices.
- Property owners and occupants located within 300 feet of the Project boundary shall be sent a notice, at least 15 days prior to commencement of construction,

regarding the construction schedule of the proposed Project. A sign, legible at a distance of 50 feet shall also be posted at the Project construction site. All notices and signs shall be reviewed and approved by the City of Upland Development Services Department, prior to mailing or posting and shall indicate the dates and duration of construction activities, as well as provide a contact name and a telephone number where residents can inquire about the construction process and register complaints.

- Construction noise reduction methods shall include shutting off idling equipment, installing temporary acoustic barriers around stationary construction noise sources, maximizing the distance between construction equipment staging areas and occupied residential areas, and electric air compressors and similar power tools.
- Construction haul routes shall be designed to avoid noise sensitive uses (e.g., residences, convalescent homes, etc.), to the extent feasible.
- During construction, stationary construction equipment shall be placed such that emitted noise is directed away from sensitive noise receivers.
- Construction activities shall not take place outside of the allowable hours specified by the City's *Municipal Code Chapter 9.40.100(M)* (allowable construction hours are between 7:00 a.m. and 6:00 p.m. on weekdays).

Transportation

TRAF-1: **Benson Avenue/Baseline Road:** Re-stripe the northbound through lane to a through-left turn lane and convert the northbound and southbound left-turn phasing from protected to split-phase. This improvement is not included in the 2016 SBCTA Development Mitigation Nexus Study. Two receiving lanes exist on the west leg of the intersection. Therefore, this improvement can be achieved by striping and signal head modifications. The Project will contribute on a fair-share basis to this improvement.

THE INITIAL STUDY PREPARED FOR THIS STUDY IS ATTACHED.

FORM PREPARED BY:

Michael Poland, Contract Planning Manager

City of Upland

460 N. Euclid Avenue

Upland, CA 91786

(909) 931-4135, email: mpoland@ci.upland.ca.us

Signature	Date
Michael Poland, Contract Planning Manager	For: City of Upland

BRIDGE POINT UPLAND PROJECT

INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION

Prepared For:

City of Upland
460 N. Euclid Avenue
Upland, CA 91786

Prepared By:

Kimley-Horn and Associates, Inc.
401 B Street, Suite 600
San Diego, California 92101

December 2019

195087002

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I. Initial Study

Background and Project Description

Project Title

Bridge Point Upland

Lead Agency Name and Address

City of Upland
460 N. Euclid Avenue
Upland, CA 91786

Contact Person and Phone Number

Michael Poland, Contract Planning Manager
(909) 931-4135

Project Location

The Bridge Point Upland Project is located in the City of Upland north of Interstate 10 (I-10), south of State Route 210 (SR-210), west of Interstate 15 (I-15) and east of State Route 57 (SR-57) as depicted in **Figure 1, Regional Location Map**. The Project is proposed on six lots, with an overall Project site of approximately 50.25 acres northeast of Central Avenue and Foothill Boulevard, as depicted in **Figure 2, Project Vicinity Map**.

Project Applicant

Bridge Development Partners, LLC

General Plan Designation

The City's General Plan land use designation for the Project site is Commercial/Industrial Mixed-Use (C/IN-MU).

Zoning

The current zoning for the Project site is Commercial/Industrial Mixed-Use (C/I-MU).

Project Setting

The Project site is located in a predominately industrial and commercial area. The land uses surrounding the Project site consist of a mix of uses including industrial, commercial, an airport and a major transportation corridor. Properties zoned for Highway Commercial uses are located immediately south of the site, along Foothill Boulevard. Cable Airport is located directly north of the site and a portion of the airport, along with industrial uses, are located west of the site. Commercial uses, including a Lowe's Home Improvement Store and a commercial shopping center are located east of the site.

Existing Project Site

The Project site consists of both disturbed land on the western portion of the site and undeveloped land on the eastern portion of the site. The disturbed portion of the land is used for outdoor dirt, sand, gravel and rock stockpiling, processing and crushing; the existing stockpiles are being processed and removed by the current operator as part of existing operations, the removal of those materials is not

a part of the Project. The Project site elevation ranges from approximately 1,350 to 1,400 feet above mean sea level and generally slopes from north to south. The on-site topography is generally flat with the exception of the northwest area of the site which currently includes the stockpiles of sand and gravel. No structures are currently located on the site; however, there is existing utility access (water, sewer, electricity, gas) located in the immediate vicinity of the proposed Project and these services would be extended to the site to serve the proposed Project.

II. Description of Proposed Project

The proposed Bridge Point Upland Project (proposed Project) is comprised of one warehouse/parcel delivery service building with an ancillary office/retail space on approximately 50.25 acres, as shown in **Figure 3, Site Plan.** The Project site is located on Assessor Parcel Nos. (APN) 1006-351-09, 1006-351-10, 1006-572-11, 1006-551-12, 1006-551-22, and 1006-574-10.

Project entitlement includes a Design Review and Site Plan Review application; a Lot Line Adjustment; and a determination from the Airport Land Use Committee that the Project is compatible with the Cable Airport Land Use Compatibility Plan. For additional information regarding the requested land use entitlements, please reference *Section III, Requested Approvals*.

The Project building is proposed to be one level and total approximately 201,096 square feet (sf), of which approximately 191,096 sf would be warehouse/parcel delivery uses and 10,000 sf would be office/retail uses. The office/retail component would include an office area for employees, and a small area for visitors to pick up pre-ordered packages. The site plan for the Project is shown in Figure 3. To be conservative, the Initial Study and technical studies prepared for this Project analyzed a 276,250 sf building, which is 75,154 square feet more than the 201,096 sf building shown in Figure 3. Therefore, the Initial Study and technical analyses likely overestimate the environmental impacts of the Project that will be constructed substantially consistent with Figure 3.

The western building frontage would include 16 dock-hi doors for trucks, and 8 van loading doors would be located on each of the northern and southern building frontages. The Project would require a minimum of 220 automobile parking spaces, and approximately 224 automobile parking spaces would be provided. Trailer parking for the warehouse building would include approximately 12 trailer stalls and an additional 1,104 van parking stalls would be located on-site.

Building Design

The warehouse/parcel delivery service building is designed as a class A building. The building architecture features a modern aesthetic including glazing with brow projections to focus attention on the entries and street frontages. The major building material is concrete which lends itself to a modern palette with reveals to enhance the building architecture. The building would have a maximum height of approximately 44 feet with parapets and façade, which would provide depth and shadowing and points of visual interest for the architecture. This relief in the design also provides locations for accents in the landscape design.

Access and Parking

Vehicular access to the Project would be provided via 13th Street, the north leg of Central Avenue/Foothill Boulevard, and two right-in/right-out driveways on Foothill Boulevard. The driveway on 13th Street and two easterly driveways on Foothill Boulevard would provide access to automobiles and vans only; trucks would access the site only via the driveway at the north leg of Central Avenue/Foothill Boulevard. Street improvements would be provided along Foothill Boulevard parallel to the Project frontage for curbs, gutters, sidewalks, street lights, traffic signal equipment and signing and striping as required. Street improvements would also be made to Central Avenue and 13th Street.

Landscaping

The Project would be landscaped along all four frontages of the site, including landscaped slopes along the western and southern portions of the site. Landscaping would also be installed throughout the parking areas. The conceptual landscape design would feature California drought tolerant and native species in an aesthetically pleasing and colorful palette.

The Project building would include 1,000 new trees and in excess of 10 acres (464,380 sf) of landscaping, which would account for more than 21% landscape coverage, more than four times the

City's minimum requirement of 5%. The warehouse/parcel delivery service building would be setback more than 200 feet on the southern building frontage and would exceed minimum setback requirements of 5 feet for front and side setbacks and rear setbacks of 10 feet. Trees and other vegetation would serve to screen the van loading areas on the southern side of the building from Foothill Boulevard.

Construction

Construction of the proposed Project is expected to commence in the first Quarter of 2020 with a construction duration of approximately 7 months. Project construction would be completed in one phase with buildout by the third quarter of 2020. Total excavation and fill of soils for the proposed Project is mostly balanced with approximately 431 cubic yards (cy) of exported soil.

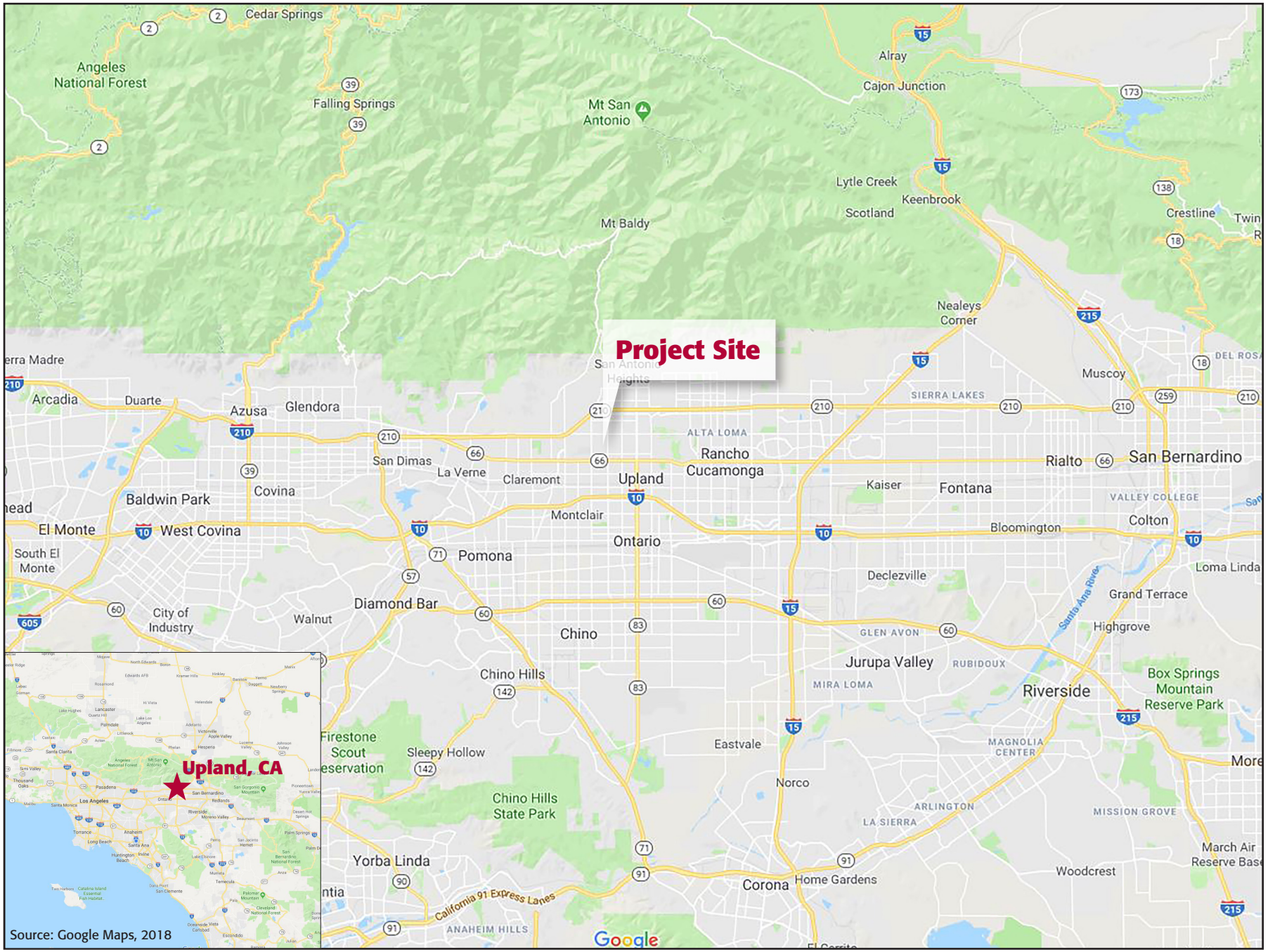


FIGURE 1: Regional Location Map
Bridge Point Upland
Upland, CA

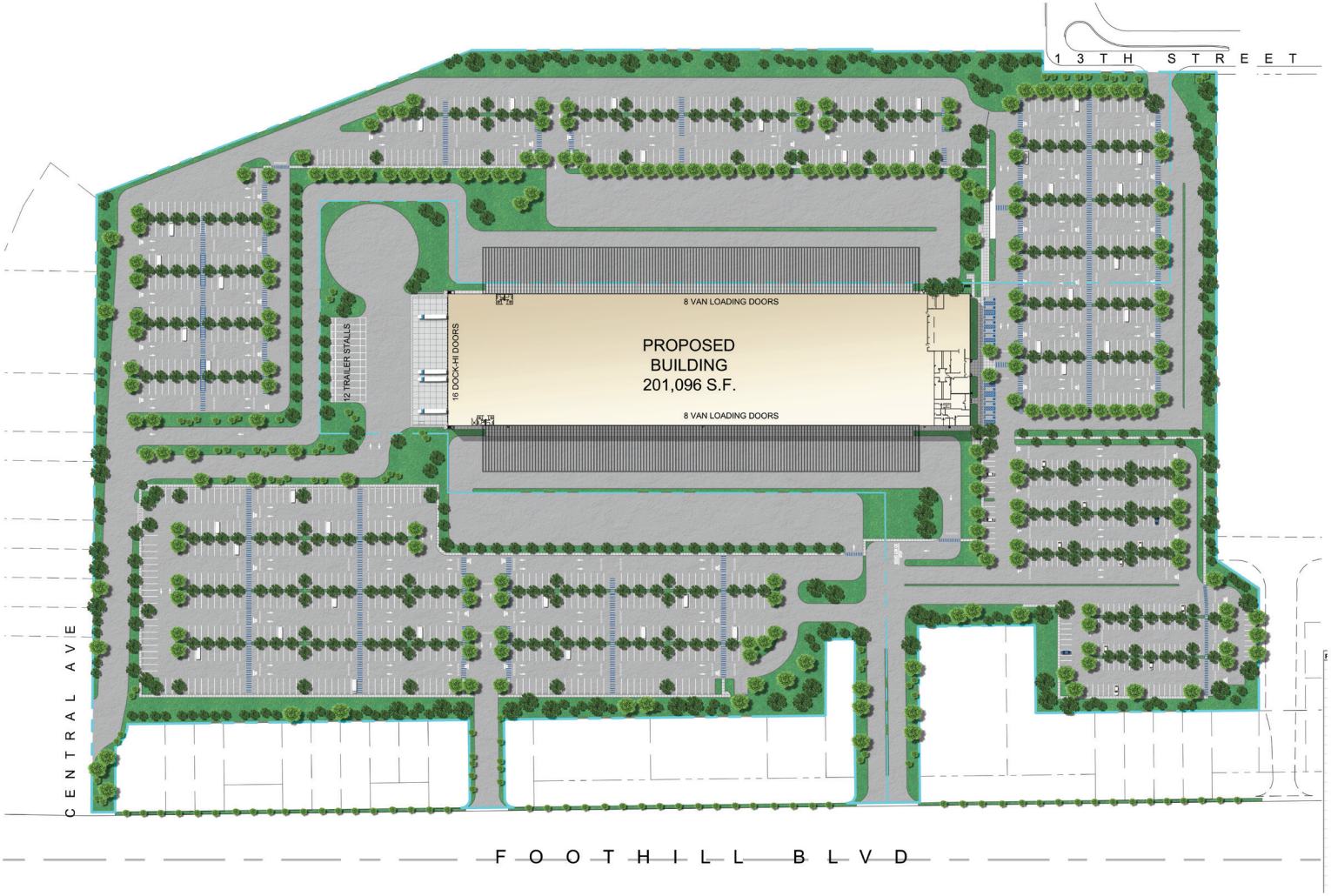
Not to scale

Kimley»Horn

Source: Google Earth, 2018

FIGURE 2: Project Vicinity Map
Bridge Point Upland
Upland, CA

Kimley»Horn



PROJECT INFORMATION			
TOTAL SITE AREA	2,189,081 SF		50.25 AC
BUILDING SITE AREA	797,306 SF		18.30 AC
COVERAGE			25.2%
BUILDING AREA			**201,096 SF**
FOOTPRINT			201,096 SF
		WAREHOUSE	191,096 SF
		OFFICE	10,000 SF
MEZZANINE	(N/A)		0 SF
PARKING REQUIRED	(9X19)		220
WAREHOUSE @ 1/1000			187
OFFICE @ 1/300			33
AUTO PARKING PROVIDED			337
		STANDARD	238
		ADA	14
		EVC VAN	2
		EVC ADA	2
		EVCS	48
		CLEAN AIR	33
VAN LOADING DOORS			16
TRUCK LOADING DOORS			16
TRAILER STALLS REQUIRED	1/2 DOCKS		10
TRAILER STALLS PROVIDED			12
LANDSCAPE PROVIDED	464,380 SF		
ADDITIONAL PARKING			
		VAN PARKING	1,104

Source: Herdman Architecture+Design, 2019

FIGURE 3: Site Plan
Bridge Point Upland
Upland, CA

Kimley»Horn

III. Requested Approvals

The City of Upland (City) is the Lead Agency under CEQA and is responsible for reviewing and approving this Initial Study and proposed Mitigated Negative Declaration. As part of the proposed Project's implementation, the City will also consider the following discretionary approvals:

- Design Review and Site Plan Review application;
- Lot Line Adjustment; and
- Determination from the Airport Land Use Committee that the Project is compatible with the Cable Airport Land Use Compatibility Plan

Additional permits may be required upon review of construction documents. Other permits required for the proposed Project may include the issuance of encroachment permits for new driveways, sidewalks, and utilities, walls, fences, security and parking area lighting; building permits; and permits for new utility connections. These additional permits are considered ministerial, and thus issuance of these permits would not trigger the need to further comply with CEQA. Development of the proposed Project does not require the issuance of any discretionary permits from any other federal, State, or local agency.

IV. Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" or "Less Than Significant Impact with Mitigation Incorporated" as indicated by the checklist on the following pages.

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

V. Determination

On the basis of this evaluation:

☐ I find that the proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

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

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

☐ I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required.

☐ I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, (b) none of the conditions described in Guidelines Section 15162 for a Subsequent EIR or Section 15163 for a Supplemental EIR have occurred and (c) only minor technical changes or additions to the previous environmental documents are necessary.

Signature

Date

VI. Environmental Evaluation

This section evaluates the potential environmental effects of the proposed Project using the environmental checklist from the State CEQA Guidelines as amended. The definitions of the response column headings include:

A. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant after the implementation of feasible mitigation measures.

B. "Less than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measure has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact."

C. "Less Than Significant Impact" applies where the project creates no significant impacts, only Less than Significant Impacts.

D. "No Impact" applies where the project does not create an impact in that category.

1. Aesthetics

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b. Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a State-designated scenic highway?	☐	☐	☐	☒
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Discussion

a) Have a substantial adverse effect on a scenic vista? ***Less Than Significant Impact.***

The proposed Project would not have a substantial adverse effect on a scenic vista. The applicant proposes the construction of one warehouse/parcel delivery service building with an ancillary office/retail space and associated parking and landscaping that would be a maximum of approximately 44 feet in height. Development of the Project site would convert the existing undeveloped land and industrial uses, including outdoor rock and gravel stockpiling and processing operations, to an enclosed warehousing use consistent with the City's General Plan, zoning code, and adjacent surrounding land uses.

The Project site elevation ranges from approximately 1,350 to 1,400 feet above mean sea level and generally slopes from north to south. The on-site topography is generally flat; however, the

northwest area of the site currently includes stockpiles of sand and gravel, which would be removed as part of existing operations prior to implementation of the Project. The land uses surrounding the Project site consist of a mix of uses including industrial, commercial, an airport, and a major transportation corridor. Properties zoned for Highway Commercial uses are located immediately south of the site. Foothill Boulevard is located further south of the site. Cable Airport is located directly north of the site and a portion of the airport, along with industrial uses, are located west of the site. Commercial uses, including a Lowe's Home Improvement Store and a commercial shopping center, are located east of the site. None of these areas, including the Project site, contain any landforms that would be considered scenic.

As shown in Table 3-1 of the EIR prepared for the City's General Plan, the City of Upland is largely developed, with vacant lands comprising less than 5% of land within the City and the City's Sphere of Influence (SOI) boundaries. Although the City is primarily developed, new development has the potential to block or obscure existing views. The City's General Plan encourages the protection of scenic resources and views of the San Gabriel Mountains. The General Plan lists one pertinent policy, as follows:

> *Policy CC-1.6: View Protection. Direct private development to enhance public corridors of the San Gabriel Mountains, where feasible. These views are an integral part of the City's geographic space and provide a unique sense of place for Upland as a foothill community.*

The San Gabriel Mountains and Mount Baldy are located north of the Project site. Views of these areas from the proposed Project site and surrounding roadways are heavily obscured by the existing gravel and rock stockpiles and intervening urban development including, structures, landscaping, and overhead utility lines. The Project's building would be a maximum of approximately 44 feet in height, in accordance with the City of Upland Zoning regulations and Municipal Code. Furthermore, the proposed Project would be subject to the development review process, which is intended to diminish conflicts between urban development and scenic vistas.

The warehouse/parcel delivery service building would be located on the center of the site and setback more than 200 feet from the southern property boundary. Foothill Boulevard is located approximately 150 feet further to the south beyond the existing developed parcels located south of the Project. Although the proposed Project would result in a change to the visual environment and reduce the availability of some distant views, this change would not substantially affect the aesthetic nature of the proposed Project site, area, or the views from the Project area due to the Project siting, setback from Foothill Boulevard, and intervening urban development. In addition, while the proposed Project would change the visual character of the site and alter views from some surrounding areas, these changes would not be considered to have a significant impact on a scenic vista. Because the views of the distant locations are already compromised, the further reduction in viewing opportunities are considered less than significant. No mitigation is required.

b) *Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?* ***No Impact.***

There are no State or County designated scenic highways proximate to the Project site.[1] Although Foothill Boulevard is not designated as a state scenic highway, the City's Scenic Highways element had previously identified Foothill Boulevard as a corridor of scenic and historic interest. The City's

[1] California Department of Transportation. Official Designated Scenic Highways. Available at: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways. Accessed September 24, 2019.

General Plan no longer includes a Scenic Highways element, but guides development along corridors using focus areas, including a focus area for Euclid Avenue, which is within the Scenic Corridor overlay zone. The intersection of Foothill Boulevard and Euclid Avenue, located approximately 1.75 miles east of the Project site, is within the Scenic Corridor Overlay zone. Despite changes to the City's strategy of maintaining visual resources along scenic corridors, the City intends to preserve existing scenic roadways by implementing policies that would continue to protect resources along scenic corridors.

The proposed Project is not located in the vicinity of the Scenic Corridor Overlay zone. Therefore, implementation of the proposed Project would not conflict with these policies and would not damage a scenic corridor or scenic roadway within the City of Upland.

There are no historically significant buildings on the site. The Project site does not contain any rock out-crops or trees. Therefore, the proposed Project would not damage any scenic resources, including trees, rock outcroppings, or historic buildings and is not located near a State scenic highway. Impacts would not occur and mitigation is not required.

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

The Project site is located in an urbanized area consisting of predominately industrial and commercial uses. The land uses surrounding the Project site consist of a mix of uses including industrial, commercial, an airport, and a major transportation corridor. Properties located immediately south of the proposed Project site are zoned for Highway Commercial uses. Foothill Boulevard is located further south of the site. Cable Airport is located directly north of the site and a portion of the airport, along with industrial uses, are located west of the site. Commercial uses, including a Lowe's Home Improvement Store and a commercial shopping center, are located east of the site.

The Project site consists of both disturbed and undeveloped land. A rock and gravel stockpiling and processing operation is located on the northwest corner of the Project site. No structures are currently located on the site; however, stockpiles of sand and gravel remain on-site and are being processed and removed by the current operator as part of existing operations. The removal of those materials is not a part of the Project. The proposed Project would change the site appearance from a former sand and gravel stockpiling and processing operation, and undeveloped land, to a modern warehouse/parcel delivery service facility. The building architecture features a modern aesthetic including glazing with brow projections to focus attention on the entries and street frontages. The major building material is concrete which lends itself to a modern palette with reveals to enhance the building architecture. The building parapets and provide depth and shadowing and points of visual interest for the architecture. The conceptual landscape design would feature California drought tolerant and native species in a pleasing and colorful palette. Decorative trees would be planted along the building facades and within the parking areas to help soften the building architecture and provide a balance and harmony to the overall design of the Project. Decorative rock and stone placements are included in the enhanced design near building entries for visibility at the pedestrian scale upon entry as well. Landscaped slopes would be located along the western and southern portions of the site.

The aesthetic appearance of the site would be consistent with the intent of the General Plan, which designates the Project site as Commercial/Industrial Mixed-Use (C/IN-MU). As such, the proposed Project would be consistent with the existing and planned development. Pursuant to section 17.05.030 of the City's Municipal Code, the proposed Project would conform to the City's development standards for Mixed -Use Zones. Therefore, although the visual characteristics of the

site would change, the proposed Project would be consistent with the surrounding areas, the intent of the General Plan, and with adopted development regulations. The Project would enhance the existing visual character of the site due to the replacement of a former sand and rock stockpiling and processing operation with a modern parcel delivery/warehouse building and associated parking and landscaping. The proposed Project would not conflict with applicable zoning and other regulations governing scenic quality. Impacts in this regard would be less than significant and no mitigation is required.

Construction of the proposed Project may create temporary aesthetic nuisances associated with construction activities including grading, and construction and the presence of debris, equipment, and truck traffic; however, those activities would be similar to existing conditions for most of the site. The visual impact associated with the construction of the proposed Project would be characteristic of a typical construction site of this scale. The temporary nature of these activities would cease upon completion of construction, and would not result in a substantial degradation to the Project site or surrounding area compared to existing conditions. In addition, no significant aesthetic resources would be altered or destroyed as a result of construction-related activities. For these reasons, the short-term construction impacts of the proposed Project would be less than significant in relation to changing the visual character of the Project site and its surroundings. No mitigation is required.

d) *Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?* ***Less Than Significant Impact.***

The existing sources of light and glare within the existing developed portion of the proposed Project and from the surrounding areas is consistent with a predominately urbanized area. Sources of glare during the day come from vehicle windshields, and windows on businesses and homes; and nighttime light comes from sources in the surrounding commercial and industrial buildings, homes, schools, streets, intersections, and vehicles. The proposed Project would introduce new sources of light needed to illuminate the outside of the parcel delivery/warehouse, building entrance areas, the parking lots, and vehicles on-site. Additionally, the proposed Project would create new sources of glare from reflection off windows and walls on the new building, reflections from windshields of vehicles, and from new surface parking lots.

The City of Upland General Plan encourages the reduction of light and glare through the incorporation of the following policy:

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

As discussed above, the proposed Project would introduce additional nighttime lighting on the Project site, which would be visible from the surrounding area. The lighting used for the proposed Project would be consistent with the existing sources of nighttime lighting in the area from the surrounding uses and street lighting along Foothill Boulevard. As part of the lighting plan for the proposed Project, the lighting for the parcel delivery/warehouse building would be designed in accordance with the City's Zoning Code and would comply with all applicable development standards. Pursuant to section 17.14.030 of the City's Municipal Code, light trespass that results in glare is prohibited. Furthermore, all non-residential outdoor lighting is required to be located, adequately shielded, and directed such that no direct light falls outside the property line or into the public right-of-way. New development that includes common areas shall be maintained with a minimum 1.0 foot-candle power on walkways and in parking lots, but with zero measurable foot-candle power at the property line. Additionally, new sources of lighting would be shielded to minimize uplighting and to prevent light from shining directly onto adjacent properties. In compliance with the City's Municipal Code, all outdoor lighting proposed for the Project shall comply with the State of California Title 24 Energy Efficiency Standards outdoor lighting

requirements. The proposed Project would also comply with applicable Cable Airport Land Use Compatibility Plan which prohibits the use of materials that would create glare in the eyes of pilots of aircraft using the airport. Incorporation of these design features would ensure that the introduction of the new sources of light and glare associated within the proposed Project would be less than significant. No mitigation would be required.

Cumulative Impacts

The potential aesthetic impacts related to views and aesthetics are generally site specific. As discussed above, project-related impacts to scenic vistas would be less than significant, and the proposed Project would not result in any impacts to on-site visual resources because there are none. In addition, the proposed Project would also be consistent with the land use and development regulations contained in pertinent planning documents. Lighting and sources of glare, while not always site-specific, would be consistent with the majority of the surrounding urban area and would be used during similar hours as surrounding uses. Projects in the vicinity of the proposed Project that are approved and pending implementation are discussed in *Section VI.17, Transportation*. However, while the proposed Project in conjunction with past, present, and reasonably foreseeable development would change the appearance of the site and surrounding area, all development projects would follow applicable local planning and design guidelines regarding building design including materials, coloration, and landscaping as specified in Section 17.14.030 of the City's Municipal Code regarding lighting standards and limitation. Therefore, aesthetic impacts are not expected to be cumulatively considerable and impacts would be less than significant.

2. Agricultural and Forestry Resources

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Discussion

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? ***No Impact.***

The proposed Project site and surrounding areas are not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on the State of California Important Farmland Map[2]. The proposed Project site, however, is designated as Other Land. Other Land is a category used for low density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry or aquaculture facilities; strip mines, borrow pits;

[2] California Department of Conservation, State of California Important Farmland Map. Available at: https://maps.conservation.ca.gov/DLRP/CIFF/. Accessed September 24, 2019.

and water bodies smaller than forty acres, as well as vacant and nonagricultural land surrounded on all sides by urban development that is greater than 40 acres. As the Project site is not categorized as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, the proposed Project would not result in a conversion of documented agricultural lands to non-agricultural use. No impact would occur and no mitigation is required.

b) *Conflict with existing zoning for agricultural use, or a Williamson Act contract?* ***No Impact.***

The proposed Project site is not zoned for agricultural use, is not under a Williamson Act contract[3], and as discussed above, is not categorized as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Based on the City of Upland Zoning Ordinance, the Project site is zoned Commercial/Industrial Mixed-Use (C/I-MU)[4]. Therefore, the proposed Project would not conflict with a Williamson Act Contract and would not conflict within the existing zoning. No impact would occur and no mitigation is required.

c) *Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?* ***No Impact.***

The proposed Project site is zoned Commercial/Industrial Mixed-Use (C/I-MU). The proposed Project site is not currently zoned as forest land, timberland, or timberland zoned for production. Therefore, improvements planned as part of the proposed Project would not conflict with existing zoning or require the rezoning. Therefore, no impact would result and no mitigation is required.

d) *Result in the loss of forest land or conversion of forest land to non-forest use*? ***No Impact.***

The proposed Project site does not contain forest land. Therefore, no impact would occur in regard to changing forest land to a non-forest use. No mitigation is required.

e) *Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use* or conversion of forest land to non-forest use*?* ***No Impact.***

The proposed Project site does not contain any land used for or designated as agricultural or forest land. Therefore, no impact would occur in this regard and no mitigation is required.

Cumulative Impacts

Projects in the vicinity of the proposed Project that are approved and pending implementation are discussed in *Section VI.17, Transportation*. However, the proposed Project would have no impact on agricultural and forestry resources. Therefore, the proposed Project would not contribute to a cumulatively considerable impact.

[3] Upland, City of, 2015. General Plan EIR, page 5.11-5.
[4] City of Upland, 2009. City of Upland Zoning Map. Available at: http://webapp.scag.ca.gov/scsmaps/Maps/San%20Bernadino/subregion/SANBAG/Upland/Image/Upland_ZN.pdf. Accessed September 24, 2019.

3. Air Quality

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☒	☐	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard?	☐	☒	☐	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	☒

Discussion

An Air Quality Assessment and Greenhouse Gas Emissions Assessment were prepared for the proposed Project by Kimley-Horn (October 2019). The reports are provided in **Appendix A-1** and **A-2;** the results and conclusions of the reports are summarized herein.

The Project site is located within the South Coast Air Basin (SCAB) within the City of Upland, which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD is the agency principally responsible for comprehensive air pollution control in the SCAB, which includes all of Orange County and the urbanized portions of Los Angeles, Riverside, and San Bernardino Counties. The SCAQMD develops rules and regulations; establishes permitting requirements for stationary sources; inspects emissions sources; and enforces such measures through educational programs or fines, when necessary.

As further discussed in *Section VI.17, Transportation,* although the site is zoned to accommodate truck traffic associated with a Commercial/Industrial Mixed-Use facility, a total of 25 trucks would arrive to the facility daily (for a total of 50 truck trips), of which 2% would occur during each of the a.m. and p.m. peak hours. No more than 5 trucks would travel to the site during the daytime. All trucks would access the site via the driveway at the north leg of Central Avenue/Foothill Boulevard.

Air quality impacts were assessed in accordance with methodologies recommended by California Air Resources Board (CARB) and the SCAQMD. Where criteria air pollutant quantification was required, emissions were modeled using the California Emissions Estimator Model (CalEEMod version 2016.3.2).

The attainment status for SCAB is included in **Table 1, Table 1: South Coast Air Basin Attainment Status.** Areas that meet ambient air quality standards are classified as attainment areas, while areas that do not meet these standards are classified as nonattainment areas. Areas for which there is insufficient data available are designated unclassified. As shown in the table, SCAB is currently designated as a nonattainment area with respect to the state ozone, PM_{10}, and $PM_{2.5}$ standards, as well as the national 8-hour ozone and $PM_{2.5}$ standards. The SCAB is designated as attainment or unclassified for the remaining State and federal standards.

Table 1: South Coast Air Basin Attainment Status

Pollutant	Federal Designation	State Designation
Ozone (O_3) (1 Hour Standard)	Non-Attainment (Extreme)	Non-Attainment
Ozone (O_3) (8 Hour Standard)	Non-Attainment (Extreme)	Non-Attainment
Particulate Matter ($PM_{2.5}$) (24 Hour Standard)	Non-Attainment (Serious)	--
Particulate Matter ($PM_{2.5}$) (Annual Standard)	Non-Attainment (Moderate)	Non-Attainment
Particulate Matter (PM_{10}) (24 Hour Standard)	Attainment (Maintenance)	Non-Attainment
Particulate Matter (PM_{10}) (Annual Standard)	--	Non-Attainment
Carbon Monoxide (CO) (1 Hour Standard)	Attainment (Maintenance)	Attainment
Carbon Monoxide (CO) (8 Hour Standard)	Attainment (Maintenance)	Attainment
Nitrogen Dioxide (NO_2) (1 Hour Standard)	Unclassifiable/Attainment	Attainment
Nitrogen Dioxide (NO_2) (Annual Standard)	Attainment (Maintenance)	Attainment
Sulfur Dioxide (SO_2) (1 Hour Standard)	Unclassifiable/Attainment	Attainment
Sulfur Dioxide (SO_2) (24 Hour Standard)	--	Attainment
Lead (Pb) (30 Day Standard)	Unclassifiable/Attainment	--
Lead (Pb) (3 Month Standard)	--	Attainment
Sulfates (SO_{4-2}) (24 Hour Standard)	--	Attainment
Hydrogen Sulfide (H_2S) (1 Hour Standard)	--	Unclassified

Source: South Coast Air Quality Management District, *Air Quality Management Plan*, 2016; U.S. EPA, *Nonattainment Areas for Criteria Pollutants (Green Book)*, October 24, 2018.

