

**INITIAL STUDY FOR:
CITY OF HIGHLAND
HOUSING ELEMENT 6th CYCLE UPZONE GPA 025-001/ZC 025-001**



**NOTICE OF INTENT TO ADOPT A
NEGATIVE DECLARATION**

Public Review Period:

Begins: December 19, 2025

Ends: January 7, 2026

INITIAL STUDY

1. Case No: GPA 025-001 and ZC 025-001
Project title: 6th Cycle Housing Element Program 33 Upzone
2. Lead agency: City of Highland, 27215 Base Line, Highland, CA 92346
3. Contact person: Lawrence A. Mainez, Community Development Director
lmainez@cityofhighland.org
4. Project location: The proposed Land Use Classification and Zoning Designation amendment consists of eight (8) parcels generally located along Greenspot Road between the Mediterra Planned Development/ Mediterra Parkway on the west and the Old Greenspot Road Historic Iron Bridge on the east within the City of Highland.

The proposed changes would include the following Assessor Parcel Numbers (APN Nos.): 0297-201-07, 0297-061-50, 0297-061-07, 0297-061-42, 0297-061-26, 0297-061-13, 0297-061-25, and 0297-021-44

The project is located in the USGS Redlands Quadrangle (7.5-minute series, topographic).

5. Project applicant
/sponsor: City of Highland

6. Description of project:

In accordance with the City's certified 6th Cycle Housing Element Program 33 (Strategically Enhance Access to Areas of Opportunity), the City is proposing to upzone approximately five (5) acres of moderate to high resource areas on the easterly portion of the City of Highland to a maximum residential density of thirty (30) dwelling units per acre (du/ac) (with a density range of 20 du/ac to 30 du/ac). As stated in the City's 6th Cycle Housing Element, "while the City has identified an adequate supply of land to fully accommodate the City's 6th Cycle Regional Housing Needs Allocation (RHNA), the City will provide an additional buffer of sites to mitigate land use patterns of access to resources and opportunities, and patterns of segregation and integration." The Project site encompasses approximately 89 acres on the easterly portion of the City of Highland and is currently designated as Agricultural Equestrian AG/EQ under the current General Plan Land Use. The proposed GPA 025-001/ZC 025-001 would redesignate the site to Planned Development (PD) with a range of densities including approximately 5 acres of the site upzoned with high density of 20-30 du/ac, approximately 61 acres of the site with 6-12 du/ac and remaining 23 acres of the project site as open space (assumed to not be developable as it is the steep-sloped foothills of the San Bernardino Mountains). This would result in an overall 2.66% increase in density compared to what was analyzed in the General Plan Environmental Impacts Report (EIR).

The current General Plan Land Use Designation and Zoning District for the subject location is AG/EQ (with a maximum density of 2 du/ac). On April 1, 2025, the City of Highland Planning Commission conducted a public workshop to receive public comments on a preferred location to upzone in accordance with the City's Housing Element Program 33, and the subject location was determined to be the preferred option. The existing General Plan Land Use designation and Zoning Classification will be changed to PD with a footnote stipulating that at least five (5) acres of the area be incorporated into a future master plan for housing at a density range of 20 du/ac to 30 du/ac. The proposed designation of PD will provide for superior development by allowing a greater degree of design and land use flexibility within the framework of a site-specific development plan (Highland Municipal Code (HMC) Section 16.12.010 (A)(1)).

The PD designation will allow for the clustering of units and building types, and the formula of specific development standards and design criteria which respond to the particular features or conditions effecting a site (HMC Section 16.12.010(A)(2)). The proposed PD designation also encourages the merging of areas or parcels in a single overall land use plan and site design which might otherwise be developed separately (HMC Section 16.12.010(A)(3)(c)).

7. Present Land Use: The project parcels consist of vacant land with natural vegetation communities, citrus orchards, and few utility structures (i.e., water tanks and pump shelters).
8. General Plan designation: Agricultural/Equestrian (AG/EQ)
9. Zoning: Agricultural/Equestrian (AG/EQ)
10. Is the proposed action a “project” as defined by CEQA? (See Section 2.6 of State CEQA Guidelines. If more than one project is present in the same area, cumulative impact should be considered) Yes ☒ No ☐
11. If “yes” on 10, does the project fall into any of the Emergency Projects listed in Section 15269 of the State CEQA Guidelines? Yes ☐ No ☒
12. If “no” on 10, does the project fall under any of the Ministerial Acts listed in Section 15268(b) of the State CEQA Guidelines? Yes ☐ No ☒
13. If “no” on 12, does the project fall under any of the Statutory Exemptions listed in Article 18 of the State CEQA Guidelines? Yes ☐ No ☒

14. If "no" on 13, does the project qualify for one of the Categorical Exemptions listed in Article 19 of the State CEQA Guidelines? (Where there is a reasonable probability that the activity will have a significant effect due to special circumstances, a categorical exemption does not apply). Yes ☐ No ☒

15. Surrounding land uses and setting (briefly describe the project's surroundings):

North: Undeveloped open space, San Bernadino Mountains

South: Undeveloped open space, Miniature Aircraft Radio Kontrol, citrus orchard

East: Undeveloped open space, Santa Anna River,

West: Single-family residences, East Valley Water District Office

16. Surrounding General Plan and Zoning:

North: Agriculture/Equestrian

South: Open Space

East: Open Space, Planned Development

West: Open Space, Agriculture/Equestrian, Low Density Residential

17. Is the proposed project consistent with (if answered “yes” or “n/a”, no explanation is required):

City of Highland General Plan

Yes ☐ No ☒ N/A ☐

Applicable Specific Plan

Yes ☐ No ☐ N/A ☒

City of Highland Zoning Code

Yes ☐ No ☒ N/A ☐

South Coast Air Quality Management Plan

Yes ☐ No ☐ N/A ☒

San Bernardino International Airport Master Plan

Yes ☐ No ☐ N/A ☒

Other: East Highlands Ranch Planned Unit Development,
Development Standards Report

Yes ☐ No ☐ N/A ☒

18. Are any of the following studies required?

Soils Report Yes ☐ No ☒Slope Study Yes ☐ No ☒Geological Report Yes ☐ No ☒Traffic Study Yes ☐ No ☒Air Quality Study Yes ☐ No ☒Hydrology Yes ☐ No ☒Sewer Study Yes ☐ No ☒Biological Study Yes ☐ No ☒Noise Study Yes ☐ No ☒Hazardous Materials Study Yes ☐ No ☒Housing Analysis Yes ☐ No ☒Archaeological Report Yes ☐ No ☒Groundwater Analysis Yes ☐ No ☒

Water Quality Report

Yes ☐ No ☒

Other

Yes ☐ No ☒

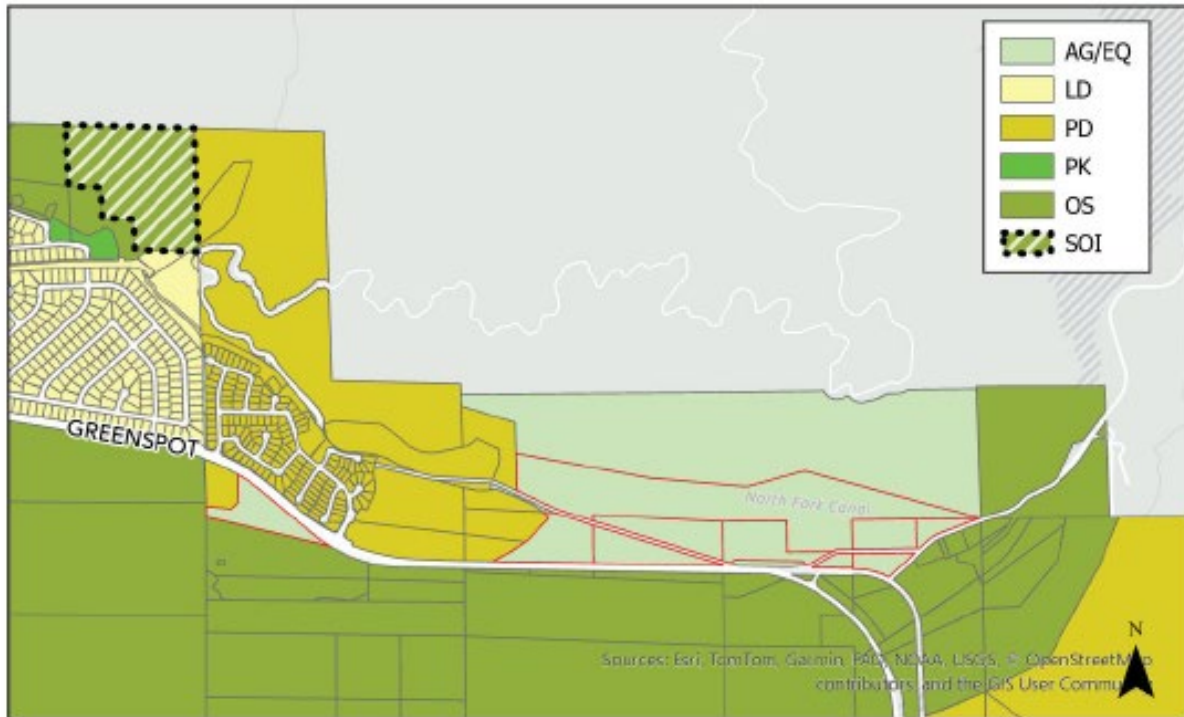
19. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement). Only required at the time of development.

None, as no specific development is proposed.

