

FINAL ENVIRONMENTAL IMPACT REPORT

**VILLA SERENA SPECIFIC PLAN PROJECT
UPLAND, CALIFORNIA**



April 2025

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VILLA SERENA SPECIFIC PLAN PROJECT UPLAND, CALIFORNIA

Submitted to:

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City of Upland
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Prepared by:

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Project No. TCI2201



April 2025

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LIST OF ABBREVIATIONS AND ACRONYMS

AB	Assembly Bill
amsl	above mean sea level
Basin	South Coast Air Basin
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
City	City of Upland
Final EIR	Final Environmental Impact Report
LOS	level of service
NOP	Notice of Preparation
project	Villa Serena Specific Plan Project
Recirculated DEIR	Recirculated Draft Environmental Impact Report
SAA	Streambed Alteration Agreement
SB	Senate Bill
SCAQMD	South Coast Air Quality Management District
USFWS	United States Fish and Wildlife Service
YSMN	Yuhaaviatam of San Manual Nation

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1.0 INTRODUCTION

1.1 PURPOSE OF THE FINAL EIR

This Final Environmental Impact Report (Final EIR) has been prepared to respond to comments received on the Recirculated Draft Environmental Impact Report (Recirculated DEIR) prepared for the proposed Villa Serena Specific Plan Project (project). This document also describes project changes, provides supplemental analysis in response to comments, and makes revisions to the Recirculated DEIR, as necessary, resulting from those comments or to clarify material in the Draft EIR.

According to *State CEQA Guidelines* Section 15132, the Final EIR shall consist of (1) the Draft EIR or a revision of the draft; (2) comments and recommendations received on the Draft EIR either verbatim or in summary; (3) a list of persons, organizations, and public agencies commenting on the Draft EIR; (4) the responses of the Lead Agency to significant environmental points raised in the review and consultation process; and (5) any other information added by the Lead Agency.

This document, together with the Recirculated DEIR, constitutes the Final EIR for the project.

1.2 ENVIRONMENTAL REVIEW PROCESS

According to Sections 15086 and 15087 of the California Environmental Quality Act (CEQA) Guidelines, lead agencies are required to consult with public agencies having jurisdiction over a proposed project and to provide the general public with an opportunity to comment on the Draft EIR.

The City circulated a Notice of Preparation (NOP) informing responsible agencies and interested parties that an EIR would be prepared for the proposed project. The NOP was published on February 8, 2022 and mailed to public agencies, organizations, property owners near the site, and individuals likely to be interested in the potential impacts of the proposed project. A scoping session was held as a public meeting on June 8, 2022, to solicit feedback regarding the scope and content of the EIR. Both verbal comments and written comments were received from members of the public during the scoping period and were considered during preparation of this EIR. Copies of the NOP, comment letters, and a summary of the verbal comments received are included in Appendix A.

The Draft EIR circulated for public review from May 28, 2024, to July 11, 2024, pursuant to Section 15105(c) of the *State CEQA Guidelines*. A complete hardcopy of the Draft EIR and all appendices were made available for review at the City of Upland Community Development, Planning Division and the City of Upland Public Library. These documents were also available in their entirety online at <https://www.uplandca.gov/environmental-review>. The Draft EIR and associated technical appendices were uploaded to the State Clearinghouse and made available electronically for public and agency review. The Notice of Availability (NOA) for the Draft EIR was provided to all individuals and organizations who provided a written request for notice, residents in the vicinity of the project, and filed with the San Bernardino County Clerk of the Board.

Due to a distribution error and the receipt of additional information, the City conservatively “recirculated” the EIR for a second full 45-day review period. A second full 45-day review period extended from November 4, 2024 to December 18, 2024. A complete hardcopy of the Recirculated DEIR and all appendices were made available for review at the City of Upland Community Development, Planning Division and the City of Upland Public Library. These documents were also available in their entirety online at <https://www.uplandca.gov/environmental-review>. The Recirculated DEIR and associated technical appendices were uploaded to the State Clearinghouse and made available electronically for public and agency review. The NOA for the Recirculated DEIR was provided to all individuals and organizations who provided a written request for notice, residents in the vicinity of the Project, and filed with the San Bernardino County Clerk of the Board.

The City received a total of 22 comment letters from regional agencies, tribal parties, and individuals during the two rounds of review. Copies of all written comments received during the comment periods are included in Chapter 3.0, Comments and Responses, of this document.

1.3 DOCUMENT ORGANIZATION

This document consists of the following chapters:

- **Chapter 1.0: Introduction.** This chapter discusses the purpose and organization of this Final EIR and responses to comments and summarizes the environmental review process for the project.
- **Chapter 2.0: List of Commenters.** This chapter contains a list of agencies, parties, and individuals who submitted written comments during the public review period.
- **Chapter 3.0: Comments and Responses.** This chapter contains reproductions of all comment letters received on the Draft EIR and Recirculated DEIR. A written response for each CEQA-related comment received during the public review period is provided. Each response is keyed to the corresponding comment.
- **Chapter 4.0: Draft EIR Text Revisions.** Corrections to the Recirculated DEIR that are necessary in light of the comments received and responses provided or are necessary to amplify or clarify material in the Recirculated DEIR are contained in this chapter. Double underlined text represents language that has been added to the Recirculated DEIR; text with ~~strikeout~~ has been deleted from the Recirculated DEIR.

1.4 USE OF FINAL EIR

The Final EIR will be used by the City of Upland, as Lead Agency, for the following purposes.

- The City of Upland Planning Commission, as a recommending body, will hold a public hearing and consider whether to recommend to the City Council approval of the project described in the Final EIR and associated actions, and certification of the Final EIR for the project.
- The City of Upland City Council, as the final approval body, will hold a public hearing following the Planning Commission hearing to consider approving the project, associated actions, and certification of the Final EIR for the project.

The Final EIR may also be used by other State, regional, and local agencies, as responsible agencies under CEQA, in considering other actions required for the project.

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2.0 LIST OF COMMENTERS

This chapter presents a list of comment letters received during the public review periods and describes the organization of the letters and comments that are provided in Chapter 3.0, Comments and Responses, of this document.

2.1 ORGANIZATION OF COMMENT LETTERS AND RESPONSES

Chapter 3.0 includes a reproduction of each comment letter received on the Draft EIR and the Recirculated DEIR. The letters are grouped by the affiliation of the commenting entity as follows: local agencies, (A); Native American parties, (B); individuals, (C); and other parties, (D). Please note, no regional, State, or federal agencies responded during the comment periods.

The comment letters are numbered consecutively following the A through D designations and follow the format below:

- Local Agencies A-#-#
- Native American Parties B-#-#
- Individuals C-#-#
- Other Parties D-#-#

The letters are numbered and comments within each letter are numbered consecutively after the hyphen. For example, Letter A-1 represents the local agency letter, and comment A-1-1 represents the first enumerated comment within that letter.

2.2 LIST OF COMMENTS ON THE DRAFT AND RECIRCULATED DRAFT EIR

The following comment letters were submitted to the City during the public review periods.

A. Local Agencies

- A-1: County of San Bernardino, Department of Public Works, Nancy Sansonetti, AICP, Supervising Planner (September 26, 2024)¹.

B. Native American Parties

- B-1: Gabrieleno Band of Mission Indians – Kizh Nation, Andrew Salas, Chairman (June 6, 2024)
- B-2: Gabrieleno Band of Mission Indians – Kizh Nation, Brandy Salas, Administrative Specialist (June 14, 2024)
- B-3: Yuhaaviatam of San Manual Nation, Kristen Tuosto, Tribal Archeologist (November 7, 2024)

¹ Although received in the period between the two public reviews, the City has elected to respond to these letters.

C. Individuals

- C-1: David Nasca, (June 3, 2024)
- C-2: Max and Marti Schneider (June 7, 2024)
- C-3: Tom and Susan James (June 10, 2024)
- C-4: Carol Borchers (June 11, 2024)
- C-5: David Coleman (June 24, 2024)
- C-6: Cindy Mastic (July 10, 2024)
- C-7: Robyn and Nathan Tan (July 11, 2024)
- C-8: Natasha Walton (July 11, 2024)
- C-9: Cathy Cushman (August 23, 2024)¹
- C-10: Stephen Wullkopf (September 4, 2024)¹
- C-11: Dennis Ferncez (December 11, 2024)
- C-12: Darell Maxey (December 14, 2024)
- C-13: Joe Bradley (December 18, 2024)
- C-14: Bill Rodstrom (December 18, 2024)
- C-15: Natasha Walton (December 18, 2024)
- C-16: Larry Johnson (August 4, 2024)¹
- C-17: Shari Wasson (December 18, 2024)

D. Other Parties

- D-1: Southern California Gas Company (August 30, 2024)¹

¹ Although received in the period between the two public reviews, the City has elected to respond to these letters.

3.0 COMMENTS AND RESPONSES

Pursuant to Public Resources Code Section 21091(d) and the State of California Environmental Quality Act (CEQA) Guidelines Section 15088, a lead agency is required to evaluate comments received during the noticed comment period and prepare a written response for each comment relating to any significant environmental issues raised on the Draft or Recirculated Draft Environmental Impact Report (EIR). Written responses to the comment received on the documents during the public review and comment periods are provided in this chapter. All comments received during the public review periods are provided in their entirety. Each comment is immediately followed by responses keyed to the specific comments. The comments are grouped by the affiliation of the commenting entity as follows: local agencies, (A); Native American parties, (B); individuals, (C); and other parties, (D).

The written responses presented in this chapter describe the nature of any significant environmental issues raised and provide a good-faith, reasoned analysis in response. The range of responses includes providing clarification, making factual corrections, explaining why certain comments may not warrant further response, or simply acknowledging the comment for consideration by the decision-making bodies.

As described in Chapter 1.0, Introduction, the Draft EIR and Recirculated Draft EIR Comments and Response to Comments (RTC) (Chapter 3.0), and Recirculated Draft EIR revisions (Chapter 4.0), together with the Recirculated Draft EIR and supporting appendices, constitute the Final EIR. At least 10 days prior to certifying an EIR, the City of Upland (City) must provide a written response to a public agency on comments made by that agency. Responses shall conform with the legal standards established for responses to comments on draft environmental impacts.

Where comments on the Draft EIR or Recirculated Draft EIR concern issues requiring technical expertise, the responses to comments, like the analysis in the Recirculated Draft EIR, rely on the knowledge and professional analysis of qualified experts.

Text revisions to the Recirculated Draft EIR are provided in Chapter 4.0 of this document.

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A. LOCAL AGENCIES

- A-1: County of San Bernardino, Department of Public Works, Nancy Sansonetti, AICP,
Supervising Planner (September 26, 2024)

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Main Office - 825 East Third Street, San Bernardino, CA 92415-0835 | Phone: 909.387.7910 Fax: 909.387.7911



Department of Public Works

- Flood Control
- Operations
- Solid Waste Management
- Special Districts
- Surveyor
- Transportation

www.SBCounty.gov

Noel Castillo, P.E.
Director

David Doublet, M.S., P.E.
Assistant Director

September 26, 2024

Transmitted Via Email

File: 10(ENV)-4.01

City of Upland
Attn: Joshua Winter, Senior Planner
Development Services Department
Planning Division
460 N. Euclid Avenue
Upland, CA 91786
jwinter@uplandca.gov

RE: CEQA – NOTICE OF AVAILABILITY (NOA) OF A DRAFT ENVIRONMENTAL (EIR) [VILLA SERENA SPECIFIC PLAN PROJECT (SCH# 2022020150)]

Dear Mr. Winter:

Thank you for allowing the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. **We received this request on August 26, 2024**, and pursuant to our review, the following comments are provided:

Flood Control Planning Division (Michael Fam, P.E., Engineering Manager, 909-387-7995):

1. We are aware there may be storm drains in and around the site that may be affected by the proposed Project. When planning for or altering existing or future storm drains, be advised that the Project is subject to the San Bernardino County Flood Control District Comprehensive Storm Drain Plan No. 1, dated July 1966. It is to be used as a guideline for drainage in the area and is available in the County Flood Control Offices. Any revision to the drainage should be reviewed and approved by the jurisdictional agency in which the revision occurs.

A-1-1

We respectfully request to be included on the circulation list for all project notices, public reviews, or public hearings. In closing, I would like to thank you again for allowing the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. Should you have any questions or need additional clarification, please contact the individual who provided the specific comment, as listed above.

A-1-2

Sincerely,

Nancy Sansonetti

Nancy J. Sansonetti, AICP
Supervising Planner
Environmental Management Division

NS:AS:ml

Cc: Ayida Smith

Response to Comment A-1

County of San Bernardino, Department of Public Works
Nancy Sansonetti, AICP, Supervising Planner
September 26, 2024

Response to Comment A-1-1

This comment indicated that storm drains in and around the project site that may be affected by the project would be subject to San Bernardino County Flood Control District Comprehensive Storm Drain Plan No. 1. The comment further stated Storm Drain Plan No. 1 may be used as a guidance for drainage in the project area, and any revision to the drainage should be reviewed and approved appropriately.

This comment is noted and does not raise a specific issue related to the adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

Response to Comment A-1-2

The commenter requests to be included on the circulation list for all notices, public review, or public hearings related to the project.

Pursuant to CEQA requirements, the City must provide a written responses to public agency comments at least 10 days prior to certifying an EIR. The San Bernardino County Department of Public Works will be notified as requested. This comment does not raise a specific issue related to the adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

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B. NATIVE AMERICAN PARTIES

- B-1: Gabrieleno Band of Mission Indians – Kizh Nation, Andrew Salas, Chairman (June 6, 2024)
- B-2: South Coast Air Quality Management District, Sam Wang, Program Supervisor (January 30, 2024)
- B-3 Yuhaaviatam of San Manual Nation (YSMN), Kristen Tuosto, Tribal Archeologist (November 7, 2024)

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GABRIELENO BAND OF MISSION INDIANS - KIZH NATION
Historically known as The San Gabriel Band of Mission Indians recognized by
the State of California as the aboriginal tribe of the Los Angeles basin

June 6,2024

Project Name: Villa Serena Specific Plan Project, City of Upland, CA

Thank you for your letter. Regarding the project above. This is to concur that we agree with the Specific Plan Amendment. However, our Tribal government would like to request consultation for all future projects within this location.

B-1-1

Andrew Salas, Chairman
Gabrieleno Band of Mission Indians – Kizh Nation

Andrew Salas, Chairman
Albert Perez, treasurer I

Nadine Salas, Vice-Chairman
Martha Gonzalez Lemos, treasurer II

Dr. Christina Swindall Martinez, secretary
Richard Gradias, Chairman of the council of Elders

PO Box 393 Covina, CA 91723

www.gabrielenoindians@yahoo.com

gabrielenoindians@yahoo.com

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Response to Comment B-1

Gabrieleno Band of Mission Indians – Kizh Nation
Andrew Salas, Chairman
June 6, 2024

Response to Comment B-1-1

The Kizh Nation agrees with the project and requests consultation with the City on future projects at the project site.

Pursuant to notification requirements of Assembly Bill 52 (AB 52), the City initiated consultation with the Kizh Nation on June 28, 2023. During consultation, the Kizh Nation stated that the project site is within the ancestral territory and traditional use area of their respective tribes. Although no Native American resources were identified on-site, the Recirculated Draft EIR includes measures to reduce potential impacts that may result from the inadvertent discovery of Native American cultural resources during project-related ground disturbance activities.

This comment does not raise a specific issue related to the adequacy of the content or analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

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From: Gabrieleno Administration <admin@gabrielenoindians.org>
Sent: Friday, June 14, 2024 11:19 AM
To: Joshua Winter
Cc: Kara Grant
Subject: Re: [EXTERNAL] Villa Serena Specific Plan Project, City of Upland, CA

Dear Joshua,

Following discussions with Chairman Salas, it has been determined that the matter at hand necessitates no further deliberation. Should the city choose to incorporate an additional tribal entity into our ancestral territory, it is imperative that substantial evidence supporting this decision be provided, as mandated by the California Environmental Quality Act (CEQA). However, should any significant artifacts be discovered or damaged during this process, it is essential that the city assumes accountability for its actions moving forward.