The following is a list of SCAQMD rules that are required of construction activities associated with the proposed Project:

- Rule 402 (Nuisance) – This rule prohibits the discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. This rule does not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.
- Rule 403 (Fugitive Dust) – This rule requires fugitive dust sources to implement best available control measures for all sources, and all forms of visible particulate matter are prohibited from crossing any property line. This rule is intended to reduce PM_{10} emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust. PM_{10} suppression techniques are summarized below.

a) Portions of a construction site to remain inactive longer than a period of three months will be seeded and watered until grass cover is grown or otherwise stabilized.

b) All on-site roads will be paved as soon as feasible or watered periodically or chemically stabilized.

c) All material transported off-site will be either sufficiently watered or securely covered to prevent excessive amounts of dust.

d) The area disturbed by clearing, grading, earthmoving, or excavation operations will be minimized at all times.

e) Where vehicles leave a construction site and enter adjacent public streets, the streets will be swept daily or washed down at the end of the work day to remove soil tracked onto the paved surface.

- Rule 1113 (Architectural Coatings) – This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce ROG emissions from the use of these coatings, primarily by placing limits on the ROG content of various coating categories.

The City of Upland General Plan includes the following goals and policies related to air quality:

Goal LU-2: A community with stable and livable residential neighborhoods.

Policy LU-2.3: Living Environment. Provide healthy, affordable and desirable living environments consistent with adopted code requirements that set forth the acceptable health and safety standards for the occupancy of housing.

Goal LU-4: A community whose land use patterns focus growth in ways that are sustainable and environmentally responsible, including the implementation of smart growth practices and the reduction of greenhouse gas emissions consistent with Assembly Bill (AB) 32, Senate Bill (SB) 375, the Regional Transportation Plan and Sustainable Community Strategy.

Policy LU-4.4: Incentives. Work to identify and support financial and administrative incentives (i.e., fee reductions) to encourage desired land uses, development patterns, and alternative modes of transportation that reduce greenhouse gas emissions.

Goal OSC-4: Healthful air quality in Upland and the surrounding region and reduced locally generated pollutant emissions.

Policy OSC-4.1: Land Use Patterns. Promote land use patterns that reduce the number and length of motor vehicle trips.

Policy OSC-4.4: Separation of Sensitive Uses. To the extent practicable, separate sensitive land uses (schools, senior centers, medical facilities, and residences) from significant sources of air pollutants, toxic air contaminants, or odor emissions.

Policy OSC-4.5: Design of Sensitive Uses. Require new development with sensitive uses located adjacent to mobile and stationary toxic air contaminants to be designed with consideration of site and building orientation, location of trees, and incorporation of appropriate technology for improved air quality (i.e., ventilation and filtration) to lessen any potential health risks.

Policy OSC-4.6: Protect all Resident Equally. Ensure that all land use decisions are made in an equitable manner to protect residents, regardless of age, culture, ethnicity, gender, race, socioeconomic status, or geographic location, from the health effects of air pollution.

Policy OSC-4.8: Reduction in Commuting. *Promote expansion of employment opportunities within Upland to reduce commuting to areas outside of the City.*

Policy OSC-4.9: Rideshare Incentives. *Encourage employers to offer employees incentives for ridesharing.*

Policy OSC-4.10: Vehicle Idling. *Continue to enforce the vehicle idling restrictions established by the State.*

Policy OSC-4.11: New Development. *Review proposed development projects as required by CEQA to ensure projects incorporate feasible measures that reduce construction and operational emissions for reactive organic gases, nitrogen oxides, and particulate matter (PM10 and $PM_{2.5}$) through project design.*

Policy OSC-4.12: Health Risk Assessment. *New sources of toxic air pollutants shall prepare a Health Risk Assessment as required by Section 44300 of the California Health and Safety Code. The Assessment shall be used to establish appropriate land use buffer zones around those areas posing substantial health risks based upon the California Air Resources Board's guidance provided in the Air Quality Land Use Handbook.*

Policy OSC-4.13: Best Management Practices. *Require best management practices to reduce air pollution associated with construction of development projects.*

Policy OSC-4.14: Construction Mitigation. *Review construction plans associated with development projects to determine if all feasible mitigation measures are included.*

Policy OSC-4.15: Green Building Practices*. Promote green building practices that support healthy indoor living and working environments that are well-ventilated and contaminant-free.*

Policy OSC-4.18: Coordinated Planning. *Coordinate air quality planning efforts with other local, regional and State agencies, and encourage community participation in air quality planning.*

Policy OSC-4.19: Community Involvement. *Design and conduct efforts to involve the public and affected/interested parties in the implementation of air quality improvement plans and programs. This may include public forums and workshops, community and education programs, informational brochures and web postings, and a variety of other media forms to maximize citizen involvement.*

To determine whether a project would create potential air quality impacts, the City uses SCAQMD Air Quality Thresholds. The screening thresholds for construction and daily operations are shown in Table 2, SCAQMD Daily Emissions Thresholds.

Table 2: SCAQMD Daily Emissions Thresholds

Pollutant	Thresholds (lbs/day)	
	Construction	Operations
Reactive Organic Gases (ROG)	75	55
Carbon Monoxide (CO)	550	550
Nitrogen Oxides (NO_X)	100	55
Sulfur Oxides (SO_X)	150	150
Coarse Particulates (PM_{10})	150	150
Fine Particulates ($PM_{2.5}$)	55	55
Source: South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993 ($PM_{2.5}$ threshold adopted June 1, 2007).		

a) *Conflict with or obstruct implementation of the applicable air quality plan?* ***Less than Significant Impact with Mitigation Incorporated.***

The SCAQMD drafted the 2016 Air Quality Management Plan (AQMP). The 2016 AQMP establishes a program of rules and regulations directed at reducing air pollutant emissions and achieving state and national air quality standards. The primary purpose of an air quality plan is to bring an area that does not attain federal and State air quality standards into compliance with the requirements of the federal Clean Air Act and California Clean Air Act. In addition, air quality plans are developed to ensure that an area maintains a healthful level of air quality based on the national ambient air quality standards (NAAQS) and the California ambient air quality standards (CAAQS).

The SCAQMD's CEQA Handbook identifies two key indicators of consistency with the AQMP:

1) Whether a project will result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.

2) Whether a project will exceed the assumptions in the AQMP based on the year of project buildout and phase.

The violations to which Consistency Criterion No. 1 refers are CAAQS and NAAQS. As shown in Table 3 and Table 4 below, the Project would not exceed the construction standards and net emissions would not exceed operational standards with the implementation of Mitigation Measures AQ-1 through AQ-3. Therefore, the Project would not contribute to an existing air quality violation and the Project would be consistent with the first criterion.

Concerning Consistency Criterion No. 2, the AQMP contains air pollutant reduction strategies based on SCAG's latest growth forecasts, and SCAG's growth forecasts were defined in consultation with local governments and with reference to local general plans. The proposed Project is consistent with the land use designation and development density presented in the Upland General Plan and therefore would not exceed the population or job growth projections used by the SCAQMD to develop the AQMP. Thus, no impact would occur as the Project is also consistent with the second criteria. Impacts would be less than significant with mitigation incorporated.

b) *Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard?* ***Less than Significant with Mitigation Incorporated.***

Construction associated with the proposed Project would generate short-term emissions of criteria air pollutants. The criteria pollutants of primary concern within the Project area include ozone-precursor pollutants and particulate matter. The construction emissions result from site grading, road paving, and motor vehicle exhaust associated with construction equipment and worker trips. Emissions of airborne particulate matter are largely dependent on the amount of ground disturbance associated with site preparation activities as well as weather conditions and the appropriate application of water.

Construction-generated emissions are short term and of temporary duration, lasting only as long as construction activities occur, but would be considered a significant air quality impact if the volume of pollutants generated exceeds the SCAQMD's threshold of significance. The duration of construction activities associated with the proposed Project is estimated to last approximately 7 months. Project construction would include site preparation, grading, paving, construction of the Project building, and architectural coating. Site grading is anticipated to be mostly balanced, and the import or export of soil may not be required, however the export of approximately 431 cubic yards (cy) of soil has been assumed for a conservative analysis. Project construction requires dozers and tractors/loaders/backhoes during site preparation; graders, rubber-tired dozers, excavators, and tractors/loaders/backhoes during grading; cranes, forklifts, generators, tractors, and welders

during building construction; pavers, rollers, and paving equipment during paving; and air compressors during architectural coating. Emissions for each construction phase have been quantified based upon the phase durations and equipment types. Construction-generated emissions associated with the proposed Project were calculated using the CARB-approved CalEEMod computer program. As shown in **Table 3, Construction-Related Emissions (Maximum Pounds Per Day)**, all criteria pollutant emissions would remain below their respective thresholds. While impacts would be considered less than significant, the proposed Project would be subject to SCAQMD Rules 402, 403, and 1113 to further reduce specific construction-related emissions.

Table 3: Construction-Related Emissions (Maximum Pounds Per Day)

Construction Year	Reactive Organic Gases (ROG)	Nitrogen Oxide (NO_x)	Carbon Monoxide (CO)	Sulfur Dioxide (SO_2)	Coarse Particulate Matter (PM_{10})	Fine Particulate Matter ($PM_{2.5}$)
2020	52.22	85.20	61.70	0.19	11.56	6.32
SCAQMD Threshold	75	100	550	150	55	150
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: SCAQMD Rule 403 Fugitive Dust applied. The Rule 403 reduction/credits include the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; cover stock piles with tarps; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour. Reductions percentages from the SCAQMD CEQA Handbook (Tables XI-A through XI-E) were applied. The modeled emissions also includes the use of low VOC paints; refer to Mitigation Measure AQ-2. No mitigation was applied to construction equipment. Refer to Appendix A-1 for Model Data Outputs.
Source: CalEEMod version 2016.3.2. Refer to Appendix A-1 for model outputs.

Construction would require grading of the entire Project site during the initial phases. Fugitive dust emissions are associated with land clearing, ground excavation, cut-and-fill operations, demolition, and truck travel on unpaved roadways. Dust emissions also vary substantially from day to day, depending on the level of activity, the specific operations, and weather conditions. Fugitive dust emissions that may have a substantial, temporary impact on local air quality. In addition, fugitive dust may be a nuisance to those living and working in the Project vicinity. Uncontrolled dust from construction can become a nuisance and potential health hazard to those living and working nearby. SCAQMD Rules 402 and 403 (prohibition of nuisances, watering of inactive and perimeter areas, track out requirements, etc.), are applicable to the Project and were applied in CalEEMod to minimize fugitive dust emissions. Mitigation Measure AQ-1 requires the implementation of Rule 402 and 403 dust control techniques to minimize PM_{10} and $PM_{2.5}$ concentrations. The recommended mitigation measures would be required to ensure compliance with SCAQMD Rules and Regulations, which would be verified and enforced through the City's development review process.

In addition to gaseous and particulate emissions, the application of asphalt and surface coatings creates ROG emissions, which are O_3 precursors. ROG emissions from exhaust and architectural coatings were quantified in CalEEMod. The highest concentration of ROG emissions would be generated during the application of architectural coatings. As required by law, all architectural coatings for the Project structures would comply with SCAQMD Rule 1113. Rule 1113 provides specifications on painting practices and regulates the ROG content of paint. As indicated in Table 3, Project construction would not exceed ROG thresholds with the implementation of Mitigation Measures AQ-2, which limits the VOC content of paint to 50 grams per liter or less. Compliance with AQ-2 would ensure that construction ROG emissions would not exceed SCAQMD thresholds.

Once operational, Project-generated emissions would be associated with motor vehicle use and area sources, such as the use of landscape maintenance equipment and architectural coatings.

The Project site is currently occupied with undeveloped land and industrial uses, including outdoor rock and gravel stockpiling and processing operations. The rock and gravel processing plant uses eight pieces of off-road heavy-duty diesel equipment, such as rubber tired loaders, stackers, static and mobile screens, cone and crushers, and water trucks. Additionally, the existing rock and gravel processing operations include approximately 78 trucks per day to off-haul materials processed on-site. **Table 4, Long-Term Operational Emissions (Maximum Pounds Per Day)**, shows the existing emissions that are generated from the current on-site operations as well as the net increase in maximum daily emissions that would occur with implementation of the Project. As shown in Table 4, net operational emissions would not exceed SCAQMD thresholds for any criteria air pollutants.

Table 4: Long-Term Operational Emissions (Maximum Pounds Per Day)

Source	Reactive Organic Gases (ROG)	Nitrogen Oxide (NO_x)	Carbon Monoxide (CO)	Sulfur Dioxide (SO_2)	Coarse Particulate Matter (PM_{10})	Fine Particulate Matter ($PM_{2.5}$)
Existing Gravel Processing Operations						
Summer Emissions	4.87	46.60	32.14	0.08	2.42	2.07
Winter Emissions	4.87	48.61	31.92	0.08	2.43	2.07
Proposed Project – Summer Emissions						
Area Source Emissions	6.76	0.0	0.12	0.0	0.0	0.0
Energy Emissions	0.02	0.15	0.13	0.0	0.01	0.01
Mobile Emissions	8.31	70.32	94.69	0.32	22.16	6.37
Off-Road Emissions	1.73	15.57	14.16	0.02	1.16	1.07
Total Emissions	*16.81*	*86.05*	*109.10*	*0.34*	*23.33*	*7.44*
Net Increase	**11.94**	**39.45**	**76.96**	**0.26**	**20.91**	**5.37**
SCAQMD Threshold	55	55	550	150	150	55
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Proposed Project – Winter Emissions						
Area Source Emissions	6.76	0.0	0.12	0.0	0.0	0.0
Energy Emissions	0.02	0.15	0.13	0.0	0.01	0.01
Mobile Emissions	7.72	72.98	85.97	0.30	22.16	6.37
Off-Road Emissions	1.73	15.57	25.16	0.02	1.16	1.07
Total Emissions	*16.22*	*88.70*	*100.38*	*0.32*	*23.33*	*7.45*
Net Increase	**11.35**	**40.09**	**68.46**	**0.24**	**20.9**	**5.38**
SCAQMD Threshold	55	55	550	150	150	55
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Source: CalEEMod version 2016.3.2. Refer to Appendix A-1 for model outputs.						

Area Source Emissions. Area source emissions would be generated due to on-site equipment, architectural coating, consumer products, and landscaping that were previously not present on the site. Forklifts and other equipment required for loading/unloading would be electric or powered by natural gas. These emissions are depicted as off-road sources in Table 4. As shown in Table 4, area source emissions from the proposed Project would not exceed SCAQMD thresholds for either the winter or summer seasons.

Energy Source Emissions. Energy source emissions would be generated due to electricity and natural gas usage associated with the proposed Project. Primary uses of electricity and natural gas by the Project would be for miscellaneous warehouse equipment, space heating and cooling, water

heating, ventilation, lighting, appliances, and electronics. As shown in Table 4, energy source emissions from the proposed Project would not exceed SCAQMD thresholds for criteria pollutants.

Mobile Source. Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. Depending upon the pollutant being discussed, the potential air quality impact may be of either regional or local concern. For example, ROG, NO_X, PM_{10}, and $PM_{2.5}$ are all pollutants of regional concern. NO_X and ROG react with sunlight to form O_3, known as photochemical smog. Additionally, wind currents readily transport PM_{10} and $PM_{2.5}$. However, CO tends to be a localized pollutant, dispersing rapidly at the source. Project-generated vehicle emissions have been estimated based on the trip generation data within the Project traffic study. As indicated in the traffic study, the proposed Project would generate approximately 2,483 total daily trips (2,583 passenger car equivalent trips). The fleet mix in CalEEMod has been adjusted to account for Project specific vehicle classifications.

As shown in Table 4 above, the net operational emissions would not exceed the SCAQMD thresholds. Mitigation Measure AQ-3 includes best management practices to minimize operational mobile source emissions. Mitigation Measure AQ-3 requires buildings to include infrastructure to facilitate sufficient electric charging for trucks to plug in, electric vehicle charging stations, anti-idling signs, electric or natural gas-powered service equipment (e.g., forklifts, yard trucks/hostlers, etc.). The recommended mitigation measures would be required to ensure the Project's net emissions remain below SCAQMD thresholds, which would be verified and enforced through the City's site plan review process.

Cumulative Short-Term Emissions

The SCAB is designated nonattainment for O_3, PM_{10}, and $PM_{2.5}$ for State standards and nonattainment for O_3 and $PM_{2.5}$ for federal standards. As discussed above, the Project construction-related emissions by themselves would not have the potential to exceed the SCAQMD significance thresholds for criteria pollutants.

Since these thresholds indicate whether individual Project emissions have the potential to affect cumulative regional air quality, it can be expected that the Project-related construction emissions would not be cumulatively considerable. The SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the AQMP pursuant to the federal Clean Air Act mandates. The analysis assumed fugitive dust controls would be utilized during construction, including frequent water applications. SCAQMD rules, mandates, and compliance with adopted AQMP emissions control measures would also be imposed on construction projects throughout the Air Basin, which would include related projects. Compliance with SCAQMD rules and regulations and implementation of Mitigation Measures AQ-1 and AQ-2 would reduce the proposed Project construction-related impacts to a less than significant level. Therefore, Project-related construction emissions, in combination with those from other projects in the area, would not substantially deteriorate the local air quality. Construction emissions associated with the proposed Project would not result in a cumulatively considerable contribution to significant cumulative air quality impacts.

Cumulative Long-Term Impacts

The SCAQMD has not established separate significance thresholds for cumulative operational emissions. The nature of air emissions is largely a cumulative impact. As a result, no single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, individual project emissions contribute to existing cumulatively significant adverse air quality impacts. The SCAQMD developed the operational thresholds of significance based on the level above which individual project emissions would result in a cumulatively considerable contribution to the SCAB's existing air quality conditions. Therefore, a project that exceeds the SCAQMD

operational thresholds would also be a cumulatively considerable contribution to a significant cumulative impact.

As shown in Table 4 the proposed Project's net operational emissions would not exceed SCAQMD with the implementation of Mitigation Measure AQ-3. As a result, operational emissions associated with the proposed Project would not result in a cumulatively considerable contribution to significant cumulative air quality impacts. Adherence to SCAQMD rules and regulations would minimize potential impacts related to cumulative conditions on a project-by-project basis. However, Project operations would not contribute a cumulatively considerable net increase of any nonattainment criteria pollutant. Impacts would be less than significant in this regard.

Mitigation Measures

AQ-1: Prior to the issuance of grading permits, the City Engineer shall confirm that the Grading Plan, Building Plans and Specifications require all construction contractors to comply with South Coast Air Quality Management District's (SCAQMD's) Rules 402 and 403 to minimize construction emissions of dust and particulates. The measures include, but are not limited to, the following:

- Portions of a construction site to remain inactive longer than a period of three months will be seeded and watered until grass cover is grown or otherwise stabilized.
- All on-site roads will be paved as soon as feasible or watered periodically or chemically stabilized.
- All material transported off site will be either sufficiently watered or securely covered to prevent excessive amounts of dust.
- The area disturbed by clearing, grading, earthmoving, or excavation operations will be minimized at all times.
- Where vehicles leave a construction site and enter adjacent public streets, the streets will be swept daily or washed down at the end of the work day to remove soil tracked onto the paved surface.

AQ-2: The applicant shall require by contract specifications that the interior and exterior architectural coatings (paint and primer including parking lot paint) products used would have a volatile organic compound rating of 50 grams per liter or less. Contract specifications shall be included in the construction documents for the Project, which shall be reviewed and approved by the City of Upland Building Department prior to the issuance of building permits.

AQ-3: Prior to the issuance of a certificate of occupancy, the Project Applicant shall demonstrate to the satisfaction of the City of Upland Planning Division that the following measures would be implemented during Project operations.

- The proposed warehouse shall be constructed with the appropriate infrastructure to facilitate sufficient electric charging for trucks to plug in, in anticipation of future technology that allows trucks to operate partially on electricity.
- At least 6% of all vehicle parking spaces (including for trucks) shall be designed to accommodate future electric vehicle charging stations. Further, electrical hookups should be provided at the onsite truck stop for truckers to plug in any onboard auxiliary equipment. At a minimum, electrical panels should be appropriately sized to allow for future expanded use.

- Legible, durable, weatherproof signs shall be placed at truck access gates, loading docks, and truck parking areas that identify applicable California Air Resources Board (CARB) anti-idling regulations. At a minimum, each sign shall include (1) instructions for truck drivers to shut off engines when not in use; (2) instructions for drivers of diesel trucks to restrict idling to no more than 5 minutes; and (3) telephone numbers of the building facilities manager and CARB to report violations.
- All service equipment (e.g., forklifts, yard trucks, hostlers, etc.) used within the site shall be electric or powered by compressed natural gas.
- To promote alternative fuels and help support "clean" truck fleets, the developer/successor-in-interest shall provide building occupants with information related to the SCAQMD's Carl Moyer Program, or other such programs that promote truck retrofits or "clean" vehicles and information including, but not limited to, the health effect of diesel particulates, benefits of reduced idling time, CARB regulations, and importance of not parking in residential areas. Tenants shall be notified about the availability of (1) alternatively fueled cargo handling equipment; (2) grant programs for diesel- fueled vehicle engine retrofit and/or replacement; (3) designated truck parking locations in the project vicinity; (4) access to alternative fueling stations proximate to the site that supply compressed natural gas; and (5) the US Environmental Protection Agency's SmartWay program.

c) *Expose sensitive receptors to substantial pollutant concentrations?* ***Less Than Significant Impact.***

Localized Construction Significance Analysis

The nearest sensitive receptors are the multi-family residences located 1,040 feet southeast of the Project site. To identify impacts to sensitive receptors, the SCAQMD recommends addressing Local Significance Thresholds (LSTs) for construction. LSTs were developed in response to SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4). The SCAQMD provided the Final Localized Significance Threshold Methodology (dated June 2003 [revised 2008]) for guidance. The LST methodology assists lead agencies in analyzing localized impacts associated with Project-specific emissions.

Since CalEEMod calculates construction emissions based on the number of equipment hours and the maximum daily soil disturbance activity possible for each piece of equipment. As discussed above, project construction includes concrete/industrial saws, rubber-tired dozers, and excavators during demolition; dozers and tractors/loaders/backhoes during site preparation; graders, rubber-tired dozers, excavators, and tractors/loaders/backhoes during grading; cranes, forklifts, generators, tractors, and welders during building construction; pavers, rollers, and paving equipment during paving; and air compressors during architectural coating. **Table 5, Equipment-Specific Grading Rates,** is used to determine the maximum daily disturbed acreage for comparison to LSTs.

The appropriate Source Receptor Area (SRA) for the localized significance thresholds is the Northwest San Bernardino Valley area (SRA 32) since this area includes the Project site. LSTs apply to CO, NO_2, PM_{10}, and $PM_{2.5}$. The SCAQMD produced look-up tables for projects that disturb areas less than or equal to 5 acres in size. Project construction is anticipated to disturb a maximum of 6.5 acres in a single day. As the LST guidance provides thresholds for projects disturbing 1-, 2-, and 5-acres in size and the thresholds increase with size of the site, the LSTs for 5-acre threshold are conservatively utilized for this analysis, as the LSTs increase with the size of the site.

Table 5: Equipment-Specific Grading Rates

Construction Phase	Equipment Type	Equipment Quantity	Acres Graded per 8-Hour Day	Operating Hours per Day	Acres Graded per Day
Grading	Tractors	2	0.5	8	1
	Graders	2	0.5	8	0.5
	Dozers	1	0.5	8	0.5
	Scrapers	4	1	8	4
Total Acres Graded per Day					**6.5**
Source: CalEEMod version 2016.3.2. Refer to Appendix A-1 for model outputs.					

The SCAQMD's methodology states that "off-site mobile emissions from the Project should not be included in the emissions compared to LSTs." Therefore, for purposes of the construction LST analysis, only emissions included in the CalEEMod "on-site" emissions outputs were considered. The nearest sensitive receptors are the multi-family residences located 1,040 feet southeast of the Project site. LST thresholds are provided for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. Therefore, LSTs for receptors located at 200 meters were conservatively utilized in this analysis. Table 6, Localized Significance of Construction Emissions (Maximum Pounds Per Day), presents the results of localized emissions during construction.

Table 6: Localized Significance of Construction Emissions (Maximum Pounds Per Day)

Construction Activity	Nitrogen Oxide (NO_x)	Carbon Monoxide (CO)	Coarse Particulate Matter (PM_{10})	Fine Particulate Matter ($PM_{2.5}$)
Site Preparation (2020)	42.42	21.51	9.92	6.27
Grading (2020)	84.85	55.23	9.02	4.97
Building Construction (2020)	19.19	16.85	1.12	1.05
Paving (2020)	14.07	14.65	0.75	0.69
Architectural Coating (2020)	3.37	3.66	0.22	0.22
SCAQMD Localized Screening Threshold (adjusted for 5 acres at 200 meters)	486	9,611	140	45
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**
Source: CalEEMod version 2016.3.2. Refer to Appendix A-1 for model outputs.				

Table 6 shows that the emissions of these pollutants on the peak day of construction would not result in significant concentrations of pollutants at nearby sensitive receptors. Therefore, significant impacts would not occur concerning LSTs during construction activities.

Localized Operational Significance Analysis

According to the SCAQMD localized significance threshold methodology, LSTs would apply to the operational phase of a proposed project only if the project includes stationary sources or attracts mobile sources that may spend long periods queuing and idling at the site (e.g., warehouse or transfer facilities). Since the proposed Project is a warehouse, the operational phase LST protocol is conservatively applied to both the area source and all the mobile source emissions. LSTs for receptors located at 200 meters for SRA 32 were conservatively utilized in this analysis because the closest receptors are over 300 meters away. Although the proposed Project is 50.25 acres, the 5-acre LST threshold was also conservatively used for the Project, as the LSTs increase with the size of the site.

The LST analysis only includes on-site sources. However, the CalEEMod model outputs do not separate on- and off-site emissions for mobile sources. For a worst-case scenario assessment,

the emissions shown in **Table 7, Localized Significance of Operational Emissions (Maximum Pounds Per Day)**, include all on-site Project-related stationary sources and 100% of the Project-related new mobile sources. This figure is conservative, considering only 5% of the Project-related new mobile sources would occur on-site[5]. Table 7 shows that the maximum daily emissions of these pollutants during operations would not result in significant concentrations of pollutants at nearby sensitive receptors. Therefore, significant impacts would not occur concerning LSTs during operational activities.

Table 7: Localized Significance of Operational Emissions (Maximum Pounds Per Day)

Activity	Nitrogen Oxide (NO_x)	Carbon Monoxide (CO)	Coarse Particulate Matter (PM_{10})	Fine Particulate Matter ($PM_{2.5}$)
On-Site and Mobile Source Emissions	88.70	100.38	23.33	7.45
SCAQMD Localized Screening Threshold (adjusted for 5 acres at 200 meters)	486	9,611	34	11
Exceed SCAQMD Threshold?	**No**	**No**	**No**	**No**
Source: CalEEMod version 2016.3.2. Refer to Appendix A-1 for model outputs.				

Criteria Pollutant Health Impacts

As shown in Table 6 and Table 7, localized effects of on-site project emissions on nearby receptors were found to be less than significant. The LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard. The LSTs were developed by the SCAQMD based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. The ambient air quality standards establish the levels of air quality necessary, with an adequate margin of safety, to protect public health, including protecting the health of sensitive populations such as asthmatics, children, and the elderly.

Additionally, the SCAQMD has set its CEQA regional significance thresholds for NO_X and ROG (VOC) at 10 tons per year (expressed as 55 pounds per day) based on the FCAA, which defines a major stationary source (in extreme ozone nonattainment areas such as the South Coast Air Basin) as emitting 10 tons per year. The thresholds correlate with the trigger levels for the federal New Source Review (NSR) Program and SCAQMD Rule 1303 for new or modified sources. The NSR Program[6] was created by the FCAA to ensure that stationary sources of air pollution are constructed or modified in a manner that is consistent with attainment of health-based federal ambient air quality standards. The federal ambient air quality standards establish the levels of air quality necessary, with an adequate margin of safety, to protect the public health. Therefore, projects that do not exceed the SCAQMD's mass emissions thresholds would not violate any air quality standards or contribute substantially to an existing or projected air quality violation and no criteria pollutant health impacts.

As shown above, Project-related emissions would not exceed the SCAQMD's LSTs or regional thresholds, and therefore would not exceed the ambient air quality standards or cause an increase

[5] South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, 2009.
[6] Code of Federal Regulation (CFR) [i.e., PSD (40 CFR 52.21, 40 CFR 51.166, 40 CFR 51.165 (b)), Non-attainment NSR (40 CFR 52.24, 40 CFR 51.165, 40 CFR part 51, Appendix S)

in the frequency or severity of existing violations of air quality standards. Therefore, sensitive receptors would not be exposed to criteria pollutant levels in excess of the health-based ambient air quality standards.

Carbon Monoxide Hotspots

An analysis of CO "hot spots" is needed to determine whether the change in the level of service of an intersection resulting from the proposed Project would have the potential to result in exceedances of the CAAQS or NAAQS. It has long been recognized that CO exceedances are caused by vehicular emissions, primarily when vehicles are idling at intersections. Vehicle emissions standards have become increasingly stringent in the last 20 years. Currently, the CO standard in California is a maximum of 3.4 grams per mile for passenger cars (requirements for certain vehicles are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations have steadily declined.

Accordingly, with the steadily decreasing CO emissions from vehicles, even very busy intersections do not result in exceedances of the CO standard. The Basin was re-designated as attainment in 2007 and is no longer addressed in the SCAQMD's AQMP. The 2003 AQMP is the most recent version that addresses CO concentrations. As part of the SCAQMD CO Hotspot Analysis, the Wilshire Boulevard/Veteran Avenue intersection, one of the most congested intersections in Southern California with an average daily traffic (ADT) volume of approximately 100,000 vehicles per day, was modeled for CO concentrations. This modeling effort identified a CO concentration high of 4.6 ppm, which is well below the 35-ppm federal standard. The proposed Project considered herein would not produce the volume of traffic required to generate a CO hot spot in the context of SCAQMD's *CO Hotspot Analysis*. As the CO hotspots were not experienced at the Wilshire Boulevard/Veteran Avenue intersection even as it accommodates 100,000 vehicles daily, it can be reasonably inferred that CO hotspots would not be experienced at any vicinity intersections resulting from 2,483 total daily trips (2,583 passenger car equivalent trips) additional vehicle trips attributable to the Project. Therefore, impacts would be less than significant.

d) *Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?* ***No Impact.***

The SCAQMD CEQA Air Quality Handbook identifies certain land uses as sources of odors. These land uses include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. The proposed Project would not include any of the land uses that have been identified by the SCAQMD as odor sources. Therefore, there would be no impacts from the proposed Project.

Cumulative Impacts

Projects in the vicinity of the proposed Project that are approved and pending implementation are discussed in *Section VI.17, Transportation*. However, no single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. The SCAQMD developed the operational thresholds of significance based on the level above which a project's individual emissions would result in a cumulatively considerable contribution to the Basin's existing air quality conditions. Therefore, a project that exceeds the SCAQMD operational thresholds would also be a cumulatively considerable contribution to a significant cumulative impact. As described in this section, the proposed Project's operational emissions would not exceed thresholds. Therefore, the proposed Project would not result in a cumulatively considerable contribution to significant cumulative air quality impacts.

4. Biological Resources

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

Discussion

A Habitat Assessment was prepared for the proposed Project by ELMT Consulting Inc. (August 2019). The Habitat Assessment is included as **Appendix B** and the results are summarized herein.

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the USFWS? ***Less than Significant Impact with Mitigation Incorporated.***

The California Department of Fish and Wildlife (CDFW) and the U.S. Fish and Wildlife Service (USFWS) may list species as threatened or endangered under the California Endangered Species Act (CESA) or Federal Endangered Species Act (FESA), respectively. The USFWS can designate critical habitat that identifies specific areas that are essential to the conservation of a listed species.

As a part of the Habitat Assessment prepared for the Project, a query of the CDFW's California Natural Diversity Database (CNDDB) and the CNPS Electronic Inventory of Rare and Endangered

Vascular Plants of California identified eighteen (18) special-status plant species, forty (40) special-status wildlife species and one (1) special-status plant community as having the potential to occur within the Ontario USGS 7.5-minute quadrangle.

Based on habitat requirements for specific special-status plant species and the availability and quality of habitats needed by each species, it was determined that the Project site does not provide suitable habitat for any of the special-status plant species known to occur in the area and are presumed to be absent from the Project site. The CNDDB results, habitat assessment, and potential for occurrence for each species are included in Appendix B.

According to the CNDDB, thirty-eight (38) special-status wildlife species have been reported in the Ontario quadrangle. The CNDDB results, habitat assessment, and potential for occurrence for each species are included in Appendix B. No special-status wildlife species were observed on-site during the habitat assessment. Based on habitat requirements for specific species and the availability and quality of on-site habitats, it was determined that the proposed Project site has a moderate potential to provide suitable habitat for Cooper's hawk (*Accipiter cooperii*) and a low potential to provide suitable habitat for Costa's hummingbird (*Calypte costae*). Further it was determined the Project site does not provide suitable habitat for any of the other special-status wildlife species known to occur in the area since the Project site has been heavily disturbed from on-site disturbances and existing development. With the implementation of Mitigation Measure BIO-1, impacts on Cooper's hawk (*Accipiter cooperii*) and Costa's hummingbird (*Calypte costae*) and other nesting birds would be less than significant.

Mitigation Measure

BIO-1: **Nesting Bird Pre-Construction Survey:** Vegetation clearing and ground disturbing activities should be conducted outside of the nesting season (January 15 to August 31). If these activities occur during nesting season, then a qualified biologist will conduct a nesting bird survey within three days prior to any disturbance of the site, including tree and shrub removal, disking, demolition activities, and grading. If active nests are identified, the biologist shall establish suitable buffers around the nests depending on the level of activity within the buffer and species detected, and the buffer areas shall be avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests. Raptor species will have an avoidance buffer of 500 feet and other bird species will have an avoidance buffer of 300 feet. These buffers may be reduced in consultation with the CDFW. If active nests are not identified, vegetation clearing and ground disturbing activities may be commenced.