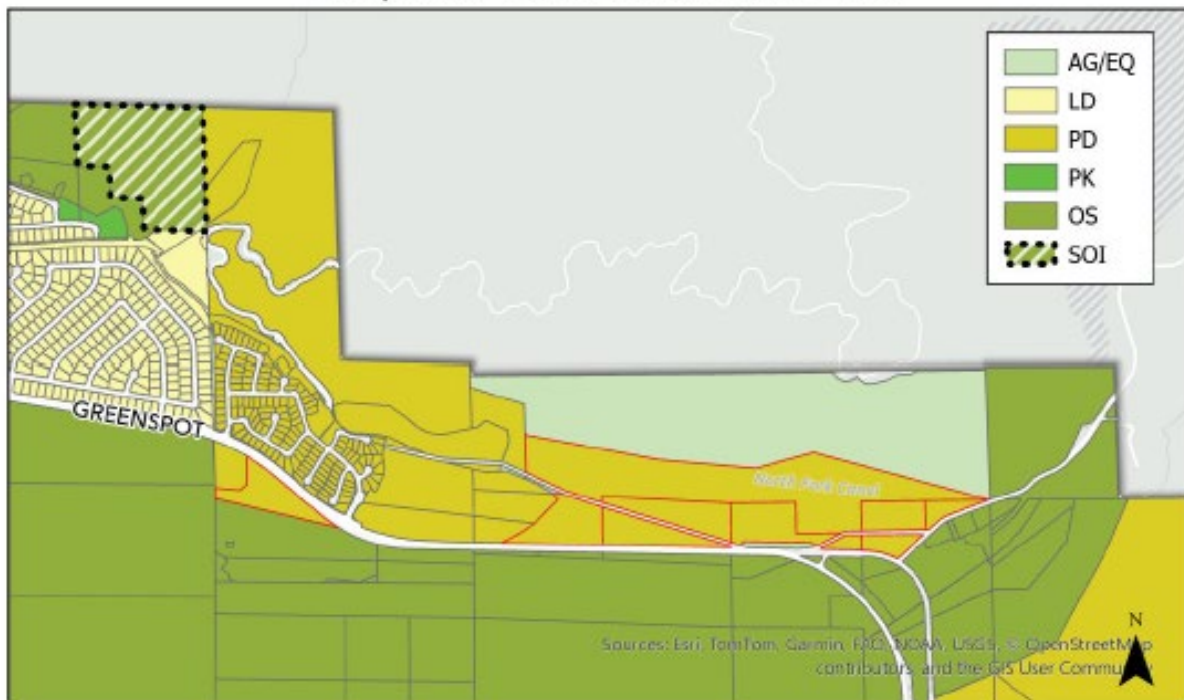
INFORMATION SOURCES CITED: The documents below are incorporated herein by reference and are available online at the web addresses identified below or for review at Highland City Hall, located at 27215 Base Line, California.

1. City of Highland General Plan, Adopted by the City Council March 14, 2006, <http://www.ci.highland.ca.us/GeneralPlan/>
2. City of Highland General Plan Environmental Impact Report, Adopted by the City Council March 14, 2006.
3. City of Highland Municipal Code, <http://www.highlandcity.org/DocumentCenter/View/742>
4. California Department of Conservation, California Important Farmland Finder website, <https://maps.conservation.ca.gov/DLRP/CIFF/> (accessed October, 2025).
5. San Bernardino Valley Water Conservation District, Final Upper Santa Ana River Wash Habitat Conservation Plan, May 2020, <https://www.sbvwd.org/~documents/route:/download/6246>

Existing General Plan Land Use



Proposed General Plan Land Use



Existing Zoning



Proposed Zoning



Residential Buildout Estimates

Parcel Type	Acreage	Density	Unit Yield	Unit Increase	Unit Percentage Increase
Total Acreage of GPA/ZC	88.86	2	178		
San Bernardino Mountains	23	0	0		
Housing Element Program 33 Upzone	5	25 units/acre	125		
Housing Element Program 33 Upzone	60.86	10	608.6		
Total Unit Increase from AG/EQ to PD				556	
2006 GP Buildout Units			20,910 ¹		
Percentage increase from 2006 GP to GP 25					2.66

¹ Highland General Plan, 2. Land Use Element, Table 2.1: Residential Buildout Estimates

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I. AESTHETICS

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

a) Have a substantial adverse effect on a scenic vista?

Less than Significant Impact. Scenic vistas are generally considered to be greater than one (1) mile from receptor and generally consist of background views. The San Bernardino Mountains are considered the backdrop for the City of Highland. The Project site encompasses approximately 89 acres on the easterly portion of the City of Highland and is currently designated A/EQ under the current General Plan Land Use. The proposed GPA 025-001/ZC 025-001 would redesignate the site to PD with a range of densities including approximately five (5) acres of the site upzoned with high density of 20-30 du/ac, approximately 61 acres of the site with 6-12 du/ac and remaining 23 acres assumed undevelopable as steep-sloped foothills of San Bernardino Mountains. The existing site is largely vacant land characterized with gently sloping terrain, scattered vegetation and citrus orchards with views of the San Bernardino Mountains to the north of the site. The proposed Project does not include specific development plans, and any future site plan would be subject to comply with the City of Highland General Plan policies, standards and regulation for new housing design and development. Moreover, parcels to the immediate north, south, east and west remain undeveloped, with a planned residential development present to far west. Therefore, the Project would not obstruct or substantially degrade views of scenic vistas visible from surrounding viewpoints and no substantial alteration of the existing topography or San Bernadino Mountain backdrop would be conducted under the project. Therefore, impacts from the Project would be less than significant.

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

No Impact. The project site is not located along a designated state scenic highway and the nearest officially designated State Scenic Highway is Route 38, more than approximately two and a half (2.5) miles to the south- northeast of the Project site. Therefore, the Project does not have the potential to damage trees, rock outcroppings, or historic buildings within state scenic highways. No mitigation measures are required.

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

Less than Significant Impact. The visual character of the Project site includes gently sloping terrain, scattered vegetation and citrus orchards with views towards the San Bernardino Mountains to the north of the site. The proposed GPA 025-001/ZC 025-001 would designate the Project site to PD allowing for a range of higher residential densities. The PD designation would not directly impact the visual character of the Project site. Indirect impacts from future development consistent with PD instead of AG/EQ would be less than significant because all future development (increase in density of dwellings units per acre) would be consistent with the Planned Development design guidelines and relevant requirements to reduce impacts to the existing visual character and is complimentary to the surrounding developments. Therefore, less than significant indirect impacts to the existing and visual character or quality of the Project site and its surroundings would occur as a result of the proposed GPA 025-001/ZC 025-001. No mitigation measures are required.

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

Less than Significant Impact. The proposed GPA 025-001/ZC 025-001 would not directly create a new source of light and glare. All required lighting for future development consistent with PD will be in compliance with city standards so any light increase will be similar to that in the neighboring residential development. Therefore, less than significant indirect impacts from new sources of light from the Project site would occur as a result of the proposed GPA 025-001/ZC 025-001. No mitigation measures are required.

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

II. AGRICULTURE AND FORESTRY RESOURCES

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

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

Less than Significant Impact. The California Department of Conservation, Farmland Mapping and Monitoring Program (FMMP), compiles Important Farmland maps pursuant to the provisions of Section 65570 of the California Government Code. The proposed Project includes a General Plan Amendment and Zone Change to redesignate the existing site from AG/EQ to PD with

approximately 5 acres of the site upzoned to high density residential (20-30 du/ac). According to the California Department of Conservation's *Farmland Mapping and Monitoring Program (FMMP)*, approximately 14.5 acres (16.5%) of the 89-acre project site are designated as Prime Farmland, Unique Farmland, and Significant Farmland. However, the Project does not include specific development that would convert Prime Farmland, Unique Farmland or Farmland of Statewide Importance to non-agricultural use. Moreover, any future development under the proposed Project would be subject to project level CEQA review to evaluate and address project-specific impacts. Although the proposed Project would increase the density of allowed residential development within the Project area, it is within an area that was already designated for residential development in the General Plan of which the build out of this same Project area as residential was evaluated in the General Plan EIR. Therefore, the proposed Project would not directly result in conversion of Important Farmlands to non-agriculture use and potential impacts from the Project would be less than significant.

b) Conflict with existing zoning for agricultural use or a Williamson Act contract?

Less than Significant Impact. According to Policy Plan map NR-5 *Agricultural Resources*, the Project Site is not identified as a part of a Williamson Act contract.² The proposed Project is not under a Williamson Act contract and the proposed GPA 025-001/ZC 025-001 would not conflict with an existing Williamson Act contract. The proposed Project site is currently zoned AG/EQ. The proposed GPA 025-001/ZC 025-001 would change land use and zoning of the Project site from AG/EQ to PD. Because the AG/EQ land use category is for rural and equestrian-oriented residential development it is for residential development and not for higher intensity agricultural uses such as commercial farming. The change of zone from AG/EQ to PD would not result in a significant loss of existing or potential agricultural uses. Therefore, the proposed GPA 025-001/ZC 025-001 would not conflict with existing zoning and impacts are less than significant. No mitigation measures are required.

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

No Impact. There are no parcels within the City that are zoned as forest land or timberland. Therefore, the proposed Project would have no impact on forest or timberland and no mitigation is required.

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

No Impact. There is no forest land or any land that is designated for the purposes of conserving forest land within the Project site and the City of Highland. Implementation of the proposed Project would not result in loss of forest land or conversion of forest land to non-forest use. No impacts are identified or are anticipated, and no mitigation measures are required.

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

Less than Significant Impact. The Project site is adjacent to existing residential and institutional (EMWD) developments within the City of Highland. The Project would introduce additional residential development consistent with surrounding land uses and would not extend

² [NR-5 Agricultural Resources](#) accessed October 10, 2025

infrastructure or growth into agricultural or forested areas beyond the site. The Project does not include specific development that would convert Farmland to non-agricultural use or forest land to non-forest use. Moreover, any future development under the proposed Project would be subject to project level CEQA review to evaluate and address project-specific impacts. Although the proposed Project would increase the density of allowed residential development within the Project area, it is within an area that was already designated for residential development in the General Plan of which the build out of this same Project area as residential was evaluated in the General Plan EIR. Therefore, the Project's potential to induce conversion of Farmland or forest land to non-agricultural or non-forest use would be less than significant.