B-2-1

Best regards,
 Brandy Salas

Admin Specialist
 Gabrieleno Band of Mission Indians - Kizh Nation
 PO Box 393
 Covina, CA 91723
 Office: 844-390-0787
 website: www.gabrielenoindians.org



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

On Thu, Jun 13, 2024 at 3:39 PM Joshua Winter <jwinter@uplandca.gov> wrote:

Hi Savannah,

Thank you for the Phone call last week. Andrew had mentioned he would send me an email with confirmation that the mitigation in the EIR is sufficient, and the Consultation is officially closed, and also outlining some concerns regarding the Mitigation included for San Manuel.

Just checking in on that!

Thanks, let me know if you need anything else.

Joshua Winter

Senior Planner|Planning Division

Development Services Department

City Of Upland

460 N. Euclid Ave, Upland, CA 91786

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P: (909) 931-4143

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jwinter@uplandca.gov

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From: Joshua Winter
Sent: Thursday, June 6, 2024 3:56 PM
To: Gabrieleno Administration <admin@gabrielenoindians.org>
Subject: RE: [EXTERNAL] Villa Serena Specific Plan Project, City of Upland, CA

Hi Savannah,

We have included all the requested mitigation in the attached email received in response to our AB-52 and SB-18 Notice. I was under the impression our consultation had concluded, so I just want to confirm Kizh Nation is in agreement with the mitigation outlined in the EIR, and that consultation is closed. The Tribal Cultural Resources Section is attached for your convenience.

Thank you!

Joshua Winter

Senior Planner|Planning Division

Development Services Department

City Of Upland

460 N. Euclid Ave, Upland, CA 91786

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jwinter@uplandca.gov

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From: Gabrieleno Administration <admin@gabrielenoindians.org>
Sent: Thursday, June 6, 2024 3:37 PM
To: Joshua Winter <jwinter@uplandca.gov>
Subject: [EXTERNAL] Villa Serena Specific Plan Project, City of Upland, CA

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

Hello Joshua Winter,

Thank you for your letter. Please see the attachment below.

Thank you

Sincerely,

Savannah Salas

Admin Specialist
Gabrieleno Band of Mission Indians - Kizh Nation

PO Box 393
Covina, CA 91723

Office: 844-390-0787

website: www.gabrielenoindians.org



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

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Response to Comment B-2

Gabrieleno Band of Mission Indians – Kizh Nation
Brandy Salas, Administrative Specialist
June 6, 2024

Response to Comment B-2-1

This comment consists of an email exchange between the Kizh Nation and the City. The commenter states no further deliberation related to the project is necessary. The tribe further requested that “substantial evidence” be provided should the City choose to “incorporate an additional tribal entity into our ancestral territory.”

Please refer to the response to Comment B-1-1. The initiation of consultation with other tribal entities is required pursuant to State law. The standard of “substantial evidence” is not applicable to or required to consult with other tribal entities. Pursuant to applicable provisions of AB 52, the City initiated contact with other tribal entities cited by the Native American Heritage Commission. During consultation, both the Kizh Nation and Yuhaaviatam of San Manuel Nation stated that the project site is within the ancestral territory and traditional use area of their respective tribes. As required, the City initiated consultation with and considered recommended measures from both tribes.

This comment does not raise a specific issue related to the content or adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

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From: Kristen Tuosto <Kristen.Tuosto@sanmanuel-nsn.gov>
Sent: Thursday, November 7, 2024 2:59 PM
To: Joshua Winter
Subject: [EXTERNAL] Villa Serena Specific Plan Project (SCH# 2022020150) - San Manuel Concerns [CIT-UPL-2023-6]

Follow Up Flag: Follow up
Flag Status: Flagged

You don't often get email from kristen.tuosto@sanmanuel-nsn.gov. [Learn why this is important](#)

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

Hello Joshua Winter,

Yuhaaviatam of San Manuel Nation (YSMN) finds the mitigation measure TCR-2 in conflict with the requested mitigation measures for Tribal Cultural Resources made by YSMN.

When multiple Tribes claim affiliation in the project area, a single consulting Tribe cannot determine the treatment of TCRs. It is preferred to keep claims regarding those TCRs neutral by reburial in place or within the project's footprint.

If you should have any further questions regarding this matter, please do not hesitate to contact me at your convenience, as I will be your Point of Contact (POC) for YSMN with respect to this project. I also left a message for you earlier today to discuss this issue or clarify the concern.

Regards,
 Kristen

Kristen Tuosto
 Tribal Archaeologist
Kristen.Tuosto@sanmanuel-nsn.gov
 O:(909) 864-8933 x 50-3421
 M:(909) 725-1357
 26569 Community Center Dr Highland, California 92346



B-3-1

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Response to Comment B-3

Yuhaaviatam of San Manuel Nation (YSMN)
Kristen Tuosto, Tribal Archeologist
November 7, 2024

Response to Comment B-3-1

YSMN finds the mitigation measure TCR-2 in Recirculated Draft EIR conflicts with the requested mitigation measures for Tribal Cultural Resources made by YSMN. The YSMN state that, when multiple tribes claim affiliation in a project area, a single consulting tribe cannot determine the treatment of tribal cultural resources. In these cases, it is preferred to keep the competing claims neutral by requiring reburial in place or within the project's footprint.

Mitigation Measure TCR-2, identified through consultation with the Gabrieleño Band of Mission Indians – Kizh Nation, states:

Mitigation Measure TCR-2 Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)

- a. Upon discovery of any Tribal Cultural Resource, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

Mitigation Measure TCR-4, identified through consultation with the Yuhaaviatam of San Manuel Nation (YSMN), states:

Mitigation Measure TCR-4 The Yuhaaviatam of San Manuel Nation (YSMN) Cultural Resources Department shall be contacted, as detailed in Mitigation Measure CUL-1, of any pre-contact and/or historic-era cultural resources discovered during project implementation, and be provided information regarding the nature of the find, so as to provide tribal input with regards to significance and treatment.

Should the find be deemed significant, as defined by CEQA (as amended, 2015), by a Monitoring and Treatment Plan (Plan) shall be created by qualified archaeologist, in coordination with YSMN. All subsequent finds shall be subject to the Plan. The Plan shall allow for a monitor to be present that represents YSMN for the remainder of the project, should YSMN elect to place a monitor on-site.

The City's consultation efforts pursuant to AB 52 and SB 18 represent a good faith effort to identify potential impact to tribal cultural resources that may result from the development of the project site. As a conflict between measures has been identified, the following revisions are required.

Mitigation Measures TCR-2 and TCR-4 have been revised as follows:

Mitigation Measure TCR-2 Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)

Upon discovery of any Tribal Cultural Resource, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. In the event the material is determined be significant, Mitigation Measure TCR-6 shall apply. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

Mitigation Measure TCR-4 The Yuhaaviatam of San Manuel Nation (YSMN) Cultural Resources Department shall be contacted, as detailed in Mitigation Measure CUL-1, of any pre-contact and/or historic-era cultural resources discovered during project implementation and be provided information regarding the nature of the find, so as to provide tribal input with regards to significance and treatment. In the event the material is determined be significant, Mitigation Measure TCR-6 shall apply. Should the find be deemed significant, as defined by CEQA (as amended, 2015), by a Monitoring and Treatment Plan (Plan) shall be created by qualified archaeologist, in coordination with YSMN. All subsequent finds shall be subject to the Plan. The Plan shall allow for a monitor to be present that represents YSMN for the remainder of the project, should YSMN elect to place a monitor on-site.

The following measure has been identified to ensure the appropriate mitigation of any potential impact to any tribal cultural material.

Mitigation Measure TCR-6 In the event of any inadvertent discovery of any tribal cultural material, or pre-contact/historic-era resource, determined to be significant, the City shall require the preparation of a Monitoring and Treatment Plan. The monitoring and treatment plan shall be prepared by a qualified archeologist in consultation with and subject to the approval of the City and the consulting Native American tribes. The City and consulting Native American tribes shall engage in mutual good faith efforts to develop the Monitoring

and Treatment Plan. The monitoring and treatment plan shall identify the manner and process in which any suspected tribal cultural material is evaluated, recorded, removed, or curated, including the final disposition of any such material.

In the event the manner and process of evaluation, recordation, removal, and/or disposition of tribal cultural material cannot be resolved between consulting Native American parties, the City shall, in good faith, identify and approve the necessary actions in the Monitoring and Treatment Plan.

Under *State CEQA Guidelines* Section 15088.5(b), recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR. The revisions to Mitigation Measures TCR-2 and TCR-4 and the additional of Mitigation Measure TCR-6 resolves a potential point of conflict between the measures identified in the Recirculated Draft EIR and provides a mutually agreeable method to ensure full and complete mitigation of impact to any potential tribal cultural resource. These revisions provide an equally effective method of mitigation and do not identify a new impact, or an impact of greater severity that previously identified in the Recirculated Draft EIR; therefore, further recirculation is not required. No further response is necessary.

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C. INDIVIDUALS

- C-1: David Nasca, (May 27, 2024)
- C-2: Max and Marti Schneider (June 7, 2024)
- C-3: Tom and Susan James (June 10, 2024)
- C-4: Carol Borchers (June 11, 2024)
- C-5: David Coleman (June 24, 2024)
- C-6: Cindy Mastic (July 10, 2024)
- C-7: Robyn and Nathan Tan (July 11, 2024)
- C-8: Natasha Walton (July 11, 2024)
- C-9: Cathy Cushman (August 23, 2024)
- C-10: Stephen Wullkopf (September 4, 2024)
- C-11: Dennis Ferncez (December 11, 2024)
- C-12: Darell Maxey (December 14, 2024)
- C-13: Joe Bradley (December 18, 2024)
- C-14: Bill Rodstrom (December 18, 2024)
- C-15: Natasha Walton (December 18, 2024)
- C-16: Larry Johnson (August 5, 2024)
- C-17: Shari Wasson (December 18, 2024)

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DEVELOPMENT SERVICES DEPARTMENT
PLANNING DIVISION
Telephone (909) 931-4130
Facsimile (909) 931-4321

May 23, 2024

RECEIVED

5/27/24

Nasca Properties Llc
481 Georgia Ct
Claremont, CA 91711

JUN 03 2024

CITY OF UPLAND
DEV. SERVICES DEPT.

SUBJECT: VILLA SERENA SPECIFIC PLAN - NOTICE OF AVAILABILITY.

I have one question. Where are you going to get the water for these homes? The California Democrat controlled governance has NO big plans to capture water for our aquifer. There is a water shortage. The Democrats reply is, "There is a housing shortage." I think the governance has it backwards. Solve the water shortage and then proceed to build. We all know the motivation is greed & money in the pockets of a few people. My vote is a definite. No!

Sincerely
David Nasca

C-1-1

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Response to Comment C-1

David Nasca
June 3, 2024

Response to Comment C-1-1

The commenter questions where the water for the proposed homes will come from, stating there is a water shortage and no state-wide plans to capture water for recharge. The commenter further states that solving the water shortage problem will solve the housing shortage problem and states his opposition to the project.

The Recirculated Draft EIR (see Appendix A-5, pp. 3-83 and 3-84) includes a discussion of water demand and supply indicating the City maintains sufficient water supplies for normal, dry, and multiple-dry years. The commenter's statements are noted and will be considered by the City prior to any future action on the project. These comments do not raise a specific issue related to the adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

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From: AOL.COMMUNICATION <maxschneider@verizon.net>
Sent: Friday, June 7, 2024 11:24 AM
To: Joshua Winter
Subject: [EXTERNAL] Villa Serena Project

You don't often get email from maxschneider@verizon.net. [Learn why this is important](#)

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

Dear Joshua,

We live in the Upland Hills Estates on Upland Hills Drive South. The proposed project will be across the fairway behind our home. We are opposed to this project. The noise and dust created by construction will destroy the peaceful serenity of our location. Upland doesn't need the increased traffic and congestion this project will cause. They're really going to fit 65 single family homes in the flood control basin? We are going to have houses right on top of us. Our privacy will be compromised. Luckily we do have the fairway between our home and the basin, unless plans change, and they always seem to.

C-2-1

C-2-2

C-2-3

In conclusion, we are adamantly opposed to this project. We purchased here because of the peacefulness and openness of our backyard. We enjoy using our patio and being outside.
Hopefully this project will not be approved.

C-2-4

Thank you,

Max & Marti Schneider

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Response to Comment C-2

Max and Marti Schneider
June 7, 2024

Response to Comment C-2-1

The commenters state their opposition to the project, which is noted and will be considered by the City prior to any future action on the project.

This comment does not raise a specific issue related to the adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

Response to Comment C-2-2

The commenters state the noise, dust, and increased traffic congestion will destroy the peace and serenity of the area.

Project impacts related to the generation of dust, noise, and traffic were addressed in Sections 4.2, 4.6, and 4.7 of the Recirculated Draft EIR, respectively. As established in the Recirculated Draft EIR, the generation of particulate matter during either construction or operation of the project would not exceed levels established for regional or localized emissions of pollutants, including particulate matter (see Tables 4.2C through 4.2.F). Furthermore, as with all projects in the South Coast Air Basin (Basin), the project would be required to comply with the South Coast Air Quality Management District (SCAQMD) standard construction measures for the control of nuisance emissions and fugitive dust (e.g. SCAQMD Rule 402 and 403, respectively).

For noise, temporary noise impacts have been reduced to below a level of significance (see Recirculated Draft EIR, Table 4.6-H) through the implementation of **Mitigation Measures NOI-1** through **NOI-8**. As stated in the Recirculated Draft EIR (pp. 4.6-20 through 4.6-26), long-term operation-related noise levels of increases in noise levels would not exceed standards established at the nearest sensitive receptor and no significant impact would result from the occupation of the proposed uses. As stated by the commenters, the golf course fairway is between their residence and the project site, and no exceedance of noise levels established by the City would occur (see Tables 4.6.I through 4.6.M).

Until July 1, 2020, roadway congestion or level of service (LOS) was used as the primary metric for planning and environmental review purposes in Upland. In accordance with Senate Bill 743 (SB 743), on August 10, 2020, the Upland City Council approved Resolution No. 6564 adopting "Vehicle Miles Traveled" Baseline and Thresholds of Significance and Guidelines for the purposes of analyzing transportation impacts under CEQA. Nonetheless, the Recirculated Draft EIR included an LOS analysis to confirm the project's consistency with City's General Plan LOS standard. As detailed in Table 4.7.A of the Recirculated Draft EIR, all intersections within the traffic study area would continue to operate at an acceptable LOS during peak hours with the addition of project traffic, and conflict or inconsistency with General Plan LOS standards would occur.

State CEQA Guidelines Section 15384 states that argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts that do not contribute to or are not caused by physical impacts on the environment do not constitute substantial evidence. *State CEQA Guidelines* Section 15204(c) further states that commenters should explain the basis for their comments and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. The unsubstantiated comments raise only general issues of concern. The commenter's general statements and concerns are noted but do not constitute substantial evidence pursuant to *State CEQA Guidelines* Section 15064 and do not raise any specific issue related to the adequacy of the content or analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

Response to Comment C-2-3

The commenters question how the proposed development will fit on the project site and claim they will have houses "on top" of them, compromising their privacy.

A total of 9.16 acres of the project site would be developed with 65 single-family detached residential units for a residential density of 7.1 dwelling units per acre. Residential lots would range in size from 3,337 to 5,048 square feet. A comparative discussion of the scale of residential development is provided in Recirculated Draft EIR (see pp. 4.1-13 and 4.1-14). Regarding privacy of existing residences, this not a CEQA impact. Per Figure 4.2-1, the nearest residence in the Upland Hills Golf community is 144 feet from the project site. As stated by the commenter, a golf course fairway separates the project site from their residence. This unsubstantiated opinion does not raise any significant issue related to the adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

Response to Comment C-2-4

The commenters restate their opposition to the project. The commenter's statements are noted and will be considered by the City prior to any future action on the project.

This comment does not raise a specific issue related to the adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

Joshua Winter, Senior Planner
City of Upland
Development Services Dept.
Planning Division
460 N. Euclid Ave
Upland, CA 91786

Re: Villa Serena Specific Plan Project

Dear Mr. Winter,

As long-time residents of the Foothill Knolls neighborhood, we would like to voice our objection to the proposed development in the flood basin above 15th Street.