The CNDDB lists one (1) special-status plant community as being identified within the Ontario quadrangle: Riversidian Alluvial Fan Sage Scrub (RAFSS). A heavily disturbed, fragmented scalebroom scrub plant community was observed on the Project site. This community has been cut off from fluvial processes and is isolated from natural undisturbed habitats. No other special-status plant community was observed on-site. RAFSS is considered a sensitive plant community and is listed by CDFW as rare. However, the RAFSS habitat observed on-site is considered heavily disturbed, isolated and located outside of a floodplain and cut off from the active stream channel. The RAFSS habitat located on-site is no longer functioning as viable RAFSS habitat. Accordingly, the loss of the disturbed, fragmented, low-quality RAFSS on the Project site is not considered a significant impact and requires no mitigation.

b) *Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service?* ***No Impact.***

As discussed above in Threshold VI.4(a), the Project site contains RAFSS habitat that is heavily disturbed, isolated and low-quality and therefore, not considered viable RAFSS habitat. There are

no other native habitats on site. No jurisdictional drainage and/or wetland features were observed within the Project site during the field reconnaissance. There are no USGS-designated blue line streams or associated jurisdictional features on the Project site. Further, the development of Cable Airport north of the Project site has eliminated any potential water movement from north to south across the Project site. No impacts to riparian habitat or other sensitive natural community would occur as a result of the proposed Project; no mitigation is required.

c) *Have a substantial adverse effect on state or federally protected (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?* ***No Impact.***

As discussed above in Threshold VI.4(b), the Project site does not contain potential jurisdictional features, including state or federally protected wetlands and other features that carry water. Therefore, no impacts would occur and no mitigation is required.

d) *Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?* ***Less Than Significant Impact with Mitigation Incorporated.***

Wildlife Corridors: The Project site is located in a predominately industrial and commercial area and is not suitable as a wildlife movement corridor. The Project site has not been identified as a wildlife corridor or linkage in accordance with the San Bernardino County General Plan. The proposed Project would be confined to existing areas that have been heavily disturbed and surrounded by development. The Project site is isolated from regional wildlife corridors and linkages and there are no riparian corridors, creeks or useful patches of stepping stone habitat (natural areas) within or connecting the Project site to the San Gabriel Mountains. As such, development of the Project site would not impact a wildlife corridor. Therefore, there would be no impact to migratory wildlife or corridors and no mitigation is required.

Nesting Birds: The Project site has the potential to impact active bird nests if vegetation is removed or ground disturbing activities occur during the nesting season (January 15 to August 31). Impacts on nesting birds are prohibited by the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC). With the implementation of Mitigation Measure BIO-1, impacts on nesting birds would be less than significant.

e) *Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy/ordinance?* ***No Impact.***

The proposed Project would not conflict with any local policies or ordinances protecting biological resources. Title 12 of the City's Municipal Code identifies regulations pertaining to trees located in public places. However, the Municipal Code does not include regulations for trees located on private property, The Habitat Assessment prepared for the proposed Project did not identify any trees on the Project site, thus no trees would be removed during Project construction and the proposed Project would be consistent with the City's Municipal Code as it pertains to tree preservation. As the site has been disturbed and there are no identified biological resources that are subject to such regulation; no impact would occur and no mitigation is required.

f) *Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?* ***No Impact.***

The Project site is not subject to a conservation plan; no plans have been adopted in the area of the Project site. No impact relative to adopted habitat conservation or other approved local, regional or State plans would occur.

Cumulative Impacts

Mitigation Measure BIO-1 would serve to reduce the severity of biological impacts. Projects in the vicinity of the proposed Project that are approved and pending implementation are discussed in

Section VI.17, Transportation. However, similar to the proposed Project, all cumulative projects would be subject to individual project review and conformance with conservation plans and standard provisions for compliance with state and federal protection laws. Since project-related impacts would be minimized by mitigation and cumulative projects would also be required to follow suit, the cumulative impact from other past, present, and reasonably foreseeable projects, would be expected to be less than significant. Therefore, cumulative impacts would be less than significant.

5. Cultural Resources

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	☐	☐	☐	☒
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☒	☐	☐
c. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

Discussion

The discussion below relies on the City's General Plan and associated EIR as it relates to the cultural resources and the Project site.

a) Cause a substantial adverse change in the significance of a historical resource? ***No Impact.***

The Project site consists of both disturbed and undeveloped land. An outdoor rock and gravel stockpiling and processing operation is located on the northwest corner of the Project site. No structures are located on the site; however, stockpiles of sand and gravel remain on-site, but would be removed as part of existing operations prior to implementation of the Project. According to the City's General Plan, the Project is not located in any of the nine City designated Historic Districts. In addition, the Project is not located in any of the five Focus Areas targeted for land use change. The Foothill Boulevard Focus Area contains a segment of Historic Route 66; however, this Focus Area is east of the Project site. There are no structures on the site and therefore, no impact would occur to historical resources and mitigation is not required.

b) Cause a substantial adverse change in the significance of an archaeological resource? ***Less Than Significant Impact with Mitigation Incorporated.***

The Project site has been previously disturbed and the surrounding area is predominately urbanized with industrial and commercial uses. The proposed Project would excavate to depths of approximately 25 feet and would mostly balance with approximately 431 cy of exported soil. According to the General Plan, there are three prehistoric sites located within the City limits and all are located along the banks of the San Antonio Creek channel. The Project site is not located adjacent to the San Antonio Creek channel. Due to the level of past disturbance, it is not anticipated that archaeological sites would be found. Because the proposed Project involves development of a site that has been so heavily disturbed, it is not anticipated that intact subsurface archaeological resources would be encountered during excavation and grading activities. Although the potential for disturbance of undiscovered resources during grading and excavation activities is considered low, Mitigation Measures CR-1 through CR-7 below are required to reduce this potential impact to a level considered less than significant.

Mitigation Measures

CR-1: **Retain a Native American Monitor/Consultant**: The Project Applicant shall retain and compensate for the services of a Tribal monitor/consultant who is both approved by the Gabrieleño Band of Mission Indians-Kizh Nation Tribal Government and is listed under the NAHC's Tribal Contact list for the area of the project location. This list is provided by the NAHC. The monitor/consultant would only be present on-site during the construction phases that involve ground disturbing activities. Ground disturbing activities are defined by the Gabrieleño Band of Mission Indians-Kizh Nation as activities that may include, but are not limited to, pavement removal, pot-holing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the Project area. The Tribal monitor/consultant will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the Project site grading and excavation activities are completed, or when the Tribal Representatives and monitor/consultant have indicated that the site has a low potential for impacting Tribal Cultural Resources.

CR-2: **Unanticipated Discovery of Tribal Cultural and Archaeological Resources:** Upon discovery of any archaeological resources, cease construction activities in the immediate vicinity of the find until the find can be assessed. All archaeological resources unearthed by project construction activities shall be evaluated by the qualified archaeologist and Tribal monitor/consultant approved by the Gabrieleño Band of Mission Indians-Kizh Nation. If the resources are Native American in origin, the Gabrieleño Band of Mission Indians-Kizh Nation shall coordinate with the San Manuel Band of Mission Indians (SMBMI), per Mitigation measure CR-3, and the landowner regarding treatment and curation of these resources. Typically, the Gabrieleño Band of Mission Indians-Kizh Nation will request reburial or preservation for educational purposes. Work may continue on other parts of the project while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section15064.5 [f]). If a resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource", time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be offered to a local school or historical society in the area for educational purposes.

CR-3: **Monitoring and Treatment Plan:** If significant pre-contact cultural resources, as defined by CEQA (as amended, 2019), are discovered and avoidance cannot be ensured, the archaeologist shall develop a Monitoring and Treatment Plan, in coordination with San SMBMI and the Gabrieleño Band of Mission Indians-Kizh Nation (Tribes) per Mitigation measure CR-2, and all subsequent finds shall be subject to this Plan. This Plan shall allow for a monitor to be present that represents SMBMI for the remainder of the project, should SMBMI elect to place a monitor on-site.

CR-4: **Unanticipated Discovery of Human Remains and Associated Funerary Objects**: 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 PRC 5097.98, are also to be treated according to this statute. Health and Safety Code 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and excavation halted until the Coroner has determined the nature of the remains. If the Coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission (NAHC) and PRC 5097.98 shall be followed.

CR-5: **Resource Assessment & Continuation of Work Protocol:** Upon discovery, the tribal and/or archaeological monitor/consultant/consultant will immediately divert work at minimum of 150 feet and place an exclusion zone around the burial. The monitor/consultant(s) will then notify the Tribes, the qualified lead archaeologist, and the construction manager who will call the Coroner. Work will continue to be diverted while the Coroner determines whether the remains are Native American. The discovery is to be kept confidential and secure to prevent any further disturbance. If the finds are determined to be Native American, the coroner will notify the NAHC as mandated by state law who will then appoint a Most Likely Descendent (MLD). If the Gabrieleno Band of Mission Indians – Kizh Nation is designated MLD, the following treatment measures shall be implemented. To the Tribe, the term "human remains" encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the burial of funerary objects with the deceased, and the ceremonial burning of human remains. These remains are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects.

CR-6: **Treatment Measures**: Prior to the continuation of ground disturbing activities, the land owner shall arrange a designated site location within the footprint of the Project for the respectful reburial of the human remains and/or ceremonial objects. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribes will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the Project cannot be diverted, it may be determined that burials will be removed. The Tribes will work closely with the qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribes, documentation shall be taken which includes at a minimum detailed descriptive notes and sketches. Additional types of documentation shall be approved by the Tribes for data recovery purposes. Cremations will either be removed in bulk or by means as necessary to ensure completely recovery of all material. If the discovery of human remains includes four or more burials, the location is considered a cemetery and a separate treatment plan shall be created. Once complete, a final report of all activities is to be submitted to the Tribes and the NAHC. The Tribes do NOT authorize any scientific study or the utilization of any invasive diagnostics on human remains.

Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the project site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

CR-7: **Archaeological/Cultural Reports**: 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 Project Applicant and City for dissemination to the Tribes. The City and/or Project Applicant shall, in good faith, consult with Tribes throughout the life of the Project.

c) *Disturb any human remains, including those interred outsides of formal cemeteries?* ***Less Than Significant Impact with Mitigation Incorporated.***

The Project site is not located within a known or suspected cemetery and there are no known human remains within the Project site. However, this does not preclude finding human remains during project-related ground disturbance. In compliance with State regulations, should any human remains be encountered during construction activities, State Health and Safety Code Section 7050.5 states that no further disturbances shall occur in the immediate area until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code Section 5097.98. In addition, in accordance with State and local guidelines, if the Coroner determines the remains to be of a Native American, the Coroner shall contact the Native American Heritage Commission within 24 hours for identification of the most likely descendent of the deceased Native American. Additionally, if the remains are determined to be Native American, the City would work with local Native American representatives to ensure that the remains and any associated artifacts are treated in a respectful and dignified manner and as required under Mitigation Measures CR-4 through CR-6. Despite the applicable regulatory framework and the relatively low likelihood of discovery, it remains possible that the proposed Project would discover human remains during subsurface activities, which could then result in the remains being inadvertently damaged.

To reduce this potentially significant impact to a less than significant level, Mitigation Measures CR-4 through CR-6 would be implemented.

Cumulative Impacts

The proposed Project would result in less than significant impacts to historical, known archaeological resources, or known human remains after implementation of mitigation. The chances of cumulative impacts occurring as a result of Project implementation plus implementation of other projects in the region are not likely since proposed projects would be subject to individual project-level environmental review. Since there would be no project-related significant impacts and due to existing laws and regulations in place to protect cultural resources and prevent significant impacts to archaeological resources, or known human remains, the potential incremental effects of the proposed Project would not be cumulatively considerable.

6. Energy

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Discussion

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? ***Less Than Significant Impact.***

Southern California Edison (SCE) provides electricity to the Project area and Southern California Gas Company (SCG) provides natural gas service to the Project area. The Project proposes to develop one warehouse/parcel delivery service building with ancillary office/retail space and associated parking and landscaping, consistent with the land use designation and zoning identified for the Project site.

During construction, transportation energy use depends on the type and number of trips, vehicle miles traveled, fuel efficiency of vehicles, and travel mode. Transportation energy use during construction would come from the transport and use of construction equipment, delivery vehicles and haul trucks, and construction employee vehicles that would use diesel fuel and/or gasoline. The use of energy resources by these vehicles would fluctuate according to the phase of construction and would be temporary. Most construction equipment during grading would be gas-powered or diesel-powered, and the later construction phases would require electricity-powered equipment. Impacts related to transportation energy use during construction would be temporary and would not require expanded energy supplies or the construction of new infrastructure; impacts would not be significant.

During operations, energy consumption would be associated with ongoing operations at the warehousing building. Off-road operational equipment, such as forklifts, would be electric or powered by compressed natural gas. The Project would also include 1,000 on-site trees, which would reduce interior building temperatures and related energy demands. The Project site and surrounding areas are highly urbanized with numerous gasoline fuel facilities and infrastructure. Consequently, the proposed Project would not result in a substantial demand for energy that would require expanded supplies or the construction of other infrastructure or expansion of existing facilities. The Project does not include proposed uses or unusual characteristics that would require the use of equipment that would be more energy intensive than is used for comparable activities. Furthermore, the Project would not include uses or operations that would inherently result in excessive and wasteful vehicle trips thus, fuel consumption associated with vehicle trips generated by the proposed Project would not be considered inefficient, wasteful, or unnecessary. Accordingly, the proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Therefore, a less than significant impact would occur in this regard and no mitigation is required.

b) *Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?* ***Less Than Significant Impact.***

The proposed Project would develop one warehouse/parcel delivery service building with ancillary office/retail space and associated parking and landscaping. As discussed in Response 17 (b), the proposed Project would not exceed a level of service standard established by the CMP for designated roads or highways. Furthermore, the proposed Project would comply with the applicable General Plan Policies and actions identified below:

> ***Policy OSC-4.15: Green Building Practices****. Promote green building practices that support healthy indoor living and working environments that are well-ventilated and contaminant-free.*
>
> ***Policy OSC-5.2: Greenhouse Gas Reduction in New Development.*** *Reduce greenhouse gas emissions from new development by discouraging auto-dependent sprawl and dependence on the private automobile; promoting water conservation and recycling; promoting development that is compact, mixed use, pedestrian friendly, and transit oriented; promoting energy-efficient building design and site planning; improving the jobs/housing ratio; and other methods of reducing emissions.*

Additionally, the proposed Project would comply with CalGreen and Title 24 energy standards and would use energy efficiently. SCAG's 2016–2040 RTP/SCS establishes GHG emissions goals for automobiles and light-duty trucks for 2020 and 2035 as well as an overall GHG target for the project region consistent with both the target date of AB 32 and the post-2020 GHG reduction goals of EOs 5-03-05 and B-30-15. As discussed in response to Threshold 8 (b), below, the proposed Project would not result in any significant impacts or interfere with SCAG's ability to achieve the region's post-2020 mobile source GHG reduction targets. Additionally, as discussed further below in response to Threshold 8 (b), the proposed Project would be consistent with the California Air Resources Board (CARB) Scoping Plan measures as well as the overall goals of the City of Upland's Climate Action Plan (UCAP). The UCAP is the City's long-term vision for how Upland can be more environmentally friendly and provides guidance for residents. Potential impacts are considered less than significant, and no mitigation is required.

Cumulative Impacts

Projects in the vicinity of the proposed Project that are approved and pending implementation are discussed in *Section VI.17, Transportation*. However, the proposed Project would not result in direct or indirect significant impacts related to energy. Therefore, the proposed Project would not result in incremental effects to energy that could be compounded or increased when considered together with similar effects from other past, present, and reasonably foreseeable probable future projects. As a result, no cumulative significant impacts related to energy would occur.

7. Geology and Soils

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☒	☐	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	☐	☒	☐	☐

Discussion

A Geotechnical Investigation was prepared for the proposed Project by Southern California Geotechnical in November 2019. The report is provided in **Appendix C**; the results and conclusions of the report are summarized herein.

a) *Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:*

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

The Alquist-Priolo Earthquake Fault Zoning Act (Act) was passed in 1972 to address the hazard of surface faulting to structures for human occupancy. The Act's main purpose is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The Act requires the State Geologist to establish regulatory zones, known as "Alquist-Priolo (AP) Earthquake Fault Zones" around the surface traces of active faults and to issue appropriate maps. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (typically 50 feet). Based on the Geotechnical Investigation, the proposed Project site is not located within an AP Earthquake Fault Zone and no evidence of faulting was observed during the investigation. Therefore, the potential for damage due to direct fault rupture is considered to be low. The possibility of significant fault rupture on the Project site is considered to be less than significant and no mitigation is required.

ii. *Strong seismic ground shaking?* ***Less Than Significant Impact.***

The Project site is located in an area of high regional seismicity with numerous faults capable of producing significant ground motions located near the site including active faults systems such as the San Andreas fault and San Jacinto fault systems, both located within 30 miles of the Project site. Several major faults are located within the City, including the Cucamonga-Sierra Madre, Red Hill, and San Jose faults. The closest Alquist Priolo fault is a portion of the Cucamonga fault system, located approximately 2.5 miles northeast of the Project site. The closest known major earthquake fault to the proposed Project is the San Jose fault located predominantly to the southwest of the site, but approximately 900 feet to the northwest at its closest point to the proposed Project.[7] The Red Hill, Indian Hill, Stoddard Canyon, and San Antonio faults are also located in the regional vicinity and ground shaking originating from these or other faults in the region could subject the proposed Project site to strong ground motions and impact the proposed Project. The proposed Project would be required to be constructed in conformance with the California Building Code (CBC), City regulations, and other applicable standards. Conformance with standard engineering practices and design criteria would reduce the effects of seismic ground shaking to a less than significant level. No mitigation is required.

iii. *Seismic-related ground failure, including liquefaction?* ***Less than Significant Impact.***

Liquefaction is the loss of strength that generally occurs as a "quicksand" type of ground failure caused by strong ground shaking. Liquefaction generally occurs in cohesionless, saturated soils when the pore-water pressure induced in the soil by a seismic event becomes equal to or exceeds the overburden pressure. The primary factors influencing liquefaction potential include groundwater, soil type, relative density of the sandy soils, confining

[7] Caltech, 2017. – Southern California Earthquake Data Center. Available at: http://scedc.caltech.edu/significant/index.html Accessed September 25, 2019.

pressure, and the intensity and duration of ground shaking. The potential for liquefaction generally occurs during strong ground shaking within relatively loose sediments where the groundwater is usually less than 50-feet. Although the California Geological Survey has not yet conducted detailed seismic hazard mapping in the area, the San Bernardino County Official Land Use Plan, General Plan, Geologic Hazard Overlay does not show the proposed Project within an area susceptible to liquefaction (San Bernardino County, 1994). Based on the listed mapping, and the subsurface conditions encountered during the geotechnical investigation from the boring locations, impacts from liquefaction are considered less than significant.

iv. *Landslides?* ***No Impact.***

Landslides are mass movements of the ground that include rock falls, relatively shallow slumping and sliding of soil, and deeper rotational or transitional movement of soil or rock. The Project site consists of both disturbed and undeveloped land. An outdoor rock and gravel stockpiling and processing operation is located on the northwest corner of the Project site. Other than stockpiles of sand and gravel, the Project site is relatively flat; however, landscaped slopes would be formed on the southern and western perimeter of the site. The Project would be planned and constructed in accordance with CBC, City regulations, and other applicable standards. According to the San Bernardino County Geologic Hazard Overlay Map, the proposed Project is not located within an area susceptible to landslides[8] (San Bernardino County, 1994). Therefore, there would be no impact from landslides on the proposed Project and no mitigation is required.

b) Result in substantial soil erosion or the loss of topsoil? ***Less Than Significant Impact.***

Grading during the construction phase of the proposed Project would displace soils and temporarily increase the potential for soils to be subject to wind and water erosion. However, erosion and loss of topsoil would be controlled using standard erosion control practices during construction. Accordingly, the proposed Project would be required to prepare a SWPPP under the National Pollutant Discharge Elimination System (NPDES) General Construction Permit to implement Best Management Practices (BMPs) to minimize stormwater runoff during construction. Adherence to the SWPPP with the recommendations of the Water Quality Management Plan prepared for the proposed Project would reduce possible impacts related to the erosion to less than significant. No mitigation is required.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? ***Less Than Significant Impact with Mitigation Incorporated.***

The Project site is not identified as being located on a geologic unit or soil that has been identified as being unstable or having the potential to result in on-site or off-site landslide, lateral spreading, subsidence, liquefaction or collapse. The Geotechnical Investigation for the proposed Project site found impacts due to liquefaction to be less than significant. There would be no impacts from landslides because the proposed Project site is relatively flat and is not located near any areas with steep topography that would be susceptible to landslides.

[8] San Bernardino County, Geologic Hazard Overlay Maps. 2009. Available at: http://cms.sbcounty.gov/lus/planning/zoningoverlaymaps/geologichazardmaps.aspx. Accessed September 25, 2019.

The proposed Project site consists of artificial fill materials at most of the trench locations, extending to depths of 1 to 8 feet from either below the ground surface or from beneath the existing pavements. The fill soils and near-surface alluvial soils possess variable densities and strengths. The fill soils possessed varying amounts of trash and debris including fragments of brick, wire, paper, plastic, metal, wood, tree stumps, glass, concrete and asphalt. In addition, the existing fill soils are considered to represent undocumented fill. These soils, in their present condition, are not considered suitable for support of the foundation loads of the proposed structures. Remedial grading would be required to remove the undocumented fill and the upper portion of the near-surface native alluvium and replace these materials as compacted structural fill.

The Geotechnical Investigation stated that removal and recompaction of the artificial fill and near-surface native soils would be estimated to result in an average shrinkage of 6 to 14%. Minor ground subsidence is expected to occur in the soils below the zone of removal due to settlement and machinery working. The subsidence is estimated to be 0.1 feet. This estimate is based on previous experience and the subsurface conditions encountered at the test boring locations. The actual amount of subsidence is expected to be variable and will be dependent on the type of machinery used, repetitions of use, and dynamic effects.

The Geotechnical Investigation includes recommendations to ensure that soils are made appropriate for development of the proposed Project on the Project site. The recommendations, including overexcavation of soils so that a uniform blanket of structural fill can be created to support the proposed structures, are included as a part of Mitigation Measure GEO-1, below. Implementation of mitigation would reduce impacts associated with consolidation and collapse to less than significance.

Mitigation Measure

GEO-1: Prior to issuance of a grading permit, the developer shall, to the satisfaction of the City Public Works Director, show that precise grading plan(s) include(s) all recommendations contained in the geotechnical investigation report prepared for the proposed Project. The performance standard for this measure is to assure that all recommended grading and structures for the project conform to City standards.

d) Be located on expansive soil, as defined in Table 18-1-B of the California Building Code (2013), creating substantial direct or indirect risks to life or property? **Less Than Significant Impact.**

The subsurface exploration conducted for this Project consisted of twenty-one (21) exploratory trenches excavated to depths of 5 to 10 plus or minus feet below the existing site grades. Soils were classified using the Unified Soil Classification System (USCS) in accordance with ASTM-D2488, soil densities were determined using ASTM D-2937, consolidation potential was tested using ASTM D-2435, and maximum dry density and optimum moisture content was tested per ASTM D-1557.

The near-surface soils generally consist of silty sands, sands and gravelly sands. These materials have been visually classified as very low to non-expansive. The soils do not require special design considerations required related to expansive soils. In addition, the proposed Project would be required to conform to the California Building Code, city regulations, and other applicable construction and design standards. Conformance with standard engineering practices and design criteria would ensure impacts related to expansive soil potential remain less than significant.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? **No Impact.**

The proposed Project does not include the implementation of septic tanks or alternative wastewater disposal systems. Therefore, no impact would occur and no mitigation is required.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature? ***Less Than Significant Impact with Mitigation Incorporated.***

The geotechnical investigation prepared for the Project does not identify the presence of any unique geological features on the Project site. Furthermore, the City's General Plan does not identify any unique geological features within the City of Upland. Thus, the proposed Project would not directly or indirectly destroy a unique geological feature.

According to the General Plan, strata associated with late Pleistocene alluvial deposition, which have moderate potential for paleontological resources, may be exposed during deep excavations. Excavations up to approximately 25 feet are anticipated to occur with Project implementation. Should evidence of paleontological resources be encountered during grading and construction, operations would be required to cease, and the contractor would be required to retain a qualified paleontologist to evaluate the significance of the finding. While fossils are not expected to be discovered during construction, it is possible that significant fossils could be discovered during excavation activities, even in areas with a low likelihood of occurrence. Fossils encountered during excavation could be inadvertently damaged. If a unique paleontological resource is discovered, the impact to the resource could be significant.

Implementation of Mitigation Measure GEO-2 would be required to reduce this potential impact to a level of less than significant level.

Mitigation Measure

GEO-2: Prior to the issuance of any grading permits, or any permit authorizing ground disturbance, the Project applicant shall, to the satisfaction of the City Planning Division, demonstrate that a qualified paleontological monitor has been retained to be present during excavation or any mass grading activities. In the event that fossils or fossil-bearing deposits are discovered during construction, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation and, if necessary, salvage. An appropriate buffer area shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. excavations within 50 feet of the find shall be temporarily halted or diverted. The paleontologist shall document the discovery as needed in accordance with Society of Vertebrate Paleontology standards, evaluate the potential resource, and assess the significance of the find under the criteria set forth in CEQA Guidelines Section 15064.5. The paleontologist shall notify the appropriate agencies to determine procedures that would be followed before construction is allowed to resume at the location of the find. If in consultation with the paleontologist, City staff and the project applicant determine that avoidance is not feasible, the paleontologist shall prepare an excavation plan for reducing the effect of the project on the qualities that make the resource important. The plan shall be submitted to the City for review and approval and the project applicant shall implement the approval plan.

Cumulative Impacts

Projects in the vicinity of the proposed Project that are approved and pending implementation are discussed in *Section VI.17, Transportation*. However, the potential cumulative impact related to earth and geology is typically site specific. The analysis herein determined that the proposed Project would not result in any significant impacts related to landform modification, grading, or the destruction of a geologically significant landform or feature or unique paleontological resource with implementation of mitigation. Moreover, existing State and local laws and regulations are in place to protect people and property from substantial adverse geological and soils effects, including fault rupture, strong seismic

ground shaking, seismic-induced ground failure (including liquefaction), and landslides. Existing laws and regulations also protect people and property from adverse effects related to soil erosion, expansive soils, loss of topsoil, development on an unstable geologic unit or soil type that could result in on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse. These existing laws and regulations, along with mitigation assigned to the proposed Project, would render potentially adverse geological and soil effects of the proposed Project to a level considered less than significant. Moreover, these existing laws and regulations also ensure that past, present, and reasonably foreseeable future projects in the City of Upland and surrounding region do not result in substantial adverse geological and soils effects. As a result, the existing legal and regulatory framework would ensure that the incremental geological and soils effects of the proposed Project would not result in greater adverse cumulative effects when considered together with the effects of other past, present, and reasonably foreseeable future projects in the region. The impacts of the proposed project-related to geology and soils would be less than cumulatively considerable.

8. Greenhouse Gas Emissions

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Discussion

An Air Quality Assessment and Greenhouse Gas Emissions Assessment for the Project were prepared by Kimley-Horn (October 2019). The reports are provided in Appendix A-1 and A-2; the results and conclusions of the report are summarized herein.

As further discussed in *Section VI.17, Transportation,* although the site is zoned to accommodate truck traffic associated with a Commercial/Industrial Mixed-Use facility, a total of 25 trucks would arrive to the facility daily (for a total of 50 truck trips), of which 2% would occur during each of the a.m. and p.m. peak hours. All trucks would access the site via the driveway at the north leg of Central Avenue/Foothill Boulevard.

Certain gases in the earth's atmosphere, classified as greenhouse gases (GHGs), play a critical role in determining the earth's surface temperature. Emissions of GHGs contributing to global climate change are attributable in large part to human activities associated with transportation, industrial/manufacturing, utility, residential, commercial, and agricultural emissions sectors. California is a significant emitter of CO_2e in the world. The State of California has adopted various administrative initiatives and legislation relating to climate change, much of which set aggressive goals for GHG emissions reductions statewide. The SCAQMD has formed a GHG CEQA Significance Threshold Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. For all industrial projects, the SCAQMD adopted a screening threshold of 10,000 $MTCO_2$-eq per year. SCAQMD concluded that projects with emissions less than the screening threshold would not result in a significant cumulative impact. As the proposed Project involves the construction of one warehouse/parcel delivery service building, the 10,000 $MTCO_2$-eq per year industrial screening threshold has been selected as the significance threshold.

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? ***Less than Significant Impact.***

Short-Term Construction Greenhouse Gas Emissions

The proposed Project would result in direct emissions of GHGs from construction. The approximate quantity of daily GHG emissions generated by construction equipment utilized to build the proposed Project is depicted in **Table 8**, **Construction-Related Greenhouse Gas Emissions**.

Table 8: Construction-Related Greenhouse Gas Emissions

Category	$MTCO_2e$
Total Construction Emissions	1,012
30- Year Amortized Construction	34
Source: CalEEMod version 2016.3.2. Refer to Appendix A-2 for model outputs.	

As shown in Table 8, Project construction would result in the generation of approximately 1,012 $MTCO_2e$ over the course of construction. Construction GHG emissions are typically summed and amortized over the lifetime of the Project (assumed to be 30 years), then added to the operational emissions[9]. The amortized Project construction emissions would be 34 $MTCO_2e$ per year. Once construction is complete, the generation of these GHG emissions would cease.

Long-Term Operational Greenhouse Gas Emissions

Operational or long-term emissions occur over the life of the proposed Project. GHG emissions would result from direct emissions such as Project generated vehicular traffic, on-site combustion of natural gas, and operation of any landscaping equipment. Operational GHG emissions would also result from indirect sources, such as off-site generation of electrical power, the energy required to convey water to, and wastewater from the Project site, the emissions associated with solid waste generated from the Project site, and any fugitive refrigerants from air conditioning or refrigerators.

The Project site currently consists of existing undeveloped land and industrial uses, including outdoor rock and gravel stockpiling and processing operations. The sand and gravel processing plant uses eight pieces off-road heavy-duty diesel equipment, such as rubber tired loaders, stackers, static and mobile screens, cone and crushers, and water trucks. Additionally, the existing sand and gravel processing operations include approximately 78 trucks per day to off-haul materials processed on-site. As discussed in *Section VI.17, Transportation*, the traffic study conservatively does not take credit for the existing rucks.

Total GHG emissions associated with proposed Project are summarized in **Table 9, Project Greenhouse Gas Emissions**. **Table 10** shows the existing emissions that are generated from the current on-site operations as well as the net increase in maximum daily emissions that would occur with implementation of the Project. As shown in Table 9, the Project would generate approximately 6,121 $MTCO_2e$ annually of GHG emissions from both construction and operations. The net increase of emissions would be 5,222 $MTCO_2e$ per year and the proposed Project would not

[9] The project lifetime is based on the standard 30-year assumption of the South Coast Air Quality Management District (South Coast Air Quality Management District, Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #13, August 26, 2009).

exceed the SCAQMD GHG threshold of 10,000 $MTCO_2e$ per year. Therefore, Project-related GHG emissions would be less than significant and no mitigation measures are required.

Table 9: Project Greenhouse Gas Emissions

Emissions Source	$MTCO_2e$ per Year
Construction Amortized Over 30 Years	34
Area Source	0.03
Energy	418
Mobile	5,114
Off-road	211
Waste	66
Water and Wastewater	278
Total	*6,121*
Existing Emissions	899
Net Increase	**5,222**
SCAQMD Industrial Project Threshold	10,000
Exceeds SCAQMD Threshold?	**No**
Source: CalEEMod version 2016.3.2. Refer to Appendix A-2 for model outputs.	

b) *Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?* ***Less than Significant Impact.***

The City of Upland has prepared the Climate Action Plan (UCAP) to identify opportunities for a cleaner city. The UCAP serves as a long-term vision for how Upland can be more environmentally friendly and provides guidance for residents, City staff, and decision makers in the community on how to achieve future sustainability goals. The goals outlined in the UCAP target GHG emissions in 2035; see Table 10, City of Upland Climate Action Plan Consistency, for Project consistency with these goals. As shown in Table 10, the Project would not conflict with City's goals within the UCAP.

Table 10: City of Upland Climate Action Plan Consistency

Upland Goals		Compliance	
GOAL 1:	Encourage the use of zero emission vehicles, low-emission vehicles, non-motorized vehicles and bicycles, and car-sharing programs by requiring sufficient and convenient infrastructure and parking facilities in employment centers to accommodate these vehicles.	Consistent:	The current CalGreen Code and mitigation measure AQ-3 would require six% of the project's required parking spaces to include infrastructure for electric vehicle charging.
GOAL 2:	Give preference to professional maintenance providers using reduced emission equipment for contracts for services (e.g., landscape maintenance), as well as businesses which practice sustainable operations, to the extent that it is economically feasible to do so.	N/A:	This is not a project-specific goal and is therefore not applicable. The City does not have a policy in place to provide guidance or regulate the selection of contracts for services between private entities.

Table 10: City of Upland Climate Action Plan Consistency

Upland Goals		Compliance	
GOAL 3:	Reduce commute times for Upland residents and employees by providing more local employment near transit.	Consistent:	The Project provides employment opportunities for Upland residents. There are several bus stops located adjacent to the Project site.
GOAL 4:	Promote expansion of employment opportunities within Upland to reduce commuting to areas outside of the City.	Consistent:	The Project provides employment opportunities within the City for Upland residents.
GOAL 5:	Reduce greenhouse gas emissions from new development by; promoting water conservation and recycling; promoting development that is compact, mixed use, pedestrian friendly, and transit oriented; promoting energy-efficient building design and site planning; improving the jobs/housing ratio; and other methods of reducing emissions.	Consistent:	Project would comply with the General Plan and the Zoning Code to facilitate reductions in GHG emissions. The Project would also meet CalGreen and Title 24 energy standards to use energy efficiently and to include drought-tolerant landscaping and water efficient irrigation systems. The Project is also located adjacent to several bus stops along Foothill Boulevard and Central Avenue.
GOAL 6:	Require that deciduous trees be planted on the south- and west-facing sides of new buildings onsite to reduce energy use in the summer and winter months.	Consistent:	The Project complies with Chapter 17.07.040 Landscaping in the City of Upland Municipal Code.
GOAL 7:	Promote green building practices that support healthy indoor living and working environments that are well ventilated and contaminant-free.	Consistent:	The Project would comply with CalGreen and Title 24 energy standards and will use energy efficiently.
GOAL 8:	Require new development to comply with the California Green Building Code (CalGreen) adopted by the California Building Standards Commission at the time of building permit application.	Consistent:	See response to UCAP Goal 7.
GOAL 9:	Encourage the installation and construction of renewable energy systems and facilities such as wind, solar, hydropower, geothermal, and biomass facilities.	N/A:	This is not a project-specific policy and is therefore not applicable. Project would comply with the 2014 Zoning Code Update.
GOAL 10:	Establish water demand reduction standards for new development and redevelopment to reduce per capita and total water demand.	Consistent:	See response to UCAP Goal 7.
GOAL 11:	Require new development projects to adopt best management practices for water use efficiency and demonstrate specific water conservation measures.	Consistent:	See response to UCAP Goal 7.