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

III. AIR QUALITY

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

a) *Conflict with or obstruct implementation of the applicable air quality plan?*

Less than Significant Impact. The project site is located within the South Coast Air Basin (SCAB), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The applicable air quality plan for the region is the 2022 Air Quality Management Plan (AQMP). The proposed Project involves a General Plan Amendment and Zone Change for an approximately 89-acre site from AG/EQ to PD, to accommodate future residential development consistent with the City's certified 6th Cycle Housing Element (Program 33). The Project would upzone approximately 5 acres of the site to high density residential (PD; 20–30 du/ac), approximately 61 acres with Low–Medium Density Residential (6–12 du/ac) and retain approximately 23 acres as assumed undevelopable. Overall, the proposed changes represent an estimated 2.66 percent increase in citywide residential density. This is considered a modest increase, above what was already accounted for in the City's General Plan, General Plan EIR, and the AQMP. The Project would therefore not introduce significant growth beyond regional projections or otherwise interfere with implementation of the AQMP's control measures or emission reduction goals. Accordingly, the Project would not conflict with or obstruct implementation of the applicable air quality plan, and impacts would be less than significant.

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

Less than Significant Impact. The proposed GPA 025-001/ZC 025-001 would not directly result in development that could violate air quality standards or contribute substantially to an existing air quality violation. The proposed GPA 025-001/ZC 025-001 would change land use categories in the Project site from AG/EQ to PD. However, air pollutant emissions associated with future development could occur over the short-term from site preparation and construction activities and over the long term from daily vehicle trips associated with the new residential units. Moreover, the proposed Project would represent an approximately 2.66% increase in citywide residential density, a modest change relative to existing regional population and growth

projections used in SCAQMD 2022 AQMP and accounted for in the General Plan EIR. Therefore, the proposed Project would not indirectly allow significant residential development beyond what was already considered in the General Plan for the area and analyzed in the General Plan EIR. As such, the Project's potential to violate air quality standards is less than significant. No mitigation measures are required.

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

Less than Significant Impact. The only and closest sensitive receptors to the Project site are the single-family residences of the Mediterra development to the northwest and north. The proposed GPA 025-001/ZC 025-001 would change the land use designation of the approximately 89-acre AG designated Project site to PD with varying densities of 20-30 du/ac on 5 acres of the site and a density of 6-12 du/ac on approximately 61 acres of the remaining site with approximately 23 acres assumed undevelopable as steep-sloped foothills of the San Bernardino Mountains. The proposed GPA/ZC would not directly result in construction or physical development that could expose sensitive receptors such as residences, schools, daycare centers, hospitals and other facilities to pollutants. Moreover, any future development within the GPA/ZC area would be subject to project-level review under CEQA and would be designed in compliance with the SCAQMD guidelines utilizing construction BMPs. Therefore, impacts under the proposed Project would be less than significant and no mitigation measures are required.

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

Less than Significant Impact. The proposed GPA 025-001/ZC 025-001 would not directly result in development but would allow future residential development of increased density on approximately 89 acres site. The Project would upzone approximately 5 acres of the site with high density residential (20–30 du/ac), approximately 61 acres with Low–Medium Density Residential (6–12 du/ac) and retain approximately 23 acres is assumed undevelopable as it is steep-sloped foothills of the San Bernardino Mountains. Short-term construction activities such as use of diesel-powered equipment, asphalt paving, application of paints and coating would generate temporary odors. However, these odors would be short term, localized and typical of construction projects. Moreover, future construction activities would be required to comply with SCAQMD Rule 402 and 403, and construction best management practices would be utilized to minimize emissions and impacts. Long-term operational odors would be typical of residential use and are not considered significant sources of objectional odors. Moreover, the GPA 025-001/ZC 025-001 does not propose any land use known to generate substantial odors such as landfills, wastewater treatment plants or manufacturing facilities. Therefore, the Project would not result in significant other emissions that cause odors, and the impacts would be less than significant.

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

IV. BIOLOGICAL RESOURCES

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

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

Less than Significant Impact. As outlined in the City of Highland General Plan, Chapter 5. Conservation and Open Space Element, there are a large number of animal and plant communities within and adjacent to the City, several of which are significant biological habitats. Many are associated with the watercourses that traverse the City and drainages in the canyons of the foothills and mountains. According to previous biological surveys, the following sensitive native habitats (natural communities) have been identified within or adjacent to the City:

- Valley Needlegrass Grassland
- Wildflower Field (California Annual Grassland)
- Riversidian Alluvial Fan Sage Scrub

- Southern Willow Scrub
- Southern Coast Live Oak Riparian Forest
- Southern Sycamore Alder Riparian Woodland
- California Walnut Woodland
- Freshwater Seep

The City contains habitat for species that are designated as “endangered” or “threatened” under the under the federal Endangered Species Act (ESA), the California Endangered Species Act (CESA), as well as species designated as sensitive by the California Department of Fish and Wildlife (CDFW) or the California Native Plant Society (CNPS) and include:

- San Bernardino Kangaroo Rat (animal)
- Santa Ana River Woolly Star (plant)
- Slender-Horned Spineflower (plant)
- Coastal California Gnatcatcher (bird)

The Project site consists of approximately 89 acres of vacant land with natural vegetation communities, one parcel with utility structures (i.e. water tank and pump shelters), and citrus orchards. The proposed GPA/ZC would not directly result in construction or physical development that could adversely impact sensitive biological resources. Moreover, any future development within the GPA/ZC area would be subject to project-level CEQA review, including biological resources assessments. If sensitive biological resources are present, appropriate mitigation - such as avoidance, minimization of impacts, and/or mitigation - would be implemented to reduce potential impacts to a less-than-significant level. Although the proposed Project would increase the density of allowed residential development within the Project area, it is within an area that was already designated for residential development in the General Plan, of which the build out of this same Project area as residential was evaluated in the General Plan EIR. The proposed Project would result in less than significant impacts, and no mitigation measures are required.

- b) *Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

Less than Significant Impact. Per the City of Highland General Plan, Chapter 5. Conservation and Open Space Element, Figure 5-1 Biological Sensitivity Map, Plunge Creek and Santa Ana River are located outside of the Project site, to the northwest and east, respectively. Also, per Figure 5-1 Biological Sensitivity Map, the vacant areas of the Project site, not developed or citrus groves, are mapped as natural communities. Based on review of aerial maps/ imagery the canyons of the San Bernardino Mountain foothills in the northern part of the Project site may support drainages that convey stormwater runoff from the mountains to the Santa Ana River which may meet the definition of water of the state or US that are regulated by state code or the federal Clean Water Act.

However, the proposed GPA/ZC would not directly result in construction or physical development that could adversely impact sensitive biological resources, riparian habitat or other sensitive natural community. Any future development within the GPA/ZC area would be subject to project-level CEQA review, including biological resources assessments and jurisdictional delineations as applicable. If sensitive biological resources are present, appropriate mitigation - such as avoidance, minimization of impacts, and/or mitigation - would be implemented to reduce potential impacts to a less-than-significant level. Although the proposed Project would increase the density

of allowed residential development within the Project area, it is within an area that was already designated for residential development in the General Plan, of which the build out of this same Project area as residential was evaluated in the General Plan EIR. The proposed Project would result in less than significant impacts, and no mitigation measures are required.

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

Less than Significant Impact. As outlined in the City of Highland General Plan, Chapter 5. Conservation and Open Space Element and based on previous biological surveys, there are a large number of plant communities within and adjacent to the City, several of which are significant biological habitats. Many are associated with the watercourses that traverse the City and drainages in the canyons of the foothills and mountains and include Riversidian alluvial fan sage scrub, southern willow scrub, southern coast live oak riparian forest, southern cottonwood-willow riparian forest, southern riparian forest, white alder riparian forest, southern sycamore alder riparian woodland, California walnut woodland, and freshwater seep. Vernal pools were not identified, and coastal wetlands, including marshes would not occur as not located near the coast. These drainage features and associated riparian habitats could contain areas within them that have the various parameters to constitute a wetland.

However, the proposed GPA/ZC would not directly result in construction or physical development that could adversely impact sensitive biological resources, including wetlands. Any future development within the GPA/ZC area would be subject to project-level CEQA review, including biological resources assessments and jurisdictional delineations, as applicable. If sensitive biological resources are present, appropriate mitigation - such as avoidance, minimization of impacts, and/or mitigation - would be implemented to reduce potential impacts to a less-than-significant level. Although the proposed Project would increase the density of allowed residential development within the Project area, it is within an area that was already designated for residential development in the General Plan, of which the build out of this same Project area as residential was evaluated in the General Plan EIR. The proposed Project would result in less than significant impacts, and no mitigation measures are required.

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

Less than Significant Impact. Habitat linkages provide connections between larger habitat areas that are separated by development. Wildlife corridors provide opportunities for animals to disperse or migrate between areas. A corridor can be defined as a linear landscape feature of sufficient width to allow animal movement between two comparatively undisturbed habitat fragments. Adequate cover is essential for a corridor to function as a wildlife movement area. Wildlife corridors allow for the dispersal, seasonal migration, breeding, and foraging of a variety of wildlife species. The Project site is located adjacent to and north of an important wildlife corridor in the region, the Santa Ana River wash. The Project site contains some vacant areas with some remaining natural habitat and citrus groves in which wildlife could move from the Santa Ana River Wash to the San Bernardino Mountains to the north. Development of these areas could reduce the area's potential to function as a wildlife corridor. Per the City of Highland General Plan, Chapter 5. Conservation and Open Space Element, Figure 5-1 Biological Sensitivity Map, Plunge Creek and Santa Ana River are located outside of the Project site, to the northwest and east, respectively. They serve as wildlife corridors between the Santa Ana River wash and the San Bernardino Mountains. These areas are also designated as Open Space the General Plan and

no change is proposed to the land use designation and zoning of these areas; they would remain unchanged/ as is.