- 1) We are concerned about extra traffic in our neighborhood and on Campus Ave.
- 2) We will inevitably enter another season of drought in the future and these residences will require water. Also, the development will cover areas of absorption for ground water.
- 3) We are concerned that wildlife in that basin will be destroyed during the construction process.
- 4) Upland High School is already over-crowded. Adding more homes will increase the need for a second high school which Upland has no plans to build.

Thank you for your consideration of these concerns,

Tom James
Susan James

Tom and Susan James
1456 Hildita Ct.
Upland, CA 91786

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JUN 10 2024

CITY OF UPLAND
DEV. SERVICES DEPT.

C-3-1

C-3-2

C-3-3

C-3-4

C-3-5



Thomas James
1456 Hildita Ct
Upland CA 91786-2853

SANTA ANA CA 926

5 JUN 2024 PM 1 L



Joshua Winter, Senior Planner
City of Upland
Development Services Dept.
Planning Division
460 N. Euclid Ave
Upland, CA 91786

RECEIVED
JUN 10 2024
CITY OF UPLAND
DEV. SERVICES DEPT.

91786-473260

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Response to Comment C-3

Tom and Susan James
June 10, 2024

Response to Comment C-3-1

The commenters state their opposition to the project, which is noted and will be considered by the City prior to any future action on the project.

This comment does not raise a specific issue related to the adequacy of the analysis contained in the Draft EIR or supporting studies; therefore, no further response is required.

Response to Comment C-3-2

The commenters express concern about additional traffic in their neighborhood and on Campus Avenue.

Please refer to the response to Comment C-2-2. Also, the commenters reside in the neighborhood south of the proposed project. The proposed project is anticipated to generate a total of 614 two-way vehicle trips per day, with 46 a.m. peak-hour trips and 61 p.m. peak-hour trips. Vehicular access to the project site would be provided via two gated driveways from 15th Street, the primary ingress and egress driveway at the western boundary of the project site via the future new alignment of 15th Street from Coyote Run Drive to Campus Avenue, and an egress/emergency-vehicle-access-only gated driveway to 15th Street east of Coyote Run Drive East. As detailed in Figures 3.3 and 3.4 of the Recirculated Draft EIR, the 15th Street extension to Campus Avenue provides direct gated access from the proposed project site. The traffic knuckle planned for the intersection of 15th Street and Fernando Avenue will prevent through traffic to Campus Avenue from the existing segment of 15th Street, the adjacent neighborhood, or points further east (e.g., Grove Avenue.) As such, due to its less circuitous route, most of the project traffic will enter/exit the project from Campus Avenue, thereby minimizing travel through the commenter's neighborhood.

The traffic study addressed conditions at the following intersections: Campus Avenue at 14th, 15th, and 16th Street, and Coyote Run Drive at East and West 15th Street. The additional traffic resulting from development and occupation of the proposed residences would not result in an unacceptable LOS during the a.m. peak hour and p.m. peak hour (see Table 4.7.A). Furthermore, as stated in the response to Comment C-2-2, traffic congestion is longer the metric for planning and environmental review of traffic impacts in Upland.

The commenter's general statements and concerns are noted but do not constitute substantial evidence pursuant to *State CEQA Guidelines* Section 15064 and do not raise any specific issue related to the adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

Response to Comment C-3-3

This comment states drought will inevitably occur again and that the proposed residences will require water and that the project will cover areas currently used for groundwater absorption.

As stated in Section 4.5 of the Recirculated Draft EIR (pp. 4.5-14 and 4.5-15), the 15th Street Basin has a total existing recharge volume of 280,870 cubic feet (or 6.45 acre-feet¹). The proposed project would include modifications to the existing ponds within the 15th Street Basin. A summary of the post-developed groundwater recharge volumes is provided in Table 4.5.D of the Recirculated Draft EIR, demonstrating the modifications to the existing 15th Street Basin would result in an increase of on-site recharge from 6.45 acre-feet to 9.7 acre-feet, an increase of 3.25 acre-feet. Therefore, the proposed project would result in an increase in groundwater recharge potential compared to the existing condition. Considering this increase in recharge capacity, no significant impact was identified in the Recirculated Draft EIR.

This comment does not raise a specific issue related to the adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

Response to Comment C-3-4

This comment expresses a non-specific concern regarding how wildlife in the basin will be affected during project construction.

The Recirculated Draft EIR (Section 4.3) provides a comprehensive assessment of the project's impacts on biological resources. *State CEQA Guidelines* Section 15204(c) states that commenters should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments.

The general concern expressed by the commenter did not raise any specific substantiated issue related to the significance of environmental impacts or the adequacy of the Draft EIR. The comment does not raise any issues regarding the adequacy of the environmental analysis in the Draft EIR, Recirculated Draft EIR, or supporting studies; and no further response is required.

Response to Comment C-3-5

This comment states Upland High School is already overcrowded, and that the project will increase the need for a second high school, which Upland has no plans to build.

As stated in the Recirculated Draft EIR (see Appendix A-5, pp. 3-71 and 3-73), California Government Code (Section 65995[b]) establishes the base amount of allowable developer fees imposed by school districts. Per the California Government Code, "The payment or satisfaction of a fee, charge, or other requirement levied or imposed ... are hereby deemed to be full and complete mitigation of the impacts ... on the provision of adequate school facilities." The project will be required to pay these school impact fees in accordance with Government Code 65995 and Education Code 17620. Through payment of development fees in accordance with Government Code 65995 and Education Code 17620, impacts to school would be less than significant; therefore, no mitigation is required.

¹ Acre-foot = 325,851 gallons.

This comment does not raise a specific issue related to the adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

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From: Carol Borchers <borchersce@gmail.com>
Sent: Tuesday, June 11, 2024 3:55 PM
To: Joshua Winter
Subject: [EXTERNAL] Villa Serena Specific Plan Project

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

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I am strongly opposed to this project.

There are, as of this writing, 87 homes for sale within the city limits. Why does the city feel additional housing needs to be built?

C-4-1

Opening up 15th street to Campus will increase traffic flow from drivers using 15th street from Grove Ave to Campus Ave as a pass through, or shortcut, to avoid the intersection at Foothill Blvd and Campus Ave., This problem already exists on 14th street between Grove Ave and Campus Ave. Excess traffic and speeding are a very big concern already. The same will occur on 15th street.

C-4-2

There will be a negative impact on the current schools within the boundaries of this project.

C-4-3

There will be a negative impact to San Antonio Regional Hospital, which already struggles to support the current population, both within and outside of the city limits.

C-4-4

The City of Upland designates itself as the "City of Gracious Living". The continual building of new housing has caused a negative change to this city.

C-4-5

Carol Borchers
 929 E Foothill Blvd. Spc 81
 Upland, CA 91786

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Response to Comment C-4

Carol Borchers
June 11, 2024

Response to Comment C-4-1

The commenter questions why additional housing is required to be built in Upland. This comment does not raise a specific issue related to the adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

Response to Comment C-4-2

The commenter states that opening 15th Street to Campus Avenue will allow drivers to use 15th Street to avoid the intersection of Foothill Boulevard and Campus Avenue, noting that traffic and speeding area already a big concern.

Based on previous public concern regarding traffic through the neighborhood south of the project site, primary access to the site was revised from that which was originally proposed. This access would be installed on 0.63 acre of unimproved land off site connecting the project site to the current terminus of East 15th Street through to Campus Avenue. Vehicular access to the project site would be provided to/from 15th Street at two locations. Primary (gated) access would be through the extension of 15th Street, which would allow residential entry from Campus Avenue, allowing vehicle traffic to avoid the neighborhood to the south. As detailed in Figures 3.3 and 3.4 of the Recirculated Draft EIR, the 15th Street extension to Campus Avenue provides direct gated access from the proposed project. The traffic knuckle planned for the intersection of 15th Street and Fernando Avenue will prevent through traffic to Campus Avenue from the existing segment of 15th Street, the adjacent neighborhood, or points farther east (e.g., Grove Avenue.) As such, due to its less circuitous route, the majority of project traffic will enter/exit the project from Campus Avenue; thereby minimizing travel through the commenter's neighborhood.

This comment does not raise a substantiated specific issue related to the adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

Response to Comment C-4-3

This comment provides an unsubstantiated opinion the project would have an unspecified negative impact on local schools.

Please refer to the response to Comment C-3-5. This comment does not raise a specific issue related to the adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

Response to Comment C-4-4

This comment provides an unsubstantiated opinion the project would have an unspecified negative impact on San Antonio Regional Hospital.

The demand for hospital services depends on a myriad of factors, which may include (but not necessarily limited to) actual need, preference, location, services provided, and urgency. It is speculative to determine if, when, and at what intensity future residents of the proposed project would require medical care. *State CEQA Guidelines* Section 15145 states that if a Lead Agency finds that a particular impact is too speculative for evaluation, this conclusion should be noted, and discussion of the impact should be terminated. As the commenter provides no substantiation to support their opinion, the City determines the evaluation of potential impacts to San Antonio Hospital would be speculative. As such, this comment does not raise a specific issue related to the adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

Response to Comment C-4-5

The commenter restates their opinion that development of the proposed project would cause a negative impact on Upland. This opinion is noted and will be considered by the City prior to any future action on the project.

This unsubstantiated opinion does not raise a specific issue related to the adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

From: David Coleman <lindavidc@twc.com>
Sent: Monday, June 24, 2024 10:34 AM
To: Joshua Winter
Subject: [EXTERNAL] Villa Serena

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

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Hello Mr. Winter,

During the early days of information released there was an issue with the State of California stating that the area was restricted from use. Following that information the contractor burned off all vegetation and bulldozed the area. If there were any protected species in the area they would have been irradiated by the actions of the contractor. What are the positions of the City of Upland and the State of California on these issues today?

I live directly north of the area facing the twelfth fairway of the golf course. I also serve as President of the Upland Hills Estates Condominium Association which has 274 homes on the southside of Baseline Road.

I look forward to your response.

David Coleman
909-256-3224

C-5-1

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Response to Comment C-5

David Coleman
June 24, 2024

Response to Comment C-5-1

The commenter states that vegetation in the basin had been previously removed and the area bulldozed by the contractor and questions the impacts of these activities on any protected species. The commenter further questions what the current positions of the City and the State are on this these issues.

The project's impacts on biological resources have been comprehensively assessed in Section 4.3 of the Recirculated Draft EIR. The analysis contained in the Section 4.3 is supported by site-specific general biological resources surveys, protocol-level surveys for California gnatcatcher and San Bernardino kangaroo rat, nesting birds, and aquatic resources survey/delineation surveys conducted throughout 2022 and 2023 (see Section 4.3.1.2.) The impacts identified in the Recirculated Draft EIR and mitigation required to reduce the significance of these impact were substantially based on the technical reports (Recirculated Draft EIR, Appendices D1 through D4) and the Draft Streambed Alteration Agreement (SAA) ² between the project applicant and the California Department of Fish and Wildlife (CDFW). The SAA establishes the impacts and measures to, "...avoid and minimize impacts to fish and wildlife resources."

Mitigation Measures BIO-1 through BIO-6 address impacts to sensitive wildlife species, Mitigation Measure BIO-7 requires submittal of evidence of compliance with provisions of the SAA prior to the initiation of ground disturbance, and Mitigation Measures BIO-8 and BIO-9 identify the mechanisms to create, monitor, enhance, and maintain resources in the existing "conservation area" at the eastern end of the basin or provide purchase of an area within a CDFW approved mitigation bank. Based on the impacts and mitigation identified in Section 4.3 of the Recirculated Draft EIR, the City has determined that implementation of previously identified mitigation measures, developed in cooperation with the CDFW, would mitigate potential impacts to sensitive habitat and species that occur on the project site to a less than significant level.

This comment does not raise a specific issue related to the adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

² Streambed Alteration Agreement, EPMI-SBR-24938-R6, 15th Street Basin.

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From: Cindy <happa4@gmail.com>
Sent: Wednesday, July 10, 2024 12:40 PM
To: Joshua Winter
Subject: [EXTERNAL] Fwd: Villa Serena Specific Plan Project

You don't often get email from happa4@gmail.com. [Learn why this is important](#)

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Forwarded Conversation

Subject: Villa Serena Specific Plan Project

From: **Cindy** <happa4@gmail.com>
Date: Wed, Jul 10, 2024 at 12:32 PM
To: <jwinters@uplandca.gov>

Dear Mr. Winters,

I am emailing to express my deep concern for my neighborhood if Upland approves the development of Villa Serena. I have read the proposal and I understand that the traffic study specifically on Grove, 14th Street and Campus Ave. will increase by 632 vehicles daily. I object to any entry or exit path on 15th St.

Please be aware of the additional changes to our neighborhood regarding the City of Rancho Cucamonga Nicholson Strawberry Field.

C-6-1

C-6-2



Project Team

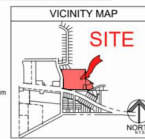
APPLICANT / OWNER
FORE PROPERTY
 1 Park Plaza #500
 Irvine, CA 92614
 949.254.2532
 Contact: Mike Finger
 mifinger@foreproperty.com

RESIDENTIAL ARCHITECT
AO ARCHITECTS
 144 N. Orange Street
 Orange, CA 92666
 (714) 639-6600
 Contact: Serafin Maranan
 serafin@aoarchitects.com

LANDSCAPE ARCHITECT
MS LANDSCAPE ARCHITECTURE
 507 30th Street
 Newport Beach, CA 92663
 949.875.5654
 Contact: Dan Della
 dan@ms-la.com

CIVIL ENGINEER
ENGINEERING SOLUTIONS
 31600 Railroad Canyon Road, Suite J
 Canyon Lake, CA 92587
 951.754.0288
 Contact: David Cunningham
 david@engineering-solutions.com

LIGHTING CONSULTANT
SALAS O'BRIEN
 8825 Research Drive
 Irvine, CA 92618
 949.753.1503
 Contact: Victor H. Becerra Sr.
 victor.becerra@salasobrien.com



COVER SHEET



FOOTHILL AND GROVE MIXED USE
 Rancho Cucamonga, CA
 FORE PROPERTY



ENGINEERING SOLUTIONS



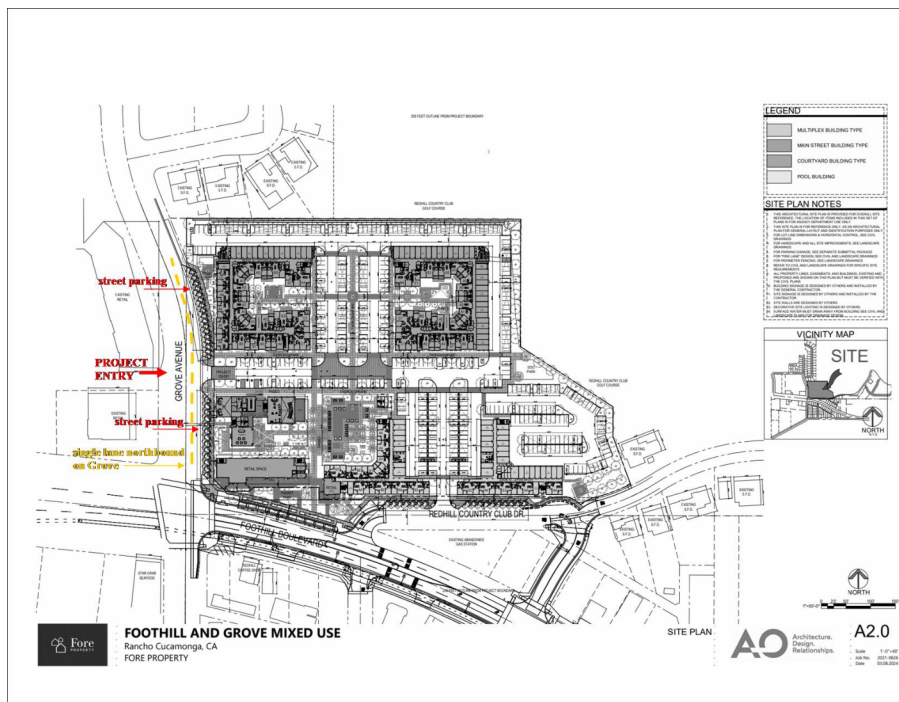
SALAS O'BRIEN



As you can see Rancho is already setting grounds in the construction of Foothill and Grove to accommodate the influx of traffic for this project. Please note, on this rendering, the vehicles parked on public streets (on Grove, back-in only) are positioned to go north. These are parking areas for the commercial renters. It would be a difficult maneuver to exit south on Grove because the Walmart shopping center also has an exit and southbound gets backed up. May I remind the Planning Commission, this is Rancho's project not Upland. According to their study regarding this development, it will increase traffic by approximately 700 vehicles. Together with Villa Serena's 632, this will impact this area negatively and affect the quality of life for our neighborhood and the City of Upland.