The Open Space and Conservation Element of the City's General Plan also includes GHG related policies. The majority of these policies are municipal measures, such as requiring a Citywide GHG assessment, climate change assessment and monitoring, reduced emissions for City operations, preference for reduced-emissions equipment, City employee transportation systems management and trip reduction, adopting green buildings standards, and LEED standards for public buildings. Policies relevant to development projects include Policy OSC-5.2 (GHG reduction in new development) and Policy OSC-5.5 (requiring emissions reductions for development projects that exceed SCAQMD thresholds), Policy OSC-5.2 promotes water conservation and recycling, promoting energy efficient building design, and improving the jobs/housing ratio. The Project proposes one warehouse/parcel delivery service building with an ancillary office/retail space and associated parking and landscaping that would implement water conservation and energy efficiency measures pursuant to the latest building codes and City requirements. Regarding Policy OSC-5.5, the Project would not exceed SCAQMD thresholds and would not be required to further reduce emissions. Also, per Policy OSC-5.8 and the latest building codes, the Project would be required to include electric vehicle infrastructure and charging stations.

SCAG RTP/SCS Consistency

On April 7, 2016, the Southern California Association of Governments (SCAG) Regional Council adopted the *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy* (RTP/SCS). The RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. The RTP/SCS embodies a collective vision for the region's future and is developed with input from local governments, county transportation commissions, tribal governments, nonprofit organizations, businesses, and local stakeholders in the counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura. SCAG's RTP/SCS establishes GHG emissions goals for automobiles and light-duty trucks for 2020 and 2035 as well as an overall GHG target for the Project region consistent with both the target date of AB 32 and the post-2020 GHG reduction goals of Executive Orders 5-03-05 and B-30-15.

The RTP/SCS contains over 4,000 transportation projects, ranging from highway improvements, railroad grade separations, bicycle lanes, new transit hubs and replacement bridges. These future investments were included in county plans developed by the six county transportation commissions and seek to reduce traffic bottlenecks, improve the efficiency of the region's network, and expand mobility choices for everyone. The RTP/SCS is an important planning document for the region, allowing project sponsors to qualify for federal funding.

The plan accounts for operations and maintenance costs to ensure reliability, longevity, and cost effectiveness. The RTP/SCS is also supported by a combination of transportation and land use strategies that help the region achieve state GHG emissions reduction goals and Federal Clean Air Act (FCAA) requirements, preserve open space areas, improve public health and roadway safety, support our vital goods movement industry, and utilize resources more efficiently. GHG emissions resulting from development-related mobile sources are the most potent source of emissions, and therefore Project comparison to the RTP/SCS is an appropriate indicator of whether the proposed Project would inhibit the post-2020 GHG reduction goals promulgated by the state. The proposed Project's consistency with the RTP/SCS goals is analyzed in detail in, **Table 11, Regional Transportation Plan/Sustainable Communities Strategy Consistency.**

Table 11: Regional Transportation Plan/Sustainable Communities Strategy Consistency

Upland Goals		Compliance	
GOAL 1:	Align the plan investments and policies with improving regional economic development and competitiveness.	N/A:	This is not a project-specific policy and is therefore not applicable.
GOAL 2:	Maximize mobility and accessibility for all people and goods in the region.	N/A:	This is not a transportation improvement project and is therefore not applicable.
GOAL 3:	Ensure travel safety and reliability for all people and goods in the region.	N/A:	This is not a transportation improvement project and is therefore not applicable.
GOAL 4:	Preserve and ensure a sustainable regional transportation system.	N/A:	This is not a transportation improvement project and is therefore not applicable.
GOAL 5:	Maximize the productivity of our transportation system.	N/A:	This is not a transportation improvement project and is therefore not applicable.
GOAL 6:	Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).	N/A:	This is not a project-specific policy. However, the Project is required to comply with the provisions of the California Building Energy Efficiency Standards and the Green Building Standards Code (CALGreen) and is located in an infill area near existing development and transit.
GOAL 7:	Actively encourage and create incentives for energy efficiency, where possible.	N/A:	This is not a project-specific policy and is therefore not applicable.
GOAL 8:	Encourage land use and growth patterns that facilitate transit as well as non-motorized transportation.	Consistent:	See response to RTP/SCS Goal 6.
GOAL 9:	Maximize the security of our transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.	N/A:	This is not a transportation improvement project and is therefore not applicable.

Source: Southern California Association of Governments, Regional Transportation Plan/Sustainable Communities Strategy, 2016.

The UCAP determined that implementation of GHG policies as well as compliance with applicable State standards would ensure consistency with state and regional GHG reduction planning efforts. The goals stated in the RTP/SCS were used to determine consistency with the planning efforts previously stated. As shown in Table 11, the proposed Project would be consistent with the stated goals of the RTP/SCS and the CARB Scoping Plan. Therefore, the proposed Project would not result in any significant impacts or interfere with SCAG's ability to achieve the region's post-2020 mobile source GHG reduction targets.

Consistency with the CARB Scoping Plan

The California State Legislature adopted AB 32 in 2006. AB 32 focuses on reducing GHGs (carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride) to 1990 levels by the year 2020. Pursuant to the requirements in AB 32, CARB adopted the *Climate Change Scoping Plan* (CCSP) in 2008, which outlines actions recommended to obtain that goal.

The CCSP provides a range of GHG reduction actions that include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as the cap-and-trade program, and an AB 32 implementation fee to fund the program. As shown in **Table 12, Project Consistency with Applicable CARB Scoping Plan Measures**, the proposed Project is consistent with most of the strategies, while others are not applicable to the proposed Project.

The 2017 CCSP Update identifies additional GHG reduction measures necessary to achieve the 2030 target. These measures build upon those identified in the first update to the CCSP in 2013. Although a number of these measures are currently established as policies and measures, some measures have not yet been formally proposed or adopted. It is expected that these actions to reduce GHG emissions will be adopted as required to achieve statewide GHG emissions targets. As such, impacts related to consistency with the Scoping Plan would be less than significant.

Table 12: Project Consistency with Applicable CARB Scoping Plan Measures

Scoping Plan Sector	Scoping Plan Measure	Implementing Regulations	Project Consistency
Transportation	California Cap-and-Trade Program Linked to Western Climate Initiative	Regulation for the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanism October 20, 2015 (CCR 95800)	**Consistent.** The Cap-and-Trade Program applies to large industrial sources such as power plants, refineries, and cement manufacturers. However, the regulation indirectly affects people who use the products and services produced by these industrial sources when increased cost of products or services (such as electricity and fuel) are transferred to the consumers. The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, generated in-state or imported. Accordingly, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program. The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and combustion of other fossil fuels not directly covered at large sources in the Program's first compliance period.
	California Light-Duty Vehicle Greenhouse Gas Standards	Pavley I 2005 Regulations to Control GHG Emissions from Motor Vehicles Pavley I 2005 Regulations to Control GHG Emissions from Motor Vehicles	**Consistent**. This measure applies to all new vehicles starting with model year 2012. The proposed Project would not conflict with its implementation as it would apply to all new passenger vehicles purchased in California. Passenger vehicles, model year 2012 and later, associated with construction and operation of the proposed Project would be required to comply with the Pavley emissions standards.
		2012 LEV III California GHG and Criteria Pollutant Exhaust and Evaporative Emission Standards	**Consistent.** The LEV III amendments provide reductions from new vehicles sold in California between 2017 and 2025. Passenger vehicles associated with the site would comply with LEV III standards.
	Low Carbon Fuel Standard	2009 readopted in 2015. Regulations to Achieve Greenhouse Gas Emission Reductions Subarticle 7. Low Carbon Fuel	**Consistent.** This measure applies to transportation fuels utilized by vehicles in California. The proposed Project would not conflict with implementation of this measure. Motor vehicles associated with construction and operation of the proposed Project would utilize low carbon transportation fuels as required under this

Table 12: Project Consistency with Applicable CARB Scoping Plan Measures

Scoping Plan Sector	Scoping Plan Measure	Implementing Regulations	Project Consistency
		Standard CCR 95480	measure.
	Regional Transportation-Related Greenhouse Gas Targets.	SB 375. Cal. Public Resources Code §§ 21155, 21155.1, 21155.2, 21159.28	**Consistent.** The proposed Project would provide development in the region that is consistent with the growth projections in the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).
	Goods Movement	Goods Movement Action Plan January 2007	**Not applicable**. The proposed Project does not propose any changes to maritime, rail, or intermodal facilities or forms of transportation.
	Medium/Heavy-Duty Vehicle	2010 Amendments to the Truck and Bus Regulation, the Drayage Truck Regulation and the Tractor-Trailer Greenhouse Gas Regulation	**Consistent.** This measure applies to medium and heavy-duty vehicles that operate in the state. The proposed Project would not conflict with implementation of this measure. Medium and heavy-duty vehicles associated with construction and operation of the proposed Project would be required to comply with the requirements of this regulation.
	High Speed Rail	Funded under SB 862	**Not applicable.** This is a statewide measure that cannot be implemented by a project applicant or Lead Agency.
Electricity and Natural Gas	Energy Efficiency	Title 20 Appliance Efficiency Regulation	**Consistent.** The proposed Project would not conflict with implementation of this measure. The proposed Project would comply with the latest energy efficiency standards.
		Title 24 Part 6 Energy Efficiency Standards for Residential and Non-Residential Building	
		Title 24 Part 11 California Green Building Code Standards	
	Renewable Portfolio Standard/Renewable Electricity Standard.	2010 Regulation to Implement the Renewable Electricity Standard (33% 2020)	**Consistent.** The Project would obtain electricity from the electric utility, Southern California Edison (SCE). SCE obtained 28% of its power supply from renewable sources in 2016. Therefore, the utility would provide power when needed on site that is composed of a greater percentage of renewable sources.
	Million Solar Roofs Program	SB 350 Clean Energy and Pollution Reduction Act of 2015 (50% 2030)	
	Million Solar Roofs Program	Tax Incentive Program	**Consistent.** This measure is to increase solar throughout California, which is being done by various electricity providers and existing solar programs. The program provides incentives that are in place at the time of construction.
Water	Water	Title 24 Part 11 California Green Building Code Standards	**Consistent.** The proposed Project would comply with the California Green Building Standards Code, which requires a 20% reduction in indoor water use. The proposed Project would also comply with the City's Water-Efficient Landscaping Regulations (Chapter 17.12 of the Upland Municipal Code).
		SBX 7-7—The Water Conservation Act of 2009 Model Water Efficient Landscape Ordinance	
Green Buildings	Green Building Strategy	Title 24 Part 11 California Green	**Consistent.** The State is to increase the use of green building practices. The proposed Project would

Table 12: Project Consistency with Applicable CARB Scoping Plan Measures

Scoping Plan Sector	Scoping Plan Measure	Implementing Regulations	Project Consistency
		Building Code Standards	implement required green building strategies through existing regulation that requires the proposed Project to comply with various CalGreen requirements. The proposed Project includes sustainability design features that support the Green Building Strategy.
Industry	Industrial Emissions	2010 CARB Mandatory Reporting Regulation	**Not applicable.** The Mandatory Reporting Regulation requires facilities and entities with more than 10,000 MTCO2e of combustion and process emissions, all facilities belonging to certain industries, and all electric power entities to submit an annual GHG emissions data report directly to CARB. As shown above, total Project GHG emissions would not exceed 10,000 MTCO2e. Therefore, this regulation would not apply.
Recycling and Was Management	Recycling and Waste	Title 24 Part 11 California Green Building Code Standards	**Consistent.** The proposed Project would not conflict with implementation of these measures. The proposed Project is required to achieve the recycling mandates via compliance with the CALGreen code. The City has consistently achieved its state recycling mandates.
		AB 341 Statewide 75 Percent Diversion Goal	
Forests	Sustainable Forests	Cap and Trade Offset Projects	**Not applicable.** The proposed Project site is in an area designated for urban uses. No forested lands exist on-site.
High Global Warming Potentia	High Global Warming Potential Gases	CARB Refrigerant Management Program CCR 95380	**Not applicable.** The regulations are applicable to refrigerants used by large air conditioning systems and large commercial and industrial refrigerators and cold storage system. The proposed Project would not conflict with the refrigerant management regulations adopted by CARB.
Agriculture	Agriculture	Cap and Trade Offset Projects for Livestock and Rice Cultivation	**Not applicable.** The proposed Project site is designated for urban development. No grazing, feedlot, or other agricultural activities that generate manure occur currently exist on-site or are proposed to be implemented by the proposed Project.

Source: California Air Resources Board, *California's 2017 Climate Change Scoping Plan*, November 2017 and CARB, *Climate Change Scoping Plan*, December 2008.

The Project is estimated to emit approximately 6,121 $MTCO_2e$ per year (5,222 $MTCO_2e$ per year net emissions) directly from on-site activities and indirectly from off-site motor vehicles, see Table 9. The GHG emissions caused by long-term operation of the proposed would be less than significant.

Regarding goals for 2050 under Executive Order S-3-05, at this time it is not possible to quantify the emissions savings from future regulatory measures, as they have not yet been developed; nevertheless, it can be anticipated that operation of the proposed Project would comply with all applicable measures are enacted that state lawmakers decide would lead to an 80% reduction below 1990 levels by 2050.

Cumulative Impacts

It is generally the case that an individual project of this size and nature is of insufficient magnitude by itself to influence climate change or result in a substantial contribution to the global GHG

inventory. GHG impacts are recognized as exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective. The additive effect of project-related GHGs would not result in a reasonably foreseeable cumulatively considerable contribution to global climate change. In addition, the proposed Project as well as other cumulative related projects, which are discussed further in *Section VI.17, Transportation*, would also be subject to all applicable regulatory requirements, which would further reduce GHG emissions. As shown in Table 10 and Table 11, the proposed Project would not conflict with the City's Climate Action Plan or the RTP/SCS. As a result, the Project would not conflict with any GHG reduction plans including the CARB Scoping Plan. Therefore, the Project's cumulative contribution of GHG emissions would be less than significant and the Project's cumulative GHG impacts would also be less than cumulatively considerable.

9. Hazards and Hazardous Materials

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

Discussion

A *Phase I Environmental Site Assessment was* prepared for the proposed Project by Ardent Environmental Group, Inc. (May 2018) and is provided as **Appendix D**; the results of the report is summarized herein.

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? ***Less Than Significant Impact.***

Per the Phase I Environmental Site Assessment (ESA), the Project site was historically vacant land until approximately 2002, when a portion of the site was occupied by an outdoor rock and gravel stockpiling and processing operation for the production of road base, sand and gravel. The eastern and southern portions of the site remain vacant, undeveloped land. No buildings are located on the site. Ardent concluded that there were no on- or off-site environmental concerns for the Project site and recommended no further investigation.

Once the proposed Project is constructed, hazardous materials would be limited to those associated with a warehouse/parcel delivery service facility. These include cleaners, paints,

solvents, and fertilizers and pesticides for site landscaping. Because these materials are used in very limited quantities, they are not considered a hazard to the public. Adherence to federal, State, and local health and safety requirements regarding these substances would preclude potential impacts. No mitigation is required.

b) *Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?* ***Less Than Significant Impact.***

The proposed Project is a warehousing facility and is not anticipated to result in releases of hazardous materials into the environment. The proposed facility would be expected to use limited hazardous materials and substances which would be limited to cleaners, paints, solvents, and fertilizers and pesticides for site landscaping. All materials and substances would be subject to applicable health and safety requirements. A less than significant impact would occur and no mitigation is required.

c) *Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?* ***No Impact.***

The Project site is not located within one-quarter mile of a school. The nearest school is Cabrillo Elementary School at 562 W 11th St, approximately 0.29 miles to the southeast of the site. Warehouse/ parcel delivery service operations would not be expected to emit or handle hazardous or acutely hazardous materials. Thus, no impact would occur.

d) *Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?* ***No Impact.***

The Project site is not included on a hazardous site list compiled pursuant to California Government Code Section 65962.5.[10] In addition, a Phase I Environmental Site Assessment was prepared for the Project site by Ardent Environmental in May 2018 and according to that report, there was no Recognized Environmental Condition (REC)s (as defined by ASTM Practice E 1527-13) identified in association with the Project site that required additional investigation. No significant adverse impacts relative to hazardous materials sites would result with project implementation. No mitigation is required.

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

The Project site is located immediately adjacent to the privately owned, public use Cable Airport located at 1749 W. 13th Street to the north of the Project site. The proposed Project is considered a Major Land Use Action in Policy 2.5.6 in the Cable Airport Land Use Compatibility Plan (ALUCP) dated September 2015, as such the Airport Land Use Committee shall make a determination during the development application review process as to whether the action is consistent with the compatibility criteria in Chapter 3 of the ALUCP. The Project site in relation to the Cable Airport compatibility zones is shown in **Figure 4, ALUCP Compatibility Zones**.

[10] California, State of, Department of Toxic Substances Control, DTSC's Hazardous Waste and Substances Site List - Site Cleanup (Cortese List). Available at: https://dtsc.ca.gov/dtscs-cortese-list/ Accessed September 26, 2019.

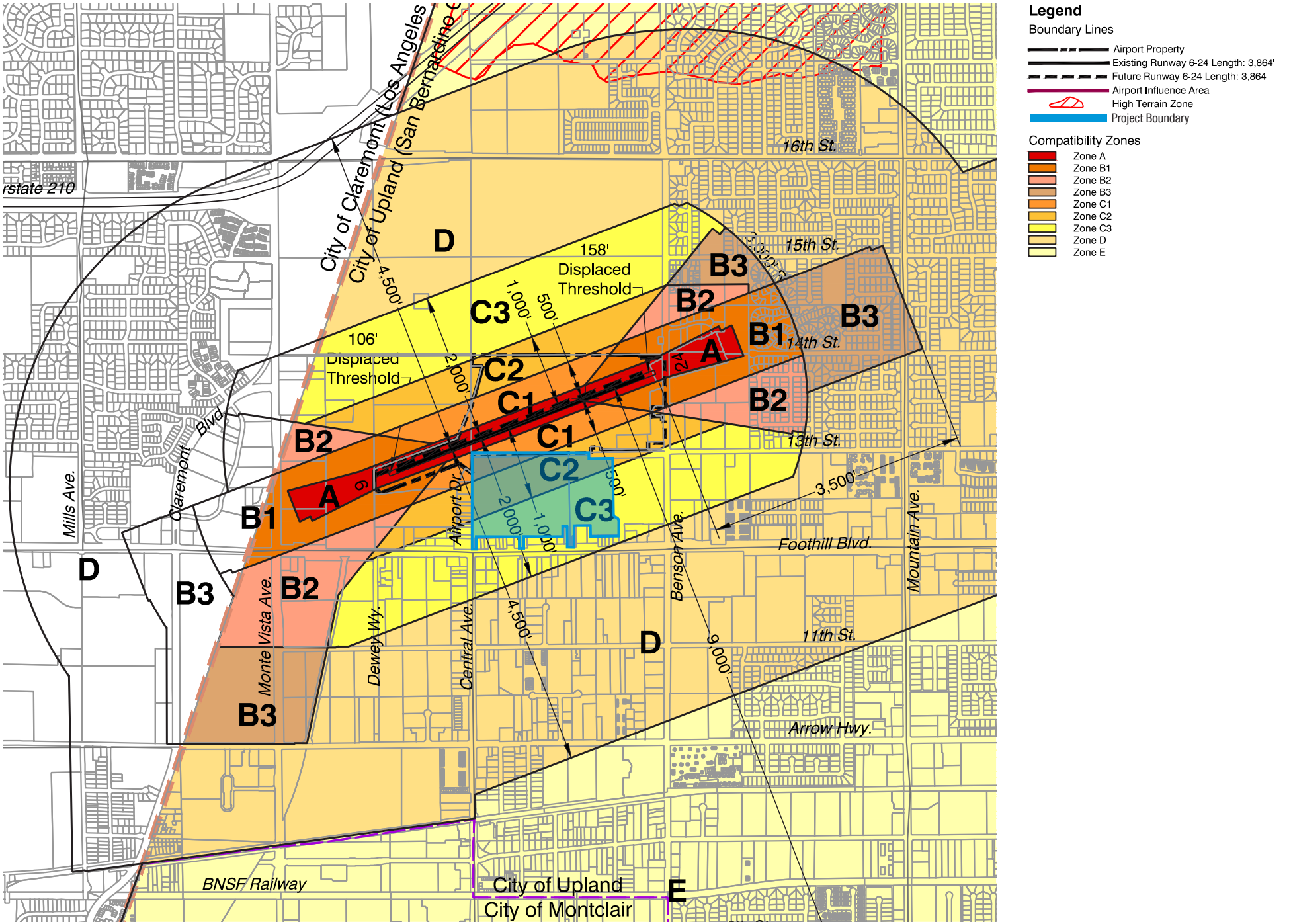


FIGURE 4: ALUCP Compatibility Zones
Bridge Point Upland
Upland, CA

Kimley»Horn

Per the ALUCP, the criteria listed in Table 3A of the ALUCP, together with the compatibility zones depicted on Map 3A of the ALUCP are the primary basis for determining whether a proposed land use project would be compatible with Cable Airport activity. The table and map both take into account all four compatibility concerns: noise, safety, airspace protection, and overflight. As shown on Map 3A of the ALUCP, the Project site is located in the C1, C2 and C3 airport compatibility zones. Consistent with Table 3A, the warehouse/parcel delivery service building is not located within the C1 zone. The warehouse/parcel delivery service building would be located within the C2 and C3 zones, would have a maximum height of approximately 44 feet, and therefore would be considered conditionally compatible, as any buildings located within those areas must ensure that an airspace obstruction would not occur. The warehouse/parcel delivery service building would not include any airspace obstructions, therefore the Project would be consistent. Warehouse uses are considered normally compatible in the C2 and C3 zones. The portion of the site in the C1 zone must meet intensity criteria for non-residential uses identified in the ALUCP. As the portion of the site within the C1 zone would not include a structure or outdoor uses noted in Table 3A, no persons are expected to occupy the portion of the site within the C1 zone. Accordingly, the portion of the site within the C1 zone would comply with the maximum sitewide average intensity, which allows for 120 people per acre within the C1 zone, and the maximum single-acre intensity, which allows for 300 people per acre within the C1 zone. The proposed Project would be consistent with the conditions in Chapter 3 of the ALUCP for the C1, C2 and C3 zones and therefore, would not create a safety hazard for people residing or working in the Project area; thus, a less than significant impact would occur.

f) *Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?* ***No Impact.***

The proposed Project would not impair or physically interfere with an adopted emergency response or evacuation plan. Primary access to all major roads would be maintained during construction of the proposed Project. Therefore, no associated impacts would occur.

g) *Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?* ***Less Than Significant Impact.***

The Project area is in a predominately developed area consisting of industrial and commercial uses. However, the Project area is located in a Local Responsibility Area (LRA) on the Fire Hazard Severity Zones in State Responsibility Area (SRA) Map dated November 2007.[11] The Project area is zoned "Very High Fire Hazard Severity Zone" (VHFHSZ) on the LRA Map dated November 2008[12] and on Exhibit 5.14-1 of the City's General Plan EIR. [13]

The proposed Project site is located in an area with minimal vegetation and a limited number of buildings. The minimal amount of brush and limited number of structures surrounding the site reduces the likelihood of significant risk of loss, injury or death from wildland fires. The Project is not proposing residential uses, and therefore would not intermix residential uses with wildlands. The proposed Project's development application and building plans shall be reviewed by the San Bernardino County Fire Protection Department for conformity with state and local statutes,

[11] California, State of, Department of Forestry and Fire Protection. SW San Bernardino County Fire Hazard Severity Zones in LRA. 2007. Available at: http://frap.fire.ca.gov/webdata/maps/san_bernardino_sw/fhszl_map.62.pdf. Accessed September 25, 2019.
[12] California, State of, Department of Forestry and Fire Protection. SW San Bernardino County Fire Hazard Severity Zones in SRA. 2007. Available at: https://osfm.fire.ca.gov/media/5952/upland.pdf. Accessed September 25, 2019.
[13] Upland, City of, 2015. General Plan EIR, page 5.14-21.

ordinances, and regulations relating to the prevention of fire, the storage of hazardous materials, and the protection of life and property against fire, explosion, and exposure to hazardous materials. Under state and local law, all new construction in a VHFHSZ is required to be compliant with construction regulations (Chapter 7A) of the California Building Code, including requirements for buildings, in the course of construction. Adherence to the above regulations already in place through the development application and review process at the City would reduce the potential impacts associated with fire hazards as a result of adjacent wildlands to less-than-significant.

Cumulative Impacts

Projects in the vicinity of the proposed Project that are approved and pending implementation are discussed in *Section VI.17, Transportation*. However, the incremental effects of the proposed Project related to hazards and hazardous materials, if any, are anticipated to be minimal, and any effects would be site-specific. Therefore, the proposed Project would not result in incremental effects to hazards or hazardous materials that could be compounded or increased when considered together with similar effects from other past, present, and reasonably foreseeable probable future projects. The proposed Project would not result in cumulatively considerable impacts to or from hazards or hazardous materials.

10. Hydrology and Water Quality

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

Discussion

Preliminary Hydrology Calculations were prepared for the proposed Project by Thienes Engineering (November 2019) and are provided as **Appendix E.** A Water Quality Management Plan (November 2019) was prepared for the proposed Project and is provided as **Appendix F**. The results and conclusions of both reports are summarized herein.

a) *Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?* ***Less Than Significant Impact.***

The Project site consists of both disturbed and undeveloped land. An outdoor rock and gravel stockpiling and processing operation is located on the northwest corner of the Project site. No structures are currently located on the site; however, stockpiles of sand and gravel remain on-site, but will be removed as part of existing operations prior to implementation of the Project. Runoff from the Project site generally drains from north to south towards Foothill Boulevard through the adjacent properties and open spaces to the south. There is an existing storm drain system in Dewey Way (west of the Project site). This storm drain traverses Dewey Way southerly from Foothill Boulevard to an existing detention basin located south of Arrow Highway. An existing 72-inch mainline storm drain is located within Foothill Boulevard, downstream of the Project site. As a part of the proposed Project, this mainline storm drain would be extended easterly toward the Project site. There is also an existing storm drain system in Benson Avenue. The upstream portion of this storm drain is located at the intersection of Benson Avenue and 13th Street and Cable Airport Drive. The storm drain in Benson Avenue continues southerly to Arrow Highway and then flows westerly in Arrow Highway discharging into detention basins south of Arrow Highway. It does not appear that a significant portion of the Project site drains to the Benson Avenue storm drain system.

Cable Airport, located to the north of the Project site, appears to have an on-site drainage system. The majority of runoff from the airport is conveyed westerly to a storm drain system that continues south and connects to the previously mentioned Dewey Way storm drain system. It does not appear that flows from Cable Airport drain directly to the Project site.

The majority of the Project site is proposed to drain into subterranean retention systems that would be located on the southwest corner of the site. One flow-based biofiltration unit would be located at the downstream portion of the most westerly drive aisle leading to Foothill Boulevard. Stormwater runoff from impervious areas, including the surface parking lots, would be routed to the underground retention system for treatment via infiltration. Due to the significant difference in elevation between the existing site and Foothill Avenue, all three driveway/drive aisles are considered too steep to support an infiltration system. An infiltration system next to the slopes is geotechnically hazardous to construct. In addition, this area sits within approximately 20 feet of fill.

With these technical constraints, a proprietary flow-based biofiltration unit is proposed for treatment and release of the most westerly driveway/drive aisle. The other two driveway/drive aisles would not be treated with proprietary flow-based biofiltration units due to the inability to discharge treated flows back to the proposed onsite storm drain. Approximately 0.40 acres along the easterly property line would sheet flow offsite without being routed to the proposed on-site Best Management Practices (BMPs). This landscape is considered self-treating. Approximately 3.22 acres of landscape and driveway/drive aisles along the southerly property line would not be routed to a BMP for treatment. Of this 3.22 acres, approximately 2.52 acres would be considered self-treating landscaping, while the remaining 0.70 acres of driveway/drive aisles would drain offsite without treatment due to technical infeasibility. The majority of the site drains to a proposed underground infiltration retention system which would meet the performance criteria for low impact design (LID) BMP Design and infiltrate the Design Capture Volume (DCV). The proposed Project will meet stormwater treatment requirements in the San Bernardino MS4 Permit; therefore, impacts to water quality as a result of the proposed Project would be less than significant.

To minimize water quality impacts during construction of the proposed Project, construction activities would be required to comply with a Stormwater Pollution Prevention Plan (SWPPP) consistent with the General Permit for Stormwater Discharge Associated with Construction Activity (Construction Activity General Permit). The SWPPP would incorporate BMPs such as gravel bags, silt fence, and fiber rolls. Preparation and implementation of a SWPPP would reduce potential impacts to water quality during construction to a less than significant level. Accordingly, based on compliance with the water quality standards and discharge requirements discussed above, the proposed Project would have a less than significant impact and no mitigation is required.

b) *Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?* ***Less Than Significant Impact.***

The proposed Project does not propose to use groundwater. Although the proposed Project would result in additional impervious surfaces on site, the proposed Project would construct underground infiltration retention systems, which would retain and treat water prior to discharging into the public storm drain system. To allow for groundwater recharge within the Chino Basin, flows captured by the public storm drain system would then be conveyed through the San Antonio Creek and Army Corps of Engineers' San Antonio Channel and diverted into the Basin by use of an inflatable dam. Therefore, due to the onsite subterranean infiltration and direction of flows to allow for groundwater recharge, the proposed Project would not significantly impact local groundwater recharge or impede sustainable groundwater management of the basin. Less than significant impacts would occur in this regard and no mitigation is required.

c) *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of stream or river or through the addition of impervious surfaces, in a manner which would:* ***Less Than Significant Impact.***

i. *Result in substantial erosion or siltation on- or off-site?*

ii. *Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?*

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

iv. *Impede or redirect flood flows?*

The proposed Project would continue to drain south towards Foothill Boulevard and discharge into the existing storm drain system in Dewey Way and Benson Avenue as well as the extended mainline storm drain in Foothill Boulevard. The existing downstream storm drain plan indicates a 100-year peak flow rate of 288.4 cubic feet per second (cfs). The existing commercial development at the northeast corner of Dewey Way and Foothill Boulevard does not use this storm drain. It appears that the 72-inch storm drain has the capacity of the proposed development along with remaining areas on Foothill Boulevard.

The Project proposes to use underground infiltration retention systems and biofiltration units to treat stormwater runoff prior to discharge into the existing storm drain system. The proposed Project would comply with County Flood Control requirements of a maximum site discharge of 90% predeveloped flow. The total proposed 100-year peak flow from the Project site is approximately 178.0 cfs. The existing public storm drain in Foothill Boulevard is designed for a 100 year storm event and indicates a peak flow rate of 288.4 cfs. This leaves approximately 100 cfs for the smaller remaining developments at Foothill Boulevard. Therefore, downstream facilities will not be negatively impacted by the development of the Project site. The Project site does not contain any streams or rivers; therefore, none would be altered by the proposed Project. Accordingly, impacts to the drainage pattern, erosion, siltation, surface run-off, and issues related to flooding would be less than significant.

d) *In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?* ***No Impact.***

The proposed Project is located over 40 miles east of the Pacific Ocean. There is no risk of exposure to inundation by seiche or tsunami. Accordingly, there is no significant risk of release of pollutants due to project inundation. Thus, no impact would occur and no mitigation is required.

e) *Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?* ***No Impact.***

Water quality impacts other than those described in Response 10 (a) above are not anticipated with implementation of the proposed Project. Furthermore, the proposed Project does not propose to use groundwater and, as discussed in Response 10 (b) above, the majority of the drainage would utilize underground infiltration retention systems, which would retain and treat water prior to discharging into the public storm drain system. Therefore, the proposed Project would not obstruct implementation of a water quality control plan or sustainable groundwater management plan. No impacts would occur in this regard and no mitigation is required.

Cumulative Impacts

Projects in the vicinity of the proposed Project that are approved and pending implementation are discussed in *Section VI.17, Transportation*. However, the potential impacts related to hydrology and storm water runoff are typically site specific and site specific BMPs are implemented at the proposed Project level. The analysis above determined that the implementation of the proposed Project would not result in significant impacts. Therefore, the proposed Project would have no impact under most hydrology criteria, and therefore could not contribute toward a cumulative impact. In regards to proposed Project impacts that would be considered less than significant, such impacts are not expected to result in compounded or increased impacts when considered together with similar effects from other past, present, and reasonably foreseeable probable future projects, as other projects would be subject to similar laws and requirements regarding hydrology practices. Potential impacts are considered less than cumulatively considerable.

11. Land Use and Planning

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
c. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

Discussion

a) Physically divide an established community? ***No Impact.***

Projects that are typically considered to have the potential to divide an established community include the construction of new freeways, highways, or roads, or other uses that physically separate an existing or established neighborhood. The proposed Project does not include the construction of public roadways, structures, or other improvements that would be located between existing neighborhoods. Therefore, the proposed Project would not physically divide or separate neighborhoods within an established community. The Project site is located in a predominately industrial and commercial area. The land uses surrounding the Project site consist of a mix of uses including industrial, commercial, an airport, and a major transportation corridor. The Project site is zoned for Commercial/Industrial Mixed-Use and the properties located immediately south of the site are zoned for Highway Commercial uses. Foothill Boulevard is located further south of the site. Cable Airport is located directly north of the site and a portion of the airport, along with industrial uses are located west of the site. Commercial uses, including a Lowe's Home Improvement Store and a commercial shopping center, are located east of the site.

As discussed above, the proposed Project is zoned for commercial and industrial uses and is predominantly surrounded by industrial and commercial uses, thus would not physically separate residential areas. Accordingly, the proposed Project would generally blend in with the surrounding uses and would not physically divide an established community. Therefore, no impacts would occur and no mitigation is required.

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

The City of Upland General Plan land use designation for the Project site is Commercial/Industrial Mixed-Use (C/IN-MU). In part, the Commercial/Industrial Mixed-Use designation is intended to encourage development of business in the City and to increase the opportunities for employment. The proposed Project would comply with applicable General Plan Policies LU 1.3, 3.1, 3.2, 3.5, and 4.3. The proposed Project would foster growth in strategic areas with available infrastructure,

promote economic development, provide employment opportunities, and encourage commercial revitalization within the City of Upland.