However, the proposed GPA/ZC would not directly result in construction or physical development that could adversely impact sensitive biological resources, including wildlife corridors. Any future development within the GPA/ZC area would be subject to project-level CEQA review, including biological resources assessments and jurisdictional delineations as applicable. If sensitive biological resources are present, including wildlife corridors, appropriate mitigation - such as avoidance, minimization of impacts, and/or mitigation - would be implemented to reduce potential impacts to a less-than-significant level. Although the proposed Project would increase the density of allowed residential development within the Project area, it is within an area that was already designated for residential development in the General Plan, of which the build out of this same Project area as residential was evaluated in the General Plan EIR. The proposed Project would result in less than significant impacts, and no mitigation measures are required.

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

Less than Significant Impact. The City of Highland has a Heritage Tree Preservation Ordinance (HMC 16.64.040). The Project site does contain mature trees and woodland areas which could be impacted/removed by future development projects. However, the proposed GPA/ZC would not directly result in construction or physical development that could adversely impact protected trees. Any future development within the GPA/ZC area would be subject to project-level CEQA review, including compliance with the Heritage Tree Preservation Ordinance. If protected trees are present, appropriate mitigation - such as avoidance or replacement of trees in accordance with the ordinance - would be implemented to reduce potential impacts to a less-than-significant level. Although the proposed Project would increase the density of allowed residential development within the Project area, it is within an area that was already designated for residential development in the General Plan, of which the build out of this same Project area as residential was evaluated in the General Plan EIR. The proposed Project would result in less than significant impacts, and no mitigation measures are required.

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

Less than Significant Impact. The Upper Santa Ana River Wash Habitat Conservation Plan (HCP) is located approximately 1 mile downstream of the Seven Oaks Dam and encompasses approximately 4,892 acres, extending approximately 6 miles westward from Greenspot Road in the City of Highland to Alabama Street in the City of Redlands. The primary goal of the Upper Santa Ana River Wash HCP (Wash Plan HCP) is to balance the ground-disturbing activities of water conservation, aggregate mining, recreational activities, and other public services in the Wash Plan HCP Area with the conservation of natural communities and populations of special-status plants and wildlife. The five species covered by the Wash Plan HCP include: slender-horned spineflower, Santa Ana River woolly-star, cactus wren, coastal California gnatcatcher, and San Bernardino kangaroo rat. The Project site is not located with any other adopted HCP, Natural Community Conservation Plan, or other approved habitat conservation plan.

Most of the Project site is located outside of the Wash Plan HCP area. Only a small portion of the Project site which is located south of Greenspot Road, is located within the Wash Plan, which is designated as Neutral Lands in the plan and not included in the HCP Preserve lands. Therefore, any future development in this area within the Wash Plan HCP area would not conflict with the conservation goals and objectives of the Wash Plan HCP. Furthermore, the proposed GPA/ZC

would not directly result in construction or physical development that would conflict with an HCP. Any future development within the GPA/ZC area would be subject to project-level CEQA review, including compliance with an adopted HCP. Although the proposed Project would increase the density of allowed residential development within the Project area, it is within an area that was already designated for residential development in the General Plan, of which the build out of this same Project area as residential was evaluated in the General Plan EIR. The proposed Project would result in less than significant impacts, and no mitigation measures are required.

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

V. CULTURAL RESOURCES

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

- a) *Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?*

Less than Significant Impact. The Project site consists of approximately 89 acres of vacant land with natural vegetation communities, one parcel with utility structures (i.e. water tank and pump shelters), and citrus orchards. The proposed GPA/ZC would not directly result in construction or physical development that could adversely impact a historic resource. Moreover, any future development within the GPA/ZC area would be subject to project-level CEQA review, including historic resources assessments in accordance with CEQA Guidelines §15064.5. If archaeological resources are present, appropriate mitigation - such as avoidance, evaluation, or data recovery - would be implemented to reduce potential impacts to a less-than-significant level. The proposed Project would result in less than significant impacts and no mitigation measures are required.

- b) *Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?*

Less than Significant Impact. Figure 5-2, *Archeological Resources* in the City of Highland General Plan identifies the Project site as largely being located within the mapped Areas of Sensitivity for Archeological Resources. The proposed GPA 025-001/ZC 025-001 would change the land use and zoning from AG/EQ to PD. The proposed GPA/ZC would not directly result in construction or physical development that could adversely impact an archaeological resource. Moreover, any future development on the site would be subject to project-level CEQA review, including cultural resources assessments in accordance with CEQA Guidelines §15064.5. Although the proposed Project would increase the density of allowed residential development within the Project area, it is within an area that was already designated for residential development in the General Plan of which the build out of this same Project area as residential was evaluated in the General Plan EIR. If archaeological resources are present, appropriate mitigation such as avoidance, evaluation, or data recovery would be implemented to reduce potential impacts to a less-than-significant level.

- c) *Disturb any human remains, including those interred outside of formal cemeteries?*

Less than Significant Impact. There are no cemeteries in or near the Project site. No human remains are known to exist in the Project area. The proposed GPA/ZC would not directly result in

land disturbance and construction activities that could potentially disturb human remains interred outside of a formal cemetery. However, the potential exists that human remains may be unearthed during earthmoving activities associated with future Project construction associated with GPA/ZC Project area. Although the proposed Project would increase the density of allowed residential development within the Project area, it is within an area that was already designated for residential development in the General Plan of which the build out of this same Project area as residential was evaluated in the General Plan EIR.

If human remains are discovered during construction activities, the Project proponent would be required to comply with the applicable provisions of California Health and Safety Code § 7050.5 as well as Public Resources Code § 5097, et. seq., which requires that if the coroner determines the remains to be of Native American origin, he or she will notify the Native American Heritage Commission, who will then identify the most likely descendants to be consulted regarding treatment and/or reburial of the remains. Mandatory compliance with these provisions of California state law would ensure that impacts to human remains, if unearthed during construction activities, would be appropriately treated. California state law (California Health & Safety Code 7050.5) and federal law and regulations ([Archaeological Resources Protection Act (ARPA) 16 USC 470 & 43 CFR 7], [Native American Graves Protection & Repatriation Act (NAGPRA) 25 USC 3001 & 43 CFR 10] and [Public Lands, Interior 43 CFR 8365.1-7]) require a defined protocol if human remains are discovered in the State of California regardless of if the remains are modern or archaeological. The proposed Project would result in less than significant impacts and no mitigation measures are required.

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

VI. ENERGY

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

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

Less Than Significant Impact. The proposed Project GPA 025-001 and ZC 025-001 would redesignate approximately 89 acres of the Project Site from AG/EQ to PD with an upzone on 5 acres of the site with high density residential, low- medium density residential on 61 acres of the site. However, there is no proposed development under the Project, therefore no unnecessary consumption of energy resources would occur due to construction and operation. Moreover, any future development within the GPA/ZC Project area would be subject to project level CEQA review and would be required to comply with the state and local regulations and the latest California Building Energy Efficiency Standards (Title 24, Part 6) and the California Green Building Standards Code (CALGreen), which establish requirements to reduce energy demand and promote efficient building design. As such, the Project would not directly or indirectly result in the wasteful, inefficient, or unnecessary consumption of energy resources during construction or operation. Therefore, the impact would be less than significant.

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

No Impact. The proposed Project does not currently include specific development. Any future development within the GPA/ZC Project area would be designed to comply with the latest California Building Energy Efficiency Standards (Title 24, Part 6) and the California Green Building Standards Code (CALGreen) The Proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are recommended.

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

VII. GEOLOGY AND SOILS

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

a) *Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:*

- I. Rupture of a known earthquake fault, as delineated on the most recent Alquist Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.*
- II. Strong seismic ground shaking?*
- III. Seismic related ground failure, including liquefaction?*
- IV. Landslides?*

I-IV) **Less than Significant Impact.** The proposed Project GPA 025-001 and ZC 025-001 would redesignate approximately 89 acres of the Project site from AG/EQ to PD with an upzone on 5 acres of the site with high density residential, low- medium density residential on 61 acres of the site and remaining 23 acres would be assumed as undevelopable. The majority of the Project site except a parcel to the southwest of the Greenspot Road is located within an Alquist-Priolo Earthquake Fault Zone or County Fault Hazard Zones.³ According to the San Bernardino County Policy Plan, Hazard Element Map *HZ-1 Earthquake Fault Zone*, the San Andreas Fault is located approximately four miles north of the Project site and the south branch of the fault traverses northwest through southeast of the Project site. The Project site is located in a seismically active area and in a high liquefaction susceptibility area, but not in a high landslide susceptibility area based on Hazard Element Map *HZ-2 Liquefaction and Landslides*.⁴ Per the City of Highland General Plan, Chapter 6. Public Health Safety, and Environmental Justice Element, Figure 12, Landslides, the Project site is located in Landslide Susceptibility areas 2 and 3. The proposed Project includes a policy level change and does not include any specific development or construction activities. Moreover, any future project would be subject to project level CEQA review and would be required to comply with the California Building Code requirements and the Uniform Fire Code requirements and all applicable statutes, codes, ordinances, and standards of the Highland Fire Department. Although the proposed Project would increase the density of allowed residential development within the Project area, it is within an area that was already designated for residential development in the General Plan, of which the build out of this same Project area as residential was evaluated in the General Plan EIR. The design of any structures on-site would incorporate measures to accommodate projected seismic ground shaking in accordance with the California Building Code (CBC) and local building regulations. The CBC is designed to preclude significant adverse effects associated with strong seismic ground shaking. Compliance with these codes and standards would address potential impacts resulting from an earthquake event. Therefore, impacts under the proposed Project would be less than significant.