C-6-2
(cont)

C-6-3



It appears to have an Exit/Entry point on Grove Ave. into the new development. If so, how is acceptable since this is a City of Rancho project and Grove is in Upland? (Error correction on map in yellow, please ignore.)

C-6-5

I urge you to view the mini-packet, I urge you to travel Campus, 14th, and Grove daily before moving forward with Villa Serena. We already have 1 gated community exiting into this neighborhood (Red Hill) and now we are in jeopardy of adding 2 more. The City of Upland has ignored our paved roads, trees, and sidewalks for years. I am able to bypass those things. I understand it is all about the budget and revenue. The 15th basin may be wildly overgrown but it is a tranquil spot in the neighborhood which lacks a park. (proposed when we bought our home but now a drydock).

C-6-6

The Villa's 65 2-story homes on 10 ft berm will affect some residences more than others. Our mountain view is just as

C-6-7

important as those council members who boast their mountain view on social media.

Take pride in our city and neighborhoods. Mine is not as pristine as others, but I know my neighbors, kids play in the streets, we borrow eggs from each other, we walk the dog.

C-6-7
(cont)

C-6-8

From: **Mail Delivery Subsystem** <mailer-daemon@googlemail.com>
Date: Wed, Jul 10, 2024 at 12:32 PM
To: <happa4@gmail.com>



Message blocked

Your message to jwinters@uplandca.gov has been blocked. See technical details below for more information.

The response from the remote server was:

550 5.4.1 Recipient address rejected: Access denied.
[SA2PEPF00002250.namprd09.prod.outlook.com 2024-07-10T19:32:25.987Z
08DC9DDE50DEF353]

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Response to Comment C-6

Cindy Mastic
July 10, 2024

Response to Comment C-6-1

The commenters state their opposition to the project, which is noted and will be considered by the City prior to any future action on the project. The commenter further cites the daily vehicle traffic generated by the proposed project and objects to any entry or exit path on 15th Street.

As stated in the response to Comment C-3-2, primary ingress and egress driveway at the western boundary of the project site would be via the future new alignment of 15th Street from Coyote Run Drive to Campus Avenue.³ The 15th Street connection to Campus Avenue was provided based on previous public concern regarding traffic through the neighborhood south of the project site. As detailed in Figures 3.3 and 3.4 of the Recirculated Draft EIR, the 15th Street extension to Campus Avenue provides direct gated access from the proposed project. The traffic knuckle planned for the intersection of 15th Street and Fernando Avenue will prevent through traffic to Campus Avenue from the existing segment of 15th Street, the adjacent neighborhood, or points farther east (e.g., Grove Avenue). As such, due to its less circuitous route, the majority of project traffic will enter/exit the project from Campus Avenue, thereby minimizing travel through the commenter's neighborhood.

This comment does not raise a specific issue related to the adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

Response to Comment C-6-2

The commenter cites additional changes to their neighborhood resulting from the Strawberry Field development at the intersection of Foothill Boulevard and Grove Avenue in Rancho Cucamonga.

This comment does not raise a specific issue related to the adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

Response to Comment C-6-3

The commenter cites specific concerns regarding development in Rancho Cucamonga that is planned at the northeast corner of Foothill Boulevard and Grove Avenue. Notably, the commenter cites that the combined traffic from the proposed project and the project in Rancho Cucamonga would negatively impact their neighborhood and Upland.

As noted by the commenter, Rancho Cucamonga is the Lead Agency tasked with evaluating the direct, indirect, and cumulative impacts of development within its jurisdiction. As such, the traffic impacts referenced by the commenter would be properly evaluated by the City of Rancho Cucamonga. The City of Upland did not require the intersection of Foothill Boulevard and Grove Avenue to be addressed in the project-specific traffic study, because the proposed project would not contribute 50 or more peak hour trips at that intersection. The Traffic Impact Analysis

³ An egress/emergency vehicle access only gated driveway to 15th Street east of Coyote Run Drive East.

(Recirculated Draft EIR, Appendix G-1) states, “The 5 study area intersections shown ... were selected for evaluation in this TA based on consultation with City of Upland staff. At a minimum, the study area includes intersections where the Project is predicted to contribute 50 or more peak hour trips per the City’s Guidelines.” As stated in the response to Comment C-3-2, all intersections within the traffic study area would continue to operate at an acceptable LOS during peak hours with the addition of project traffic and no conflict or inconsistency with General Plan LOS standards would occur.

This comment does not raise a specific issue related to the adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

Response to Comment C-6-4

The commenter claims that traffic will use 15th Street as a shortcut to avoid the intersection of Foothill Boulevard and Campus Avenue. The commenter further provided in its entirety, the staff packet from the June 12, 2024 meeting of the City of Rancho Cucamonga Planning Commission for the referenced project.

As stated in the response to Comment C-6-1, the traffic knuckle at Fernando Avenue would prevent through access to Campus Avenue from 15th Street, negating the use of 15th Street as a shortcut for current traffic or traffic from the project in Rancho Cucamonga. The staff packet (provided at <https://rcdocs.cityofrc.us/WebLink/DocView.aspx?id=2000919&dbid=0&repo=RanchoCucamonga>) is noted. This comment does not raise a specific issue related to the adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

Response to Comment C-6-5

This comment questions the locations and control of the access points for the project in Rancho Cucamonga; the condition of daily traffic on Campus Avenue, 14th Street, and Grove Avenue; and presence of existing and future gated communities.

This comment does not raise a specific issue related to the adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

Response to Comment C-6-6

This comment states the City of Upland has ignored the condition of pavement, trees, and sidewalks; and comments that, although the 15th Street Basin may be wildly overgrown, it is a tranquil spot in the neighborhood that lacks a park.

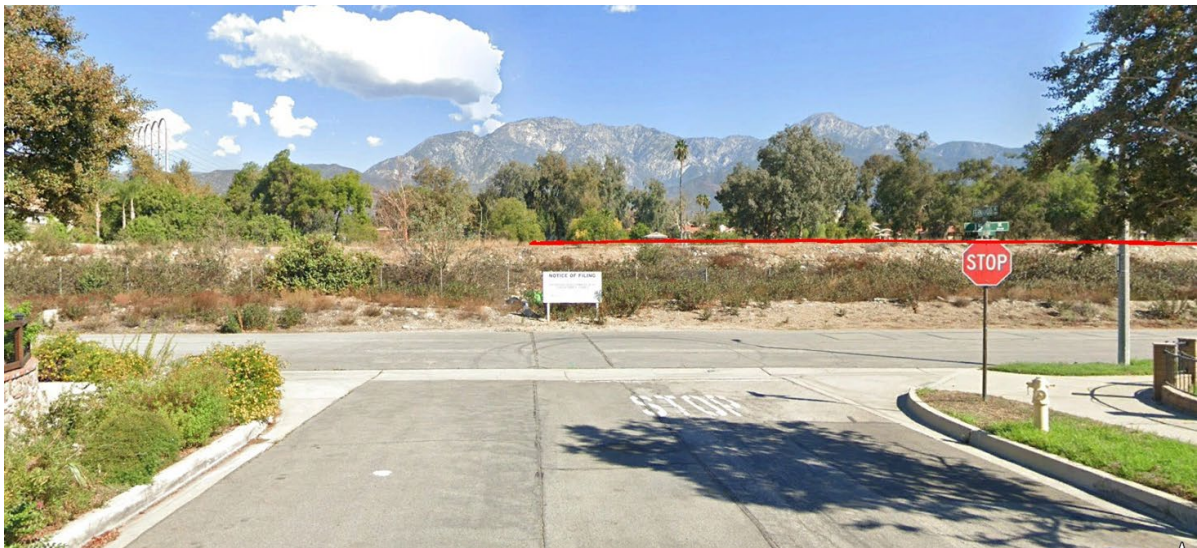
This comment does not raise a specific issue related to the adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

Response to Comment C-6-7

The commenter states the development of two-story homes will affect some residences more than others and claims views to the mountain are as important to neighborhood residents as they are to local elected officials.

The current top of the berm is at approximately 1,430 feet above mean sea level (amsl). Per the grading plan, the pads of the proposed residential structures would be at 1,429 feet amsl.

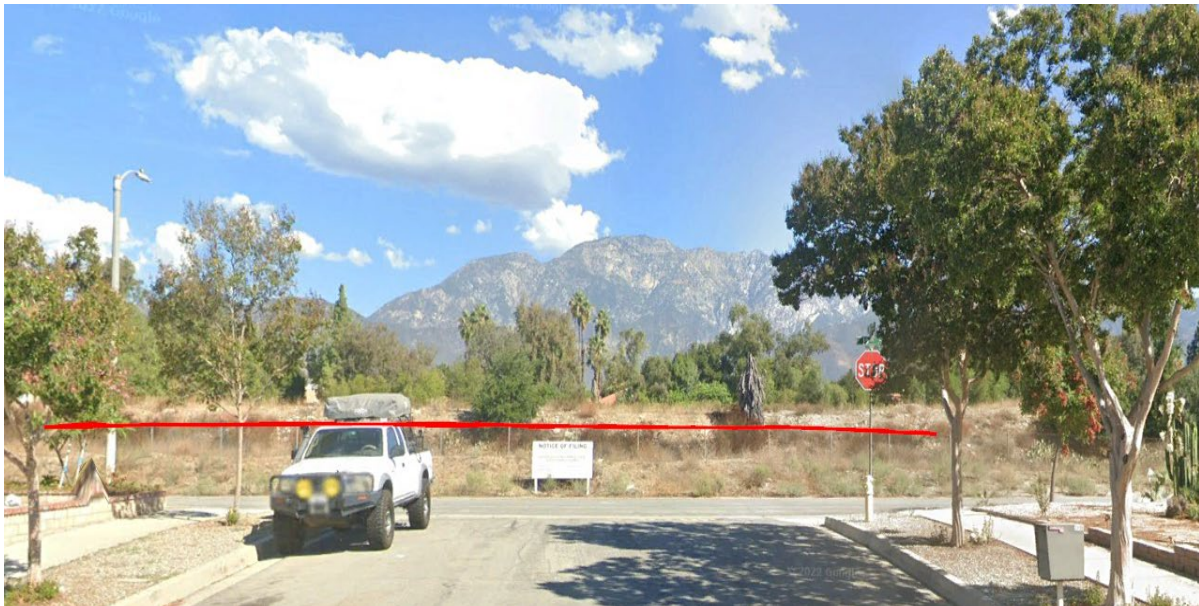
Current views north from Fernando Avenue to the project site are provided in the photograph below. As shown, the proposed project site is visible in the foreground with the San Gabriel Mountains offering background views. Under the current condition, golf course landscaping partially blocks views of the lower slopes of the San Gabriel Mountains.



Post-development, views north to the San Gabriel Mountains will include the proposed two-story homes, enhanced streetscape, and project landscaping in the foreground (see simulation on the next page). As shown, the height of the proposed two-story residences is approximate to the height of the existing current golf course landscaping that blocks views of the lower slopes of the San Gabriel Mountains. Views of the prominent ridgelines of the mountains are maintained.



When viewed north from 13th Avenue (see photo below), the lower slopes of the San Gabriel Mountains are partially obstructed by on-site vegetation and golf course landscaping.



Post-development, views north to the San Gabriel Mountains will include the proposed two-story homes, enhanced streetscape, and project landscaping in the foreground (see simulation below). As shown, the height of the proposed two-story residences is approximate to the height of the existing golf course landscaping. Views of the prominent ridgelines of the mountains are maintained.



By their nature, any view, whether of a typical neighborhood or the San Gabriel Mountains, will vary depending on the location of viewer. The California Court of Appeals concluded in its *Mira Mar Mobile Community v. Oceanside* decision that potential impacts related to views from private lands are not considered impacts under CEQA unless the lead agency has specifically adopted a standard or policy relevant to the project site specifically protecting a private landowner's views. The City of Upland, as the CEQA lead agency for the proposed project, has not adopted any such policy or standard.

The current partially obstructed views of the San Gabriel Mountains are described in Section 4.1.1.5 of the Recirculated Draft EIR. The post-development condition of these same views from publicly accessible streets is provided in Section 4.1.2.2 of the Recirculated Draft EIR (pgs. 4.1-12 and 4.1-14). As stated in the Recirculated Draft EIR:

...while the proposed project would slightly obscure lower views of the San Gabriel Mountains and Mt. Baldy, the ridgeline and most prominent views (i.e., higher views that extend above the existing mature trees) would continue to be visible with implementation of the proposed project.

The commenter's non-specific comment is noted and will be considered by the City prior to any future action on the project. This comment does not raise a specific issue related to the adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

Response to Comment C-6-8

The commenter asks that the City to take pride in Upland and its neighborhoods.

This comment is noted but does not raise a specific issue related to the adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

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From: Robyn&Nathan Tan <michler.tan@gmail.com>
Sent: Thursday, July 11, 2024 9:54 AM
To: Joshua Winter
Cc: ICE Robyn Michler Tan
Subject: [EXTERNAL] Villa Serena Specific Plan Project

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To whom it may concern,

As a resident who will be directly impacted by this development which will be adjacent to the north boundary of my property, I am concerned that there is no clear description of the provisions to provide privacy and security for those of us who will suddenly find themselves with a new development and public bike path behind their property. We bought this home in part because of the privacy, quiet and views provided by not having anyone behind us. Now, not only will we have to endure additional neighborhood traffic, noise and obscured views, we will also have random people cycling or walking behind our yard which at this time affords almost complete privacy and *serenity*.

C-7-1

Please advise if there is a provision to remediate this issue (i.e the builder will construct a sufficiently high wall - 7'-to ensure privacy or provide compensation to impacted homeowners for their own construction costs). Otherwise, please add it to the concerns that need to be addressed as part of the EIR and project approval.

C-7-2

Regards,
 Robyn and Nathan Tan

Sent from my iPhone

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Response to Comment C-7

Robyn and Nathan Tan
July 11, 2024

Response to Comment C-7-1

The commenters express concern that there is no clear description of the provisions to provide security and privacy to residents living adjacent to the project site. The commenters raise questions regarding the increased noise from public use (cycling and bicycling) within the project site and the changed character of views from their property.

As detailed in the Recirculated Draft EIR, and the responses to Comments C-2-2, C-3-2 and C-6-7, impacts related to noise, traffic, and visual impacts have been determined to be less than significant (traffic and visual impacts) or less than significant with the incorporation of mitigation (noise). Per *State CEQA Guidelines* Section 15131(a), "Economic or social effects of a project shall not be treated as significant effects on the environment...The focus on the analysis [in the EIR] shall be on the physical changes." As such, the commenters' issues related to the privacy, or the serenity of their residence are not relevant for purposes of CEQA analysis.

This comment does not raise a substantiated, specific issue related to the adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

Response to Comment C-7-2

The commenters suggest preferred options to ensure the continued privacy of existing, adjacent residences.

The commenters' concerns are noted and will be considered by the City prior to any future action on the project. As stated previously, residential privacy is not an issue addressed under CEQA. This comment does not raise a specific or substantiated issue related to the adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

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From: Natasha Walton <notlaw2018@gmail.com>
Sent: Thursday, July 11, 2024 5:59 PM
To: Joshua Winter
Subject: [EXTERNAL] Villa Serena Specific Plan Project

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Dear Mr. Winter:

I am an advocate for open green spaces and wildlife in our Upland community.