> ***Policy LU-1.3: Strategic Growth.*** *Concentrate growth in strategic locations that strengthens the City's economic base, offers new housing opportunities, maximizes available and planned infrastructure, and fosters the development and use of transit and multi-modal transportation. These areas include Historic Downtown Upland, Foothill Boulevard, the Southeast Quadrant, College Heights, Mountain Avenue, along the Interstate 10 corridor, and in the 9th Street Industrial area.*
>
> ***Policy LU-3.1: Economic Development.*** *Retain and attract land uses that generate revenue to the City, provide employment for residents while balancing other community needs such as housing, parks and open space, and public facilities.*
>
> ***Policy LU-3.2: Economic Revitalization.*** *Promote the development of vacant and underutilized parcels with higher intensity commercial and industrial land uses.*
>
> ***Policy LU-3.5: Commercial Revitalization.*** *Encourage the revitalization of aging commercial centers to improve the tax base and provide improved commercial services for the community.*
>
> ***Policy LU-4.3: Jobs Housing Balance.*** *Encourage a balance between jobs, workforce skills, and housing supply, which will reduce the negative impacts of long commutes.*

Allowable uses within this land use category include commercial and industrial. Typical industrial uses could include limited general industrial, manufacturing, assembly, warehousing, multi-tenant industrial, research and development, and airport–related uses. Typical commercial uses include retail commercial and durable sales goods, tourist-related commercial, entertainment, recreational uses, administrative and professional offices, commercial activities, business support services, food and institutional uses, as well as residential, subject to a reasonable minimum increment of land area as well as a special use permit process. Section 17.05.020 identifies the allowable uses for mixed-use zones. Warehousing is identified as an allowable use within the commercial category. The proposed Project would include a Lot Line Adjustment and determination from the Airport Land Use Committee that the Project is compatible with the Cable Airport Land Use Compatibility Plan.

The zoning for Project site is also Commercial/Industrial Mixed-Use (C/I-MU). The C/I-MU zone allows for warehousing, office and professional uses, retail, and Industrial uses[14]. Furthermore, allowable land uses would comply with all applicable local, State and federal hazardous materials regulations. In compliance with the development regulations for the C/I-MU zone, the proposed Project would have a Floor Area Ratio (FAR) of 25.2%, a maximum building height of approximately 44-feet and would comply with the minimum setback requirements for the C/I-MU zone. The Project would require a minimum of 224 automobile parking spaces, which would be provided on-site. Accordingly, the proposed Project would comply with the development standards identified for the Proposed Project in Section 17.05.030 of the City's Municipal Code.

Land Use Airport

The proposed Project site is adjacent to the privately owned, public use Cable Airport and is subject to the Cable Airport ALUCP dated September 2015. Policy 2.5.6 of the ALUCP categorizes the

[14] Upland, City of, 2018. Zoning. Available at: http://www.qcode.us/codes/upland/. Accessed September 25, 2019.

proposed Project as a Major Land Use Action, which warrants a review and determination of consistency with the Cable Airport compatibility criteria, as defined in Chapter 3 of the ALUCP. As discussed in Response 9 (e) and shown in Figure 4, the Project site is located within the C1, C2, and C3 airport compatibility zones. Table 3A of the ALUCP identifies the normally compatible, conditionally compatible, and incompatible uses within the C1, C2, and C3 zones. Residential uses are identified as incompatible for much of the site. Agriculture and most types of recreation facilities and educational facilities are also considered incompatible or conditionally compatible due to proximity to the airport. Research and development uses are also identified as incompatible in the C1 and conditional in the C2 and C3 zones. Both major (i.e., regional shopping centers and 'big box" retail) and local retail (i.e., community/neighborhood shopping centers, grocery stores) are incompatible within the C1 zone and conditionally permitted on the portion of the site located within the C2 zone; however, the conditional status is dependent on compliance with specific intensity restrictions. The limited retail, office, surface parking, and warehousing uses proposed by the Project are identified as normally compatible on the majority of the site, within the C2 and C3 zones. Consistent with Table 3A, the warehouse/parcel delivery service building is not located within the C1 zone.

As discussed above and in Response 9 (e), the proposed Project meets the compatibility requirements for the C1, C2 and C3 airport compatibility zones. However, the Airport Land Use Committee shall make a determination during the development application review process as to whether the action is consistent with the compatibility criteria in Chapter 3 of the ALUCP. The proposed Project would be consistent with the conditions in Chapter 3 of the ALUCP for the C1, C2, and C3 zones and therefore, would not create a safety hazard for people residing or working in the Project area.

The proposed Project is consistent with the pertinent land use planning and policy documents, including the General Plan, Zoning, and the Cable Airport ALUCP. Therefore, the proposed Project would have a less than significant impact on a plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

c) *Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?* ***No Impact.***

The Project site is not located within an area designated as a habitat conservation area or subject to a natural community conservation plan. Therefore, the proposed Project would not conflict with either type of plan, impacts would not occur, and no mitigation is required.

Cumulative Impacts

The proposed Project does not conflict with any applicable land use regulations, land use policies, or land use planning documents. The proposed Project does include street improvements along Central Avenue and 13th Street, but would not include construction of new roadways or other significant infrastructure improvements that would restrict access, require a diversion of existing travel routes, or otherwise divide an established community. Therefore, the proposed Project would not contribute towards any cumulative impacts in these regards. The proposed Project would not conflict with a habitat conservation plan or natural community conservation plan, nor does it hinder the implementation or establishment of such plans. For these reasons, the proposed Project would not contribute to a cumulative impact or result in land use conflicts. Projects in the vicinity of the proposed Project that are approved and pending implementation are discussed in *Section VI.17, Transportation*. However, these projects would be subject to project level review of their land use impacts. As discussed above, the proposed Project would not impact land use policies, therefore, taken with past, present and reasonably foreseeable Projects impacts are not considered cumulatively considerable, and no mitigation is required.

12. Mineral Resources

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	☐	☐	☒	☐
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☒	☐

Discussion

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State? ***Less Than Significant Impact.***

The Surface Mining and Reclamation Act of 1975 (SMARA) requires the State Geologist to classify land in California according to its potential to contain mineral resources. The City of Upland General Plan shows the Mineral Lands Classification (MLC) maps of the proposed Project site based on SMARA classifications. According to the City's Regional Mineral Resource Zone Map (Exhibit 5.12-1 of the General Plan EIR)[15], the entirety of the City, including the proposed Project site, is located within the Claremont-Upland Production-Consumption (PC) Region and classified as MRZ-2, which is defined as an area where geologic data indicates that significant PCC-Grade aggregate resources are present.

The proposed Project is located within Sector B-10, designated by the City as a sector containing regionally significant PCC-grade aggregate resources. Due to the loss of PCC-grade reserves within the City and the City's Sphere of Influence (SOI), in 2007 the California Geological Survey updated a report for the Claremont-Upland PC Region known as Special Report 202. The report concluded that the Claremont-Upland PC Region was estimated to produce 240 million tons of PCC-grade aggregate for the next 50 years (through 2056) and the PCC-grade reserves had increased significantly, thereby extending the region's potential depletion date from 1991 to 2034. However, the potential for mineral resources in the City was also limited due to development of much of the land within the City, including a portion of Sector B-10, adjacent to the proposed Project site. Additional loss of PCC-grade aggregate land within other sectors of the City and SOI totals 261 acres, or approximately 38 million tons of the prime aggregate resources within the Claremont-Upland PC Region.

Due to Special Report 202's substantial increase in production estimates extending the region's depletion date by 43 years, and despite the loss of prime aggregate resources within the Claremont-Upland PC Region, the Geologic Resources Committee forwarded a recommendation to the State Mining and Geology Board to terminate 2,120 acres of designated mineral resource lands or approximately 49% of the total 4,310 acres within the Claremont-Upland PC Region. The

[15] Upland, City of, 2015. General Plan EIR, page 5.12-3.

Project site was identified within a sector partially or solely lost to incompatible land uses. Accordingly, the 2015 Upland General Plan Update revised the land use designation and zoning for some mineral resource lands, including the proposed Project site, to land uses more compatible with surrounding and proposed surrounding land uses. Furthermore, the proposed Project would comply with applicable General Plan Policies identified below, as well as Policies LU 3.5, 3.7, 4.1 and 4.3 discussed in Response 11 (b).

> ***Policy OSC-7.6: Reuse of Mined Land.*** *Require mined property to be left in a condition suitable for reuse in conformance with the California Surface Mining and Reclamation Act (SMARA).*

The Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR) addresses the needs of state and local governments, and the oil and gas industry by regulating statewide oil and gas activities with uniform laws and regulations. DOGGR maintains a mapping system that shows the location of all oil and gas wells within the state. According to the DOGGR mapping system, the closest well used for oil and gas production is approximately 3 miles to the west of the proposed Project. DOGGR does not map any wells on the proposed Project site[16] and there is no known history of oil or gas wells having been drilled within the Project site.

Although the entirety of the City of Upland, including the proposed Project site is mapped within a MRZ-2 area, the site is zoned as Commercial/Industrial Mixed-Use (C/IN/MU). Thus, implementation of the proposed Project presents a potential loss of availability of a known mineral resource. However, Special Report 202 determined that the PCC grade reserves within the Claremont-Upland PC Region had increased significantly, thereby recommending the reduction in reserves. This allowed for the City to introduce a new zone as a part of the Zoning Code Update, the Mining (M) zone, which was applied to certain lands in the City, however, the Project site was identified as C/I-MU. The introduction of a Mining zone allowed the City to encourage cohesive land uses, while not resulting in a significant loss to known mineral resources. Thus, impacts related to the loss of availability of a known mineral resource would be considered less than significant and no mitigation is required.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? ***Less Than Significant Impact.***

The proposed Project site has not been used for mineral resource recovery and is not delineated as a mineral resource recovery site on any land use plans. The Project site consists of both disturbed and undeveloped land including an outdoor rock and gravel processing operation located on the northwest corner of the Project site. As discussed above, the Project site is not currently used (or planned for use) as a mineral resource recovery site. Therefore, no impacts to mineral resources in this regard would be less than significant and mitigation is not required.

Cumulative Impacts

Projects in the vicinity of the proposed Project that are approved and pending implementation are discussed in *Section VI.17, Transportation*. However, the proposed Project would not result in direct or indirect permanent or temporary impacts related to mineral resources. Implementation of the proposed Project would not result in the loss of an area that is designated for mineral resource extraction, as the site has been zoned for Commercial/Industrial Mixed-Use (C/IN/MU) and would not

[16] California Department of Conservation, Division of Oil, Gas, and Geothermal Resources. Available at: http://www.conservation.ca.gov/dog/Pages/Wellfinder.aspx. Accessed September 24, 2019.

result in the inability to use any other areas for such purpose. Therefore, the proposed Project would not result in incremental effects to the loss of mineral resources that could be compounded or increased when considered together with similar effects from other past, present, and reasonably foreseeable future projects. Thus, no cumulative impacts related to mineral resources would occur.

13. Noise

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

Discussion

A Noise and Vibration Study was prepared for the proposed Project by Kimley-Horn (October 2019). The Noise and Vibration Study is included as **Appendix G** and the results are summarized herein.

Noise is generally defined as loud, unpleasant, unexpected, or undesired sound that is typically associated with human activity and that interferes with or disrupts normal activities. The human environment is generally characterized by a certain consistent noise level that varies by area. This is called ambient, or background noise. Although exposure to high noise levels has been demonstrated to cause hearing loss, the principal human response to environmental noise is annoyance. The response of individuals to similar noise events is diverse and influenced by the type of noise, perceived importance of the noise and its appropriateness in the setting; time of day and type of activity during which the noise occurs, and sensitivity of the individual.

Sound is a physical phenomenon consisting of minute vibrations that travel through a medium, such as air, and are sensed by the human ear. Sound is generally characterized by several variables, including frequency and intensity. Frequency describes the sound's pitch and is measured in cycles per second, or hertz (Hz). Intensity describes the sound's loudness and is measured in decibels (dB). A sound level of 0 dB is approximately the threshold of human hearing and is barely audible under extremely quiet listening conditions. Normal speech has a sound level of approximately 60 dB. Sound levels above about 120 dB begin to be felt inside the human ear as discomfort and eventually as pain at still higher levels. The minimum change in the sound level of individual events that an average human ear can detect is about 3 dB. Decibels are measured using a logarithmic scale; thus, the average person perceives a change in sound level of about 10 dB as a doubling (or halving) of the sound's loudness. This relation holds true for sounds of any loudness.

Because community noise fluctuates over time, a single measure called the Equivalent Sound Level (L_{eq}) is often used to describe the time-varying character of community noise. The L_{eq} is the energy-averaged A-weighted sound level during a measured time interval, and is equal to the level of a continuous steady sound containing the same total acoustical energy over the averaging time period as the actual time-varying sound.

Another sound measure known as the Community Noise Equivalent Level (CNEL) is an adjusted average A-weighted sound level for a 24-hour day. It is calculated by adding a 5 dB adjustment to sound levels during evening hours (7:00 p.m. to 10:00 p.m.) and a 10 dB adjustment to sound levels during nighttime hours (10:00 p.m. to 7:00 a.m.). These adjustments compensate for the increased sensitivity to noise during the typically quieter evening and nighttime hours. The CNEL is used by the State of California and the City to evaluate land use compatibility with respect to transportation noise.

Upland protects residents, the labor force, and visitors from the harmful effects of noise by establishing exterior and interior noise standards. Higher exterior noise standards are permitted for mixed-use and residential infill projects, as long as the interior noise standard is maintained. The City's General Plan Safety Element Policies mitigate noise by requiring the implementation of noise reduction techniques in site design and construction to ensure the compatibility of uses. Mobile sources of noise, such as vehicles and aircraft, are also regulated by the enforcement of Upland's noise standards.

The pertinent General Plan goals and policies are listed below:

Goal SAF-1: Upland is protected from interior and exterior noise levels that cause harm to safety, health and well-being.

Policy SAF-1.1: Require noise mitigation for all development where the projected exterior noise levels exceed those shown in Table 13, Exterior Noise Compatibility Standards, *to the extent feasible.*

Table 13: Exterior Noise Compatibility Standards

Land Use Type	Highest Level of Noise Exposure that is Regarded as "Normally Acceptable" (L_{dn} or CNEL)
Residential – Low Density Single-Family, Duplex, Mobile Homes	60 dBA
Residential – Multi-Family	65 dBA
Mixed-Use	70 dBA
Transient Lodging – Hotels, Motels	65 dBA
Schools, Libraries, Churches, Hospitals, Nursing Homes	70 dBA
Auditoriums, Concert Halls, Amphitheaters	Mitigation based on site-specific study
Sports Arena, Outdoors Spectator Sports	Mitigation based on site-specific study
Playgrounds, Neighborhood Parks	70 dBA
Golf Courses, Riding Stables, Water Recreation, Cemeteries	75 dBA
Office Buildings – Commercial, Office/Professional	70 dBA
Industrial, Manufacturing, Utilities, Agriculture	75 dBA
Source: City of Upland, *General Plan Policy SAF-1-1 Table SAF-1*, 2015.	

Policy SAF-1.2: Exterior Incremental Noise Standards. Require noise mitigation for all development that increases existing noise levels by more than the allowable increment shown in Table 14, Exterior Incremental Noise Impact Standards for Noise-Sensitive Uses (dBA), *to the extent feasible.*

Table 14: Exterior Incremental Noise Impact Standards for Noise-Sensitive Uses (dBA)

Residences and Buildings Where People Normally Sleep		Institutional Land uses with Primarily Daytime and Evening Uses	
Existing L_{dn}	Allowable Noise Increment	Existing Peak Hour L_{dn}	Allowable Noise Increment
45	8	45	12
50	5	50	9
55	3	55	6
60	2	60	5
65	1	65	3
70	1	70	3
75	0	75	1
80	0	80	0
Source: City of Upland, City of Upland General Plan Policy SA-1.2 Table SAF-4, 2015.			

Policy SAF-1.3: Interior Noise Standards. *Require new development to include noise mitigation to assure acceptable interior noise levels appropriate to the land use type: 45 dBA Ldn for residential, transient lodgings, hospitals, nursing homes, and other uses where people normally sleep; and 45 dBA Ldn (peak hour) for office buildings and similar uses.*

Policy SAF-1.4: Location of Noise-Sensitive Land Uses. *Prevent noise-sensitive land uses (schools, medical centers and hospitals, senior centers, and residences) from locating in areas with noise levels that exceed those considered normally acceptable for each land use unless measures can be implemented to reduce noise to acceptable levels.*

Policy SAF-1.5: Noise Impact Study. *Require a noise impact study to evaluate impacts of projects that may exceed 65 Ldn as part of the design review process.*

Policy SAF-1.6: Acoustical Study. *Require an acoustical study for all new residential developments that lie within the 65 Ldn noise contour on the Future Noise Contour Map, to ensure indoor levels will not exceed City standards. In addition, the City shall continue to enforce the California Building Code for indoor noise levels.*

Policy SAF-1.7: Noise Reduction in Site Design. *Require measures that attenuate exterior and/or interior noise levels to acceptable levels to be incorporated into all development projects where current and/or future outdoor noise levels may be unacceptable. Require noise reduction features, the focus of which shall be on site design techniques, so long as they do not conflict with the goals of the Community Character Element. Techniques include:*

a. *Designing landscaped building setbacks to serve as a buffer between the noise source and receptor.*
b. *Placing noise-tolerant land uses such as parking lots, maintenance facilities, and utility areas between the noise source and receptor.*
c. *Orienting buildings to shield noise-sensitive outdoor spaces from a noise source.*
d. *Locating bedrooms or balconies on the sides of buildings facing away from noise sources.*
e. *Utilizing noise barriers, such as landscaped berms, to reduce adverse noise levels in noise-sensitive outdoor activity areas, avoiding sound walls wherever possible.*

Policy SAF-1.11: Construction Noise. *Require construction projects to adhere to the City's construction hours and incorporate measures to minimize impacts.*

Policy SAF-1.12: Operational Noise. *Require mixed-use, commercial, and industrial projects to mitigate operational noise impacts to adjoining sensitive uses to meet operational noise thresholds.*

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

Policy SAF-1.15: Coordination with Cable Airport. *Work with Cable Airport to monitor aircraft noise, implement noise-reducing operation measures (i.e., Fly Quiet, Fly Neighborly programs), and promote pilot awareness of noise sensitive land uses.*

The noise standards are identified in Chapter 9.40 of the Upland Municipal Code, also known as the Noise Ordinance. Within the City, the Noise Ordinance governs operational noise generated between two properties and does not regulate noise from transportation sources, such as traffic, aircraft, and railways. Upland Municipal Code Section 9.40.070 establishes the exterior noise standards for residential uses, while Upland Municipal Code Section 9.40.080 establishes the exterior noise standards for nonresidential uses. Exterior noise should be measured on the exterior at the property line of the affected properties, and no noise level should exceed the levels presented in **Table 15, City of Upland Residential Exterior Noise Limits.** Upland Municipal Code Section 9.40.080 states that for non-residential properties, no noise level should exceed the respective base ambient noise levels of 65 dBA at any time for uses not specified, and 75 dBA at any time for industrial and commercial uses.

Table 15: City of Upland Residential Exterior Noise Limits

Maximum Time of Exposure	Noise Metric[1]	Noise Level Not to Be Exceeded[2]	
		7:00 a.m. to 10:00 p.m. (Daytime)	10:00 p.m. to 7:00 a.m. (Nighttime)
30 Minutes / Hour	L_{50}	55 dBA	45 dBA
15 Minutes / Hour	L_{25}	60 dBA	50 dBA
5 Minutes / Hour	L_{8}	65 dBA	55 dBA
1 Minute / Hour	L_{2}	70 dBA	60 dBA
Any Period of Time	L_{max}	75 dBA	65 dBA
Notes: 1) Noise levels that are equaled or exceeded by a fluctuating sound level (in this table) 50%, 25%, 8%, and 2% of the stated time period.			
Source: City of Upland, *Upland Municipal Code*, October 2019.			

Existing Noise Environment

The City is impacted by various noise sources. Mobile sources of noise, especially cars and trucks, are the most common and significant sources of noise in most communities. Other sources of noise are the various land uses throughout the City that generate stationary-source noise. The Cable Airport is located immediately adjacent to the Project site on the north and west sides of the Project.

Mobile Sources

Existing roadway noise levels were calculated for the roadway segments in the Project vicinity. This task was accomplished using the Federal Highway Administration (FHWA) Highway Traffic Noise Prediction Model (FHWA-RD-77-108) and existing traffic volumes from the Project traffic analysis (prepared by Translutions, 2019). The noise prediction model calculates the average noise level at

specific locations based on traffic volumes, average speeds, roadway geometry, and site environmental conditions. The average vehicle noise rates (also referred to as energy rates) used in the FHWA model have been modified to reflect average vehicle noise rates identified for California by the California Department of Transportation (Caltrans). The average daily noise levels along roadway segments in proximity to the Project site are included in **Table 16, Existing Traffic Noise Levels.**

Table 16: Existing Traffic Noise Levels

Roadway Segment	ADT	dBA CNEL at 100 feet from Roadway Centerline
Baseline Road, Monte Vista Avenue to SR-210 Ramps	23,525	69.2
Baseline Road, SR-210 Ramps to Benson Avenue	26,990	69.8
Foothill Boulevard, Monte Vista Avenue to Central Avenue	18,855	68.3
Foothill Boulevard, Central Avenue to Project Driveway	10,515	65.7
Foothill Boulevard, Project Driveway to Benson Avenue	9,885	65.4
Monte Vista Avenue, Baseline Road to Foothill Boulevard	16,665	67.6
Central Avenue, Foothill Boulevard to 11th Street	10,350	64.6
Central Avenue, 11th Street to Arrow Route	11,790	65.1
Central Avenue, Arrow Route to Arrow Highway	15,970	66.4
Central Avenue, Arrow Highway to Moreno Street	21,670	67.7
Central Avenue, Moreno Street to I-10 Ramps	32,665	69.4
Benson Avenue, Baseline Road to 15th Street	16,930	67.4
Benson Avenue, 15th Street to 13th Street	16,420	67.2
Benson Avenue, 13th Street to Foothill Boulevard	17,380	67.4
ADT = average daily trips; dBA = A-weighted decibels; CNEL = community noise equivalent level		
Source: Based on traffic data within the *Foothill Boulevard Warehouse Traffic Impact Analysis*, prepared by Translutions, November 2019. Refer to Appendix G for traffic noise modeling assumptions and results.		

As depicted in Table 16, the existing traffic-generated noise level on Project-vicinity roadways ranges from 64.6 to 69.8 dBA CNEL at 100 feet from the centerline. The traffic highest noise levels occur along Baseline Road from the SR-210 ramps to Benson Avenue. As previously described, CNEL is 24-hour average noise level with a 5-dBA weighting during the hours of 7:00 p.m. to 10:00 p.m. and a 10-dBA weighting added to noise during the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively.

Stationary Sources

The primary sources of stationary noise in the Project vicinity are those associated with the operations of adjacent general industrial uses and Cable Airport adjacent to the Project site. The noise associated with these sources may represent a single-event noise occurrence, short-term, or long-term/continuous noise.

Sensitive Receptors

Noise exposure standards and guidelines for various types of land uses reflect the varying noise sensitivities associated with each of these uses. Residences, hospitals, schools, guest lodging, libraries, and churches are treated as the most sensitive to noise intrusion and therefore have more stringent noise exposure targets than do other uses, such as manufacturing or agricultural uses, that are not subject to impacts such as sleep disturbance. Sensitive receptors near the Project site include multi-family residences approximately 1,040 feet southeast of the site, a church approximately 1,050 feet south of the site, and single-family housing approximately 1,190 feet east of the site. **Table 17,Sensitive Receptors,** lists the distances and locations of sensitive receptors within the Project

vicinity. The distances depicted in Table 17 are based on the distance from the Project site to the vicinity sensitive receptors.

Table 17: Sensitive Receptors

Receptor Type/Description	Distance and Direction from the Project Site
MG Parkview Apartments	1,040 feet southeast
Middle East Gospel Outreach	1,050 feet south
Single Family Residential Neighborhood	1,190 feet east
California Optical	1,250 feet northeast
Multi-Family Residential Neighborhood	1,270 feet east
Ovation School of the Performing Arts	1,300 feet northeast
Prime Time Dance School of the Arts	1,550 feet south
Cabrillo Elementary School	1,570 feet southeast
North Upland Terrace Apartments	1,710 feet southeast
Single Family Residential Neighborhood	1,860 feet northeast
Single Family Residential Neighborhood	1,880 feet southeast
Cabrillo Park	1,920 feet southeast
Corporate Center Office Buildings	1,990 feet west
Park Central Apartments	2,030 feet south
Greenbelt Park	2,350 feet northeast

Noise Measurements

The Project site currently includes undeveloped land and industrial uses, including outdoor rock and gravel stockpiling and processing operations with no existing structures. The site is bounded by an airport to the north, a Lowe's building supply store to the east, Foothill Boulevard to the south, as well as industrial and commercial uses to the west. Four short-term noise measurements were taken on October 18, 2018. The noise measurement sites were representative of typical existing noise exposure within and immediately adjacent to the Project site. The 10-minute measurements were taken between 10:30 a.m. and 12:00 p.m. Short-term L_{eq} measurements are considered representative of the noise levels throughout the day. The average noise levels and sources of noise measured at each location are listed in **Table 18, Existing Noise Measurements** and shown in **Figure 5, Noise Measurement Locations.**

Source: Google Earth, 2018

FIGURE 5: Noise Measurement Locations
Bridge Point Upland
Upland, CA

Kimley»Horn

Table 18: Existing Noise Measurements

Site #	Location	L_{eq} (dBA)	L_{min} (dBA)	L_{max} (dBA)	Time
1	At the southwestern corner of the Aviation Drive and Airport Drive intersection	67.5	52.8	81.6	10:30 a.m.
2	Along the south side of Foothill Boulevard, approximately 450 feet east of Central Avenue	73.5	57.9	85.4	11:02 a.m.
3	At the northwestern corner of the Foothill Boulevard and Lowe's Entrance intersection	66.4	48.5	82.8	11:18 a.m.
4	Along the south side of 13th Street, approximately 350 feet west of Benson Avenue	58.4	45.3	76.8	11:40 a.m.
Source: Noise measurements taken by Kimley-Horn and Associates, October 18, 2018. See Appendix G for noise measurement results.					

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

Construction

Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., land clearing, grading, excavation, paving). Noise generated by construction equipment, including earth movers, material handlers, and portable generators, can reach high levels. During construction, exterior noise levels could affect the residential neighborhoods near the construction site. At the nearest, Project construction would occur approximately 200 feet from existing industrial and commercial uses and 1,040 feet from existing apartments. However, construction activities would occur throughout the Project site and would not be concentrated at the point closest to the sensitive receptors.

Construction activities would include site preparation, grading, building construction, paving, and architectural coating. Such activities would require graders, scrapers, and tractors during site preparation; graders, dozers, and tractors during grading; cranes, forklifts, generators, tractors, and welders during building construction; pavers, rollers, mixers, tractors, and paving equipment during paving; and air compressors during architectural coating. Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full power operation followed by 3 to 4 minutes at lower power settings. Other primary sources of acoustical disturbance would be random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts). Noise generated by construction equipment, including earth movers, material handlers, and portable generators, can reach high levels. Typical noise levels associated with individual construction equipment are listed in **Table 19, Typical Construction Noise Levels**.

Table 19: Typical Construction Noise Levels

Equipment	Typical Noise Level (dBA) at 50 Feet from Source	Typical Noise Level (dBA) at 100 Feet from Source[1]
Air Compressor	80	74
Backhoe	80	74
Compactor	82	76
Concrete Mixer	85	77
Concrete Pump	82	76
Concrete Vibrator	76	79
Crane, Derrick	88	76
Crane, Mobile	83	70
Dozer	85	82
Generator	82	77
Grader	85	79
Impact Wrench	85	76
Jack Hammer	88	79
Loader	80	79
Paver	85	82
Pile-driver (Impact)	101	74
Pile-driver (Sonic)	95	79
Pneumatic Tool	85	95
Pump	77	89
Roller	85	79
Saw	76	71
Scraper	85	84
Shovel	82	89
Truck	84	79

Note:
1) Calculated using the inverse square law formula for sound attenuation: $dBA_2 = dBA_1+20Log(d_1/d_2)$
Where: dBA_2 = estimated noise level at receptor; dBA_1 = reference noise level; d_1 = reference distance; d_2 = receptor location distance
Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018.

As shown in Table 18, exterior noise levels could affect the nearest existing adjacent uses and sensitive receptors in the vicinity. Sensitive uses in the Project site vicinity include residential uses approximately 1,040 feet to the southeast. Based on the discussion above, if the noisiest piece of equipment is operated at the closest point to the nearest use (i.e., the adjacent commercial and industrial uses), the exterior noise level at that use could reach 76 dBA, with the sensitive receptors in the area receiving lesser noise levels as they are further away. It should be noted that this is a maximum level and would be limited to short periods of time when equipment is closest to adjacent uses. Although construction noise is exempt between the hours of 7:00 a.m. and 6:00 p.m. Monday through Friday, the Project would nonetheless include project design features (PDF) (refer to PDF NOI-1, below) that would reduce construction noise levels. With the implementation of the project design features set forth below, Project construction would not generate a substantial temporary increase in ambient noise levels in the vicinity of the Project in excess of standards established in the City's General Plan or noise ordinance. The City's Noise Ordinance does not establish quantitative construction noise standards. Instead, the Noise Ordinance has established allowable hours of construction. Pursuant to the Upland Municipal Code Section 9.40.100, unless an exception is approved, construction hours are limited to between 7:00 a.m. and 6:00 p.m. on weekdays. Specifically, Municipal Code Section 9.40.100(M) indicates that construction is prohibited except between the hours of 7:00 a.m. and 6:00 p.m. on weekdays. These permitted hours of construction are required in recognition that construction activities undertaken during daytime hours are a typical part of living in an urban environment and do not cause a significant disruption.

Construction activities may also cause increased noise along access routes to and from the Project site due to movement of equipment and workers. The Project could require approximately 431 cubic yards of soil export that would require approximately 54 truck trips. Implementation of PDF NOI-1 would further minimize impacts from construction noise as it requires construction equipment to be equipped with properly operating and maintained mufflers and other state required noise attenuation devices. Thus, upon implementation of PDF NOI-1, a less than significant noise impact would result from construction activities.

Operations

Implementation of the proposed Project would create new sources of noise in the Project vicinity. The major noise sources associated with the Project that would potentially impact existing nearby residences include the following:

- Mechanical equipment (i.e., trash compactors, air conditioners, etc.);
- Slow moving trucks on the Project site, approaching and leaving the loading areas;
- Activities at the loading areas (i.e., maneuvering and idling trucks, equipment noise);
- Parking areas (i.e., car door slamming, car radios, engine start-up, and car pass-by); and
- Off-Site Traffic Noise

Mechanical Equipment

The Project is surrounded by industrial and commercial uses. The nearest sensitive receptors to the Project site are the residences 1,040 feet southeast of the Project site. Potential stationary noise sources related to long- term operations in the Project site would include mechanical equipment. Mechanical equipment (e.g., heating ventilation and air conditioning [HVAC] equipment) typically generates noise levels of approximately 50 to 60 dBA at 50 feet. HVAC equipment is expected to be roof-mounted at a minimum worst-case distance of approximately 1,040 feet from the closest sensitive receptors to the southeast. The closest adjacent commercial/industrial uses would be approximately 200 feet away. Typical noise levels from HVAC equipment at 200 feet are approximately 48 dBA, which is less than a perceptible difference in noise level when compared to existing noise levels of 58 dBA (refer to Table 19) and would also be below the City's 75 dBA noise standard for commercial and industrial uses. Additionally, roof-mounted HVAC equipment is anticipated to be installed closer to the middle of the building and the distance to sensitive receptors will likely be farther, which will reduce noise levels. Furthermore, equipment will likely be located behind a parapet for additional noise attenuation. Operation of mechanical equipment would not increase ambient noise levels beyond the acceptable compatible land use noise levels. Therefore, the proposed Project would result in a less than significant impact related to stationary noise levels.

Truck and Loading Dock Noise

The proposed Project would include one building with 16 loading docks and 16 van loading doors. Loading and unloading activities would occur on the north, south, and west sides of the proposed building. Typically, noise levels associated with truck and van loading generate a noise level of 68 dBA at a distance of 50 feet. The closest residences would be located approximately 1,040 feet southeast of the loading areas and would experience truck and van noise levels of approximately 42 dBA, which is below the 55 dBA exterior residential noise standard designated in the Municipal Code. Noise levels at the closest industrial and commercial uses located approximately 150 feet away would be 59 dBA which is below the City's 75 dBA standard for these uses. This noise level

would be further attenuated by intervening structures and topography. Noise levels associated with trucks, vans, and loading/unloading activities would be less than significant.

Parking Noise

The proposed Project would accommodate the need for parking. Traffic associated with parking lots is typically not of sufficient volume to exceed community noise standards, which are based on a time-averaged scale such as the CNEL scale. The instantaneous maximum sound levels generated by a car door slamming, engine starting up, and car pass-bys range from 60 to 63 dBA and may be an annoyance to adjacent noise-sensitive receptors. Conversations in parking areas may also be an annoyance to adjacent sensitive receptors. Sound levels of speech typically range from 33 dBA at 50 feet for normal speech to 50 dBA at 50 feet for very loud speech. It should be noted that parking lot noises are instantaneous noise levels compared to noise standards in the hourly L_{eq} metric, which are averaged over the entire duration of a time period.

Parking lot noise would occur within the surface parking lots on-site. It is also noted that parking lot noise occurs at the adjacent properties under existing conditions. Parking lot noise would be consistent with the existing noise in the vicinity and would be partially masked by background noise from air traffic to the north of the site and vehicle traffic along Foothill Boulevard. Actual noise levels over time resulting from parking lot activities is anticipated to be far below the City's noise guidelines. Therefore, noise impacts from parking lots would be less than significant.

Off-Site Traffic Noise

Future development generated by the proposed Project would result in additional traffic on adjacent roadways, thereby increasing vehicular noise near existing and proposed land uses. Based on the Traffic Impact Analysis, the proposed Project would result in approximately 2,483 total daily trips (2,583 passenger car equivalent trips). The Operational Year "2020 Without Project" and "2020 Plus Project" scenarios are compared in **Table 20, Opening Year 2020 Traffic Noise Levels**. As described in the Project Traffic Impact Analysis, future year traffic volumes include cumulative projects as well as ambient growth.

As shown in Table 20, roadway noise levels would range from 66.0 dBA to 70.6 under "2020 Without Project" conditions and from 66.5 dBA to 70.7 dBA under "2020 Plus Project" conditions. The highest increase in noise levels would occur along Central Avenue. As shown in Table 20, Central Avenue is expected experience an increase in ambient noise levels of 0.7, 67.3 dBA for two roadway segments. The segment from Foothill Boulevard to 11th Street would increase to 66.7 dBA and the segment from 11th Street to Arrow Route would increase to 67.3 dBA. However, the increase of 0.7 dBA would be below the perceptible noise level change of 3.0 dBA. Additionally, these noise levels are all below the City's 75 dBA standard for industrial uses and 70 dBA standard for commercial uses along this roadway segment. It should be noted that operational truck routes for the Project would likely occur along Foothill Boulevard to Monte Vista Avenue to reach the SR-210 freeway. Modeled truck percentages were increased during the "Plus Project" scenario to reflect the additional trucks that could occur along the Project study roadway segments. As discussed above, traffic from the proposed Project would not cause roadway segments to exceed the City's thresholds and would also not create a perceptible traffic noise increase. Therefore, no significant impacts would occur.