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

Less than Significant Impact. As explained in the prior sections, the proposed Project GPA 025-001 and ZC 025-001 is a policy level change and does not include any specific development or construction activities. Any future development would be subject to a project level CEQA review and would be required to develop and implement a Storm Water Pollution and Prevention Plan (SWPPP) for construction activities and a Water Quality Management Plan (WQMP) for long-term use/operations. Although the proposed Project would increase the density of allowed residential development within the Project area, it is within an area that was already designated for residential development in the General Plan, of which the build out of this same Project area as residential was evaluated in the General Plan EIR. SWPPPs and WQMPs for future projects would outline the Best Management Practices (BMPs) to be implemented for each Project to avoid and minimize soil erosion. Compliance and implementation of BMPs would ensure that the proposed Project does not result in substantial soil erosion or the loss of topsoil. Therefore, less significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

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

Less than Significant Impact. As explained in the prior sections, the proposed Project GPA 025-001 and ZC 025-001 is a policy level change and does not include any specific development or

³ San Bernardino Countywide Plan. HZ-1 Earthquake Fault Zones.

⁴ San Bernardino Countywide Plan. HZ-2 Liquefaction and Landslides.

construction activities. Moreover, any future project would be subject to project level CEQA review and would be required to comply with the California Building Code requirements as well as recommendations identified in standard geotechnical investigations. Although the proposed Project would increase the density of allowed residential development within the Project area, it is within an area that was already designated for residential development in the General Plan, of which the build out of this same Project area as residential was evaluated in the General Plan EIR. Compliance with regulations and code and project specific geotechnical investigation recommendations would address potential risks associated with future residential development and unstable soils and mitigate risks to life and property. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are recommended.

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

Less than Significant Impact. The proposed Project would change the land use and zoning of the site from AG/EQ to PD with varying densities. The Project does not currently include specific development and construction activities and would not directly expose people or structures to expansive soil hazards. Any future development on the site would be subject to Project level CEQA review and would be required to comply with the California Building Code, including provisions for design and construction on expansive soils, as well as recommendations identified in standard geotechnical investigations. Although the proposed Project would increase the density of allowed residential development within the Project area, it is within an area that was already designated for residential development in the General Plan, of which the build out of this same Project area as residential was evaluated in the General Plan EIR. Compliance with these regulations and geotechnical investigation recommendations would address potential risks associated with expansive soils and mitigate risks to life and property. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are recommended.

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

No Impact. The GPA/ZC from AG/EQ to PD is a policy level change and does not include development or construction activities and thus would not impact the soils on site. Any future development on site will connect to the local water and sewer delivery system, therefore no impacts are anticipated.

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

Less than Significant Impact. The proposed Project to redesignate the site from AG/EQ to PD is a policy level change and does not include any specific development or ground-disturbing construction activities. Any future development would be subject to project level CEQA review, including preparation of a project specific paleontological resources assessment by the City or Project proponent's consulting paleontologist. Although the proposed Project would increase the density of allowed residential development within the Project area, it is within an area that was already designated for residential development in the General Plan, of which the build out of this same Project area as residential was evaluated in the General Plan EIR. Therefore, the potential impacts would be less than significant.

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

VIII. GREENHOUSE GAS EMISSIONS

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

- a) *Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*
- b) *Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

Less than Significant Impact. The proposed Project GPA 025-001/ZC 025-001 will redesignate approximately 89 acres on the easterly portion of the City of Highland from AG/EQ to PD allowing for various residential densities with an upzone on approximately 5 acres of the site with higher density residential (20-30 du/ac). The Project would develop approximately 61 acres with medium-density residential (6–12 du/ac), and approximately 23 acres would remain as assumed undevelopable. The proposed Project is a policy level change and does not include any site-specific development or construction.

The proposed GPA/ZC would result in an overall 2.66 percent increase in residential citywide density compared to what was already accounted for and evaluated in the City's General Plan, General Plan EIR, and the AQMP. This is considered a modest increase. In addition, any future residential projects in the proposed GPA/ZC area would be required to comply with the Green Building Code, which reduces GHG emissions. Because this increase represents a relatively small adjustment within the City's planned growth framework, it would not introduce significant growth beyond regional projections and what was already evaluated in the General Plan EIR. Moreover, the Project is a policy level amendment which would not result in direct residential development and generation of GHG emissions. The Project would not conflict with any adopted local or statewide plans, policies, or regulations aimed at reducing greenhouse gas (GHG) emissions. Therefore, the Project would not generate greenhouse gas emissions, either directly or indirectly, or conflict with an applicable plan, policy or regulation adopted for the purpose of reducing emission of greenhouse gases. Thus, the impacts under the Project would be less than significant.

No significant adverse impacts have been identified or anticipated, and no mitigation is required.

IX. HAZARDS AND HAZARDOUS MATERIALS

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

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

Less than Significant Impact. The proposed Project GPA 025-001 and ZC 025-001 are a policy level change and does not include any specific development or construction activities. Construction of future residential projects within the Project area would require the routine transport, use, storage, and disposal of limited quantities of common hazardous materials such as gasoline, diesel fuel, oils, solvents, paint, fertilizers, pesticides, and other similar materials. All materials required during construction would be required to be kept in compliance with State and local regulations and BMPs. Although these materials could be stored on-site during construction activities, future residential projects would be required to comply with the guidelines established by the SWPPP. The management of hazardous materials during future construction activities would not result in significant impacts. Operations would include standard maintenance (i.e., landscape upkeep, exterior painting and similar activities) involving the use of commercially available products (e.g., pesticides, herbicides, gas, oil, paint, etc.) the use of which would not

create a significant hazard to the public. Impacts from operations would be less than significant. Hazardous materials are highly regulated in California, including the methods in which they are transported, used and stored. Moreover, any future project would be subject to project level CEQA review and would be required to comply with all federal, state and local regulations related to hazardous materials. Although the proposed Project would increase the density of allowed residential development within the Project area, it is within an area that was already designated for residential development in the General Plan, of which the build out of this same Project area as residential was evaluated in the General Plan EIR. A less than significant impact is anticipated, and no mitigation measures are required.

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

Less than Significant Impact. The existing site is largely vacant land characterized with gently sloping terrain, scattered vegetation and citrus orchards with views of the San Bernardino Mountains to the north of the site. Per the City of Highland General Plan, Chapter 6. Public Health, Safety, and Environmental Justice Element, Figure 8 Hazardous Waste Cleanup Sites, the Project area does not contain any hazardous waste cleanup sites. Moreover, there are no known hazardous materials sites within or adjacent to the Project Site, nor is there historical evidence of prior industrial uses that involved hazardous substances. The proposed Project does not include specific development plans or construction activities that would directly result in the routine use, storage, transport or disposal of hazardous materials. Future residential development would be subject to project-level CEQA review and compliance with applicable federal, state, and local regulations governing hazardous materials. Although the proposed Project would increase the density of allowed residential development within the Project area, it is within an area that was already designated for residential development in the General Plan, of which the build out of this same Project area as residential was evaluated in the General Plan EIR. Therefore, the impacts under the Proposed Projects would be less than significant.

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

No Impact. No existing or known proposed school is located within one-quarter mile of the Project area. The nearest school is Cram Elementary School located at 29700 Water St. approximately 2.9 miles northwest of the Project area. No schools exist within a quarter mile of the Project area. Residential development is not a type of land use that typically generates hazardous emissions or handles acutely hazardous materials or substances. Therefore, the proposed Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or known proposed school. No impacts are identified or anticipated, and no mitigation measures are required.

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

No Impact. According to the California Department of Toxic Substances Control EnviroStor (accessed 10/22/2025), the Project Site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. And per the City of Highland General Plan, Chapter 6. Public Health, Safety, and Environmental Justice Element, Figure 8 Hazardous Waste Cleanup Sites, the Project area does not contain any hazardous waste cleanup sites. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

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

No Impact. The Project area is not within an airport safety review area or Airport Runway Protection Zone. The Project area is not located within the vicinity of any other private or public airstrip. The nearest airport to the Project area is Redlands Municipal Airport, approximately two and a half (2.5) miles southwest. The San Bernadino International Airport a public airport is located approximately seven (7) miles southwest of the Project area in the City of San Bernadino. Per the City of Highland General Plan, Chapter 6. Public Health, Safety, and Environmental Justice Element, Figure 9 Airport Influence Areas, the Project area is not located within the San Bernardino Airport Influence Area. The Project area is not located within 2 miles of any neighboring public use airport. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

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

Less than Significant Impact. The proposed Project GPA 025-001 and ZC 025-001 is a policy level change and does not include any specific development or construction activities that would alter roadway alignments or circulation patterns that would interfere with emergency response plan or evacuation plan. The proposed Project area is located along Greenspot Road, a designated arterial that provides access to major regional routes including State Route 210 and Highland Avenue. The proposed amendment would not alter Greenspot Road, and all future development projects would be required to comply with the City's Emergency Operations Plans and Fire Code standards and undergo a project level CEQA review for compliance. Although the proposed Project would increase the density of allowed residential development within the Project area, it is within an area that was already designated for residential development in the General Plan, of which the build out of this same Project area as residential was evaluated in the General Plan EIR. Therefore, the impacts under the project would be less than significant.

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

Less than Significant Impact. According to the City of Highland General Plan, Chapter 6. Public Health, Safety, and Environmental Justice Element, City of Highland – San Bernardino County Local Responsibility Area Fire Hazard Severity Zones Map, the portion of the Project area located north of Greenspot Road is within an area designated as Very High Fire Hazard Severity Zone and the portion of the Project area located south of Greenspot Road is within an area designated as High Fire Severity Zone. The proposed Project GPA 025-001/ ZC 025-001 is a policy level change and does not include any specific development or construction activities. Future residential development would be subject to project-level CEQA review and would be required to comply with the current building and fire codes and regulations designed for safe development in these Very High and High Fire Severity Zones. Although the proposed Project would increase the density of allowed residential development within the Project area, it is within an area that was already designated for residential development in the General Plan, of which the build out of this same Project area as residential was evaluated in the General Plan EIR. Therefore, the proposed Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires resulting in a less than significant impact and no mitigation is required.