I ask that the developer for the Villa Serena Specific Plan project adopt an alternative project – **the donation of the 15th Street flood basin property to a non-profit conservation organization, such as the [Wildlands Conservancy](#), to preserve this open space, wildlife habitat, and flood control basin in perpetuity.** Non-profit organizations, like the Wildlands Conservancy create preserves that are open to the public and include outdoor education programs for public schools (please visit their website for more information).

C-8-1

Such a preservation project would be a win-win situation for the entire Upland community! The land owner of proposed project site would have a nice tax write off, and the basin would continue to provide local flood control and become a preserve that would protect the native habitat and wildlife that reside there in perpetuity. In addition the site could remain accessible to the public and become a site of an outdoor education programs for students, like those at Foothill Knolls STEM Academy of Innovation.

I have hope that the city staff, planning commission, and city council will realize that this project site must be **preserved for flood control and as a special place for our native wildlife and plants, and, yes, even our hearts.**

C-8-2

Thank you for your time and consideration.

Sincerely,

Natasha Walton, MS

20-Year Upland Resident

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Response to Comment C-8

Natasha Walton
July 11, 2024

Response to Comment C-8-1

The commenter requests that the developer and the City adopt an alternative to the project, the donation of the project site to a non-profit conservation organization to preserve the project site in perpetuity for open space, wildlife habitat, and flood-control purposes.

The Recirculated Draft EIR (Section 6.1) provides an assessment of the “No Project” alternative, described as follows:

The No Project alternative assumes that the proposed project would not be developed and that the project site would generally remain in its current condition. The project site would continue to be undeveloped. Infrastructure improvements within and adjacent to the project site, include the extension of 15th Street, would not occur.

Per *State CEQA Guidelines* Section 15126.6, an EIR must “describe a reasonable range of alternatives to the project, or to the location of the project, which could feasibly attain most of the project’s basic objectives, while avoiding or substantially reducing the project’s significant environmental impacts.” The range of alternatives required in an EIR is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The commenter’s suggested alternative, donation of the site and preservation in perpetuity in its current state, is synonymous to the “No Project” alternative, which fails to achieve any of the project’s objectives detailed in Section 3.4 of the Recirculated Draft EIR.

As the Recirculated Draft EIR provides an alternative assessment to maintain the site in its current condition and because this comment does not raise a substantiated, specific issue related to the adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies, no further response is required.

Response to Comment C-8-2

The commenter expresses hope that the site be preserved in its special state. This comment is noted and will be considered by the City prior to any future action on the project. This comment does not raise a substantiated, specific issue related to the adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

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From: Cathy Cushman <ccush2020@gmail.com>
Sent: Friday, August 23, 2024 3:51 PM
To: Joshua Winter
Subject: [EXTERNAL] Villa Serena Specific Plan Project

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I vote a big fat NO on this project. The following are my reasons:

C-9-1

1. In 1977 I lived on a street below 15th near Monte Verde St. I would hate to have the traffic from this new development going down Monte Verde. I would think the residents on Alta Avenue and Fernando Avenue would be upset too with the increased traffic going down their quiet neighborhood street.

C-9-2

2. Now I live on the SW corner of Fernbrook and 16th Street. The traffic is so bad in the afternoon, the traffic backs up to 2nd Avenue. I often have to take 15th street east to get to Campus and then turn left to reach 16th. Now Campus is backed up to 15th because people have discovered that route.

C-9-3

Now you want to open 15th St. to 65 new houses which might mean 130 more drivers dumping into Campus at 15th?? And speaking of Campus, I have called the city and told them that Campus needs to be repaved from Foothill to Arrow. It also has potholes between 16th and Foothill. I know our city is not rich, and we do not have a lot of money to fix things, so why do we want to add more drivers to our city streets?

3. The 2nd reason deals with the flood control basin. It is there for a reason and has been there for years. Why would you want to build 65 houses on it? I read the comments from the people who are very knowledgeable about what lives in that basin and based on their views, I think it is important to keep the wildlife area.

C-9-4

4. If I lived on 15th Street or Red Hill, I would be very angry if the new project blocked my views of the mountains.

C-9-5

5. And finally there is the water and electricity matter. Our state is trying to cut all of that. I read that CA has to import 60% of our electricity. And we know how water goes- even though houses use less than 5% of the state's water, the gov't is always trying to threaten us with less. Until our state gets serious about real energy and not stupid solar and wind, I don't want to cut my carefully controlled use because of 65 new housing units.

C-9-6

Though my stance may sound like NIMBY, it's more about quality of life. We watched the Colonies absorb all the open land which I believe was done nicely. Can we please just conserve the 9 acres for open space?

Thank you. Cathy Cushman

Response to Comment C-9

Cathy Cushman
August 23, 2024

Response to Comment C-9-1

The commenter expresses opposition to the project.

This comment is noted and will be considered by the City prior to any future action on the project. This comment does not raise a substantiated, specific issue related to the adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

Response to Comment C-9-2

The commenter states residents will be “upset” by increased traffic and noise on local streets.

Please refer to the response to Comments C-2-2 and C-3-2 regarding noise and traffic impacts that result from development of the proposed project. This comment does not raise a specific, substantiated issue related to the adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

Response to Comment C-9-3

The commenter states current traffic conditions on Campus Avenue and other local roadways are bad and “dumping” the project traffic onto Campus Avenue will worsen conditions. The commenter further questioned the condition of the existing pavement on Campus Avenue.

This comment does not raise a specific, substantiated issue related to the adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

Response to Comment C-9-4

The commenter questions the purpose of converting the project site to residential uses and expresses the opinion the “wildlife area” be retained.

As detailed in Section 3.1 of the Recirculated Draft EIR:

The project site encompasses the existing, 20.3-acre 15th Street control detention basin (basin) located south of the Upland Hills Country Club in the central-eastern portion of Upland in San Bernardino County, California... The City of Upland (City) has determined the western portion of the basin is a surplus parcel. The proposed residential uses would be developed on this 9.16-acre surplus parcel. The remaining portion of the basin is adequate for continued flood control operations pursuant to the completion of basin modifications that are a component of this project.

The commenter’s opinion is noted and will be considered by the City prior to any future action on the project. This comment does not raise a specific, substantiated issue related to the adequacy of

the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

Response to Comment C-9-5

This comment expresses an opinion regarding changes in views of the San Gabriel Mountains.

Please refer to the response to Comment C-6-7. This comment is noted and will be considered by the City prior to any future action on the project. This comment does not raise a specific, substantiated issue related to the adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

Response to Comment C-9-6

The comment expresses an unsubstantiated, non-specific opinion regarding electricity and water usage and the State's policy regarding said resources.

This comment does not raise a specific issue related to the adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

Response to Comment C-9-7

The commenter expresses an opinion regarding conservation of the project site as open space.

This comment is noted and will be considered by the City prior to any future action on the project. This comment does not raise a specific, substantiated issue related to the adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

From: [Stephen Wulkopf](#)
To: [Joshua Winter](#)
Cc: [Stephen Wulkopf](#)
Subject: [EXTERNAL] Villa Serena Specific Plan Project
Date: Wednesday, September 4, 2024 9:29:20 AM

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Mr. Winter,

On behalf of the Home Owner's Association Board at Mountain View (the neighborhood to the direct west of the project), I am writing to formally state our opposition to the project. Wild life in the area already has limited space and this project and the construction will force more animals into our community park. The coyotes are specifically a concern as we have many small children and pets that play in our neighborhood park. Additionally, we have concerns about the additional traffic coming through the extended corridor of 15th. Assuming the project moves forward despite any public dissent, we would at least like fewer homes to be built (smaller footprint, less cars). Thank you for your attention to this matter.

■ C-10-1
■ C-10-2
■ C-10-3
■ C-10-4

Kind regards,
Stephen Wulkopf
HOA Board President
MountainView in Upland

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Response to Comment C-10

Stephen Wulkopf
September 4, 2024

Response to Comment C-10-1

The commenter expresses opposition to the project.

This comment is noted and will be considered by the City prior to any future action on the project. This comment does not raise a substantiated, specific issue related to the adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

Response to Comment C-10-2

The commenter provides a general statement that project construction will force more animals, including coyotes, from the site into local parks which may prove harmful to small children and pets.

As identified in the Recirculated Draft EIR (see pp. 4.3-33 and 4.3-34), the project site is currently surrounded on all sides by urban/suburban development, and golf course landscapes with little to no areas that may provide connectivity to other habitat, if any, in the region. The project site is not within any identified Essential Habitat Connectivity areas or Natural Landscape Blocks. As further stated in Section 3.1 of the Recirculated Draft EIR, only the eastern 9.16 acres of the basin will be developed with residences. The remaining portions of the basin, 6.85-acre area directly east of the residential development will be modified and maintained for stormwater and flood control capacity, and a 4.29-acre area at the extreme eastern boundary of the basin (the “conservation area”) would remain unaffected by project activities. Similar to the existing condition, these areas would be available for wildlife use.

This comment does not raise a specific or substantiated issue related to the adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

Response to Comment C-10-3

The commenter states that neighborhood will experience additional traffic through the extension of 15th Street.

Please refer to the response to Comment C-3-2, which describes the configuration of the 15th Street extension, which limits access to project residents only. This comment does not raise a specific or substantiated issue related to the adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

Response to Comment C-10-4

This comment recommends the project move forward with fewer residences built on-site.

As stated in the Section 6.2 of the Recirculated Draft EIR, the City considered a “Reduced Density/Conservation” alternative assuming the project site would still be developed with single-family residential uses, similar to the proposed project, but that only approximately 45 units would be developed on the site. This alternative would achieve the objectives of the proposed project, although not to the same extent as the proposed project.

The commenter’s development preference is noted and will be considered by the City prior to any future action on the project. This comment does not raise a specific or substantiated issue related to the adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

December 11, 2024

Joshua Winter, Senior Planner
City of Upland
Development Services Department
Planning Division
460 N. Euclid Ave.
Upland, CA 91786
jwinter@uplandca.gov

RE: Villa Serene Specific Plan Project – Resident Pedestrian Access

Dear Mr. Winter,

I am writing to express my concerns regarding the Villa Serena project on East 15th Street. As a nearby resident, I would like to address the proposed extension of 15th Street from Campus Avenue to the site.

The city owns the property necessary for this extension, and while I support its development, I believe it is important to ensure that the use of this property benefits not only the developer and future residents but also the current residents of the area.

Currently, there is no pedestrian access between 15th Street and Campus Avenue. To reach Campus Avenue for exercise, or to access local parks and businesses, residents must walk all the way down to 14th Street and then back up Campus Avenue, adding roughly 1.89 miles to the round-trip journey (see Exhibit A). Providing a pedestrian connection between East 15th Street and Campus Avenue would significantly improve the walkability of our neighborhood and offer a direct route to local amenities, benefiting residents and businesses alike.

With support from my neighbors, I respectfully request that a public pedestrian access be created from East 15th Street to Campus Avenue (see Exhibit B).

I would appreciate the opportunity to discuss this matter further and work towards a solution that benefits all parties involved—the neighbors, the developer, and the City of Upland. Please feel free to contact me at your earliest convenience.

Thank you for your attention to this request.

Sincerely,

Dennis Ferncez
Cell: 714-604-9748
dennis@ferncez.com

C-11-1

Exhibit A

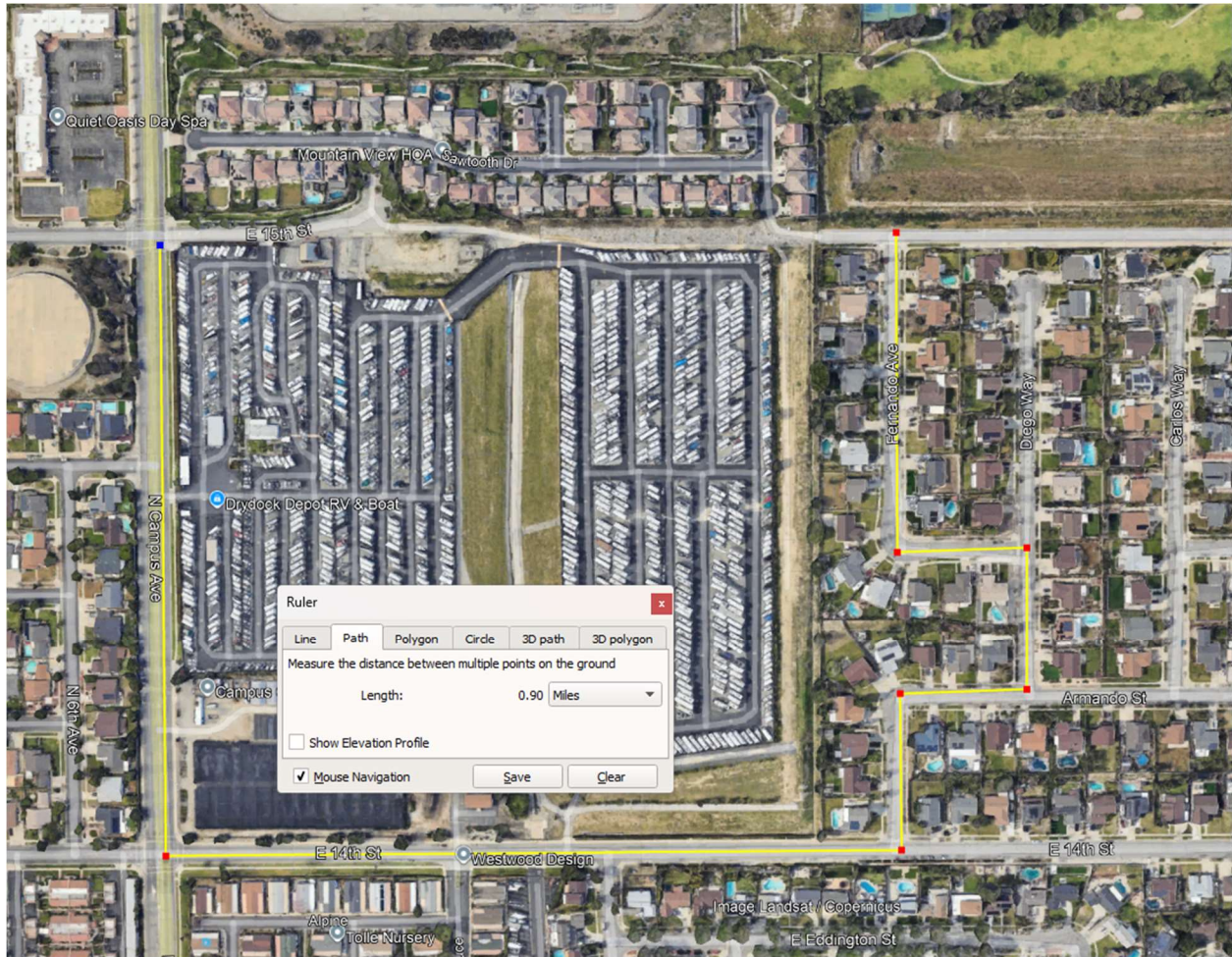
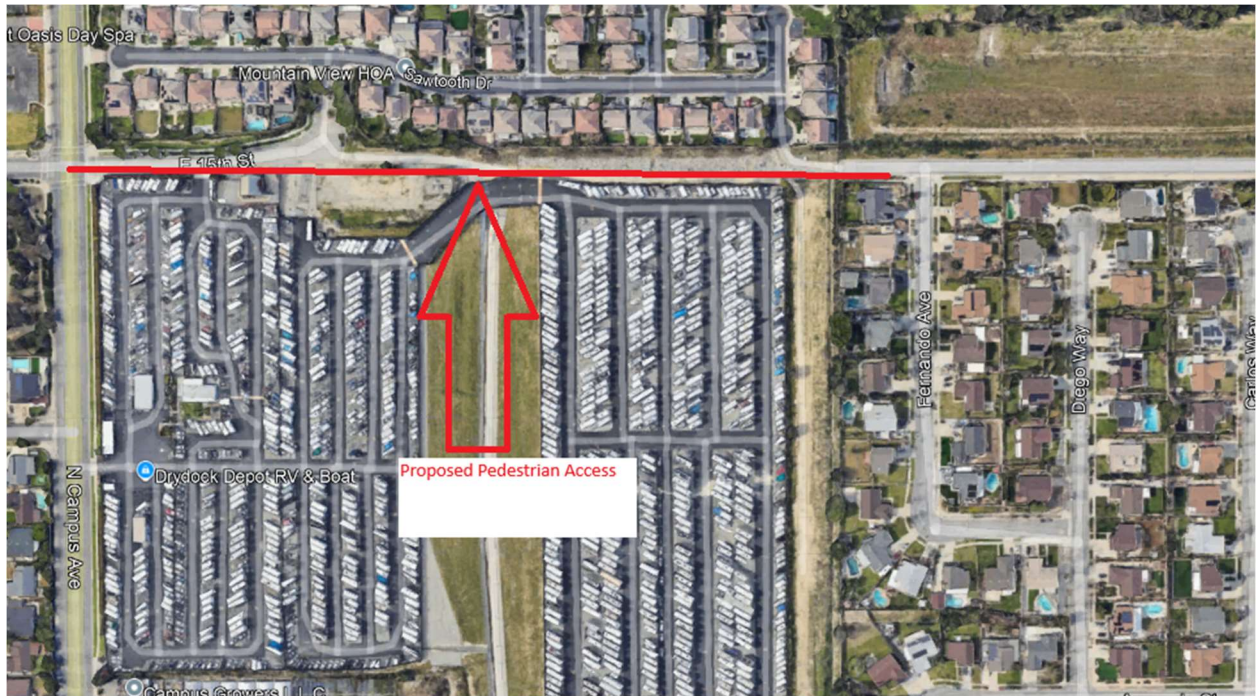