Table 20: Opening Year 2020 Traffic Noise Levels

Roadway Segment	2020 Without Project		2020 Plus Project		Change	Applicable Noise Standard (dBA)[1]	Significant Impacts[2]
	ADT	dBA CNEL at 100 feet from Roadway Centerline	ADT	dBA CNEL at 100 feet from Roadway Centerline			
Baseline Road							
Monte Vista Avenue to SR-210 Ramps	28,815	70.1	28,815	70.2	0.1	60	No
SR-210 Ramps to Benson Avenue	32,430	70.6	32,620	70.7	0.1	60	No
Foothill Boulevard							
Monte Vista Avenue to Central Avenue	22,730	69.1	22,940	69.2	0.1	70	No
Central Avenue to Project Driveway	12,930	66.6	13,130	66.7	0.1	70	No
Project Driveway to Benson Avenue	12,270	66.3	12,755	66.5	0.2	70	No
Monte Vista Avenue							
Baseline Road to Foothill Boulevard	21,015	68.6	21,090	68.8	0.2	60	No
Central Avenue							
Foothill Boulevard to 11th Street	14,155	66.0	14,525	66.7	0.7	70	No
11th Street to Arrow Route	16,630	66.6	17,275	67.3	0.7	60	No
Arrow Route to Arrow Highway	21,655	67.7	22,265	68.3	0.6	60	No
Arrow Highway to Moreno Street	29,340	69.0	29,910	69.4	0.4	60	No
Moreno Street to I-10 Ramps	40,890	70.4	41,390	70.6	0.2	60	No
Benson Avenue							
Baseline Road to 15th Street	21,380	68.4	21,690	68.8	0.4	60	No
15th Street to 13th Street	20,685	68.2	20,975	68.6	0.4	60	No
13th Street to Foothill Boulevard	21,650	68.4	21,650	68.7	0.3	60	No

ADT = average daily trips; dBA = A-weighted decibels; CNEL = community noise equivalent level

Notes:
1. Although some roadway segments may be adjacent to various land uses with different noise standards, the most conservative noise standards are reported.
2. With Project noise levels must exceed the applicable noise standard and result in a 3.0 dBA increase to result in a significant impact.
Source: Based on traffic data within the *Foothill Boulevard Warehouse Traffic Impact Analysis*, prepared by Translutions, November 2019.
Refer to Appendix G for traffic noise modeling assumptions and results.

The Horizon Year "2040 Without Project" and "2040 Plus Project" scenarios were also compared. As shown in **Table 21, Horizon Year 2040 Traffic Noise Levels**, roadway noise levels would range from 66.5 dBA to 71.0 dBA under "2040 Without Project" conditions and from 66.9 dBA to 71.1 dBA under "2040 Plus Project" conditions. As shown in Table 21, the highest noise levels would occur along Central Avenue. Central Avenue is expected experience an increase in ambient noise levels of up to 0.7 dBA from Foothill Boulevard to 11th Street. This level is below the perceptible noise level change of 3.0 dBA, and the resulting noise level is 67.2 dBA, which is below the City's 75 dBA standard for industrial uses and 70 dBA standard for commercial uses along this roadway segment. The remainder of the Project-related traffic noise increases would be below 3.0 dBA, which is not perceptible. Therefore, no significant impacts would occur.

Table 21: Horizon Year 2040 Traffic Noise Levels

Roadway Segment	2040 Without Project		2040 Plus Project		Change	Applicable Noise Standard (dBA)[1]	Significant Impacts[2]
	ADT	dBA CNEL at 100 feet from Roadway Centerline	ADT	dBA CNEL at 100 feet from Roadway Centerline			
Baseline Road							
Monte Vista Avenue to SR-210 Ramps	33,710	70.8	33,710	70.8	0.0	60	No
SR-210 Ramps to Benson Avenue	35,920	71.0	36,110	71.1	0.1	60	No
Foothill Boulevard							
Monte Vista Avenue to Central Avenue	24,825	69.5	25,035	69.6	0.1	70	No
Central Avenue to Project Driveway	13,615	66.8	13,815	66.9	0.1	70	No
Project Driveway to Benson Avenue	13,340	66.7	13,825	66.9	0.2	70	No
Monte Vista Avenue							
Baseline Road to Foothill Boulevard	22,450	68.9	22,525	69.1	0.2	60	No
Central Avenue							
Foothill Boulevard to 11th Street	16,020	66.5	16,390	67.2	0.7	70	No
11th Street to Arrow Route	18,430	67.1	19,075	67.7	0.6	60	No
Arrow Route to Arrow Highway	19,020	67.2	19,630	67.7	0.5	60	No
Arrow Highway to Moreno Street	26,460	68.6	27,030	69.0	0.4	60	No
Moreno Street to I-10 Ramps	38,775	70.2	39,275	70.4	0.2	60	No
Benson Avenue							
Baseline Road to 15th Street	23,335	68.8	23,645	69.1	0.3	60	No
15th Street to 13th Street	19,925	68.0	20,215	68.5	0.5	60	No
13th Street to Foothill Boulevard	20,820	68.2	20,820	68.5	0.3	60	No

ADT = average daily trips; dBA = A-weighted decibels; CNEL = community noise equivalent level

Notes:
1) Although some roadway segments may be adjacent to various land uses with different noise standards, the most conservative noise standards are reported.
2) With Project noise levels must exceed the applicable noise standard and result in a 3.0 dBA increase to result in a significant impact.
Source: Based on traffic data within the *Foothill Boulevard Warehouse Traffic Impact Analysis*, prepared by Translutions, November 2019.
Refer to Appendix G for traffic noise modeling assumptions and results.

Project Design Features:

NOI-1: A construction management plan shall be implemented prior to Grading Permit issuance which shall contain the following elements:

- Construction contracts shall specify that all construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers and other state required noise attenuation devices.
- Property owners and occupants located within 300 feet of the Project boundary shall be sent a notice, at least 15 days prior to commencement, regarding the construction schedule of the proposed Project. A sign, legible at a distance of 50 feet shall also be posted at the Project construction site. All notices and signs shall be reviewed and approved by the City of Upland Development Services Department, prior to mailing or posting and shall indicate the dates and duration of construction activities, as well as provide a contact name and a telephone number where residents can inquire about the construction process and register complaints.
- Construction noise reduction methods shall include shutting off idling equipment, installing temporary acoustic barriers around stationary construction noise sources, maximizing the distance between construction equipment staging areas and occupied residential areas, and electric air compressors and similar power tools.
- Construction haul routes shall be designed to avoid noise sensitive uses (e.g., residences, convalescent homes, etc.), to the extent feasible.
- During construction, stationary construction equipment shall be placed such that emitted noise is directed away from sensitive noise receivers.
- Construction activities shall not take place outside of the allowable hours specified by the City's *Municipal Code Chapter 9.40.100(M)* (allowable construction hours are between 7:00 a.m. and 6:00 p.m. on weekdays).

Mitigation Measures: No mitigation is required.

b) Generation of persons to or generation of excessive groundborne vibration or groundborne noise levels? ***Less Than Significant Impact.***

Increases in groundborne vibration levels attributable to the proposed Project would be primarily associated with short-term construction-related activities. Construction on the Project site would have the potential to result in varying degrees of temporary groundborne vibration, depending on the specific construction equipment used and the operations involved.

The Federal Transit Administration (FTA) guidelines set forth in their 2018 Transit Noise and Vibration Assessment Manual are used to evaluate potential impacts related to construction vibration for both potential building damage and human annoyance. Vibration impacts associated with human annoyance are evaluated in vibration decibels (VdB) (the vibration velocity level in decibel scale), while vibration impacts associated with building damage is evaluated. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. Building damage can be cosmetic or structural.

Based on the FTA guidance, groundborne vibration could result in building damage if any of the following were to occur:

- Project construction activities cause groundborne vibration levels to exceed 0.5 in/sec PPV at the nearest offsite reinforced-concrete, steel, or timber building.

- Project construction activities cause groundborne vibration levels to exceed 0.3 in/sec PPV at the nearest offsite engineered concrete and masonry building.
- Project construction activities cause groundborne vibration levels to exceed 0.2 in/sec PPV at the nearest offsite non-engineered timber building.
- Project construction activities cause groundborne vibration levels to exceed 0.12 in/sec PPV at buildings extremely susceptible to vibration damage, such as historic buildings.

Based on FTA guidance, construction vibration could be perceived as annoying to humans if any of the following were to occur:

- Project construction activities cause groundborne vibration levels to exceed 72 VdB at off-site sensitive uses, including residential uses.

Table 22, Typical Construction Equipment Vibration Levels, lists vibration levels at 25 feet for typical construction equipment. Groundborne vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance. As indicated in Table 22, based on FTA data, vibration velocities from typical heavy construction equipment operations that would be used during Project construction range from 0.003 to 0.089 in/sec PPV at 25 feet from the source of activity.

The nearest sensitive receptors are the residential uses approximately 1,040 feet to the southeast and the nearest structures (commercial buildings) are approximately 200 feet from the closest active construction zone. Using the calculation shown in Table 22, at 100 feet the vibration velocities from construction equipment would not exceed 0.011 in/sec PPV, which is well below the FTA's 0.20 PPV threshold. Construction equipment would also not exceed the human annoyance standard of 72 VdB. It can be assumed that at a greater distance this vibration velocity would be even less. Therefore, at 200 feet, vibration levels would be reduced further. It is also acknowledged that construction activities would occur throughout the Project site and would not be concentrated at the point closest to the nearest residential structure. Therefore, vibration impacts associated with the proposed Project would be less than significant.

Table 22: Typical Construction Equipment Vibration Levels

Equipment	Peak Particle Velocity at 25 Feet (in/sec)	Peak Particle Velocity at 100 Feet (in/sec)[1]	Approximate VdB at 25 Feet	Approximate VdB at 100 Feet
Large Bulldozer	0.089	0.011	87	69
Caisson Drilling	0.089	0.011	87	69
Loaded Trucks	0.076	0.010	86	68
Jackhammer	0.035	0.004	79	61
Small Bulldozer/Tractors	0.003	0.000	58	41
Notes: Calculated using the following formula: PPVequip = PPVref x (25/D)1.5 Where: PPVequip = the peak particle velocity in in/sec of the equipment adjusted for the distance PPVref = the reference vibration level in in/sec from Table 7-4 of the Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018. D = the distance from the equipment to the receiver				
Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018.				

Once operational, the Project would not be a source of groundborne vibration. Operations of the proposed Project would include truck deliveries. Due to the rapid drop-off rate of ground-borne vibration and the short duration of the associated events, vehicular traffic-induced ground-borne vibration is rarely perceptible beyond the roadway right-of-way, and rarely results in vibration levels that cause damage to buildings in the vicinity. Table 22 shows that the loaded trucks would have a PPV of 0.076 in/sec and generate 86 VdB at 25 feet. As noted above, the closest adjacent uses would be more than 100 feet away and sensitive uses would be approximately 1,040 feet from the project site but could be approximately 100 feet from the potential truck routes accessed by Project trucks. At 100 feet, worst case truck vibration levels would be reduced to 0.010 in/sec PPV and 68 VdB and would not exceed FTA thresholds for building damage or annoyance. Impacts would be less than significant in this regard.

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

Cable Airport is the nearest airport in the immediate area, located directly adjacent to the Project site along the northern and western limits of the site. A review of the Cable Airport ALUCP, shows the Project site located within noise impact zones. The Project site is currently exposed to noise levels greater than 65 dBA closest to the airstrip and noise levels between 60-65 dBA further from the airstrip. As indicated in Table 13, above, the City's General Plan designates noise levels at industrial uses to be normally acceptable up to 75 dBA. Therefore, airport noise impacts would be less than significant.

Cumulative Impacts

A significant impact would result only if both the combined and incremental effects criteria have been exceeded. If both the combined and incremental effects criteria are exceeded, the applicable noise and land use compatibility standards must also be exceeded. Noise is a localized phenomenon and reduces as distance from the source increases. Consequently, only the proposed Project and growth due to occur in the Project site's general vicinity would contribute to cumulative noise impacts. **Table 23, Cumulative Noise Scenario**, lists the traffic noise effects along roadway segments in the Project vicinity for "Existing", "2040 Without Project", and "2040 Plus Project" conditions, including incremental and net cumulative impacts. As described in the Project Traffic Impact Analysis, future year traffic volumes include cumulative projects as well as ambient growth. The highest increase in noise levels would occur along Foothill Boulevard. As shown in Table 23, Central Avenue (from Foothill Blvd. to 11th Street and 11th Street to Arrow Route) is expected to experience an increase in ambient noise levels of up to 2.6 dBA by the year 2040 with the addition of the Project. Additionally, the combined effects for these segments would result in an increase of up to 0.7 dBA for Foothill Blvd. to 11th Street. However, the resulting noise level is 67.2 dBA, which is below the City's 75 dBA standard for industrial uses and 70 dBA standard for commercial uses along this roadway segment. The remainder of the Project-related traffic noise increases would be below the combined and incremental effects criteria. Therefore, no significant impacts would occur.

Table 23: Cumulative Noise Scenario

Roadway Segment	dBA@ 100 ft from Road CL			Combined Effects	Incremental Effects	Applicable Noise Standard (dBA)[1]	Cumulative Significant Impact? [2]
	Existing	2040 Without Project	2040 With Project	Difference Existing and 2040 Plus Project	Difference 2040 Without Project and Plus Project		
Baseline Road							
Monte Vista Ave.to SR-210 Ramps	69.2	70.8	70.8	1.6	0.0	60	No
SR-210 Ramps to Benson Ave.	69.8	71.0	71.1	1.3	0.1	60	No
Foothill Boulevard							
Monte Vista Ave. to Central Ave.	68.3	69.5	69.6	1.3	0.1	70	No
Central Ave.to Project Driveway	65.7	66.8	66.9	1.2	0.1	70	No
Project Driveway to Benson Ave.	65.4	66.7	66.9	1.5	0.2	70	No
Monte Vista Avenue							
Baseline Rd. to Foothill Blvd.	67.6	68.9	69.1	1.2	0.2	60	No
Central Avenue							
Foothill Blvd. to 11th Street	64.6	66.5	67.2	2.6	0.7	70	No
11th Street to Arrow Route	65.1	67.1	67.7	2.6	0.6	60	No
Arrow Route to Arrow Highway	66.4	67.2	67.7	1.3	0.5	60	No
Arrow Highway to Moreno Street	67.7	68.6	69.0	1.3	0.4	60	No
Moreno Street to I-10 Ramps	69.4	70.2	70.4	1.0	0.2	60	No
Benson Avenue							
Baseline Road to 15th Street	67.4	68.8	69.1	1.7	0.3	60	No
15th Street to 13th Street	67.2	68.0	68.5	1.3	0.5	60	No
13th Street to Foothill Blvd.	67.4	68.2	68.5	1.1	0.3	60	No

Notes: ADT = average daily traffic; dBA = A-weighted decibels; CNEL = community noise equivalent level

Notes:

1) Although some roadway segments may be adjacent to various land uses with different noise standards, the most conservative noise standards are reported.

2) With Project noise levels must exceed the applicable noise standard and result in a 3.0 dBA increase to result in a significant impact.

Source: Based on traffic data within the *Foothill Boulevard Warehouse Traffic Impact Analysis*, prepared by Translutions, November. Refer to Appendix G for traffic noise modeling assumptions and results.

14. Population and Housing

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

Discussion

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

The proposed Project would result in the construction of one warehouse/parcel delivery service building with an ancillary office/retail space. The proposed Project does not involve any residential development. Roadways adjacent to the proposed Project include Foothill Boulevard to the south, Airport Drive to the west, 13th Street to the north, and Benson Avenue to the east. The proposed Project would require on-site infrastructure improvements including the construction of four driveways to access the site, one would be located on 13th Street, one would be located at the termination of Central Avenue, and two would be located along Foothill Boulevard, but there is no proposal to extend these or any other roadway to any other areas. The Project would also include street improvements to Foothill Boulevard, Central Avenue and 13th Street, but would not include construction of new roadways or other significant infrastructure improvements that could contribute to direct or indirect unplanned growth.

In addition, infrastructure (water, sewer, electrical) is located in the immediate vicinity of the proposed Project and these services would be extended to the site to serve the proposed Project. The proposed Project would not result in the extension of infrastructure beyond areas currently served.

Unemployment in San Bernardino County is currently 4.5%, within the Riverside-San Bernardino-Ontario Municipal Service Area (MSA) it is 4.6%,[17] and within the City of Upland unemployment is 3.4%.[18] The proposed Project would create new jobs and increase demand for new employees. By providing jobs, the proposed Project is expected to benefit the local community while having little

[17] California Employment Development Department, Riverside-San Bernardino-Ontario Metropolitan Statistical Area (MSA), August 2019 – Preliminary. Available at https://www.labormarketinfo.edd.ca.gov/file/lfmonth/rive$pds.pdf Accessed September 27, 2019.

[18] California Employment Development Department, *Labor Force and Unemployment Rate* for Cities and Census Designated Places. Available at: http://www.labormarketinfo.edd.ca.gov/data/labor-force-and-unemployment-for-cities-and-census-areas.html. Accessed September 27, 2019.

effect on population growth. The growth that would occur as a result of the proposed Project is planned for in the City's General Plan, which designated the site for use as a Commercial/Industrial Development. Given the need for jobs to meet existing population, and the relatively small number of jobs created by the proposed Project compared to those on a regional basis, the proposed Project would not induce substantial population growth. Accordingly, although the proposed Project would create job opportunities, a warehouse/parcel delivery service project such as this is not considered inherently growth inducing. Therefore, the proposed Project would not result in any adverse change in the population, housing, or employment projections developed by or for the City of Upland. Impacts would be less than significant and no mitigation is required.

b) *Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?* ***No Impact****.*

The Project site consists of both disturbed and undeveloped land. No structures are currently located on the site. The Project site does not contain any housing which would be removed or people that would be displaced, and as such, the construction of substantial replacement housing would not be required. Therefore, impacts would be less than significant and no mitigation is required.

Cumulative Impacts

Projects in the vicinity of the proposed Project that are approved and pending implementation are discussed in *Section VI.17, Transportation*. However, the proposed Project would not result in direct or indirect permanent or temporary impacts related to population, housing, or employment. Therefore, the proposed Project would not result in incremental effects to population, housing, or employment that could be compounded or increased when considered together with similar effects from other past, present, and reasonably foreseeable probable future projects. As a result, no cumulative impacts related to population and housing would occur.

15. Public Services

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i. Fire protection?	☐	☐	☒	☐
ii. Police protection?	☐	☐	☒	☐
iii. Schools?	☐	☐	☐	☒
iv. Parks?	☐	☐	☒	☐
v. Other public facilities?	☐	☐	☐	☒

Discussion

a) Would the project adversely impact:

i. *Fire protection?* ***Less Than Significant Impact.***

The San Bernardino County Fire Protection Department (SBFD) provides fire protection services for the City of Upland. The SBFD service area covers approximately 19,000-square miles and is led by a Fire Chief/Fire Warden and two Deputy Fire Chiefs who oversee 1,052 county fire personnel and 681 fire suppression personnel. The SBFD deploys from 65 active fire stations staffed 24 hours per day by career firefighters. The Upland Fire Department was annexed into the SBFD on July 22, 2017. The SBFD continues to staff three city fire stations to cover the 15-square mile service area and 76,000 residents within the City of Upland. The closest fire station to the Project site is Fire Station #163 located approximately 0.2 miles northeast of the Project site at 1350 N Benson Avenue in the City of Upland[19].

Development of the proposed Project would place an additional demand on existing fire services. Per Section 3.44.050 of the Municipal Code, development impact fees for general government, fire and police are established upon issuance of all building permits for development within the boundaries of the City to pay for public improvements. Furthermore, consistent with standard County requirements to offset the increased demand for fire protection services, the proposed Project would be conditioned to provide fire safety and fire suppression measures including compliance with State and local fire codes, fire sprinklers, fire hydrant system, paved access, and secondary access routes. The proposed Project does

[19] County of San Bernardino Fire Department. Available at: https://www.sbcfire.org/. Accessed September 27, 2019.

not require new or physically altered fire protection facilities. Therefore, impacts would be less than significant, and no mitigation is required.

ii. *Police protection?* ***Less Than Significant Impact.***

Police protection services would be provided by the City of Upland Police Department. The Upland Police Department operates from one police station, located approximately 0.3 miles east of the Project site at 1499 W. 13th Street in the City of Upland. Currently there are 46 officer positions at the Upland Police Department who would serve the needs of the proposed Project and future employees[20].

Although a new warehouse/parcel delivery service building with an ancillary office/retail space and associated parking and landscaping would be constructed and operate on the Project site, the proposed Project is in a developed area and is currently served by the Police Department. Because of this, and because law enforcement personnel already patrol the Project vicinity and surrounding areas, the proposed Project is not anticipated to increase response times to the Project site or surrounding areas. As a means to provide adequate funding for police services, the City has established development impact fees that are charged to all new developments within the City of Upland. The fees are designed to cover the added expense to police services resulting from new development. The development impact fees levied on the proposed Project, based on the City of Upland Development Fee Schedule, would help the City provide for infrastructure, equipment, and staffing. The proposed Project does not require new or physically altered police protection facilities. Therefore, impacts would be less than significant and no mitigation is required.

iii. *Schools?* ***No Impact.***

The proposed Project is a non-residential land use. Implementation of the proposed Project would not directly result in an increased population in the City and would therefore not increase the need for the construction of additional school facilities. Per the City's Development Impact Fee Table, the Upland Unified School District would require development fees be paid by the applicant. Upon payment of the required fees, no significant impact to school services or facilities would occur and no mitigation is required.

iv. *Parks?* ***Less than Significant Impact.***

The proposed Project does not have a residential component. As such, the proposed Project would not create a significant increased demand or need for the construction of park facilities. The City has established park development fees to offset the costs associated with increased maintenance and the addition of park facilities resulting from new development. The City's park development fees are generated based on the type of land use. Residential uses are required to pay a park development fee; however, commercial and industrial uses are not obligated to contribute to park development fees. Therefore, the impact would be less than significant and no mitigation is required.

v. *Other public facilities?* ***No Impact.***

The City requires that certain types of development pay impact fees to compensate for additional services provided by public facilities as a result of implementation of their project.

[20] City of Upland Police Department Organization chart. Available at https://ci.upland.ca.us/uploads/files/Police/Org%20Chart%20revised%20Jan%202017.pdf. Accessed September 27, 2019.

The City of Upland requires general development impact fees based on the square footage of the proposed Project. The proposed Project does not include residential uses and would not result in a direct increase in population within the City or surrounding area. Therefore, based on the payment of required developer fees and the nominal impacts to the City's population, impacts to other public facilities would be less than significant and no mitigation is required.

Cumulative Impacts

The proposed Project would not result in a significant cumulative impact to public services or facilities. Projects in the vicinity of the proposed Project that are approved and pending implementation are discussed in *Section VI.17, Transportation*. However, the proposed Project would not result in growth beyond what has been planned in the General Plan. Similar to the proposed Project, future projects would be required to compensate the City for potential increases in demand for public services. It is expected that impacts of future projects also would be reduced to a less than significant level through payment of fees and compensation for the provision of services. Therefore, the proposed Project would not result in substantial incremental effects to public services and facilities when taken in sum with other past, present, and reasonably foreseeable projects. Therefore, the proposed Project would not result in cumulatively considerable impacts to public services or facilities.

16. Recreation

Issues	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

Discussion

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? ***No Impact.***

The proposed Project does not include development of any residences, which would directly increase population and result in increased demand for parks and recreational facilities. Accordingly, implementation of the proposed Project would not generate an increase in demand on existing public or private parks or other recreational facilities that could result in increased physical deterioration of the facility. Because the proposed Project consists of a warehouse/parcel delivery service use, the proposed Project would not be subject to the City of Upland Development Park Impact Fee. Therefore, no impact to existing recreational facilities would occur and no mitigation is required.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? ***No Impact.***

As discussed above, the proposed Project consists of one warehouse/parcel delivery service building with an ancillary office/retail space and associated parking and landscaping and does not include any residential use that would increase the demand on and increase the deterioration of an existing park or recreational facility. In addition, the proposed Project site is not identified in the Upland General Plan as a park or open space resource. The proposed Project does not include the construction of recreational facilities, nor would it require the construction or expansion of recreational facilities. Therefore, the proposed Project would not have an adverse physical effect on the environment from providing recreational resources and no impact would occur. No mitigation is required.

Cumulative Impacts

Projects in the vicinity of the proposed Project that are approved and pending implementation are discussed in *Section VI.17, Transportation*. However, the proposed Project would not result in an increased use of recreational facilities or require construction or expansion of existing recreational facilities. Therefore, take in sum with past, present, and reasonably foreseeable projects, no cumulative impacts on recreational facilities would result from implementation of the proposed Project.

17. Transportation

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

A Traffic Impact Analysis (TIA) was prepared by Translutions, Inc. (November 2019) to assess the potential traffic impacts of the proposed Project. The findings of the TIA are summarized in this Initial Study; the TIA is provided as **Appendix H-1**. A Trip Generation for Retail Development Memorandum (Retail Analysis Memorandum) was also prepared by Translutions, Inc. (November 2019) to analyze the number of trips that would be generated for the proposed Project if the same size building were developed for retail uses. The findings of the Retail Analysis memorandum are summarized in this Initial Study; the memorandum is provided as **Appendix H-2**.

As discussed below, although the site is zoned to accommodate truck traffic associated with a Commercial/Industrial Mixed-Use facility, a total of 25 trucks would arrive to the facility daily (for a total of 50 truck trips), of which 2% would occur during each of the a.m. and p.m. peak hours. No more than 5 trucks would travel to the site during daytime hours. All trucks would access the site via the driveway at the north leg of Central Avenue/Foothill Boulevard.

Discussion

a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? ***Less Than Significant Impact.***

The TIA was prepared in consultation with City staff through the Scoping Letter Agreement process and in accordance with the requirements for a TIA established by the San Bernardino County Management Program (CMP), adopted in November 1993 and last revised in 2016. The CMP required analysis of off-site intersections potentially affected by the Project, which the CMP defines as intersections at which the Project is forecast to add 50 or more peak hour trips. The City of Upland and Montclair follows the guidelines set forth in the CMP. The TIA study area includes 17 intersections and Project driveways as identified below.

- Monte Vista Avenue/Baseline Road (City of Claremont – 50 trip threshold not met, requested by City);
- SR-210 Ramps/Baseline Road (Caltrans) – 50 trip threshold not met, requested by City);
- Benson Avenue/Baseline Road (City of Upland – 50 trip threshold not met, requested by City);
- Benson Avenue/15th Street (City of Upland – 50 trip threshold not met, requested by City);

- Benson Avenue/13th Street (City of Upland – 50 trip threshold not met, requested by City);
- Monte Vista Avenue/Foothill Boulevard (City of Upland – 50 trip threshold not met, requested by City);
- Central Avenue/Foothill Boulevard (City of Upland – 50 trip threshold met);
- Project Driveway/Foothill Boulevard (City of Upland – 50 trip threshold met);
- Benson Avenue/Foothill Boulevard (City of Upland – 50 trip threshold met);
- Central Avenue/11th Street (City of Upland – 50 trip threshold met);
- Central Avenue/Arrow Route (City of Upland – 50 trip threshold met);
- Central Avenue/Arrow Highway (City of Montclair – 50 trip threshold met);
- Central Avenue/Moreno Street (City of Montclair – 50 trip threshold met);
- Central Avenue/I-10 Westbound Ramps (Caltrans – 50 trip threshold met);
- Central Avenue/I-10 Eastbound Ramps (Caltrans – 50 trip threshold not met, requested by City);
- Project Driveway 2/Foothill Boulevard (City of Upland – 50 trip threshold met); and
- Monte Vista Avenue/Claremont Boulevard (City of Claremont– 50 trip threshold not met, requested by City).

Traffic conditions within the study area were analyzed for the following scenarios:

- Existing Conditions
- Existing With Project Conditions
- Opening Year (2020)
- Opening Year (2020) With Project Conditions
- Year 2040 Conditions
- Year 2040 With Project Conditions

Consistent with CMP requirements, the TIA analyzes weekday a.m. and p.m. peak hour conditions. The a.m. peak hour is defined as the one hour of highest traffic volumes occurring between 7:00 and 9:00 a.m. The p.m. peak hour is defined as the one hour of highest traffic volumes occurring between 4:00 and 6:00 p.m.

Trip Generation, Trip Distribution & Assignment

As a warehouse/parcel delivery use, the operations of the proposed Project would be similar to high-cube parcel hub warehouse facilities, but with some differences described below. Warehouse/parcel delivery uses typically entail one merchant/vendor, while parcel hub warehouses such as FedEx and UPS typically work with multiple merchants and vendors. Another difference is that parcel hub facilities have high truck traffic throughout the day, while the proposed warehouse/parcel delivery use would have a majority of truck trips occurring during the off-peak hours. Based on information provided by the client, a total of 25 trucks will arrive to the facility daily, of which 2% will occur during each of the a.m. and p.m. peak hours. The trip generation for the Project is based on trip generation rates for Land Use 156 "High-Cube Parcel Hub Warehouse" and Land Use 820 "Shopping Center" from Institute of Transportation Engineers' (ITE) Trip Generation (10th Edition). The rates included in the ITE *Trip Generation* for Parcel Hub Warehouses are net rates inclusive of passenger car, delivery vans, and truck traffic. However, to present a

conservative analysis, the trip generation rates from the *Trip Generation* has been assumed to be passenger cars and vans, and truck traffic has been added to the trip generation estimates.

All trucks would only access the site via the driveway at the north leg of Central Avenue/Foothill Boulevard. As stated previously, the majority of truck traffic would occur during the off-peak hours, with one truck entering and exiting the Project each peak hour. No more than 5 trucks would travel to the site during daytime hours. The peak hour truck trips were converted to passenger car equivalent (PCE)s using 3.0 for 4-axle trucks. **Table 24, Project Trip Generation**, summarizes the Project trip generation. As shown in Table 24, the Project is forecast to generate 202 PCE trips in the a.m. peak hour, 202 PCE trips in the p.m. peak hour, and 2,583 daily PCE trips. The traffic study conservatively does not take credit for the existing truck trips.

Trip distribution patterns for the proposed Project were developed based on the location of the Project in relation to the surrounding land uses and the regional network. Trip distribution patterns were developed separately for autos/vans and trucks.

Retail Analysis Memorandum

The TIA analyzed a building with 276,825 square feet of gross leasable area. A Retail Analysis Memorandum was also prepared to analyze the number of trips that would be generated if the same size building were developed for retail uses. The trip generation utilized in the Retail Analysis Memorandum is based on trip generation rates from the Institute of Transportation Engineers' (ITE) Trip Generation (10th Edition) and are based on Land Use 820 - "Shopping Center".

The Retail Analysis Memorandum found that a retail building the same size as the proposed Project is anticipated to generate 260 trips in the a.m. peak hour, 696 trips in the p.m. peak hour, and 7,941 daily trips. The TIA for the proposed warehouse Project forecasts 198 a.m. peak hour trips, 198 p.m. peak hour trips, and 2,483 daily trips. As shown in **Table 25, Trip Generation Comparison**, a retail use for the same size building would generate 62 trips more than the proposed warehouse Project in the a.m. peak hour, 498 trips more than the Project in the p.m. peak hour, and 5,459 more daily trips than the Project. The proposed warehouse Project is anticipated to generate 50 daily truck trips. While the ITE Trip Generation Manual does not have any data related to truck trips from retail uses, the California Emissions Estimator Model (CalEEMod) states that approximately 3.9% of trips from retail uses are from trucks. Therefore, a retail building the same size as the proposed Project is anticipated to generate approximately 310 daily truck trips. Therefore, a retail building would generate 260 more truck trips per day than the proposed Project.

LOS Definitions, Procedures and Thresholds

Level of service (LOS) is a measure of the quality of operational conditions within a traffic stream and is generally expressed in terms of such measures as speed and travel time, freedom to maneuver, traffic interruptions, and comfort and convenience. Levels range from A to F, with LOS A representing excellent (free-flow) conditions and LOS F representing extreme congestion. Consistent to the guidelines, the Highway Capacity Manual (HCM) procedures have been used to evaluate levels of service. This section discusses the LOS definitions, procedures, and thresholds used in the TIA.

Intersection LOS Thresholds

The analysis of traffic operations at intersections was conducted according to the Highway Capacity Manual 6th Edition (HCM) delay methodologies, which is described in the Highway Capacity Manual (Transportation Research Board, Washington, D.C., November 2016). Under the HCM methodology, LOS for signalized intersections is based on the average delay experienced by vehicles traveling through an intersection, whereas for unsignalized intersections, the LOS is based

on the worst approach where the minor leg has a shared lane and on the worst movement where the minor leg has dedicated turn lanes. **Table 26, Intersection LOS Criteria**, presents a brief description of each level of service letter grade, as well as the range of delays associated with each grade.

The Cities of Upland and Montclair use LOS D as the minimum level of service standard for intersection operations. The City of Upland does not have significant impact threshold criteria while the City of Montclair applies incremental thresholds based on the Project LOS as follows:

- LOS A/B – Project related increase of 10 seconds;
- LOS C – Project related increase of 8 seconds;
- LOS D – Project related increase of 5 seconds;
- LOS E – Project related increase of 2 seconds; and
- LOS F – Project related increase of 1 seconds.

The City of Claremont uses LOS D for secondary arterials and LOS E for major arterials. Based on the City of Claremont General Plan, Baseline Road is designated as a major arterial, indicating the minimum level of service is LOS E at the intersection of Monte Vista Avenue and Baseline Road. Also, Monte Vista Avenue is designated as a major arterial, indicating the minimum level of service is LOS E at the intersection of Monte Vista Avenue and Claremont Boulevard. The City of Claremont's significance criteria includes the following:

- If the intersection currently operates at a deficient level of service, the existing level of service shall be maintained.

Volume Development Methodology

Forecast traffic volumes at study intersections were developed based on discussion with City staff and consistent with the guidelines in the CMP. This section discusses the volume development methodology used to forecast future traffic volumes.

Existing Traffic Volumes

Existing traffic volumes are based on peak hour intersection turn movement counts collected by Counts Unlimited in May 2018. Vehicle classification counts (e.g., passenger vehicle, 2-axle truck, 3- axle truck, and 4 or more axle truck), were conducted at several intersections. Consistent to the Guidelines, PCE volumes at this intersection was computed using a PCE factor of 1.5 for 2-axle trucks, 2.0 for 3-axle trucks, and 3.0 for trucks with 4 or more axles. The percentage of trucks at the remaining intersections was determined from counts at nearby intersections on the same arterial.