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would?				
I. Result in substantial erosion or siltation on – or off-site;	☐	☐	☒	☐
II. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on – or off-site;	☐	☐	☒	☐
III. Create or contribute runoff water which would exceed the capacity of the existing or planned stormwater drainage systems or provide substantial additional resources of polluted runoff; or	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐

- a) *Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?*

Less than Significant Impact. The Project site consists of approximately 89 acres of vacant land with natural vegetation communities, citrus orchards, and one parcel with utility structures (i.e. water tank and pump shelters). The proposed GPA/ZC would not directly result in construction or physical development that could violate water quality standards or discharge requirements. Moreover, the proposed project does not currently include development and any future residential development **in** the Project area would be subject to Project level CEQA review and would be required to comply with federal, state, and local water quality regulations for new developments which include preparation and implementation of Storm Water Pollution Prevention Plans (SWPPPs) for construction activities and project specific Water Quality Management Plans (WQMPs) for long-term operations. Although the proposed Project would increase the density of allowed residential development within the Project area, it is within an area that was already designated for residential development in the General Plan, of which the build out of this same Project area as residential was evaluated in the General Plan EIR. Therefore, the impacts under the proposed project would be less than significant.

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

Less than Significant Impact. The proposed Project GPA 025-001 and ZC 025-001 is a policy level change and does not include any specific development or construction activities, therefore, the Project would not result in extraction of groundwater or substantially decrease groundwater supplies or interfere substantially with groundwater recharge.

The Project area is not currently used for groundwater recharge. The Upper Santa Ana River Wash Habitat Conservation Plan (HCP) is located south of the Project area, directly south of Greenspot Road and includes extensive groundwater recharge basins owned and operated by the San Bernardino Valley Water Conservation District. The proposed Project would not interfere with current groundwater recharge activities in the area.

Efficient use, protection and conservation of water resources are high priorities in the City of Highland General Plan Chapter 5. Conservation and Open Space Element, which includes various goals and policies related to water conservation and protection of water quality. Any future residential development would be subject to project level CEQA review and would be required to comply with the City of Highland's General Plan policies related to groundwater sustainability and conservation. Although the proposed Project would increase the density of allowed residential development within the Project area, it is within an area that was already designated for residential development in the General Plan, of which the build out of this same Project area as residential, was evaluated in the General Plan EIR. Therefore, impacts under the policy level change of the proposed Project would less than significant.

- c) *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would?*
- I. *Result in substantial erosion or siltation on – or off-site;*
 - II. *Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site;*
 - III. *Create or contribute runoff water which would exceed the capacity of the existing or planned stormwater drainage systems or provide substantial additional resources of polluted runoff; or*

I-III. Less than Significant Impact. The proposed Project GPA 025-001/ ZC 025-001 is a policy level change and does not include any specific development or construction activities that would alter existing drainage patterns.

Moreover, any future development under the GPA 025-001/ZC 025-001 would be subject to project level CEQA review and compliance with the City of Highland Municipal Code, including Chapter 8.28 (Stormwater and Urban Runoff Management), and the National Pollutant Discharge Elimination System (NPDES) permit requirements. Any future projects would include site-specific design and construction activities deploying BMPs to minimize soil erosion, manage stormwater and ensure runoff does not exceed the capacity of existing or planned drainage infrastructure. Therefore, implementation of standard stormwater management and erosion control measures during future development would ensure that potential impacts to drainage patterns, erosion, flooding, or stormwater quality remain less than significant. Although the proposed Project would increase the density of allowed residential development within the Project area, it is within an area that was already designated for residential development in the General Plan, of which the build

out of this same Project area as residential was evaluated in the General Plan EIR. A less than significant impact is anticipated, and no mitigation measures are required.

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

Less than Significant Impact. Tsunamis are giant waves caused by earthquakes or volcanic eruptions under the sea. As the proposed Project area is located more than 50 miles inland from the Pacific Ocean and is not subject to tsunami hazards, potential impacts from tsunamis are less than significant. A seiche is a standing wave oscillating in a body of water. There are no large standing bodies of water near the Project area, therefore, potential impacts from seiche are less than significant. As shown in the City of Highland General Plan Chapter 6. Public Health, Safety, and Environmental Justice Element, Figure 11 Flood Risk, the Project area is not located within the 100-year Flood Zone.

The proposed Project GPA 025-001 and ZC 025-001 is a policy level change and does not include any specific development or construction activities, therefore, the Project would not provide residential development that would be subject to a flood hazard, tsunami, or seiche. Any future development within the Project area would be subject to project level CEQA review and would be required to comply with the City's General Plan Safety Element, floodplain management regulations and applicable NPDES requirements to ensure flood and water quality protection. Therefore, the proposed Project would not expose people or structures to risk of pollutants, and potential impacts would be less than significant. Although the proposed Project would increase the density of allowed residential development within the Project area, it is within an area that was already designated for residential development in the General Plan, of which the build out of this same Project area as residential was evaluated in the General Plan EIR. A less than significant impact is anticipated, and no mitigation measures are required.

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

XI. LAND USE AND PLANNING

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

a) Physically divide an established community?

No Impact. The majority of the Project site is vacant with natural vegetation, but also contains citrus orchards and few water infrastructure structures. The Project area does not contain an established community. The proposed Project GPA 025-001/ ZC 025-001 is a policy level change and does not include any specific development or construction activities. Any future residential development in the proposed GPA 025-001/ZC 025-001 Project area would not physically divide an established community. Residential uses of similar land use intensity as the proposed Project are present to west of the Project area. Although the proposed Project would increase the density of allowed residential development within the Project area, it is within an area that was already designated for residential development in the General Plan, of which the build out of this same Project area as residential was evaluated in the General Plan EIR. No mitigation measures are required.

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

Less than Significant Impact. The proposed Project GPA 025-001/ ZC 025-001 is a policy level change and does not include any specific development or construction activities. The General Plan identifies the Project area as residential land use, as AG/EQ. Although the proposed Project would increase the density of allowed residential development within the Project area, it is within an area that was already designated for residential development in the General Plan, of which the build out of this same Project area as residential was evaluated in the General Plan EIR. The proposed Project would represent an approximately 2.66% increase in citywide residential density, a modest change relative to existing regional population and growth projections in the General Plan EIR. The proposed Project would implement the City's Housing Element Program 33. The proposed designation of PD will provide for superior development by allowing a greater degree of design and land use flexibility within the framework of a site-specific development plan (Highland Municipal Code (HMC) Section 16.12.010 (A)(1)). The PD designation will allow for the clustering of units and building types, and the formula of specific development standards and design criteria which respond to the particular features or conditions effecting a site (HMC Section 16.12.010(A)(2)). The proposed PD designation also encourages the merging of areas or parcels in a single overall land use plan and site design which might otherwise be developed separately (HMC Section 16.12.010(A)(3)(c)).

Any future residential development in the Project area would be reviewed for consistency with the City's General Plan, Zoning Code, and other applicable environmental protection policies at the project level. The proposed Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or

mitigating environmental effects. Impacts would be less than significant and no mitigation is required.

No significant adverse impacts are identified or are anticipated, and no mitigation measures are required.

XII. MINERAL RESOURCES

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

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

Less than Significant Impact. In 1975, the California Legislature enacted the Surface Mining and Reclamation Act (SMARA), which, among other things, provided guidelines for the classification and designation of mineral lands. Areas are classified on the basis of geologic factors without regard to existing land use and land ownership. The areas are categorized into four Mineral Resource Zones (MRZs):

- MRZ-1: An area where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence;
- MRZ-2: An area where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood exists for their presence;
- MRZ-3: An area containing mineral deposits, the significance of which cannot be evaluated; and
- MRZ-4: An area where available information is inadequate for assignment to any other MRZ zone.

According to the City of Highland General Plan, Chapter 5. Conservation and Open Space Element, Figure 5-3, Mineral Resources Zones the Project area is located within zones MRZ-2 and MRZ-3. The Project area is largely vacant except for natural vegetation communities, citrus orchards and a small water utility structure and has not previously been used for mineral extraction. As such, the proposed Project would not result in the loss of availability of a known mineral resource as the mineral resource was not previously available for extraction. Although the proposed Project would increase the density of allowed residential development within the Project area, it is within an area that was already designated for residential development in the General Plan, of which the build out of this same Project area as residential was evaluated in the General Plan EIR. Therefore, less significant impacts are anticipated, and no mitigation measures are required.

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

Less than Significant Impact. As discussed previously, the Project area is within areas mapped as MRZ-2 and MRZ-3. However, no mineral extraction activities occur on the site currently, or historically. The site is largely vacant with natural and disturbed vegetation communities and citrus orchards. As such, the proposed Project would not result in the loss of availability of a known

mineral resource as the mineral resource was not previously available for extraction. Although the proposed Project would increase the density of allowed residential development within the Project area, it is within an area that was already designated for residential development in the General Plan, of which the build out of this same Project area as residential was evaluated in the General Plan EIR. Therefore, less significant impacts are identified or anticipated, and no mitigation measures are required.