Exhibit B



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Response to Comment C-11

Dennis Ferncez
December 11, 2024

Response to Comment C-11-1

The commenter states that the City owns the property planned for the 15th Street extension and that pedestrian access from the existing section of 15th Street through the proposed 15th Street extension to Campus Avenue be provided for current residents of the neighborhood. The commenter further states that providing public access through the 15th Street extension to Campus Avenue would significantly improve the walkability of the existing neighborhood,

As detailed in Figure 3.6 of the Recirculated Draft EIR, pedestrian access is provided from the existing segment of 15th Street, through the pocket park to be developed north of Fernando Avenue and the proposed extension of 15th Street to Campus Avenue. The commenter's preference for public complete public access to the planned sidewalk along the 15th Street extension through to Campus Avenue will be considered by the City prior to any future action on the project. This comment does not raise a specific or substantiated issue related to the adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

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From: Darrell James Maxey <maxjames200@gmail.com>
Sent: Saturday, December 14, 2024 1:03 PM
To: Joshua Winter
Subject: [EXTERNAL] Villa Serena Specific Plan

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Good afternoon

My name is Darrell Maxey and I live at 1310 Upland Hills Dr S, Upland, CA 91786, which is 300 feet north of the proposed Villa Serena Development. I have lived at this address since 2015, am very familiar with the site or the proposed development. I am a retired Civil Engineer. There is a record of my comments on the June 8, 2020 scoring meeting.

I reviewed the documents in the Draft Environmental Document for the Initial Study and the more recent revised or amended documents.

My comments are as follows:

1. The proposed residential development will remove about 1/2 or 9.2 acres or the 20 existing 20 acre 15th St flood basin. Modifications will be made to the remaining 11.1 acres to mitigate the loss of the flood basin. The basis for this decision is a 2017 Basin Modification study by Madole and Associates. The drainage and hydraulic study may be out of date given changes due to Climate change and major swings in precipitation and flood events occurring in California, Southern California and elsewhere. Significantly, reducing the capacity and function of a working flood detention basin could be a mistake that man will regret. During recent "wet year" precipitation events in the fall/winter of 2022/23 and 2023/24 the basin had much higher water levels than the 2010-2022 drought years and these events did not approach 100+ year events.. At the very least, a new independent hydraulic and flood study should be conducted which would incorporate more updated projections of precipitation and flood events. The Villa Serena development is not in the best interests of the City and its residences and will have long term potentially unavoidable impacts to flooding as proposed.

C-12-1

2. The Traffic Impact in Appendix H analysis appears to be flawed. The traffic impact analysis based on 2022 observations (when traffic was light partially due to residual covid work from home and school restrictions) shows level of service (LOS) is A (good) at the intersection of 15th and Campus for PM peak. I drive through this intersection of 15th and Campus several days a week at 4:30 - 6:30 pm and the LOS northbound on Campus is more likely D or E (poor). It often takes 3 or 4 traffic cycles to move north from 15th St. to Baseline (16th Street) and the intersection at Campus and 15th is sometimes blocked. The Villa Serena single home multiple car residential development which proposes to connect

C-12-2

and open top 15th St. will likely make the LOS F at this intersection. A new traffic study should be conducted based on 2024/2025 traffic and the streets serving the development re-designed. I am not sure what could be reasonably done to mitigate the traffic impacts. The Villa Serena development is not in the best interests of the City and its residences and will have near term (soon after the development is occupied) unavoidable impacts to traffic as proposed.

C-12-2
(cont)

3. The Biological, Aquatic (Appendix, D) and similar environmental studies were not properly conducted, in part due to the timing of the studies. Field studies of the basin were conducted in spring and summer of 2022. The years 2015- 022 were a relatively dry "drought" period especially in later spring and through summer and fall broken up by wet years in the the fall/winter of 2022/2023, and 2023/2024 especially from November through March. Field studies for habitat should have been conducted during the middle of a "wet season" and much more vibrant and robust habitat of frogs, birds (ducks, geese, other), plants and wildlife and would have qualified as an urban area to preserve for plants and wildlife. The California Dept. of Fish and Game and the March 9, 2022 letter from Bill Rodstrow, a former US Fish and Wildlife biologist, was well written and provided a much more realistic assessment of the site .

C-12-3

The look and feel of the 15th St Drainage Basin is very similar to the nearby Cucamonga Basin #6 which has trails and the sensitive habitat areas fenced off. The 15th St. Drainage Basin should be developed similar to the very nearby (less than 1 mile north) Cucamonga Basin #6 (refer to photos below and text, including big differences between dry and wet periods).

C-12-4

The Villa Serena development is not in the best interests of the City and its residences and will have unavoidable impacts to this urban "wetlands" with its wildlife and plants. The 15th St. Drainage Basin should be developed similar to the Cucamonga Basin #6.

C-12-5

4. We all recognize that there is a major shortage of housing in California. The Villa Serena plan with its 70+ single family homes with 2 to 3 cars per home, "not walkable", will not contribute much to solving the housing crisis. encourages sprawl and traffic congestion, and is a poor use of land and resources. A better idea would be for the City to work with the developer and the past agreement with the "Colonies" and develop denser housing on the underutilized Colonies parking lots and underutilized Big Box store (now Dicks Sporting Goods, formerly Bed Bath and Beyond). Building denser developments on this Colonies Site underutilized parking areas would promote walkable and liveable housing and is a much better use of land and resources. In lieu of developing Villa Serena and to preserve the "deal or agreement" with the Colonies for developing the 15th St Drainage basin - the City should work with the Colonies to allow replacement housing in the underutilized parking areas of the Colonie, possibly around the former and closed Bed Bath and Beyond store. There are many examples of shopping areas and their parking lots being converted to dense housing.

C-12-6

Sincerely
Darrell Maxey

Cucamonga Basin #6

 Elizabeth Boatman  February 3, 2017  Add comment  4 min read

One of my go-to neighborhood walks is in an area of Upland, California, that I call The Wetlands. It's owned by the county Flood Control District. Its real name is [Cucamonga Basin #6](#). If you're thinking that's as unromantic as it gets, I agree. I visited recently because a neighbor mentioned there was now water in the basin! That also sounds a bit odd. Of course a flood basin should have water; but in December when I visited, the basin was very dry.



Cucamonga Basin 6 in mid-December 2016

C-12-7



C-12-8
(cont)

The snow on [Cucamonga Peak](#) isn't bad either. It was better right after the rain, but I'm not complaining.

With the water came the birds. There were ducks, some little black ones that looked like coots and several geese. This makes a good place to stop and rest during migration. The trails wind around high above the water level. The regulations warn hikers not to cross the fence. As a result, I didn't have many choices about where to stand to get a shot. Sometimes I pointed the camera between the bars of the fence. Of course, those didn't turn out well. My lens can't pick up tiny birds swimming about in the distance. That didn't stop me from trying.



C-12-8
(cont)

These birds were off in the shade and didn't really want to cooperate. In fact, they were moving away from me. I like the reflections, especially their necks.

Joggers, dog walkers, and bikers enjoy the trails in the basin. The paths are wide and made of dirt. In some spots, there are observation areas where one can sit and rest. You can cross the stream in a couple places, which is handy. You don't have to go all the way around. These bridges are also your only chance to get down near the water.

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Response to Comment C-12

Darrel Maxey
December 14, 2024

Response to Comment C-12-1

The commenter states the basis for the conclusions related to the flood capacity of the modified 15th Street Basin may be out of date due to major swings in rain and flood events in Southern California between 2022 and 2024 and recommends preparation of a new independent hydraulic analysis. The commenter further states the project would have potentially unavoidable flood impacts as proposed.

The 15th Street Basin has a total existing recharge volume of 280,870 cubic feet (6.45 acre-feet). As described in Section 4.5.2.2 of the Recirculated Draft EIR (pp. 4.5-15 and 4.5-16), the project would include modifications within the 15th Street Basin, lowering the bottom of portions of the basin by up to 7 feet. A summary of the post-developed groundwater recharge volumes is provided in Table 4.5.D of the Recirculated Draft EIR, demonstrating the modifications to the existing 15th Street Basin would result in an increase on-site recharge volume from 6.45 acre-feet to 9.7 acre-feet, an increase of 3.25-acre feet.

The watershed tributary to the 15th Street Basin encompasses 583 acres. This watershed contributes storm water runoff from developed portions of Upland, consisting of single-family residential neighborhoods, multifamily residential developments, golf course and open space areas and regional power generation and transmission facilities. The watershed is broken into five subareas, each of which currently have direct physical connections into the basin. Each of these five drainage subareas contain fully improved storm drain collection systems composed of concrete catch basins at the street level that connect to concrete pipes or concrete-lined channels. In a 100-year storm event under current conditions, the duration of stormwater detention within the basin is between 26 and 27 hours. At approximately 17 hours into the storm event, the high-water level within the basin would be at an elevation of 1,422.7 feet amsl, approximately 10.7 feet in depth from the lowest point of the basin. Approximately 276.3-acre feet of water (90,032,100 gallons) would be routed through the basin during the 100-year storm event under current conditions.

With the proposed modifications, the 15th Street Basin will continue to operate as a flood control basin to minimize and control the release of storm runoff to meet the capacity of downstream flood control facilities. The City has required that flows from one of the tributary drainage areas (Node 72.3) and all surface runoff within the proposed project not drain directly to the modified basin. The bottom of the reduced basin will be excavated 7 feet lower than the existing low point in the current basin to ensure that the 100-year water surface in the basin remains below the top of existing levees. As modified, in a 100-year storm event, the duration of stormwater detention within the basin would be approximately 40 hours. At approximately 17 hours into the storm event, the high-water level within the basin would be at an elevation of 1,425.2 feet amsl, approximately 20.2 feet in depth from the lowest point of the proposed excavation in the bottom of the reduced basin (1,405.0 feet amsl). The elevation of the outlet storm drain from the reduced basin is 1,412.15 feet amsl. Approximately 257 acre-feet of water (83,743,800 gallons) would be routed through the basin during the 100-year storm event in its modified form. Approximately 4.9 acre-feet (1,596,700

gallons) of dead storage – runoff that would enter the reduced basin and incapable of leaving the reduced basin – would be retained below the level of the basin outlet.⁴

The proposed modifications have been designed to accommodate the 100-year storm condition⁵, providing sufficient mitigation for potential impacts associated with flooding. The proposed modifications to the 15th Basin increase the recharge capacity and reduce the 100-year outflow from the 15th Street Basin. The modifications have been designed to comply with appropriate design criteria established by the City, County, and State and have undergone review by third-party reviewers and the City. Regarding the focus of review, *State CEQA Guidelines* (Section 15204a) states that “...CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.” Although the commenter notes the varying nature of recent precipitation events, no substantial or specific evidence has been provided to counter the analysis and conclusions set forth in the Recirculated Draft EIR; therefore, preparation of a new analysis is not warranted. In the absence of a substantiated issue related to the content adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

Response to Comment C-12-2

The commenter states the Traffic Impact (Analysis) appears to be flawed, based on 2022 observations. The commenter further disputes the stated condition of the intersection of 15th Street and Campus Avenue and declares adding project traffic to this intersection would further degrade the LOS at this intersection. The commenter believes a new traffic study should be prepared and the streets serving the project be redesigned. The commenter states that the project is not in the best interest of the city and would have unavoidable impacts.

Per *State CEQA Guidelines* Section 15126 (a), an EIR shall identify and focus on the significant effects of the proposed project on the environment. In assessing the impact of a proposed project on the environment, the lead agency should normally limit its examination to changes in the existing physical conditions in the affected area as they exist at the time the Notice of Preparation (NOP) is published. The NOP for the project was published in February 2022. The traffic scoping agreement, establishing the extent and methodology for addressing project-related traffic impacts, was developed in consultation with the City. The traffic assessment was developed by experts in traffic analysis using appropriate contemporary Institute of Transportation Engineers protocols and methodologies and is consistent with the City of Upland requirements.

As stated in Section 3.5 of the Traffic Analysis (Recirculated Draft EIR, Appendix G-1), the intersection LOS analysis is based on the traffic volumes observed during the peak-hour conditions using traffic count data collected in January and August 2022 when local schools were in session and

⁴ Correspondence between Madole & Associates, Inc., and California Department of Fish and Wildlife, November 1, 2021.

⁵ A 100-year flood is a flood event that has on average a 1 in 100 chance (1% probability) of being equaled or exceeded in any given year. Statistical techniques, through a process called frequency analysis, are used to estimate the probability of the occurrence of a given precipitation event.

operating on normal bell schedules. A list of cumulative development, as provided by the City, was reviewed to determine which projects would likely contribute measurable traffic through the study area intersections (e.g., those cumulative projects close to the proposed project). An ambient growth factor accounts for background (area-wide) traffic increases from 2022 to 2025. Consistent with other studies performed in the area, an ambient growth rate of 2 percent per year was used to approximate background traffic growth not identified by nearby cumulative development projects. The additional traffic resulting from development and occupation of the proposed residences would not result in an unacceptable LOS during the a.m. peak hour or p.m. peak hour (see Table 4.7.A). Furthermore, as stated in the response to Comment C-3-2, traffic congestion is longer the metric for planning and environmental review of traffic impacts in Upland.

State CEQA Guidelines Section 15384 states that argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly erroneous or inaccurate, or evidence of social or economic impacts that do not contribute to or are not caused by physical impacts on the environment do not constitute substantial evidence. *State CEQA Guidelines* Section 15204(c) further states that commenters should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. The commenter does not provide substantiated evidence to support the claim the traffic analysis is inadequate. The claim does not raise a specific issue related to the adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

Response to Comment C-12-3

The commenter states the biological resource surveys (Recirculated Draft EIR, Appendices D-1 through D-4) were not properly conducted, in part due to the timing of the studies and intervening periods of drought between 2015 and 2022. The commenter references previous correspondence from the CDFW and Mr. Bill Rodstrom as providing a “more realistic” assessment of the project site.