Opening year (2020) Traffic Volumes

Opening year (2020) peak hour traffic volumes were developed by applying an annual growth rate of 2% per year (2018 to 2020) to the existing volumes and adding cumulative project trips at each study intersection. The cumulative projects were determined from City staff and development activity from the Cities of Claremont and Montclair. **Table 27: Cumulative Projects Trip Generation,** lists the cumulative projects included in the analysis. The cumulative projects are anticipated to generate 4,439 net a.m. peak hour trips, 6,703 net p.m. peak hour trips, and 76,861 net daily trips.

Table 24: Project Trip Generation

Land Use		Units	Peak Hour						Daily
			AM Peak Hour			PM Peak Hour			
			In	Out	Total	In	Out	Total	
High-Cube Parcel Hub Warehouse[1]	266.8	Per TSF	0.350	0.350	0.700	0.435	0.205	0.640	7.750
Passenger Vehicles Inbound/Outbound Splits			50%	50%	100%	68%	32%	100%	50%/50%
Passenger Vehicles Trip Generation			93	94	187	116	55	171	2,068
Trucks			1	1	2	1	1	2	50
Truck PCEs			3	3	6	3	3	6	150
Total Trip Generation			**96**	**97**	**193**	**119**	**58**	**177**	**2,218**
Retail[2]	10	Per TSF	0.583	0.357	0.940	1.829	1.981	3.810	37.750
Inbound/Outbound Splits			62%	38%	100%	48%	52%	100%	50%/50%
Trip Generation			6	3	9	18	20	38	378
Pass-By Trips			0	0	0	(6)	(7)	(13)	(13)
Total Net Trip Generation			**6**	**3**	**9**	**12**	**13**	**25**	**365**
Total Project Net Trip Generation			**102**	**100**	**202**	**131**	**71**	**202**	**2,583**

Notes:
Per TSF = Per Thousand Square Feet
1) Rates based on Land Use 156 - "High-Cube Parcel Hub Warehouse" from Institute of Transportation Engineers (ITE) Trip Generation (10th Ed.).
2) Rates based on Land Use 820 - "Shopping Center" from Institute of Transportation Engineers (ITE) Trip Generation (10th Ed.).

Table 25: Trip Generation Comparison

Land Use	A.M. Peak Hour	P.M. Peak Hour	Daily
Retail	260	696	7,942
Warehouse	198	198	2,483
Difference in Trip Generation (Retail – Warehouse)	**62**	**498**	**5,459**

Table 26: Intersection LOS Criteria

LOS	Description of Drivers' Perception and Traffic Operation	Delay in Seconds	
		Unsignalized	Signalized
A	This level is typically assigned when the volume-to-capacity ratio is low and either progression is exceptionally favorable, or the cycle length is very short. If it is due to favorable progression, most vehicles arrive during the green indication and travel through the intersection without stopping.	≤ 10	≤ 10
B	This level is assigned when the volume-to-capacity ratio is low and either progression is highly favorable, or the cycle length is short. More vehicles stop than with LOS A.	> 10 and ≤ 15	> 10 and ≤ 20
C	This level is typically assigned when progression is favorable, or the cycle length is moderate. Individual cycle failures (i.e., one or more queued vehicles are not able to depart as a result of insufficient capacity during the cycle) may begin to appear at this level. The number of vehicles stopping is significant, although many vehicles still pass through the intersection without stopping.	> 15 and ≤ 25	> 20 and ≤ 35
D	This level is typically assigned when the volume-to-capacity ratio is high and either progression is ineffective, or the cycle length is long. Many vehicles stop and individual cycle failures are noticeable.	> 25 and ≤ 35	> 35 and ≤ 55
E	This level is typically assigned when the volume-to-capacity ratio is high, progression is unfavorable, and the cycle length is long. Individual cycle failures are frequent.	> 35 and ≤ 50	> 55 and ≤ 80
F	This level is typically assigned when the volume-to-capacity ratio is very high, progression is very poor, and the cycle length is long. Most cycles fail to clear the queue.	> 50	> 80

Source: *Highway Capacity Manual, 6th Edition*

Table 27: Cumulative Projects Trip Generation

Project #	Name	Land Use	Quantity	Units	A.M. Peak Hour In	A.M. Peak Hour Out	A.M. Peak Hour Total	P.M. Peak Hour In	P.M. Peak Hour Out	P.M. Peak Hour Total	Daily
1	SP 16-18	Retail									
		Trip Generation Rates [1]			0.58	0.36	0.94	1.83	1.98	3.81	37.75
		Trip Generation	40.0	TSF	23	15	38	73	80	153	1,510
		Pass-By Trips			0	0	0	(25)	(27)	(52)	(52)
		Total Net Trip Generation			23	15	38	48	53	101	1,458
2	SP 16-10	Medical Office Building									
		Trip Generation Rates [2]			2.17	0.61	2.78	0.97	2.49	3.46	34.8
		Trip Generation	60.0	TSF	130	37	167	58	150	208	2,088
3	DR 18-08	Warehouse [3]									
		Passenger Cars	41.49	TSF	4	2	6	2	5	7	58
		Truck PCEs			0	8	8	0	8	8	43
		Total PCEs			4	10	14	2	13	15	101
4	SP 16-05	Retail									
		Trip Generation Rates [1]			0.58	0.36	0.94	1.83	1.98	3.81	37.75
		Trip Generation	8.7	TSF	5	3	8	16	18	34	327
		Pass-By Trips			0	0	0	(5)	(6)	(12)	(12)
		Total Net Trip Generation			5	3	8	11	12	22	315
5	SP 16-14	Warehouse [3]									
		Passenger Cars	76.00	TSF	8	3	11	3	9	12	106
		Truck PCEs			3	8	11	0	11	11	79
		Total PCEs			11	11	22	3	20	23	185
6	TM 18249	Single-Family Detached									
		Trip Generation Rates [4]			0.19	0.56	0.74	0.62	0.37	0.99	9.44
		Trip Generation	223	DU	41	124	165	139	82	221	2,105
7	TM 18274	Single-Family Detached									
		Trip Generation Rates [4]			0.19	0.56	0.74	0.62	0.37	0.99	9.44
		Trip Generation	145	DU	27	80	107	90	54	144	1,369
8	TM 18697	Single-Family Detached									
		Trip Generation Rates [4]			0.19	0.56	0.74	0.62	0.37	0.99	9.44
		Trip Generation	203	DU	38	112	150	127	74	201	1,916
9	TM 18951	Single-Family Detached									
		Trip Generation Rates [5]			-	-	-	-	-	-	-

Table 27: Cumulative Projects Trip Generation

Project #	Name	Land Use	Quantity	Units	A.M. Peak Hour In	A.M. Peak Hour Out	A.M. Peak Hour Total	P.M. Peak Hour In	P.M. Peak Hour Out	P.M. Peak Hour Total	Daily
		Trip Generation	78	DU	13	29	42	29	21	50	594
10	TM 20017	Single-Family Detached									
		Trip Generation Rates [6]			-	-	-	-	-	-	-
		Trip Generation	39	DU	7	22	29	25	14	39	371
11	TTM 17481	Single-Family Detached									
		Trip Generation [7]	61	DU	6	12	18	14	10	24	402
		Retail									
		Trip Generation [7]	1.4	TSF	8	7	15	8	5	13	174
12	TT 16-02 TTM 20017	Single-Family Detached									
		Trip Generation Rates			-	-	-	-	-	-	-
		Trip Generation [8]	68	DU	13	38	51	43	25	68	647
13	SP 16-20	Single-Family Detached									
		Trip Generation Rates [4]			0.19	0.56	0.74	0.62	0.37	0.99	9.44
		Trip Generation	40	DU	7	23	30	25	15	40	378
14	SP 16-26	Apartments									
		Trip Generation Rates [9]			0.11	0.35	0.46	0.35	0.21	0.56	7.32
		Trip Generation	23	DU	2	9	11	8	5	13	168
15	PR 14-01	Apartments									
		Trip Generation Rates [9]			0.11	0.35	0.46	0.35	0.21	0.56	7.32
		Trip Generation	50	DU	5	18	23	18	10	28	366
16	sp 16-16 TTM 20023	Townhomes									
		Trip Generation Rates [9]			0.11	0.35	0.46	0.35	0.21	0.56	7.32
		Trip Generation	52	DU	6	18	24	18	12	30	381
17	TTM 20117	Single-Family Detached									
		Trip Generation Rates [4]			0.19	0.56	0.74	0.62	0.37	0.99	9.44
		Trip Generation	48	DU	9	27	36	30	18	48	453
18	The Enclave At Upland	Single-Family Detached									
		Trip Generation Rates [10]			-	-	-	-	-	-	-
		Trip Generation	350	DU	66	197	263	221	129	350	3,332
19	Upland Commons	Apartments									
		Trip Generation Rates [9]			0.11	0.35	0.46	0.35	0.21	0.56	7.32
		Trip Generation	48	DU	5	17	22	17	10	27	351

Table 27: Cumulative Projects Trip Generation

Project #	Name	Land Use	Quantity	Units	A.M. Peak Hour In	A.M. Peak Hour Out	A.M. Peak Hour Total	P.M. Peak Hour In	P.M. Peak Hour Out	P.M. Peak Hour Total	Daily
20	TPM 19856	Apartments									
		Trip Generation Rates [9]			-	-	-	-	-	-	-
		Trip Generation	263	DU	25	70	95	71	45	116	1,431
21		Restaurant									
		Trip Generation Rates [11]			5.47	4.47	9.94	6.06	3.71	9.77	112.18
		Trip Generation	1.2	TSF	7	5	12	7	5	12	135
		Pass-By Trips			0	0	0	(3)	(2)	(5)	(5)
		Total Net Trip Generation			7	5	12	4	3	7	130
22	Sycamore Hills PA 3	Single-Family Detached									
		Trip Generation Rates [4]			0.19	0.56	0.74	0.62	0.37	0.99	9.44
		Trip Generation	93	DU	17	52	69	58	35	93	878
		Townhomes									
		Trip Generation Rates [9]			0.11	0.35	0.46	0.35	0.21	0.56	7.32
		Trip Generation	83	DU	9	29	38	29	18	47	608
23	1985 11th Street	Warehouse [12]									
		Passenger Cars	67.99	TSF	-	-	-	-	-	-	-
		Truck PCEs			-	-	-	-	-	-	-
		Total PCEs			56	12	68	14	56	70	556
24	Sycamore Hills Plaza	Retail									
		Trip Generation Rates [1]			0.58	0.36	0.94	1.83	1.98	3.81	37.75
		Trip Generation	35.0	TSF	20	13	33	64	70	134	1,321
		Pass-By Trips			0	0	0	(22)	(24)	(46)	(46)
		Total Net Trip Generation			20	13	33	42	46	88	1,275
		Market									
		Trip Generation Rates [13]			2.29	1.53	3.82	4.71	4.53	9.24	106.78
		Trip Generation	30.0	TSF	69	46	115	141	137	278	3,203
		Pass-By Trips			0	0	0	(51)	(49)	(100)	(100)
		Total Net Trip Generation			69	46	115	90	88	178	3,103
		Drugstore									
		Trip Generation Rates [14]			1.91	1.03	2.94	4.17	4.34	8.51	90.08
		Trip Generation	13.0	TSF	25	13	38	54	57	111	1,171
		Pass-By Trips			0	0	0	(19)	(21)	(40)	(40)

Table 27: Cumulative Projects Trip Generation

Project #	Name	Land Use	Quantity	Units	A.M. Peak Hour In	A.M. Peak Hour Out	A.M. Peak Hour Total	P.M. Peak Hour In	P.M. Peak Hour Out	P.M. Peak Hour Total	Daily
		Total Net Trip Generation			25	13	38	35	36	71	1,131
25	TM 18707	Single-Family Detached									
		Trip Generation Rates [4]			0.19	0.56	0.74	0.62	0.37	0.99	9.44
		Trip Generation	144	DU	27	80	107	90	53	143	1,359
26		Condominiums									
		Trip Generation Rates [9]			0.11	0.35	0.46	0.35	0.21	0.56	7.32
		Trip Generation	475	DU	50	169	219	168	98	266	3,477
27	Athletic Fields	Fields									
		Trip Generation Rates [15]			-	-	-	-	-	-	-
		Trip Generation	-		12	3	15	16	191	207	504
28	Pomona College Master Plan	College									
		Trip Generation Rates [16]			-	-	-	-	-	-	-
		Trip Generation	-		9	2	11	3	8	11	119
29	Office Building	Office Building									
		Trip Generation Rates [17]			1.00	0.16	1.16	0.18	0.97	1.15	9.74
		Trip Generation	4.7	TSF	5	0	5	1	5	6	45
30	Condominiums	Condominiums									
		Trip Generation Rates [9]			0.11	0.35	0.46	0.35	0.21	0.56	7.32
		Trip Generation	93	DU	10	33	43	33	20	53	681
31	Condominiums	Condominiums									
		Trip Generation Rates [9]			0.11	0.35	0.46	0.35	0.21	0.56	7.32
		Trip Generation	95	DU	10	34	44	34	20	54	695
32	Condominiums	Condominiums									
		Trip Generation Rates [9]			0.11	0.35	0.46	0.35	0.21	0.56	7.32
		Trip Generation	60	DU	6	22	28	21	13	34	439
33	Condominiums	Condominiums									
		Trip Generation Rates [9]			0.11	0.35	0.46	0.35	0.21	0.56	7.32
		Trip Generation	78	DU	8	28	36	28	16	44	571
		Single-Family Detached									
		Trip Generation Rates [4]			0.19	0.56	0.74	0.62	0.37	0.99	9.44
		Trip Generation	25	DU	5	14	19	16	9	25	236

Table 27: Cumulative Projects Trip Generation

Project #	Name	Land Use	Quantity	Units	A.M. Peak Hour In	A.M. Peak Hour Out	A.M. Peak Hour Total	P.M. Peak Hour In	P.M. Peak Hour Out	P.M. Peak Hour Total	Daily
		Retail									
		Trip Generation Rates [1]			0.58	0.36	0.94	1.83	1.98	3.81	37.75
		Trip Generation	5.6	TSF	3	2	5	10	12	22	211
		Pass-By Trips			0	0	0	(3)	(4)	(7)	(7)
		Total Net Trip Generation			3	2	5	7	8	15	204
34	Condominiums	Condominiums									
		Trip Generation Rates [9]			0.11	0.35	0.46	0.35	0.21	0.56	7.32
		Trip Generation	126	DU	13	45	58	44	27	71	922
35	Village Lofts	Condominiums/Retail									1,045
		Trip Generation [16]			40	54	94	56	36	92	
36		Retail									
		Trip Generation Rates [1]			0.58	0.36	0.94	1.83	1.98	3.81	37.75
		Trip Generation	5.7	TSF	3	2	5	11	11	22	217
		Pass-By Trips			0	0	0	(4)	(4)	(7)	(7)
		Total Net Trip Generation			3	2	5	7	7	15	210
37		Single-Family Detached									
		Trip Generation Rates [4]			0.19	0.56	0.74	0.62	0.37	0.99	9.44
		Trip Generation	47	DU	9	26	35	29	18	47	444
38	Montclair Place	Multiplex Movie Theater									
		Trip Generation Rates [18]			0.00	0.00	0.00	6.42	8.18	14.60	220
		Trip Generation	12	Screens	0	0	0	77	99	176	2,640
		Concert Hall									
		Trip Generation Rates [19]			0.00	0.00	0.00	0.44	0.03	0.47	0
		Trip Generation	18	TSF	0	0	0	8	1	9	9
		Apparel Store									
		Trip Generation Rates [20]			0.80	0.20	1.00	2.10	2.02	4.12	66.4
		Trip Generation	15	TSF	12	3	15	32	30	62	996
		Indoor Playground									
		Trip Generation Rates [21]			0.00	0.00	0.00	1.83	1.75	3.58	235
		Trip Generation	11	TSF	0	0	0	20	20	40	2,585
		Fast-Food Restaurant									
		Trip Generation Rates [22]			15.06	10.04	25.10	14.17	14.17	28.34	346.23

Table 27: Cumulative Projects Trip Generation

Project #	Name	Land Use	Quantity	Units	A.M. Peak Hour In	A.M. Peak Hour Out	A.M. Peak Hour Total	P.M. Peak Hour In	P.M. Peak Hour Out	P.M. Peak Hour Total	Daily
		Trip Generation	0.6	TSF	9	6	15	8	9	17	204
		Pass-By Trips			(4)	(3)	(7)	(4)	(5)	(9)	(16)
		Total Net Trip Generation			5	3	8	4	5	9	188
		Office Space									
		Trip Generation Rates [17]			1.00	0.16	1.16	0.18	0.97	1.15	9.74
		Trip Generation	3.9	TSF	4	1	5	1	4	5	38
39	Harvey Mudd College Master Plan Amendment	University/College									
		Trip Generation Rates [23]			0.12	0.03	0.15	0.05	0.10	0.15	1.56
		Trip Generation	100	Students	12	3	15	5	10	15	156
40	Claremont McKenna College Master Plan	University/College									
		Trip Generation Rates [23]			0.12	0.03	0.15	0.05	0.10	0.15	1.56
		Trip Generation	250	Students	29	9	38	12	26	38	390
41	CGU Master Plan	University/College									
		Trip Generation Rates [16]			-	-	-	-	-	-	-
		Trip Generation	415	Students	203	0	203	33	199	232	1,067
42	North Montclair Downtown Specific Plan Update	Condominiums									
		Trip Generation Rates [9]			0.11	0.35	0.46	0.35	0.21	0.56	7.32
		Trip Generation	1,340	DU	142	474	616	473	278	751	9,809
		Retail									
		Trip Generation Rates [1]			0.58	0.36	0.94	1.83	1.98	3.81	37.75
		Trip Generation	462.0	TSF	269	165	434	845	916	1,761	17,441
		Pass-By Trips			0	0	0	(287)	(311)	(599)	(599)
		Total Net Trip Generation			269	165	434	558	605	1,162	16,842
43	Soccer Complex	Soccer Complex									
		Trip Generation Rates [24]			0.60	0.39	0.99	10.84	5.59	16.43	71.33
		Trip Generation	6	Fields	4	2	6	65	34	99	428
44	Metrolink-Gold Line										

Table 27: Cumulative Projects Trip Generation

Project #	Name	Land Use	Quantity	Units	A.M. Peak Hour In	A.M. Peak Hour Out	A.M. Peak Hour Total	P.M. Peak Hour In	P.M. Peak Hour Out	P.M. Peak Hour Total	Daily
	Station										
		Trip Generation Rates [25]			0.33	0.09	0.42	0.11	0.32	0.43	2.81
		Trip Generation	1,600	PS	531	141	672	172	516	688	4,496
Total Trip Generation					**2,075**	**2,364**	**4,439**	**3,289**	**3,414**	**6,703**	**76,861**

Notes:

DU = Dwelling Units, TSF = Thousand Square Feet, PS=Parking Spaces

1) Trip generation based on rates for Land Use 820 - "Shopping Center" from Institute of Transportation Engineers' (ITE) *Trip Generation* (10th Edition).
2) Trip generation based on rates for Land Use 720 - "Medical-Dental Office Building" from Institute of Transportation Engineers' (ITE) *Trip Generation* (10th Edition).
3) Rates based on Land Use 150 - "Warehousing" from Institute of Transportation Engineers (ITE) Trip Generation (10th Ed.). Recommended Truck Mix Percentages per City of Fontana Truck Trip Generation Study for Heavy Warehouse uses, August 2003. Recommended PCE Factor per City of SBCTA Guidelines.
4) Trip generation based on rates for Land Use 210 - "Single-Family Detached Housing" from Institute of Transportation Engineers' (ITE) *Trip Generation* (10th Edition).
5) Trip generation from "Central Avenue Live & Work Project Traffic Impact Analysis" from Kunzman Associates (February, 2014).
6) Trip generation from "Traffic Impact Analysis for Tierras Altas Apartments from Albert Wilson & Associates (May, 2017).
7) Trip generation from "Spanish Trails Specific Plan Initial Study" from LSA (April, 2016.)
8) Trip generation from "Upland Hills Residential Project Traffic Impact Analysis from LSA (November, 2016).
9) Trip generation based on rates for Land Use 220 - "Multifamily Housing (Low-Rise)" from Institute of Transportation Engineers' (ITE) *Trip Generation* (10th Edition).
10) Trip generation from "The Enclave At Upland Traffic Impact Analysis from Translutions (June, 2015).
11) Trip generation based on rates for Land Use 932 - "High-Turnover (Sit-Down) Restaurant" from Institute of Transportation Engineers' (ITE) *Trip Generation* (10th Edition).
12) Trip generation from "1985 11th Street, Upland Traffic Study from Albert Grover & Associates (May, 2018).
13) Trip generation based on rates for Land Use 850 - "Supermarket" from Institute of Transportation Engineers' (ITE) *Trip Generation* (10th Edition).
14) Trip generation based on rates for Land Use 880 - "Pharmacy/Drugstore without Drive-Through Window" from Institute of Transportation Engineers' (ITE) *Trip Generation* (10th Edition).
15) Trip generation from "Claremont Colleges East Campus Traffic Impact Analysis" from Linscott, Law, & Greenspan (January, 2015.)
16) Trip generation from "Pomona College Master Plan Traffic Impact Analysis" from Linscott, Law, & Greenspan (August, 2014.)
17) Trip generation based on rates for Land Use 710 - "General Office Building" from Institute of Transportation Engineers' (ITE) *Trip Generation* (10th Edition).
18) Trip generation based on rates for Land Use 445 - "Multiplex Movie Theater" from Institute of Transportation Engineers' (ITE) *Trip Generation* (10th Edition).

Table 27: Cumulative Projects Trip Generation

Project #	Name	Land Use	Quantity	Units	A.M. Peak Hour In	A.M. Peak Hour Out	A.M. Peak Hour Total	P.M. Peak Hour In	P.M. Peak Hour Out	P.M. Peak Hour Total	Daily
19) Trip generation based on rates for Land Use 460 - "Arena" from Institute of Transportation Engineers' (ITE) *Trip Generation* (10th Edition).											
20) Trip generation based on rates for Land Use 876 - "Apparel Store" from Institute of Transportation Engineers' (ITE) *Trip Generation* (10th Edition).											
21) Trip generation based on rates for Land Use 876 - "Multipurpose Recreational Facility" from Institute of Transportation Engineers' (ITE) *Trip Generation* (10th Edition).											
22) Trip generation based on rates for Land Use 933 - "Fast-Food Restaurant without Drive-Through Window" from Institute of Transportation Engineers' (ITE) *Trip Generation* (10th Edition).											
23) Trip generation based on rates for Land Use 550 - "University/College" from Institute of Transportation Engineers' (ITE) *Trip Generation* (10th Edition).											
24) Trip generation based on rates for Land Use 488 - "Soccer Complex" from Institute of Transportation Engineers' (ITE) *Trip Generation* (10th Edition).											
25) Trip generation based on rates for Land Use 090 - "Park-and-Ride Lot with Bus or Light Rail Service" from Institute of Transportation Engineers' (ITE) *Trip Generation* (10th Edition).											

Year 2040 Traffic Volumes

Based on discussion with City staff, traffic volumes for year 2040 conditions were developed based on the San Bernardino Transportation Analysis Model (SBTAM). The base year for the traffic model is 2012 and the forecast year is 2040. The difference between the modeled 2012 and 2040 peak period directional arterial traffic volumes (for each intersection approach and departure) was identified from loaded network model plots. This difference defines the growth in traffic over the 28-year period. This incremental growth in peak period approach and departure volumes was factored to develop the incremental change in peak hour volumes. The SBTAM uses a three-hour a.m. peak period and a four-hour p.m. peak period. Southern California Association of Governments (SCAG), the regional Metropolitan Transportation Organization (MPO) has established that the a.m. peak hour comprises 38% of the a.m. peak period and that the p.m. peak hour comprises 28% of the p.m. peak period. Therefore, the incremental changes in peak period volumes were multiplied by the appropriate factor to develop incremental changes in peak hour volumes. The incremental growth in approach and departure volumes between 2012 and 2040 was factored to reflect the forecast growth between the year of the ground counts (2018) and 2040. For this purpose, linear growth between 2012 and year 2040 was assumed. Since the increment between 2018 and 2040 is 22 years of the 28-year time span, a factor of 0.7857 (i.e., 22/28) was used. This forecast growth in approach and departure volumes were added to the 2018 ground counts, resulting in postprocessed forecast year 2040 link volumes.

Year 2040 turn volumes were developed using existing turn volumes and the future approach and departure volumes, based on the methodologies contained in National Cooperative Highway Research Program Report (NCHRP) 765: Analytical Travel Forecasting Approaches for Project-Level Planning and Design (National Academies of Sciences, Engineering, and Medicine. 2014. Analytical Travel Forecasting Approaches for Project-Level Planning and Design. Washington, DC: The National Academies Press.). At some locations, forecast turning movements were forecast to be less than those under opening year 2019 conditions. This can be attributed to network improvements, planned transit, or changes in land use. Therefore, these turning movements were adjusted by applying a growth factor of 5% to opening year 2020 traffic volumes to account for an increase in traffic volumes at these locations from cumulative conditions to year 2040.

Project Site Access

Access to the Project would be provided via 13th Street, the north leg of Central Avenue/Foothill Boulevard, and two right-in/right-out driveways on Foothill Boulevard. The driveway on 13th Street would provide access to automobiles and vans only; trucks would access the site via the driveway at the north leg of Central Avenue/Foothill Boulevard.

Existing, Opening Year (2020) and Year 2040 With Project Traffic Volumes

Traffic volumes for existing, opening year (2020), and year 2040 With Project conditions were developed by adding the trip assignment to the corresponding (i.e. existing, opening year (2020), and year 2040) without Project traffic volumes.

Existing Conditions

Existing Roadway Conditions

Regional access to the Project site is provided by SR-210 to the north and Interstate 10 to the south. Local access is provided by the following roadways:

- **Central Avenue** is oriented in the north-south direction and is currently a four-lane roadway in the analysis area. Central Avenue is classified as a Major Arterial in the

City of Upland's General Plan. Central Avenue is a truck route with unrestricted access from Arrow Highway to Richton Street and a truck route restricted to 5 tons from Richton Street to the City of Upland's southern limits. Central Avenue is a truck route with unrestricted access from the City of Montclair's northern limits to the City of Montclair's southern limits.

- **Benson Avenue** is oriented in the north-south direction and is currently a four-lane roadway in the analysis area. Benson Avenue is classified as a Secondary Arterial in the City's General Plan. Benson Avenue is a truck route with unrestricted access from north of Baseline Road to Foothill Boulevard and is restricted to 5 tons from Foothill Boulevard to the City of Upland's southern limits.
- **Foothill Boulevard** is oriented in the east-west direction and is currently a four-lane roadway in the analysis area. Foothill Boulevard is classified as a Major Arterial in the City's General Plan. Foothill Boulevard is a truck route with unrestricted access from the City of Upland's western limits to the City of Upland's eastern limits.
- **Monte Vista Avenue** is oriented in the north-south direction and is currently a four-lane roadway in the analysis area. Monte Vista Avenue is classified as a Secondary Arterial in the City's General Plan. Monte Vista Avenue is a truck route with unrestricted access from north of Baseline Road to the City of Claremont's southern limits. Monte Vista Avenue is a truck route with unrestricted access from City of Upland's northern limits to Foothill Boulevard and from Arrow Highway to the City of Upland's southern limits. It is also a truck route with unrestricted access from City of Montclair's northern limits to Palo Verde Street.
- **Baseline Road** is oriented in the east-west direction and is currently a four-lane roadway in the analysis area. Baseline Road is classified as a Secondary Arterial in the City's General Plan. It is a truck route with unrestricted access from the City of Claremont's western city limits to the City's eastern city limits. It is also a truck route with unrestricted access from the City of Upland's western city limits to Benson Avenue and is restricted to 5 tons from Benson Avenue to Euclid Avenue.
- **Arrow Highway** is oriented in the east-west direction and is currently a four-lane roadway in the analysis area. Arrow Highway is classified as a Secondary Arterial in the City's General Plan. Arrow Highway is a truck route with unrestricted access from the City of Montclair's western limits to the eastern limits. It is also a truck route with unrestricted access from City of Upland's western limits to Mountain Avenue and a truck route restricted to 5 tons from Mountain Avenue to Euclid Avenue.

Existing Transit Service

Public transportation services within the City of Upland and near the proposed Project include bus transit service (OmniTrans) and commuter rail transportation (Metrolink). These services are further described below.

Bus Service. Public transportation in the City of Upland is mainly provided by OmniTrans, which is the regional transit operator in San Bernardino County. The following transit routes operate near the Project:

- **Route 66** serves Fontana and Montclair via Foothill Boulevard. It operates on weekdays at headways of approximately 30-40 minutes during peak hours. Near the study area, Route 66 travels along Central Avenue and Foothill Boulevard.
- **Route 85** serves between the Chino Civic Center, Montclair, and Chino Transit Center. It operates on headways of approximately 30 minutes. Near the study area, Route 85 travels along Central Avenue and Arrow Highway.

Commuter Rail Service. Commuter rail service is provided by Metrolink, which is operated by the Southern California Regional Rail Authority (SCRRA). Metrolink train service is available between the counties of Ventura, Los Angeles, San Bernardino, Orange, Riverside, and north San Diego. The area is served by the San Bernardino Line, which runs east- west between the San Bernardino Station and the Los Angeles Union Station. The Montclair Station is the nearest Metrolink station to the Project site and is approximately 1 mile southwest of the Project site.

Existing Bicycle & Pedestrian Facilities

Existing bicycle lanes are located on Baseline Road, Monte Vista Avenue, Benson Avenue, and Foothill Boulevard. Adjacent to the Project there are no bicycle lanes on Foothill Boulevard from Central Avenue to Benson Avenue.

Pedestrian circulation in Upland is primarily provided via sidewalks. There are continuous sidewalks adjacent to the Project on Foothill Boulevard. The closest bus stop is located on southeast corner of Central Avenue/Foothill Boulevard.

Existing Intersections Levels of Service

An intersection level of service analysis was conducted for existing conditions to determine current circulation system performance. The existing levels of service for the study area intersections are summarized in **Table 28, Existing Intersection Levels of Service.** As shown in Table 28, all study area intersections are currently operating at satisfactory levels of service.

Existing With Project Intersections Levels of Service

An intersection level of service analysis was conducted for existing with Project conditions to determine circulation system performance. The existing with Project levels of service for the study area intersections are summarized in Table 28. As shown in Table 28, all study area intersections are forecast to operate at satisfactory levels of service.

Table 28: Existing Intersection Levels of Service

Intersection	LOS Standard	Jurisdiction	Control	Without Project				With Project				Project Impact
				AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		
				Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS	
1 . Monte Vista Avenue/Baseline Road	E	Claremont	Signal	17.1	B	23.4	C	17.2	B	23.4	C	NO
2 . SR-210 Ramps/Baseline Road	D	Caltrans	Signal	18.6	B	43.3	D	23.3	C	43.2	D	NO
3 . Benson Avenue/Baseline Road	D	Upland	Signal	47.4	D	40.0	D	51.2	D	40.9	D	NO
4 . Benson Avenue/15th Street	D	Upland	Signal	5.8	A	3.2	A	5.8	A	3.2	A	NO
5 . Benson Avenue/13th Street	D	Upland	Signal	22.0	C	23.6	C	22.2	C	24.3	C	NO
6 . Monte Vista Avenue/Foothill Boulevard	D	Upland	Signal	22.3	C	26.5	C	22.4	C	26.7	C	NO
7 . Central Avenue/Foothill Boulevard	D	Upland	Signal	17.1	B	31.1	C	20.7	C	31.2	C	NO
8 . Project Driveway/Foothill Boulevard	D	Upland	TWSC	*Future Intersection*				10.0	A	9.8	A	NO
9 . Benson Avenue/Foothill Boulevard	D	Upland	Signal	33.9	C	33.8	C	34.1	C	34.2	C	NO
10 . Central Avenue/11th Street	D	Upland	Signal	13.1	B	26.6	C	12.6	B	26.9	C	NO
11 . Central Avenue/Arrow Route	D	Upland	Signal	20.7	C	28.2	C	20.7	C	27.3	C	NO
12 . Central Avenue/Arrow Highway	D	Montclair	Signal	27.8	C	29.9	C	27.8	C	30.1	C	NO
13 . Central Avenue/Moreno Street	D	Montclair	Signal	21.5	C	27.7	C	21.6	C	27.8	C	NO
14 . Central Avenue/I-10 Westbound Ramps	D	Caltrans	TWSC	14.0	B	15.6	C	14.2	B	15.9	C	NO
15 . Central Avenue/I-10 Eastbound Ramps	D	Caltrans	Signal	18.3	B	26.0	C	18.4	B	26.0	C	NO
16 . Project Driveway 2/Foothill Boulevard	D	Upland	TWSC	*Future Intersection*				12.0	B	11.4	B	NO
17 Monte Vista Avenue/Claremont Boulevard	E	Claremont	Signal	10.8	B	13.2	B	10.9	NO	13.3	B	NO

Notes:
TWSC = Two-Way Stop Control; For TWSC intersections, reported delay is for worst-case approach/movement.
LOS = Level of Service

Opening Year 2020 Conditions

This section discusses opening year transportation conditions in the study area. It is anticipated that the Project will open in 2020.

Opening Year 2020 Roadway Conditions

Opening year roadway conditions are assumed to be the same as those under existing conditions.

Opening Year 2020 Transit Service

Transit service under opening year conditions are anticipated to remain the same as under existing conditions.

Opening Year 2020 Pedestrian & Bicycle Facilities

Pedestrian and bicycle facilities under opening year conditions are anticipated to remain the same as under existing conditions.

Opening Year 2020 Intersections Levels of Service

An intersection level of service analysis was conducted for opening year 2020 conditions to determine circulation system performance. Opening year 2020 levels of service for the study area intersections are summarized in **Table 29, Table 29: Opening Year 2020 Intersection Levels of Service**. As shown in Table 29 all study area intersections are forecast to operate at satisfactory levels of service except for the following location:

- Benson Avenue/Baseline Road (a.m. peak hour).

Opening Year 2020 With Project) Intersections Levels of Service

An intersection level of service analysis was conducted for opening year 2020 with Project conditions to determine circulation system performance. The opening year 2020 with Project levels of service for the study area intersections are summarized in Table 29. As shown in Table 29, all study area intersections are forecast to operate at satisfactory levels of service except for the following location:

- Benson Avenue/Baseline Road (a.m. peak hour).