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

XIII. NOISE

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

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

Less than Significant Impact. The proposed Project GPA 025-001/ZC 025-001 is a General Plan Amendment and Zone change that will redesignate approximately 89 acres on the easterly portion of the City of Highland from AG/EQ to PD allowing various residential densities with an upzone on approximately five (5) acres of the site with higher density residential (20-30 du/ac). The Project would develop approximately 61 acres with medium-density residential (6–12 du/ac), and approximately 23 acres would remain as open space. The proposed Project would represent an approximately 2.66% increase in citywide residential density, a modest change relative to existing regional population and growth projections in the General Plan EIR. The proposed Project is a policy level change and does not include any site-specific development or construction activities that would generate noise or vibration. Any future development within the Project area would be subject to project level CEQA review to ensure future development incorporates site-specific noise mitigation measures such as setbacks, sound attenuation features for sensitive receptors including schools, hospitals and residences. Future development would also be required to comply with the City of Highland General Plan Noise Element, Municipal Code Chapter 8.50 (Noise Control Ordinance), and standard design practices to minimize construction and operational noise impacts. All future construction activities would implement BMPs such as mufflers, restricted hours, and vibration-reducing equipment. Operational noise from typical residential uses including traffic, landscaping, and neighborhood activities would be consistent with existing ambient levels and would not exceed local noise standards. Potential impacts due to groundborne vibration or noise would be short-term and temporary during construction. Thus, the potential impacts of the proposed Project would be less than significant.

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

No Impact. The proposed Project is not located within the vicinity of a private airstrip or an airport land use plan. The nearest airport to the Project area is Redlands Municipal Airport, approximately two and a half (2.5) miles southwest. The San Bernadino International Airport, a public airport, is located approximately seven (7) miles southwest of the Project area in the City of San Bernadino. The Project is not located within 2 miles of any neighboring public use airport. Therefore, the proposed Project would not expose people residing or working in the Project area to excessive noise levels and there would be no potential impact.

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

XIV. POPULATION AND HOUSING

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

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

Less than Significant Impact. The proposed Project would allow an overall 2.66 percent increase in residential growth compared to the levels analyzed in the City's General Plan EIR. This is considered a modest increase and is intended to accommodate the City's growing population and meet regional housing needs identified in the 6th Cycle Housing Element (Program 33). The Project would not induce significant population growth beyond the growth projections already considered in the General Plan EIR and would not exceed the City's planned capacity for infrastructure, public services, or roads. Any future development under the PD designation would be subject to project-level CEQA review. Although the proposed Project would increase the density of allowed residential development within the Project area, it is within an area that was already designated for residential development in the General Plan, of which the build out of this same Project area as residential was evaluated in the General Plan EIR. Therefore, potential impacts under the Project would be less than significant.

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

No Impact. The proposed Project area contains citrus groves and some water infrastructure with the remaining area vacant. There are no exiting people or housing that would necessitate the construction or replacement of housing. Therefore, no impact would occur, and no mitigation measures are required.

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

XV. PUBLIC SERVICES

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

- a) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: Fire protection, Police protection, Schools, Recreation/Parks, Other public facilities?*

Less than Significant Impact. The Project would allow for a 2.66 percent increase in residential growth compared to the growth levels analyzed in the City's General Plan EIR. This growth is considered a modest increase and would not induce significant population that would exceed the City's planned capacity for public services. Any future development under the PD designation would be subject to project-level CEQA review. Although the proposed Project would increase the density of allowed residential development within the Project area, it is within an area that was already designated for residential development in the General Plan, of which the build out of this same Project area as residential was evaluated in the General Plan EIR.

Fire Protection: The City of Highland Fire Department and San Bernardino County Fire Department have planned for growth consistent with the General Plan. The modest increase in density allowed and associated population from this Project is not expected to require new fire stations or substantial expansion of existing facilities. Moreover, this is a policy level change, and any future project would be subject to project level CEQA review and would be compliant with standard fire safety requirements, including compliance with building and fire codes, hydrants, and fire access.

Police Protection: The City's Police Department has planned for population growth consistent with the General Plan. The small increase in residential density would not require construction of

new police facilities beyond those anticipated in the General Plan buildout. Any proposed future development would pay standard development impact fees to support police services.

Schools: Any additional student population generated by any future residential development would be accommodated within existing or planned school facilities. School districts routinely plan for residential growth using enrollment projections that include General Plan buildout. Any project-level impacts would be addressed through standard development impact fees to the school district.

Recreation/Parks: The Project includes 23 acres of open space, which would contribute to recreational opportunities. Any future residential development would be required to comply with City standards for parkland dedication or in-lieu fees, ensuring that park and recreational service ratios remain acceptable.

Other Public Facilities: Other municipal services, including libraries, community centers, and utilities, have been planned for General Plan buildout. The incremental increase in allowed residential density from this Project is not expected to trigger the need for new facilities beyond those that currently exist or would be needed with General Plan buildout.

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

XVI. RECREATION

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

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

Less than Significant Impact. The Project would allow for a 2.66 percent increase in residential growth compared to the growth levels analyzed in the City's General Plan EIR. This growth is considered a modest increase and would not induce significant population that would exceed the City's planned capacity for neighborhood or regional parks. Moreover, no specific developments are proposed at this stage. All future projects under the GPA 025-001/ZC 025-001 would be subject to project level CEQA review and compliance with the local park ordinance and in-lie fee requirements under the Quimby Act (government Code 66477). This would ensure maintenance of recreational facilities and services and would not cause accelerated substantial physical deterioration of the facilities. Therefore, the impacts under the proposed Project would be less than significant and mitigation is not required.

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

Less than Significant Impact. The proposed Project does not include the construction or expansion of recreational facilities. Any future development under the PD designation may include open spaces and recreational facilities to serve any future residents within the Project area. Construction of such facilities would occur in compliance with applicable regulations and ordinances and would undergo project level review to address site-specific impacts. As such, the proposed GPA 025-001/ZC 025-001 does not include construction of recreational facilities which might have an adverse physical impact on the environment. Therefore, the impacts under the proposed Project would be less than significant.

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

XVII. TRANSPORTATION

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

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

No Impact. The Project would allow for a 2.66 percent increase in residential growth compared to the growth levels analyzed in the City's General Plan EIR. This growth is considered a modest increase and would not induce significant population that would exceed the City's circulation system. The majority of the Project site is located north of Greenspot Road, with one parcel located to the southwest of Greenspot Road, which is identified as a Major Highway in Figure 3-2 *Roadway Network*, in the City of Highland General Plan Circulation Element. The Project does not include any specific development or construction activities. Any future developments in the Project area would be subject to project level CEQA review and would be required to comply with existing programs, policies and ordinances addressing the circulation system. Although the proposed Project would increase the density of allowed residential development within the Project area, it is within an area that was already designated for residential development in the General Plan, of which the buildout of this same Project area as residential was evaluated in the General Plan EIR. The Project is a policy level change and does not conflict with a program plan, or ordinance, or policy addressing the circulation system, including bicycle and pedestrian facilities. Thus, less than significant impacts are anticipated.

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

Less Than Significant Impact. The Project is a policy level change and does not include any specific development or construction activities. CEQA Guidelines Section 15064.3(b) identifies Vehicle Miles Traveled (VMT) as the primary measure of transportation impacts for CEQA purposes. The proposed GPA/ZC promotes higher-density residential development in areas of opportunity, consistent with the City's 6th Cycle Housing Element (Program 33) and the General Plan's land use policies. By encouraging infill-type development near existing infrastructure, services, and transit options, the Project supports reduced VMT compared to lower-density,

dispersed development patterns. Any future residential development facilitated by the Project would be required to undergo project-level CEQA review, including evaluation of VMT and implementation of applicable mitigation measures consistent with City, regional (SCAG), and state (CARB) guidelines. Although the proposed Project would increase the density of allowed residential development within the Project area, it is within an area that was already designated for residential development in the General Plan, of which the build out of this same Project area as residential was evaluated in the General Plan EIR. Therefore, the Project would not conflict with CEQA Guidelines Section 15064.3(b) and impacts would be less than significant.

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

Less Than Significant Impact. As the Project is a policy level change and does not include any specific development or construction activities **it would not affect existing roadways**. Any future residential development within the Project area would be subject to Project level CEQA review and required to comply with City roadway design standards, engineering requirements, and the Municipal Code, which ensure safe geometric design for streets, intersections, and driveways. Additionally, future projects would be reviewed for potential traffic hazards, including compatibility with adjacent uses, farm equipment, or other potential conflicts. Any necessary improvements, such as realigned intersections, traffic calming, or signage, would be implemented at the project level to maintain safety standards. Because the Project does not include site-specific improvements and future development would be required to comply with all applicable safety and roadway design standards, the Project would not substantially increase hazards due to geometric design or incompatible uses, and potential impacts would be less than significant.

- d) *Result in inadequate emergency access?*

Less than Significant Impact. The proposed Project is a policy level change and does not include any specific development or construction activities. Any future residential development in the Project area would be subject to Project level CEQA review and required to comply with City roadway design standards, engineering requirements, and the Municipal Code, which include provisions for adequate emergency access, street widths, turnaround areas, and connectivity for fire and police vehicles. Thus, the Project would not create conditions that would impair emergency access, and potential impacts would be less than significant.

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

XVIII. TRIBAL CULTURAL RESOURCES

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

Summary of AB 52 Consultation

On August 11, 2025, the City of Highland initiated consultation with the following Native American tribes, pursuant to AB 52 and SB 18:

- Gabrieleno Band of Mission Indians
- Soboba Band of Luiseno Indians
- Yuhaaviatam of San Manuel Nation

The Gabrieleno Band of Mission Indians and Yuhaaviatam of San Manuel Nation responded via emails, stating that they have no comments since there are no proposed developments or construction at this time. However, they would like to be notified if there is a future proposed project that would result in ground disturbance. The Soboba Band of Luiseno Indians did not respond to the Project notification for request to consult.

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

Less than Significant. The proposed GPA/ZC would not directly result in construction or physical development that could adversely impact a historic resource. Moreover, any future development within the Project area would be subject to project-level CEQA review, including historic resources assessments in accordance with CEQA Guidelines §15064.5. If archaeological resources are present, appropriate mitigation - such as avoidance, evaluation, or data recovery - would be implemented to reduce potential impacts to a less-than-significant level. Although the proposed Project would increase the density of allowed residential development within the Project area, it is within an area that was already designated for residential development in the General Plan, of which the build out of this same Project area as residential was evaluated in the General Plan EIR. Therefore, the impacts under the proposed Project would be less than significant.