As stated in Section 4.3 of the Recirculated Draft EIR, the following biological resource studies were prepared to identify existing site conditions and to determine the nature and extent of potential impacts to on-site biological resources:

- *Biological Resources Technical Report Villa Serena Specific Plan (Tract No. 20245) Project*, Aspen Environmental Group, January 2023 (Appendix D-1)
- *San Bernardino Kangaroo Rat and California Gnatcatcher Habitat Assessment* for a 26.3 acre parcel in Upland, San Bernardino County, California, Origin Biological, January 10, 2023 (Appendix D-2)
- *Villa Serena Specific Plan; Nesting Bird and California Gnatcatcher Habitat Assessment*, Dugan Biological Services, May 10, 2023 (Appendix D-3)
- *Aquatic Resources Delineation Report Villa Serena Specific Plan (Tract No. 20245) Project*, Aspen Environmental Group, September 2023 (Appendix D-4)

The biological studies were conducted by qualified persons meeting the requirements established by the United States Fish and Wildlife Service (USFWS) and the State of California⁶ and were conducted pursuant to the protocol requirements for species surveyed.

The commenter refers to public comment received by the City in response its issuance of an NOP of the EIR. The purpose of a NOP is to solicit obtain early comments on a proposed project, alternatives, and potential environmental impacts. Pursuant to *State CEQA Guidelines* Section 15082, the NOP was distributed for public comment for a 30-day period extending from February 8 to March 9, 2022. The comments received on the NOP, including those of the CDFW (March 7, 2022) and Bill Rodstrom (March 9, 2022), were fully reviewed and considered during preparation of the Draft EIR and Recirculated Draft EIR and supporting biological resource studies.

Pursuant to *State CEQA Guidelines* Section 15151, an EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information that enables them to make a decision that intelligently takes account of environmental consequences. Disagreement among experts does not make an EIR inadequate. Generally, courts have looked not for perfection, but for adequacy, completeness, and a good faith effort at full disclosure.

Based on public comment received during NOP review period as well as the Draft SAA between the project applicant and the CDFW (which identifies the impacts and measures to, "...avoid and minimize impacts to fish and wildlife resources"), the biological resource studies and Section 4.3 of the Recirculated Draft EIR represent a thorough, reasonable, and good-faith effort to disclose and mitigate to a less than significant level, the biological resource impacts resulting from the construction and occupation of the proposed development.

Although the commenter provides an opinion that other studies provide a "more realistic assessment of the site", the commenter does not provide substantiated evidence to support his claim the studies were not properly conducted. As this comment does not raise a specific issue related to the content or adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies, no further comment is required.

Response to Comment C-12-4

The commenter states the "look and feel" of the basin is very similar to that of Cucamonga Basin #6, (which has trails and habitat areas fenced off) and that the 15th Street Basin should be similarly developed.

As stated in Section 3.1 of the Recirculated Draft EIR, only the eastern 9.16 acres of the basin will be developed with residences. The remaining portions of the basin, the 6.85-acre area directly east of the residential development, will be modified and maintained for stormwater and flood control capacity, and a 4.29-acre area at the extreme eastern boundary of the basin (the "conservation area") would remain unaffected by project activities. Similar to the existing condition, these areas would be available for wildlife use. As stated in Section 3.2.33 of the Recirculated Draft EIR, a public

⁶ Mikael Romich (USFWS 10(A)1(a) permit # TE-068799-5 and State scientific collecting permit #7043)

pedestrian/bicycle trail will extend from 15th Street to the existing public trails within the flood control basin.

The commenter's preferred use of the project site is noted and will be considered by the City prior to any future action on the project. This comment does not raise a specific or substantiated issue related to the content or adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

Response to Comment C-12-5

The commenter provides the opinion that the project is not in the best interest of the City and would result in unavoidable impacts to "urban wetlands", wildlife, and plants; restating the basin should be developed similar to the Cucamonga Basin #6.

The project's impacts on biological resources have been comprehensively assessed in Section 4.3 of the Recirculated Draft EIR. The analysis contained in the Section 4.3 is supported by site-specific general biological resources surveys, protocol-level surveys for California gnatcatcher and San Bernardino kangaroo rat, nesting birds, and aquatic resources survey/delineation surveys conducted throughout 2022 and 2023 (see Section 4.3.1.2). The impacts identified in the Recirculated Draft EIR and mitigation required to reduce the significance of these impact were substantially based on the technical reports (Recirculated Draft EIR, Appendices D1 through D4) and the Draft SAA between the project applicant and the CDFW. The SAA establishes the impacts and measures to, "...avoid and minimize impacts to fish and wildlife resources."

Mitigation Measures BIO-1 through BIO-6 address impacts to sensitive wildlife species, Mitigation Measure BIO-7 requires submittal of evidence of compliance with provisions of the SAA prior to the initiation of ground disturbance, and Mitigation Measures BIO-8 and BIO-9 identify the mechanisms to create, monitor, enhance, and maintain resources in the existing "conservation area" at the eastern end of the basin or provide purchase of an area within a CDFW approved mitigation bank. Based on the impacts and mitigation identified in Section 4.3 of the Recirculated Draft EIR, the City has determined that implementation of previously identified mitigation measures, developed in cooperation with the CDFW, would mitigate potential impacts to sensitive habitat and species that occur on the project site to a less than significant level.

The commenter's recommendation will be considered by the City prior to any future action on the project. This comment does not raise a specific or substantiated issue related to the content or adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

Response to Comment C-12-6

The commenter provides the unsubstantiated opinion the project is not walkable, would not contribute to improving the housing crisis, encourages sprawl and traffic congestion, and is a poor use of land and resources. The commenter provides recommendations for reuse of other underutilized areas of Upland to develop denser housing.

This comment does not raise a specific issue or substantiated comment related to the content or the adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

Response to Comment C-12-7

The comment provides photographs of Cucamonga Basin #6.

The attached photographs illustrate conditions at Cucamonga Basin #6 and do not raise a specific or substantial issue related to the content or adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

From: Joel Bradley <jjoelbradley@gmail.com>
Sent: Saturday, December 21, 2024 12:29 PM
To: Joshua Winter
Subject: Re: [EXTERNAL] Villa Serena Specific Plan Project

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

Good afternoon Joshua,

Thank you for your timely response and your reassurance that the Upland Hills Golf Course and its community will not be affected by the Villa Serena Project.

Sincerely,

Joel Bradley
1031 St. Andrews Drive Upland, CA 91784
jjoelbradley@gmail.com
951-640-8954

On Thu, Dec 19, 2024 at 3:51 PM Joshua Winter <jwinter@uplandca.gov> wrote:

Hi Joel,

The project is not involved with the Golf Course or Upland Hill Communities, and the project does not include any modifications to the Upland Hills Country Club Specific Plan. This project will include its own specific plan and is on a separate property from the golf course.

The only changes to the golf course may include minor drainage improvements (Curb and Gutter) along the very southern edge of the golf course adjacent to the project site, but those details are still being designed, and may not occur.

Joshua Winter, Senior Planner

Planning Division | Development Services Department

City Of Upland

460 N. Euclid Ave, Upland, CA 91786

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

C-13-1

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



**CITY OF
UPLAND**

From: Joel Bradley <jjoelbradley@gmail.com>
Sent: Wednesday, December 18, 2024 7:47 PM
To: Joshua Winter <jwinter@uplandca.gov>
Subject: [EXTERNAL] Villa Serena Specific Plan Project

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

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

Good evening Joshua,

My name is Joel Bradley and I reside at 1031 St. Andrews Dr. Upland, CA 91784. You may remember me as we have talked throughout the years on different projects in and around the Upland Hills Golf Course community.

I am writing to you tonight to reiterate what you told me in the past about the Villa Serena Specific Plan Project when we last spoke about it in person a few months ago at the Planning Commission desk at City Hall. Which is that it will not affect anything on the Upland Hills Golf course communities on the North side or the South side, or the golf course itself.

C-13-2

Just wanted to double verify that none of the Specific Plans that are currently in place and that govern the Upland Hills Golf course and its current communities that are on the golf course (Upland Hills North and Upland Hills South) are in no way shape or form being changed.

C-13-2
(cont)

In particular that no zoning changes will be permitted to allow more housing units to be built on either the North side or the South side and that the Upland Hills Golf Course is to remain intact and fully operational as a golf course.

C-13-3

Thank you in advance for a timely response in regards to this email from a concerned resident in the Upland Hills Golf Course community.

Sincerely,

Joel Bradley

1031 St. Andrews Dr. Upland Ca, 91784

jjoelbradley@gmail.com

951-640-8954

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Response to Comment C-13

Joe Bradley
December 18, 2024

Response to Comment C-13-1

This comment consists of an email exchange between the commenter and the City. The commenter thanks the City for its timely response to the commenter's questions.

This comment does not raise a specific issue related to the content or adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

Response to Comment C-13-2

The commenter questions whether the project will affect the Upland Hills golf course in any manner. The City responded to this comment directly, clarifying that only minor drainage improvements (curb and gutter) would take place on the extreme southern edge of the golf course adjacent to the project site.

This comment does not raise a specific issue related to the content or adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

Response to Comment C-13-3

The commenter questions where any zoning changes will be required to build more housing on the Upland Hills golf course. The City responded to this question directly, stating the project is on its own property and does not require any modification to the Upland Hills Country Club Specific Plan.

This comment does not raise a specific issue related to the content or adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

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Bill Rodstrom Public Comments for proposed Villa Serena Recirculated Draft EIR

December 18, 2024

To: Joshua Winter, Senior Planner, City of Upland

From: Bill Rodstrom, former U.S. Fish and Wildlife Service biologist (former Senior Planner also)

Just to be clear, I'm opposed to allowing the proposed Villa Serena project to go forward.

I'm a big fan of the idea of housing infill in general, to develop housing in already disturbed sites like parking lots, vacant lots with little or no native habitat, or old industrial sites, basically to avoid sprawl into wild areas. However, the 15th Street Flood Detention Basin is indeed wildlife habitat, despite being bulldozed and disturbed from time to time, and to convert it to 65 single-family homes is just more sprawl, another nail in the coffin for wildlife in Upland. The kind of housing that is most needed right now is more affordable transit-oriented rental housing, closer to shopping and bus routes, not more single family homes replacing wildland...but single family homes are more profitable for developers, so they keep building them.

C-14-1

C-14-2

You can do all the well-conducted field surveys with experienced biologists you want but after the May 14-15 2020 bulldozing and herbicide spraying of the slopes of the west basin, you won't find the destroyed critical habitat that took many years to become established, or the increased diversity of wildlife that comes with that mature coastal sage scrub ecosystem, because it had been cleared. Like I wrote in my March 9, 2022 NOP comments, to bulldoze a healthy habitat and then do the EIR - That's like applying for a permit from a city to fill a wetland (after first filling it in), and then having the city approve the permit because there is no wetland left!

C-14-3

Looks like there are conflicting priorities for this flood detention basin. Leaving it as-is, it will continue to function as a basin for 100-year floods (which are much more frequent now with the current climate crisis), ones much worse than the large flood in January 1969 that flooded Cucamonga Creek down Vineyard Ave and much of Rancho Cucamonga. Leaving it as-it will provide a nearby oasis of native plants and wildlife in a sea of residential development. But after reading the comments in the NOP by the San Bernadino County Public Works Department, it looks like they were more interested in "weed abatement" to "clear dry brush and dried-out vegetation" on the slopes of the basin..."to mitigate potential fire hazards that may ensue during the upcoming dry summer season". There was not enough vegetation on the slopes of the basin in 2020 to be a residential fire hazard in my opinion, and they certainly weren't dried out in mid-May, but were in full flowering even in mid June 2019, (see inserted photos).

C-14-4

The best use of the 20 acres is to stop bulldozing it and let the native vegetation reach maturity again. Neighborhood kids and their families can continue to learn about nature and support biodiversity, and avoid nature deficit disorder, rather than converting it into another ecological disaster and increased sprawl. If this project gets built, where are neighborhood kids going to go to explore a bit of wildland, by driving halfway to Mt. Baldy? I used to be one of those kids, growing up in East San Diego, exploring the brushy canyons within a few blocks of my home in similar fragrant coastal sage scrub, with mature live oaks and sycamores along riparian areas of Alvarado Creek, now Denny's, Marie Callender's, and Alvarado Medical Center.

C-14-5



North slope of South Levee, looking west, June 16, 2019, a year prior to the bulldozing of the slope

C-14-6



North slope of South Levee, looking west June 23, 2023, after bulldozing the upland slopes.

“They call it paradise
I don't know why
You call someplace paradise
Kiss it goodbye” - from *The Last Resort*, by *Eagles*

Response to Comment C-14

Bill Rodstrom
December 18, 2024

Response to Comment C-14-1

Although the commenter states his support for infill development to avoid sprawl, he contends the project site (15th Steet Basin) is wildlife habitat.

The primary purpose of the 15th Street Basin is to manage stormwater flows and to provide the opportunity for groundwater recharge. To maintain these crucial public safety functions, the City is entitled and required to disc, mow or otherwise manage the remaining portions of the basin and side slopes to maintain groundwater recharge and flood attenuation functions, and to maintain sufficient clearance between vegetation and adjacent to abate potential fire hazards. These activities are periodically conducted in the basin in areas outside of the “conservation area” at the extreme eastern end of the basin.

Please refer to the responses to Comments C-5-1 and C-12-5. The commenter’s opinion is noted and will be considered by the City prior to any future action on the project. This comment does not raise a specific or substantiated issue related to the content or adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

Response to Comment C-14-2

This comment states a preference for the type of housing needed in Upland.

The commenter’s opinion is noted and will be considered by the City prior to any future action on the project. This comment does not raise a specific or substantiated issue related to the content or adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

Response to Comment C-14-3

The commenter states evaluation of the site after basin maintenance was conducted in May 2020 will not identify the same conditions that existed before said maintenance.

Please refer to the response to Comment C-14-1 regarding the primary purpose of the basin and the requirements for periodic maintenance.

Per *State CEQA Guidelines* Section 15126 (a), an EIR shall identify and focus on the significant effects of the proposed project on the environment. In assessing the impact of a proposed project on the environment, the lead agency should normally limit its examination to changes in the existing physical conditions in the affected area as they exist at the time the NOP is published. The NOP for the project was published in February 2022, nearly 2 years after the May 2020 activities referenced by the commenter. The analysis contained in the Section 4.3 of the Recirculated Draft EIR is supported by site-specific general biological resources surveys, protocol-level surveys for California

gnatcatcher and San Bernardino kangaroo rat, nesting birds, and aquatic resources survey/delineation surveys conducted throughout 2022 and 2023 (see Section 4.3.1.2).

The project's impacts on biological resources have been comprehensively assessed in Section 4.3 of the Recirculated Draft EIR. The impacts identified in the Recirculated Draft EIR and mitigation required to reduce the significance of these impact were substantially based on the technical reports (Recirculated Draft EIR, Appendices D1 through D4) and the Draft SAA between the project applicant and the CDFW. The SAA establishes the impacts and measures to, "...avoid and minimize impacts to fish and wildlife resources."

This comment does not raise a specific, substantiated issue related to the content or adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

Response to Comment C-14-4

The commenter states the dual nature of the basin as a facility for flood control and protection and as an area of open space. The commenter further provides an opinion on the necessity and timing of past weed abatement activities in the basin.

The commenter's opinion is noted and will be considered by the City prior to any future action on the project. This comment does not raise a specific or substantiated issue related to the content or adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

Response to Comment C-14-5

The commenter provides an opinion that the "best use" of the project site is to stop "bulldozing it", allowing native vegetation to mature. The comment further states retention of the basin in its current state would allow neighborhood residents the opportunity to learn about nature and support biodiversity. The commenter concludes that the scarcity of access to natural areas can contribute to "nature deficit disorder".

The primary purpose of the 15th Street Basin is to manage stormwater flows and to provide the opportunity for groundwater recharge. Routine maintenance of the basin, including discing and vegetation modification, is required to maintain its primary functions. A review of the project site indicates access to the basin is limited to access for maintenance via locked gates, which declare the basin to be "Private Property". Current public pedestrian access is not provided but may be possible informally where the chain link fence surrounding the basin has been damaged or otherwise breached.

Nature-deficit disorder is the general idea that persons, primarily children, currently spend less time outdoors than they have in the past, and that a "nature-deficit" may result in behavioral changes. Per *State CEQA Guidelines* Section 15382, "...An economic or social change by itself shall not be considered a significant effect on the environment." The commenter's opinions are noted and will be considered by the City prior to any future action on the project. This comment does not raise a

specific or substantiated issue related to the content or adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

Response to Comment C-14-6

The commenter provides photographs indicating the condition of the north slope of the basin's south levee before and after basin maintenance activities.