The CMP uses a 50-trip threshold as a screening tool to identify potential impacts. The Project adds only 30 PCE trips at this location, which is substantially less than the 50-trip screening threshold. In addition, this intersection operates at unsatisfactory levels of service under Without Project conditions, and the Project maintains the Without Project measure of effectiveness. However, while the Project has a less than significant impact at this intersection, circulation improvements are proposed and included in the Circulation Improvements section, below.

Table 29: Opening Year 2020 Intersection Levels of Service

Intersection	LOS Standard	Jurisdiction	Control	Without Project				With Project				Project Impact
				AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		
				Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS	
1 . Monte Vista Avenue/Baseline Road	E	Claremont	Signal	18.3	B	30.4	C	18.3	B	30.5	C	NO
2 . SR-210 Ramps/Baseline Road	D	Caltrans	Signal	51.9	D	43.1	D	50.3	D	45.1	D	NO
3 . Benson Avenue/Baseline Road	D	Upland	Signal	77.0	E	43.7	D	79.8	E	45.6	D	NO
4 . Benson Avenue/15th Street	D	Upland	Signal	8.4	A	3.7	A	8.4	A	3.7	A	NO
5 . Benson Avenue/13th Street	D	Upland	Signal	24.5	C	26.7	C	24.9	C	27.3	C	NO
6 . Monte Vista Avenue/Foothill Boulevard	D	Upland	Signal	25.4	C	35.4	D	25.6	C	35.9	D	NO
7 . Central Avenue/Foothill Boulevard	D	Upland	Signal	21.1	C	32.9	C	23.4	C	33.0	C	NO
8 . Project Driveway/Foothill Boulevard	D	Upland	TWSC	*Future Intersection*				10.9	B	10.4	B	NO
9 . Benson Avenue/Foothill Boulevard	D	Upland	Signal	45.3	D	42.4	D	46.2	D	43.2	D	NO
10 . Central Avenue/11th Street	D	Upland	Signal	21.0	C	28.5	C	21.0	C	28.9	C	NO
11 . Central Avenue/Arrow Route	D	Upland	Signal	22.4	C	29.7	C	22.8	C	30.5	C	NO
12 . Central Avenue/Arrow Highway	D	Montclair	Signal	31.6	C	46.9	D	31.8	C	47.2	D	NO
13 . Central Avenue/Moreno Street	D	Montclair	Signal	23.5	C	32.6	C	23.6	C	32.8	C	NO
14 . Central Avenue/I-10 Westbound Ramps	D	Caltrans	TWSC	14.8	B	11.7	B	15.0	B	12.3	B	NO
15 . Central Avenue/I-10 Eastbound Ramps	D	Caltrans	Signal	19.2	B	24.4	C	19.3	B	24.5	C	NO
16 . Project Driveway 2/Foothill Boulevard	D	Upland	TWSC	*Future Intersection*				13.4	B	12.3	B	NO
17 Monte Vista Avenue/Claremont Boulevard	E	Claremont	Signal	10.7	B	13.9	B	10.8	B	14.0	B	NO

Notes:
TWSC = Two-Way Stop Control; For TWSC intersections, reported delay is for worst-case approach/movement.
LOS = Level of Service

Year 2040 Conditions

This section discusses year 2040 transportation conditions in the study area.

Year 2040 Roadway Conditions

Roadway conditions under the year 2040 scenario are anticipated to remain the same as those under existing conditions.

Year 2040 Transit Service

Transit service under year 2040 conditions will include the 12.3-mile extension of the Metro Gold Line system, with six new stations, including the Montclair Station to be located at the current Montclair Metrolink Station.

Year 2040 Pedestrian & Bicycle Facilities

Pedestrian and bicycle facilities under Year 2040 conditions may include Priority Areas as described in the City's General Plan. These areas are defined as areas where pedestrians will have a variety of transportation choices including Metrolink, bike lanes, and bus stations. These areas are located on Foothill Boulevard west of Benson Avenue and east of Central Avenue, both within the Project area.

Year 2040 Intersections Levels of Service

An intersection level of service analysis was conducted for Year 2040 conditions to determine circulation system performance. Year 2040 levels of service for the study area intersections are summarized in **Table 30, Year 2040 Intersection Levels of Service**. As shown in Table 30, all study area intersections are forecast to operate at satisfactory levels of service except for the following location:

- Benson Avenue/Baseline Road (a.m. peak hour).

Year 2040 With Project Intersections Levels of Service

An intersection level of service analysis was conducted for year 2040 with Project conditions to determine circulation system performance. Year 2040 with Project levels of service for the study area intersections are summarized in Table 30. As shown in Table 30, all study area intersections are forecast to operate at satisfactory levels of service except for the following location:

- Benson Avenue/Baseline Road (a.m. peak hour).

The CMP uses a 50-trip threshold as a screening tool to identify potential impacts. The Project adds only 30 PCE trips at this location, which is substantially less than the 50-trip screening threshold. In addition, this intersection operates at unsatisfactory levels of service under Without Project Conditions, and the Project maintains the Without Project measure of effectiveness. However, while the Project has a less than significant impact at this intersection, circulation improvements are proposed and included in the Circulation Improvements section, below.

Table 30: Year 2040 Intersection Levels of Service

Intersection	LOS Standard	Jurisdiction	Control	Without Project				With Project				Project Impact
				AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		
				Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS	
1 . Monte Vista Avenue/Baseline Road	E	Claremont	Signal	19.4	B	27.1	C	19.5	B	27.1	C	NO
2 . SR-210 Ramps/Baseline Road	D	Caltrans	Signal	51.6	D	36.7	D	51.7	D	42.4	D	NO
3 . Benson Avenue/Baseline Road	D	Upland	Signal	74.6	E	44.6	D	79.1	E	45.8	D	YES
4 . Benson Avenue/15th Street	D	Upland	Signal	10.0	A	6.1	A	11.8	B	5.4	A	NO
5 . Benson Avenue/13th Street	D	Upland	Signal	24.9	C	28.7	C	27.1	C	29.4	C	NO
6 . Monte Vista Avenue/Foothill Boulevard	D	Upland	Signal	25.4	C	35.7	D	25.5	C	36.9	D	NO
7 . Central Avenue/Foothill Boulevard	D	Upland	Signal	24.9	C	32.7	C	30.5	C	32.9	C	NO
8 . Project Driveway/Foothill Boulevard	D	Upland	TWSC	*Future Intersection*				11.3	B	10.6	B	NO
9 . Benson Avenue/Foothill Boulevard	D	Upland	Signal	45.3	D	50.0	D	47.9	D	50.8	D	NO
10 . Central Avenue/11th Street	D	Upland	Signal	20.8	C	28.6	C	20.8	C	29.0	C	NO
11 . Central Avenue/Arrow Route	D	Upland	Signal	23.9	C	30.2	C	24.2	C	30.9	C	NO
12 . Central Avenue/Arrow Highway	D	Montclair	Signal	31.1	C	47.1	D	32.5	C	47.1	D	NO
13 . Central Avenue/Moreno Street	D	Montclair	Signal	31.1	C	33.2	C	33.3	C	33.3	C	NO
14 . Central Avenue/I-10 Westbound Ramps	D	Caltrans	TWSC	19.4	C	11.1	B	19.5	C	12.2	B	NO
15 . Central Avenue/I-10 Eastbound Ramps	D	Caltrans	Signal	16.9	B	23.3	C	17.0	B	24.2	C	NO
16 . Project Driveway 2/Foothill Boulevard	D	Upland	TWSC	*Future Intersection*				13.8	B	12.6	B	NO
17 Monte Vista Avenue/Claremont Boulevard	E	Claremont	Signal					12.3	B	15.2	B	NO

Notes:
TWSC = Two-Way Stop Control; For TWSC intersections, reported delay is for worst-case approach/movement.
LOS = Level of Service

Circulation Improvements

The CMP requires that circulation improvements be recommended at any intersection which operates at unsatisfactory level of service. For intersections that meet a jurisdiction's minimum level of service standard under existing conditions, circulation improvements must maintain conformance with that standard. For intersections that fail to meet a jurisdiction's minimum level of service standard under existing conditions, circulation improvements must maintain the existing level of service. These include conversion of stop control, signalization, changes to signal phasing, and/or addition of lanes as appropriate.

Circulation Improvement Measure

Under opening year 2020 With Project conditions and Year 2040 With Project Conditions, the following improvement is recommended to restore satisfactory operations at the following location:

- Benson Avenue/Baseline Road (a.m. peak hour):

TRAF-1: **Benson Avenue/Baseline Road:** Re-stripe the northbound through lane to a through-left turn lane and convert the northbound and southbound left-turn phasing from protected to split-phase. This improvement is not included in the 2016 SBCTA Development Mitigation Nexus Study. Two receiving lanes exist on the west leg of the intersection. Therefore, this improvement can be achieved by striping and signal head modifications. The Project will contribute on a fair-share basis to this improvement.

With the implementation of recommended improvement, all intersections will operate at satisfactory levels of service.

Transit

Public transportation services within the City of Upland and near the proposed Project include bus transit service (OmniTrans) and commuter rail transportation (Metrolink), as described below.

Bus Service. Public transportation in the City of Upland is mainly provided by OmniTrans, which is the regional transit operator in San Bernardino County. The following transit routes operate near the Project:

- Route 66 serves Fontana and Montclair via Foothill Boulevard. It operates on weekdays at headways of approximately 30-40 minutes during peak hours. Near the study area, Route 66 travels along Central Avenue and Foothill Boulevard.
- Route 85 serves between the Chino Transit Center, Montclair, Chino Civic Center, and Chino Transit Center. It operates on headways of approximately 30 minutes. Near the study area, Route 85 travels along Central Avenue and Arrow Highway.

Commuter Rail Service. Commuter rail service is provided by Metrolink, which is operated by the Southern California Regional Rail Authority (SCRRA). Metrolink train service is available between the counties of Ventura, Los Angeles, San Bernardino, Orange, Riverside, and north San Diego. The area is served by the San Bernardino Line, which runs east- west between the San Bernardino Station and the Los Angeles Union Station. The Upland Station is the nearest Metrolink station to the Project site and is approximately 3.5 miles from the Project site.

Bicycle & Pedestrian

The City's bikeway network includes three types of facilities and are discussed below:

- **Class I Bike Path** A Class I facilities are bicycle trails or paths that are essentially off street and separated from automobiles. They are a minimum of eight feet in width for two-way travel and include bike lane signage and designated street crossings where needed.
- **Class II Bike Lane** Class II bike lanes can be either located next to a curb or parking lane. If located next to a curb, a minimum width of five feet is recommended. However, a Bike Lane adjacent to a parking lane can be four feet in width. Bike Lanes are exclusively for the use of bicycles and include bike lane signage, special lane lines, and pavement markings. ways delineate the right-of-way assigned to bicyclists along roadways. Bike lane signs and pavement markings help define these bike lanes.
- **Class III Bike Street** is a street providing for shared use by motor vehicles and bicyclists. While bicyclists have no exclusive use or priority, signage – both by the side of the street and stenciled on the roadway surface – alerts motorists to bicyclists sharing the roadway are called Bike Streets, and are enhancements of the standard Class III Bike Route, which is only indicated by small wayside signs.

Existing bicycle lanes are located on Baseline Road, Monte Vista Avenue, Benson Avenue, and Foothill Boulevard. Adjacent to the Project there are no bicycle lanes on Foothill Boulevard from Central Avenue to Benson Avenue.

Pedestrian circulation in Upland is primarily provided via sidewalks. There are continuous sidewalks adjacent to the Project on Foothill Boulevard. The closest bus stop is located on southeast corner of Central Avenue/Foothill Boulevard.

Based on the results of the analysis, the Project does not directly degrade traffic operations below those acceptable in the City's General Plan. The Project is consistent with adopted plans and policies related to non-motorized travel in the area. The Project does not conflict with the County's CMP and does not propose changes to the CMP's LOS standards. With implementation of Circulation Improvement Measure TRAF-1, all intersections are forecast to operate at satisfactory conditions under all "With Project scenarios". Accordingly, the Project impact is considered less than significant.

b) *Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?* ***Less Than Significant Impact.***

Section 15064.3 (b) of the CEQA Guidelines codifies the transition from Level of Service (LOS) to Vehicle Miles Traveled (VMT) as a metric for transportation impact analysis. This section was added to the CEQA Guidelines as a part of other modifications and finalized by the California Natural Resources Agency in late 2018. Section 15064.3 does not become applicable statewide until July 1, 2020. Until that time, pursuant to Section 15064.3(c), agencies are not required to use VMT as the basis for evaluation of traffic impacts and also may elect to use Section 15064.3 immediately. The City of Upland has not yet adopted a VMT methodology to address this updated Appendix G Checklist Question. Thus, at this time, traffic analyses within the City continue to be based on LOS to evaluate traffic impacts of a Project (consistent with Checklist Question XVII.b of the CEQA Guidelines prior to the latest update).

c) *Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?* ***Less Than Significant Impact.***

The intersection of Central Avenue/Foothill Boulevard will serve as the primary Project access. Based on review of the site plan, the turning radii are sufficient for vehicles to enter/exit the site safely. Truck turning templates show that the turning radii are sufficient for trucks to enter/exit the site safely. Further, design of driveways shall be per City Standard Plans or adopted Standard Plans. It is not anticipated that traffic hazards will increase. Therefore, the Project impact is considered less than significant.

d) *Result in inadequate emergency access?* ***Less Than Significant Impact.***

All streets and fire access lanes would be required to comply with applicable codes, ordinances, and City Standard Plans or adopted Standard Plans, and would meet the City's width and turnaround requirements to provide adequate emergency access. The Project would not result in inadequate emergency access. Therefore, the impact is considered less than significant.

Cumulative Impacts

The proposed Project would not result in direct or indirect significant impacts related to transportation. Therefore, the proposed Project would not result in incremental effects to transportation that could be compounded or increased when considered together with similar effects from other past, present, and reasonably foreseeable probable future projects. As a result, no cumulative impacts related to transportation would occur.

18. Tribal Cultural Resources

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

Discussion

The discussion below relies on the City's General Plan and associated EIR as it relates to the cultural and tribal resources and the Project site.

a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: i) Listed or eligible for listing in the California:

i. *Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k).* ***No Impact.***

As discussed above in *Section VI.5, Cultural Resources*, the proposed Project would result in no impact to sites that are listed or eligible for listing in the California Register of Historic Resources.

ii. *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.* ***Less Than Significant Impact with Mitigation Incorporated.***

Per the City's standard practice and in accordance with Assembly Bill 52 (AB 52), including Section 21080.3.1(d), the City circulated letters via certified mail on August 7, 2018 to the Gabrieleño Band of Mission Indians – Kizh Nation and the San Manuel Band of Mission Indians to request comments and input on the proposed Project and the potential to affect Tribal and Cultural Resources.

On August 22, 2018, the City received a response letter from the Gabrieleño Band of Mission Indians – Kizh Nation to request consultation. The City has reached out to the tribe to initiate tribal consultation and consultation will conclude prior to certification of the Project's proposed Mitigated Negative Declaration.

On May 14, 2019 the Morongo Band of Mission Indians (MBMI) responded to the City's consultation letter for the proposed Project and notified the City that they are concerned about potential future impacts that planning and land-use changes will have on ground-disturbing activities and tribal cultural resources and requested that they remain on the list for future notices. The MBMI stated that they have no more information to provide at this time; however, they retain the right to participate in the CEQA environmental review process and meaningful government-to-government consultation.

On May 28, 2019, the City received a response letter from the San Manuel Band of Mission Indians (SMBMI). Per the consultation with the SMBMI, the SMBMI may elect to place a monitor on-site in the event that significant pre-contact cultural resources are discovered and avoidance cannot be ensured, as identified in Mitigation Measure CR-3.

The proposed Project site consists of both disturbed and undeveloped land. An outdoor rock and gravel stockpiling and processing operation is located on the northwest corner of the Project site. According to the General Plan, there are three prehistoric sites located within the City limits and all are located along the banks of the San Antonio Creek channel. The Project site is not located adjacent to the San Antonio Creek channel. The Project site does not contain any existing structures or known extant tribal cultural resources. Nonetheless, while tribal cultural resources are not expected to be discovered during construction, in order to reduce potentially significant impacts to a less than significant level in the event that tribal cultural resources are discovered, Mitigation Measures CR-1 through CR-7 and Mitigation Measure GEO-2 would be required to reduce this potential impact to a level of less than significant level.

Cumulative Impacts

The proposed Project would result in less than significant impacts to tribal cultural resources after incorporation of mitigation. The chances of cumulative impacts occurring as a result of Project implementation plus implementation of other projects in the region is not likely since all past, present, and reasonably foreseeable project would be have been or will be subject to individual project-level environmental review. Since there would be no project-related impacts, and because existing laws and regulations are in place to protect tribal cultural resources and prevent significant impact to such resources, the potential incremental effects of the proposed Project would not be cumulatively considerable.

19. Utilities and Service Systems

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

Discussion

The City of Upland provides water and wastewater service to the majority of the City including the Project site. A majority of the City obtains its potable water from Cucamonga, Six Basins, and Chino groundwater basins as well as through City wells, San Antonio Water Company wells, and West End Consolidated Water Company wells. Surface water from San Antonio Creek is obtained from the San Antonio Water Company and treated at the City-owned San Antonio Canyon Surface Water Treatment Plant. Imported surface water supplies are purchased from Metropolitan Water District through the Inland Empire Utilities Agency (IEUA) and treated by the Water Facilities Authority at the Aqua de Lejos Water Treatment Plant. The Water Facilities Authority is a private water company that purchases and treats imported Metropolitan Water District water for several cities, including Upland.

The proposed Project is within the jurisdiction of the Santa Ana Regional Water Quality Control Board (RWQCB) and is subject to the waste discharge requirements of the MS4 Permit for San Bernardino and Riverside counties and the proposed permit for San Bernardino County. As discussed above, in *Section VI.9, Hydrology and Water Quality*, the proposed Project would be required to implement a Storm Water Pollution Prevention Plan (SWPPP) that would require the use of Best Management Practices (BMPs) to ensure water quality is not degraded. This may also include the filing of a NPDES permit and other applicable permits. Implementation of these measures would ensure that storm water flowing from the proposed Project site would not result in an exceedance of any wastewater treatment requirements of the Santa Ana Regional Water Quality Control Board (RWQCB). Impacts in this regard would be considered less than significant.

The proposed Project also would be required to abide by all applicable Santa Ana RWQCB requirements, including payment of fees to offset cost of wastewater infrastructure, such that the proposed Project would not exceed wastewater treatment standards. As discussed above, City of Upland owns and maintains local sewer lines within the City, which is divided into two major sewersheds and two minor sewersheds. The proposed Project is located within the Westside sewershed, a major sewershed located west of Mountain Avenue from 26th Street to Foothill Boulevard, and west of Benson Avenue from Foothill Boulevard to the Southern Pacific railroad. This sewershed drains to the Westside Interceptor for treatment at IEUA RP-1 or the Carbon Canyon Water Reclamation Facility, both of which are operated by the IEUA. These facilities have a combined design treatment capacity of 84.0 million gallons per day (mgd) when combined with the other two water treatment facilities included in the network of facilities that serve the City of Upland as well the other IEUA member agencies.[21]

Additionally, the design capacities of the Districts' wastewater treatment facilities are based on the regional growth forecast adopted by the Southern California Association of Governments (SCAG). As discussed in the EIR prepared for the City's General Plan, the City estimates that implementation of the City's General Plan would produce an additional sewage flow of 1.32 mgd over existing conditions, an annual increase of approximately 0.066 mgd per year over 20 years. The proposed Project is zoned as Commercial/Industrial Mixed-Use (C/I-MU) and would be consistent with the zoning designated for the parcels and included in the General Plan's analysis. Furthermore, the Project would comply with General Plan policies relative to wastewater facilities which include:

> ***Policy PFS-1.2: Growth and Level of Service.*** *Require new development to provide adequate facilities or pay its fair share of the cost for facilities needed to provide services to accommodate growth without adversely impacting current service levels.*
>
> ***Policy PFS-10.2: Connection to Wastewater System.*** *Require all new development located within the City limits to connect to the public wastewater collection system.*
>
> ***Policy PFS-10.4: Wastewater System Capacity.*** *Ensure that all wastewater collection and conveyance facilities are constructed to serve the ultimate buildout of all developments. This shall be done in coordination with the applicable regional agencies, which are responsible for providing treatment services.*

The proposed Project would be required to pay all applicable sewer maintenance and connection fees including the City's Sanitary Sewer Facilities Expansion Fee, which finances public improvements required to expand the sanitary sewer system as new developments are implemented throughout the City.

Therefore, the available capacity is sufficient to accommodate the treatment requirements of the proposed Project. In addition, because the system is managed by a city-wide management plan which will provide for maintenance and needed system improvements, the proposed Project will not violate any standards set forth by the RWQCB. Impacts are less than significant and no mitigation is required.

[21] Upland, City of, 2015. General Plan EIR, page 5.16-4.

a) *Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?* ***Less Than Significant Impact.***

The proposed Project is located within an urbanized area of the City of Upland and is proposing a use consistent with the land use designation and zoning for the Project site. Accordingly, the proposed Project does not increase the need for utility facilities beyond what was evaluated in the City's General Plan EIR[22]. As discussed it the EIR, wastewater and sewer pipelines have been constructed to handle wastewater flows for the City at complete buildout. The proposed Project includes uses that are consistent with the approved land use and zoning for the site, thus the wastewater pipelines would be sufficient to convey Project wastewater. Additionally, Upland Public Works Department has confirmed that IEUA has wastewater treatment plant expansions planed that would treat the growth from the IEUA member agencies, including the City of Upland.[23] The City's EIR also indicates that there are sufficient water supplies and water shortage contingency plans to protect the City's existing and future water needs, as the Project includes land uses and zoning that are approved for the site, the Project would not increase water demand, or associated need to construct water supply facilities.[24]

Sewer, water, and wastewater lines are already in place to serve the proposed Project and relocation or expansion of these lines beyond the scope of the proposed Project site, or construction of a new or expanded sewer, water, wastewater treatment facilities as a result of the proposed Project would not be required for construction or operation of the proposed Project. Additionally, stormwater, drainage, electric power, natural gas, and telecommunications facilities are in place to serve the Project without the need for construction or relocation of utility facilities. Therefore, the proposed would not require the construction of new sewer, water, wastewater, stormwater, drainage, electric power, natural gas, or telecommunication facilities which could cause significant environmental effects. Significant impacts would not occur, and no mitigation is required.

b) *Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?* ***Less Than Significant Impact.***

The City of Upland provides water and wastewater service to the majority of the City including the Project site. A majority of the City obtains its potable water from Cucamonga, Six Basins, and Chino groundwater basins as well as through City wells, San Antonio Water Company wells, and West End Consolidated Water Company wells. Surface water from San Antonio Creek is obtained from the San Antonio Water Company and treated at the City-owned San Antonio Canyon Surface Water Treatment Plant. Imported surface water supplies are purchased from Metropolitan Water District through the IEUA and treated by the Water Facilities Authority at the Aqua de Lejos Water Treatment Plant. The Water Facilities Authority is a private water company that purchases and treats imported Metropolitan Water District water for several cities, including Upland.

[22] Upland, City of, 2015. General Plan EIR, page 5.16-7.
[23] Ibid, page 5.16-7.
[24] Ibid, page 5.15-16.

In June 2016, the 2015 City of Upland Urban Water Management Plan (UWMP) was published and then amended in June 2018. The 2015 UWMP projected demand for raw and potable water for five-year increments based on land use between 2020 to 2035 for the City of Upland. The land uses analyzed include Single Family, Multi-Family, Commercial, Landscape, and Institutional/Governmental. For year 2020, commercial uses are expected to use 1,846-acre feet of water per year (afy). This is contrasted by a total demand within the City of Upland of 21,665 afy. Of this amount, commercial uses represent approximately 8.5%. The balance of the 21,665 afy would be used by a combination of uses including single family, multi-family, institutional, and landscape irrigation. These uses account for the remaining 91.5% of potable water demand. The estimated water use for commercial uses through 2035 in five-year increments are as follows: year 2025 – (8.4%), year 2030 – (8.2%), and year 2035 – (8.5%).[25]

The UWMP Act requires a retailer to quantify the minimum water supply available during the next three years. Using this criterion, for the years 2016 to 2018, assuming those years repeated the driest three-year historic sequence for each water supply source, the 2015 UWMP estimated the minimum water supply for these years. The results are shown in **Table 31, City of Upland Minimum Three-Year Supply 2016-2018**.

Table 31: City of Upland Minimum Three-Year Supply 2016-2018

Year	2016	2017	2018
Available Water Supply	24,911	24,940	26,281
Source: 2015 City of Upland Urban Water Management Plan Note: Units in Acre-feet per year			

The 2015 UWMP estimated multiple dry year scenario water supply and water demand at five-year increments from 2020-2035, as shown in **Table 32, City of Upland Water Supply and Demands Estimates for Years 2020-2035**, below.

Table 32: City of Upland Water Supply and Demands Estimates for Years 2020-2035

		2020	2025	2030	2035
First Year	Supply Total	24,911	24,961	25,051	25,051
	Demand Total	22,205	23,028	24,109	24,598
	Difference	2,706	1,933	942	453
Second Year	Supply Total	24,940	24,990	25,080	25,080
	Demand Total	22,205	23,028	24,109	24,598
	Difference	2,735	1,962	971	482
Third Year	Supply Total	26,281	26,331	26,421	26,421
	Demand Total	22,205	23,028	24,109	24,598
	Difference	4,076	3,303	2,312	1,823
Source: 2015 City of Upland Urban Water Management Plan Note: Units in Acre-feet per year					

[25] City of Upland 2015 Urban Water Management Plan. Available at https://water.ca.gov/Programs/Water-Use-And-Efficiency/Urban-Water-Use-Efficiency/Urban-Water-Management-Plans. Accessed November 8, 2019.

Based on this analysis, it is anticipated that the City of Upland would meet the potable water demands for the existing and future 20-year projected planned growth. This conclusion is true under normal, single-dry and multiple-dry year conditions. The Project would not require a zone change as it would be consistent with the City's approved land use and zoning. Thus, the Project would be consistent with the water demand estimated for these parcels in the water demand analysis in the UWMP.

Potable water would be supplied using imported water supplies, local surface and groundwater supplies and through recycling and water conservation. Water demand during construction would be temporary and would not require additional water beyond the needs of typical construction projects for a project of this type. Given that the Project's proposed use is consistent with the Project site's zoning and General Plan designation, and therefore consistent with the City's planned growth which was accounted for in the City's Urban Water Management Plan, adequate water supplies would be available to serve the proposed Project, impacts would be less than significant, and mitigation is not required.

c) *Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?* ***Less Than Significant Impact.***

As discussed in Threshold VI.18(a) and (b) above, the wastewater infrastructure needed to serve the proposed Project is already in place and the City's water treatment facilities have adequate capacity to serve the proposed Project's increased demand for construction and operations. Impacts would be less than significant and no mitigation is required.

d) *Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?* ***Less Than Significant Impact.***

Implementation of the proposed Project would be expected to generate additional waste during the temporary, short-term construction phase, as well as the operational phase, but it would not be expected to result in inadequate landfill capacity. Burrtec Waste Industries, Inc. provides the City's trash and recycling services. Solid waste would be disposed of at the West Valley Station/Material Recovery Facility located approximately 10 miles east of the proposed Project site. Recyclables are sorted and processed at the West Valley Station facility and then distributed to landfills within San Bernardino County depending on the nature of the waste and daily disposal limits at each receiving facility. The majority of solid waste derived from the City is disposed of at the Mid-Valley Sanitary Landfill located approximately 15 miles east of the Project site. The Mid-Valley Sanitary Landfill has a maximum throughput of 7,500 tons per day and a maximum permitted capacity of approximately 101.3 million cubic yards with a remaining capacity of approximately 67.5 million cubic yards.[26] The landfill has an expected operational life through 2033 with the potential for vertical, or downward expansion.

Landfill capacity is expected to decrease over time with future growth and development throughout San Bernardino County and surrounding Inland Empire areas. Waste reduction and recycling programs and regulations are expected to reduce this demand and extend the life of existing landfills. The proposed Project complies with the land use and zoning designated in City's General Plan and would comply with federal, State, and local statutes

[26] California, State of, Department of Resources Recycling and Recovery (CalRecycle) Available at: https://www2.calrecycle.ca.gov/swfacilities/Directory/36-AA-0341, accessed September 26, 2019.

and regulations related to solid waste. Furthermore, the General Plan EIR projected that build out of the City of Upland General Plan would result in an estimated net increase in solid waste disposal of 38 tons per day. This increase would represent approximately 0.51% of Mid-Valley Landfill's daily permitted capacity. This nominal incremental increase in solid waste disposal at Mid-Valley Landfill would not exceed the Landfill's capacity. Therefore, impacts would be less than significant and no mitigation is required.

e) *Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?* ***Less Than Significant Impact.***

As discussed in Threshold VI.18 (f) above, the Mid-Valley Landfill has been constructed to meet all required local, State, and federal rules and regulations. The proposed Project would not compromise the City's compliance with federal, State and local management and reduction statues and regulations related to solid waste. Impacts would be less than significant and no mitigation is required.

Cumulative Impacts

Projects in the vicinity of the proposed Project that are approved and pending implementation are discussed in *Section VI.17, Transportation*. However, the proposed Project would have a less than significant impact with respect to utilities/service systems. Development of public utility infrastructure is part of an extensive planning process involving utility providers and jurisdictions with discretionary review authority. The coordination process associated with the preparation of development and infrastructure plans is intended to ensure that adequate resources are available to serve both individual projects and cumulative demand for resources and infrastructure as a result of cumulative growth and development in the area. Individual projects are subject to review for utility capacity to avoid unanticipated interruptions in service or inadequate supplies. Coordination with the utility companies would allow for the provision of utility service to the proposed Project and other developments. The proposed Project and other planned projects are subject to connection and service fees to assist in facility expansion and service improvements triggered by an increase in demand. Because of the utility planning and coordination activities described above, the proposed Project taken in sum with past, present, and reasonably foreseeable projects would not result in significant cumulative utility impacts.

20. Wildfire

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

Discussion

a) Substantially impair an adopted emergency response plan or emergency evacuation plan? ***No Impact.***

The proposed Project would not impair or physically interfere with an adopted emergency response or evacuation plan. Primary access to all major roads would be maintained during construction of the proposed Project. Therefore, no associated impacts would occur.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? ***Less than Significant Impact.***

The proposed Project is located in a predominately developed area consisting of industrial and commercial uses. As discussed in Appendix B, the Project Site has no trees and minimal vegetation. The surrounding area has a limited number of buildings and minimal vegetation. According to wind rose data for the Project area, wind generally travels to the northeast and the west and has an average speed of 4.2 mph[27]. Therefore, in general wind is traveling away from the Project area. The surrounding area is largely developed and does not include large

[27] Iowa State University. Iowa Environmental Mesonet. Available at: https://mesonet.agron.iastate.edu/sites/windrose.phtml?station=CCB&network=CA_ASOS. Accessed on September 27, 2019.

areas of vacant or open spaces areas, thus minimizing the likeliness of an uncontrolled spread of wildfire emanating from the Project site. Impacts would be less than significant.

c) *Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?* ***Less than Significant Impact.***

As described in Response 19 (a) above, water for the proposed Project would be provided by the City of Upland and additional water facilities would not be required to serve the Project. The addition of the proposed Project would not create an additional demand for water beyond those identified in the City's General Plan EIR. Thus, adequate water required for fire emergency services would be available to the proposed Project.

The proposed Project would comply with applicable General Plan policies, including Policy PFS-2.11 which requires new development to be accessible to emergency vehicles and to not impede the ability of service providers to provide adequate emergency response. The Project would include improvements along Central Avenue and 13th Street which would comply with the requirement to maintain adequate access for emergency response.

> ***Policy PFS-2.11: Emergency Vehicle Access.*** *Require new development to be accessible to emergency vehicles and to not impede the ability of service providers to provide adequate emergency response.*

Additionally, the Project would not include the installation of above ground utilities or power lines that could exacerbate the fire risk. The construction of underground utilities would reduce the fire risk associated with above ground utilities to a less than significant level.

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

As described in Threshold IV.10 (c) above, potential hazards related to downstream flooding are less than significant. The completed Project would continue to drain south towards Foothill Boulevard and discharge into the existing storm drain system in Dewey Way and Benson Avenue. As discussed in Response 7 (a), the Project site is not located within an area susceptible to landslides. The proposed Project shall be constructed in accordance with the Uniform Building Code (UBC) and California Building Code (CBC), as well as the Geotechnical Engineering Investigation conducted for the Project and the grading requirements contained within Title 15 of the City's Development Code. Thus, impacts would be less than significant.

Cumulative Impacts

Projects in the vicinity of the proposed Project that are approved and pending implementation are discussed in *Section VI.17, Transportation*. However, the proposed Project would not result in direct or indirect significant impacts related to wildfires. Therefore, the proposed Project would not result in incremental effects to wildfires that could be compounded or increased when considered together with similar effects from other past, present, and reasonably foreseeable probable future projects. As a result, no cumulative impacts related to wildfires would occur.

21. Mandatory Findings of Significance

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

Discussion

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

The potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory were considered in the response to each question in the respective sections (*Section VI.4, Biological Resources* and *Section VI.5, Cultural Resources*) of this checklist. The Project was found to be consistent with applicable planning documents including the Upland General Plan and applicable Habitat Conservation Plans, Natural Community Conservation Plans, and other approved local, regional, or state habitat conservation plans which identify long term environmental goals. The Project was found to be compliant with applicable planning documents, and therefore does not achieve short-term environmental goals to the disadvantage of long-term environmental goals. In addition to project specific impacts, this evaluation considered the Project's potential for significant cumulative effects. There is no substantial evidence that there are biological or cultural resources that are affected or associated with this Project.

b) *Does the project have impacts which are individually limited, but cumulatively considerable (Cumulatively considerable means the projects incremental effects are considerable when compared to the past, present, and future effects of other projects)?*

Per the criteria for evaluating environmental impacts in this Initial Study, this evaluation considered the Project's potential for incremental effects that are cumulatively considerable. No cumulative effects associated with the proposed Project have been identified.

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

The Project proposes one warehouse/parcel delivery service building with an ancillary office/retail space and associated parking and landscaping and as described in the Air Quality, Hazards and Hazardous Materials, Noise, Public Service, Transportation, Utilities and Service Systems, and Wildfire sections of this Initial Study, the Project would not cause new substantial direct or indirect adverse effects on human beings.

VII. Preparers

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APPENDIX A-1

Air Quality Assessment

APPENDIX A-2

Greenhouse Gas Emissions Assessment

APPENDIX B

Habitat Assessment

APPENDIX C

Geotechnical Investigation

APPENDIX D

Phase I Environmental Site Assessment

APPENDIX E

Hydrology Calculations

APPENDIX F

Water Quality Management Plan

APPENDIX G

Noise & Vibration Study

APPENDIX H-1

Traffic Impact Analysis

APPENDIX H-2

Trip Generation for Retail Development