This comment is noted and will be considered by the City prior to any future action on the project. This comment does not raise a specific issue related to the content or adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

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From: Natasha Walton <notlaw2018@gmail.com>
Sent: Wednesday, December 18, 2024 5:49 PM
To: Joshua Winter
Cc: Upland CityClerk
Subject: [EXTERNAL] Villa Serena Specific Plan Project

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

Dear Mr. Winter:

I am an advocate for open green spaces and wildlife in our Upland community, and thank you for the opportunity to comment on the recirculated Villa Serena Specific Plan Draft Environmental Impact Report (EIR).

I do hope that public comments on the previous Draft Environmental Impact Report (EIR) for this project will still be addressed in the Final Draft of the EIR by the project proponent. However, to ensure that my previous comments are considered, I once again submit the following comments regarding this proposed project.

I ask that the developer for the Villa Serena Specific Plan project adopt an alternative project – **the donation of the 15th Street flood basin property to a non-profit conservation organization to preserve this open space, wildlife habitat, and flood control basin in perpetuity.** Non-profit organizations, like the Wildlands Conservancy, create preserves that are open to the public and include outdoor education programs for public schools (please visit their website at <https://wildlandsconservancy.org/> for more information).

Such a preservation project would be a win-win situation for the entire Upland community! The land owner of proposed project site would have a nice tax write off, and the basin would continue to provide local flood control and become a preserve that would protect the native habitat and wildlife that reside there in perpetuity. In addition the site could remain accessible to the public and become a site of an outdoor education programs for students, like those at Foothill Knolls STEM Academy of Innovation.

I have hope that the city staff, planning commission, and city council will realize that this project site must be **preserved for flood control and as a special place for our native wildlife and plants, and, yes, even our hearts.**

Thank you for your time and consideration.

Sincerely,

Natasha Walton, MS

20-Year Upland Resident

C-15-1

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Response to Comment C-15

Natasha Walton
December 18, 2024

Response to Comment C-15-1

The commenter has resubmitted their comments previously made on the Draft EIR (May 2024).

This comment is noted. Please refer to the responses to Comments C-8-1 and C-8-2.

This comment does not raise a specific issue related to the adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

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From: auminer520@aol.com
Sent: Sunday, August 4, 2024 9:29 AM
To: Joshua Winter
Subject: [EXTERNAL] Villa Serena Specific Plan Project

Follow Up Flag: Follow up
Flag Status: Flagged

You don't often get email from auminer520@aol.com. [Learn why this is important](#)

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

Hi Joshua,

I want to voice my concern regarding the above project. I am totally against any development in this area and any other area within the city limits. Planning to construct 65 single family homes, with each homeowner having 2 cars, that adds another 130 vehicles to our already congested roads. All traffic from these 65 homes will have to exit to Campus, heading south to Foothill or north to 16th Street, which is already a dangerous intersection.

C-16-1

Thanks for your time

Larry Johnson
1653 Candlewood Dr.

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Response to Comment C-16

Larry Johnson
August 4, 2024

Response to Comment C-16-1

The commenter expresses their opposition to project and contends the development of 65 single-family homes results in the addition of 130 vehicles on already congested roads and that traffic from these homes will have to exit onto Campus Avenue, an already dangerous intersection.

Please refer to the response to Comment C-2-2, which discusses the project's effect on local traffic.

State CEQA Guidelines Section 15204(c) further states that commenters should explain the basis for their comments and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. The unsubstantiated comments raise only general issues of concern. The commenter's general statements and concerns are noted but do not constitute substantial evidence pursuant to *State CEQA Guidelines* Section 15064 and do not raise any specific issue related to the adequacy of the content or analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

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From: Shari Wasson <shari_wasson@hotmail.com>
Sent: Wednesday, December 18, 2024 5:46 PM
To: Joshua Winter
Subject: [EXTERNAL] Villa Serena Draft EIR Public Comment

Follow Up Flag: Follow up
Flag Status: Flagged

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

Dear Mr. Winter,

I am writing in reference to the draft EIR for the Villa Serena Project.

Regarding alternatives to the proposed project, I would like to suggest that the developer pursue donating the land to a non-profit conservation organization so that the habitat and wildlife residing there may be preserved in perpetuity. This would not only have the least environmental impact on the area, but it could result in positive improvements that would benefit the community and the environment. For example, public access could be maintained and outdoor educational programs could be created in partnership with local schools and organizations. Thus, this area, which for decades has not only operated as a flood basin, but has provided residents with a connection to a critical and disappearing part of Upland's heritage, it's native flora and fauna, could continue to enrich the community.

C-17-1

Thank you for your time and consideration.

Shari Wasson

Sent from [Outlook](#)

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Response to Comment C-17

Shari Wasson
December 18, 2024

Response to Comment C-17-1

The commenter suggests an alternative to the project, the donation of the property to a non-profit conservation organization, so that the habitat and wildlife residing there may be preserved in perpetuity.

Please refer to the response to Comment C-8-1, which discusses the “No Project” alternative, which would retain the property in its current condition. Furthermore, as stated in Section 3.1 of the Recirculated Draft EIR, only the eastern 9.16 acres of the basin would be developed with residences. The remaining portions of the basin, the 6.85-acre area directly east of the residential development, would be modified and maintained for stormwater and flood control capacity, and a 4.29-acre area at the extreme eastern boundary of the basin (the “conservation area”) would remain unaffected by project activities. Similar to the existing condition, these areas would be available for wildlife use.

The commenter’s opinion is noted and will be considered by the City prior to any future action on the project. This comment does not raise any specific issue related to the adequacy of the content or analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

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D. OTHER PARTIES

D-1: Southern California Gas Company

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From: Rubal, Joshua <JRubal@socalgas.com>
Sent: Friday, August 30, 2024 6:23 AM
To: Joshua Winter
Cc: SCG SE Region Redlands Utility Request
Subject: [EXTERNAL] 8/30/24-Villa Serena Specific Plan Project (SCH# 2022020150)
Attachments: [20240830061402.pdf](#)

Follow Up Flag: Follow up
Flag Status: Flagged

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

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

Hello,

I just reviewed the documents regarding **Villa Serena Specific Plan Project (SCH# 2022020150)**

SoCalGas Distribution does have facilities in the area. Please note on case to have Developer contact 811 / USA at [DigAlert | Utility Locating California | Underground Wire & Cable Locator](#) prior to any excavation / demolition activities so we can Locate & Mark out our facilities.

If the Developer needs new gas service, please have them contact our Builder Services group to begin the application process as soon as practicable, at <https://www.socalgas.com/for-your-business/builder-services>.

To avoid delays in processing requests and notifications, please have all Franchise correspondence sent to our Utility Request inbox, at
SCGSERegionRedlandsUtilityRequest@semprautilities.com

I cover the **Southeast Region – Redlands**

SCGSERegionRedlandsUtilityRequest@semprautilities.com would be your contact for requests in the southeastern ends of LA County, Riverside County, San Bernardino & Imperial Counties.

Southeast Region - Anaheim office which is all of Orange County and the southern ends of Los Angeles County; therefore, any Map and/or Will Serve Letter requests you have in these areas please send them to AtlasRequests/WillServeAnaheim@semprautilities.com

Northwest Region – Compton HQ For West and Central LA County, your Map Request and Will Serve Letters, will go to SCG-ComptonUtilityRequest@semprautilities.com

Northwest Region - Chatsworth

For any requests from the northern most parts of LA County all the way up to Visalia, San Luis Obispo, Fresno and Tulare you would contact

NorthwestDistributionUtilityRequest@semprautilities.com

Transmission

For Transmission requests, please contact SoCalGas Transmission, at

SoCalGasTransmissionUtilityRequest@semprautilities.com

Thank you,

Josh Rubal

Lead Planning Associate

Distribution Planning & Project Management

Redlands HQ - Southeast Region

(213) 231-7978 Office

SCGSERegionRedlandsUtilityRequest@semprautilities.com



Response to Comment D-1

Southern California Gas Company
Joshua Rubal, Lead Planning Associate
August 30, 2024

Response to Comment D-1-1

The commenter states that Southern California Gas Company has facilities in the project area and requests that the project developer contact "811/Dig Alert" so facilities can be located and mapped prior to any on-site excavation. Further, the commenter provides information regarding assistance for new gas service to the proposed uses.

This comment does not raise a specific issue related to the adequacy of the analysis contained in the Draft EIR, Recirculated Draft EIR, or supporting studies; therefore, no further response is required.

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4.0 RECIRCULATED DRAFT EIR TEXT REVISIONS

This chapter presents specific changes to the text of the Recirculated Draft EIR that have been made to clarify and supplement the document. Where a revision to the main text has been made, the page and paragraph are set forth, followed by the appropriate revision. Added text is indicated with double underlined text. Text deleted is shown in ~~strikeout~~.

Pursuant to *State CEQA Guidelines* Section 15088.5(a):

A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term “information” can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation include, for example, a disclosure showing that:

- (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project’s proponents decline to adopt it.
- (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

Pursuant to *State CEQA Guidelines* Section 15088.5(b):

Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

The revisions to Mitigation Measures TCR-2 and TCR-4 and the additional of Mitigation Measure TCR-6 resolves a potential point of conflict between the measures identified in the Recirculated Draft EIR and provides a mutually agreeable method to ensure full and complete mitigation of impact to any potential tribal cultural resource. These revisions provide an equally effective method of mitigation and do not identify a new impact or an impact of greater severity that previously identified in the Recirculated Draft EIR; therefore, further recirculation is not required. No further response is necessary.

Chapter 3.0 Project Description, page 3.3, Figure 3-1

Page 3.3, Figure 3-1, revised the figure to reflect the proper name of Alta Avenue (see revised figure).

Chapter 4.8 Tribal Cultural Resources

Section 4.8.3.2, page 4.8-9, Mitigation Measure TCR-2, is revised as follows:

Mitigation Measure TCR-2 Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)

Upon discovery of any Tribal Cultural Resource, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered Tribal Cultural Resource has been fully assessed by the Kizh monitor and/or Kizh archaeologist. In the event the material is determined be significant, Mitigation Measure TCR-6 shall apply. ~~The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.~~

Section 4.8.3.2, page 4.8-10, Mitigation Measure TCR-4, is revised as follows:

Mitigation Measure TCR-4 The Yuhaaviatam of San Manuel Nation (YSMN) Cultural Resources Department shall be contacted, as detailed in Mitigation Measure CUL-1, of any pre-contact and/or historic-era cultural resources discovered during project implementation and be provided information regarding the nature of the find so as to provide tribal input with regards to significance and treatment. In the event the material is determined be significant, Mitigation Measure TCR-6 shall apply. ~~Should the find be deemed significant, as defined by CEQA (as amended, 2015), by a Monitoring and Treatment Plan (Plan) shall be created by qualified archaeologist, in coordination with YSMN. All subsequent finds shall be subject to the Plan. The Plan shall allow for a monitor to be present that represents YSMN for the remainder of the project, should YSMN elect to place a monitor on-site.~~

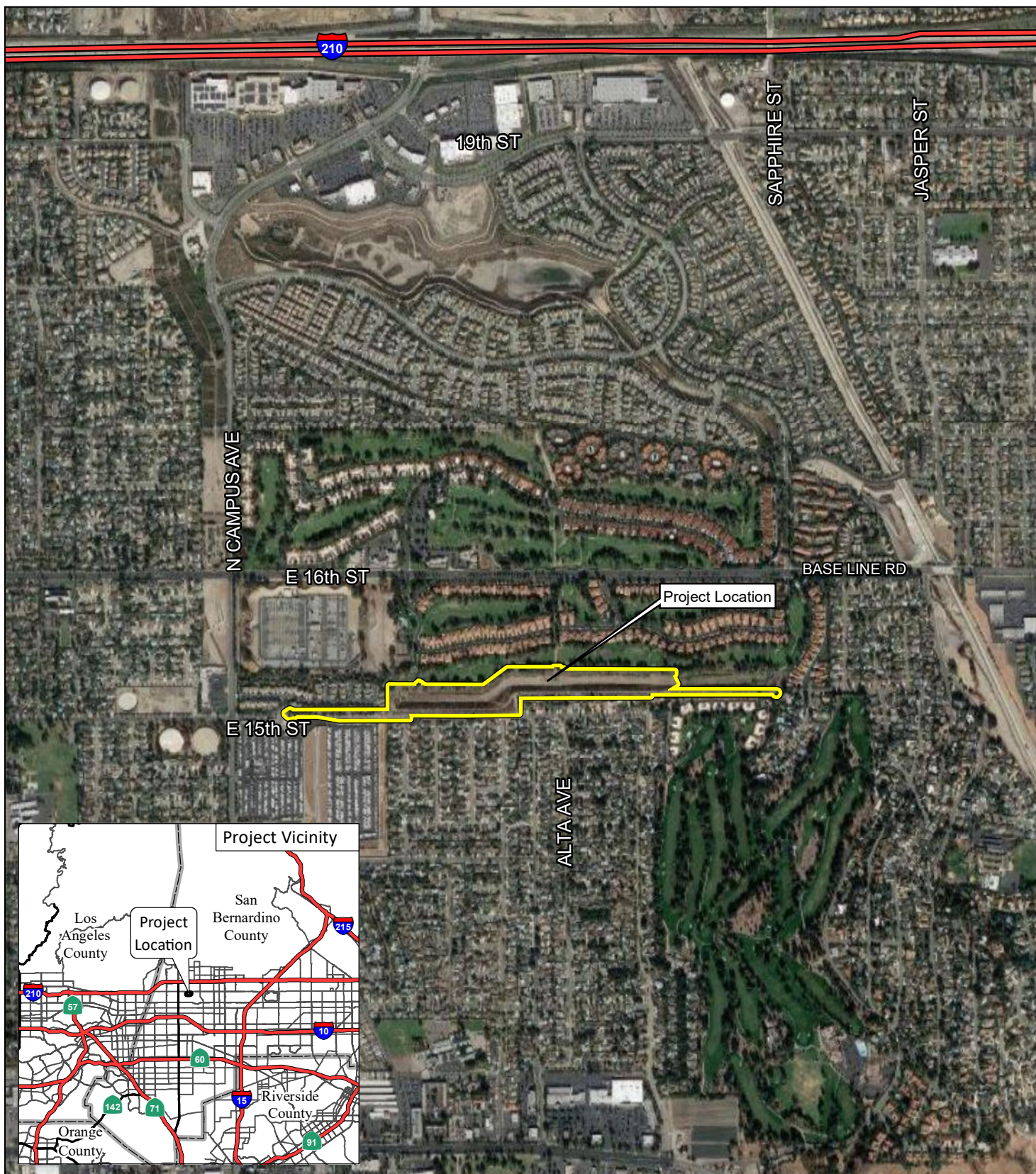
Section 4.8.3.2, page 4.8.11, following Mitigation Measure TCR-5, adds the following:

Mitigation Measure TCR-6 In the event of any inadvertent discovery of any tribal cultural material, or pre-contact/historic-era resource determined to be significant, the City shall require the preparation of a Monitoring and Treatment Plan. The monitoring and treatment plan shall be prepared by a qualified archeologist in consultation with and

subject to the approval of the City and the consulting Native American tribes. The City and consulting Native American tribes shall engage in mutual good faith efforts to develop the Monitoring and Treatment Plan. The monitoring and treatment plan shall identify the manner and process in which any suspected tribal cultural material is evaluated, recorded, removed, or curated, including the final disposition of any such material.

In the event the manner and process of evaluation, recordation, removal, and/or disposition of tribal cultural material cannot be resolved between consulting Native American parties, the City shall, in good faith, identify and approve the necessary actions in the Monitoring and Treatment Plan.

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LSA

LEGEND

Project Site



0 625 1250
FEET

SOURCE: RCA (2024); Google (2018)

I:\TCI2201\G\Proj_Location.ai (4/1/2025)

FIGURE 3.1

Villa Serena Specific Plan
Regional and Project Location

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