- b) *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?*

Less than Significant. The Project is a policy-level action and does not include site-specific development or construction that could directly affect **tribal** cultural resources. The Tribal consultation conducted by the City of Highland did not indicate concerns from Tribes during the consultation period. Any future development within the Project area would be subject to project-level CEQA review and consultation with the Tribes, which would include evaluation for potential impacts to **tribal** cultural resources and implementation of standard mitigation measures if such resources are encountered. Therefore, impacts under the proposed Project would be less than significant.

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

XIX. UTILITIES AND SERVICE SYSTEMS

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

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

Less than Significant Impact. The proposed Project would Overall, the proposed Project would allow for an estimated 2.66 percent increase in citywide residential density. This is considered a modest increase above what was already accounted for in the City's General Plan and EIR and is not anticipated to exceed the existing and planned citywide utility and infrastructure capacities required at buildout. Moreover, the proposed Project is a policy level change and does not include specific development or utility construction at this stage. Any future development under the GPA/ZC would be subject to project level CEQA review. Any necessary utility extensions or upgrades would occur within existing or previously disturbed right of way and would be constructed in compliance with applicable City, regional and state regulations. These improvements would not cause significant new environmental effects beyond those previously evaluated in the General Plan EIR. Although the proposed Project would increase the density of allowed residential development within the Project area, it is within an area that was already designated for residential development in the General Plan, of which the buildout of this same Project area as residential was evaluated in the General Plan EIR. Therefore, potential impacts under the Project would be less than significant.

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

Less than Significant Impact. The proposed Project is a policy level change and does not include specific development or construction. Any future development under the proposed Project could result in a modest 2.66% increase in residential density beyond what was considered under the General Plan EIR. The proposed Project would not allow for significant unplanned population growth beyond the General Plan projections. The East Valley Water District (EVWD) provides water service within the City of Highland. Any future development consistent with the proposed GPA and ZC would be subject to a project level CEQA review to demonstrate adequate water availability and connection capacity through the EVWD's development review and permitting process. All future projects would be subject to City's water conservation requirements (Municipal Code Chapter 13.30) and EVWD's Water Shortage Contingency Plan, which ensures reliability during drought conditions. Therefore, the Project would not result in deficiency in water supplies and potential impacts would be less than significant.

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

Less than Significant Impact. Per the City of Highland General Plan, Chapter 4. Public Services & Facilities Element, East Valley Water District (EVWD) maintains Highland's sewer system and has a joint powers agreement with the City of San Bernardino to accept all sewage generated within EVWD's boundaries which is conveyed to the City of San Bernardino Water Reclamation Plant (WRP) operated by the San Bernardino Municipal Water Department (SBMWD). The San Bernardino WRP has a treatment capacity of approximately 33 million gallons per day (mgd) and currently treats an average daily flow of about 26 mgd. The anticipated 2.66% increase in residential density and associated growth allowed with the GPA 025-001/ZC 025-001 would be accommodated within the existing reserve capacity of the treatment plant. Any future development under the GPA/ZC would be subject to project level CEQA review and would be required to coordinate with the City, EVWD and SBMWD to ensure adequate conveyance and treatment capacity prior to service connection, consistent with Municipal Code Chapter 13.12. Thus, the Project would not exceed the existing capacity of wastewater treatment facilities or require construction of new facilities that could result in significant environmental effects. Therefore, impacts would be less than significant.

- d) *Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*

Less than Significant Impact. The Project represents a policy-level amendment and does not include specific development or construction that would generate solid waste. Solid waste collection and disposal services in the City of Highland are provided by Burrtec Waste Industries, with disposal at the Mid-Valley Sanitary Landfill (MVSL) operated by the County of San Bernardino Department of Public Works, Solid Waste Management Division. The MVSL has a maximum permitted daily throughput of 7,500 tons per day and a remaining capacity of approximately 61.2 million tons, with an estimated closure date of 2045. The anticipated 2.66 percent increase in residential density and associated growth that would be allowed under the proposed Project would result in a minor incremental increase in solid waste generation that would be well within the existing and planned landfill capacity. Because the Project is a policy-level land use action that would not directly generate solid waste, and future development would be subject to compliance with all applicable waste reduction and recycling regulations, the Project would not

result in solid waste generation exceeding local capacity or impede waste reduction goals. Therefore, impacts would be less than significant.

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

Less than Significant Impact. The Project is a policy-level amendment and does not include site-specific development or construction at this stage. Any future development proposed under the GPA 025-001/ZC 025-001 would be required to comply with all applicable federal, state, and local regulations regarding solid waste management, including the following:

- California Integrated Waste Management Act (AB 939) – mandates waste diversion and landfill reduction goals.
- California Green Building Standards Code (CALGreen, Title 24, Part 11) – requires construction and demolition waste recycling and reduction.
- City of Highland Municipal Code Chapter 8.20 (Solid Waste Management) – governs solid waste collection, recycling, and disposal within the city.

Because the Project does not include development at this stage and any future project would be required to comply with the above statutes and regulations to ensure appropriate solid waste management, promote recycling, and prevent adverse impacts related to the handling or disposal of solid waste, impacts would be less than significant.

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

XX. WILDFIRE

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

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

Less than Significant Impact. The proposed Project is a policy level change and does not include any specific development or construction that would impair or block emergency evacuation or response plans. The City of Highland has adopted emergency response and evacuation plans that guide emergency operations and ensure safe evacuation during wildfires, floods, or other hazards. Any future development within the Project area would be required to comply with City standards for street design, emergency access, and fire safety, including consultation with the Highland Fire Department and other emergency service providers. Because the Project does not propose changes that would block, restrict, or otherwise interfere with emergency routes or operations, and future development would be required to maintain compliance with all emergency planning requirements, the impacts would be less than significant.

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

Less than Significant Impact. The Project is a policy-level change and does not include specific development, construction or grading that would immediately alter slope or vegetation conditions. However, the Project area is located within Very High and High Fire Hazard Severity Zone according to the City of Highland General Plan, Chapter 6. Public Health, Safety, and Environmental Justice Element, City of Highland – San Bernardino County Local Responsibility Area Fire Hazard Severity Zones Map. Any future development would be subject to project level CEQA review and comply with the Highland Municipal Code, Fire Code regulations, and California Department of Forestry and Fire Protection (CAL FIRE) standards for wildland-urban interface areas. Thus, the proposed Project would not cause a significant impact due to slope, prevailing

winds, and other factors, exacerbate wildfire risks, thereby exposing Project occupants to pollutant concentrations from wildfire or the uncontrolled spread of a wildfire. Although the proposed Project would increase the density of allowed residential development within the Project area, it is within an area that was already designated for residential development in the General Plan, of which the buildout of this same Project area as residential was evaluated in the General Plan EIR. Therefore, impacts would be less than significant impacts.

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

Less than Significant Impact. The Project area is located adjacent to existing residential development to the west and Greenspot Road which have existing infrastructure such as power lines and other utilities. Only minor extensions from these areas would be required to serve any future developments within the Project area. The proposed Project is a policy level change and does not include the installation or maintenance of associated infrastructure that would exacerbate fire risk. Any future development and associated infrastructure improvements would be subject to project level CEQA review and would be made in accordance with development standards per the San Bernardino County Development Code, and County Fire Department development standards as well as California Fire Codes. Therefore, impacts under the project would be less than significant.

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

Less than Significant Impact. The Project site is relatively vacant with gentle sloping terrain, vegetation and citrus orchards, and the foothills of the San Bernadino Mountains. The Project **area** is located within High and Very High Fire Risk areas as shown on the City of Highland General Plan, Chapter 6. Public Health, Safety, and Environmental Justice Element, City of Highland – San Bernardino County Local Responsibility Area Fire Hazard Severity Zones Map. It is not within a 100-year Flood Zone per the City of Highland General Plan, Chapter 6. Public Health, Safety, and Environmental Justice Element, City of Highland – Figure 11 Flood Risk Map. The Project is a policy level amendment and does not include site specific development. Any future development would be subject to project level CEQA review and would be required to comply with local, regional and state regulations and building codes. The Project area is not anticipated to expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Therefore, impacts under Project are less than significant.

No significant adverse impacts are identified or anticipated, and no mitigation measures are required.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

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

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

Less than Significant Impacts. The proposed Project is a policy level change and does not include any specific development or construction. The results of the Initial Study show that the impacts under the proposed GPA 025-001/ZC 025-001 would be less than significant. Therefore, the Proposed Project will not substantially degrade the quality of the environment and impact on habitat, wildlife populations, plant and animal communities, rare and endangered species or important examples of the major periods of California history or prehistory; no mitigation is warranted.

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

Less than Significant Impact. Cumulative impacts are defined as two or more individual effects that, when considered together, are considerable or that compound or increase other environmental impacts. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the development when added to the impacts of other closely related past, present, and reasonably foreseeable or probable future developments. Cumulative impacts can result from individually minor but collectively significant

developments taking place over a period. The CEQA Guidelines, Section 15130 (a) and (b), states:

- (a) Cumulative impacts shall be discussed when the project's incremental effect is cumulatively considerable.
- (b) The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided of the effects attributable to the project. The discussion should be guided by the standards of practicality and reasonableness.

The results of the Initial Study show that the impacts under the proposed GPA 025-001/ZC 025-001 would be less than significant. Impacts associated with the proposed Project would not be significant individually and would not contribute towards cumulative impacts. The proposed Project would have less than significant cumulative impacts, and no mitigation measures are required.

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

Less than Significant Impact. The proposed Project is a policy level change and does not include any specific development or construction. There would be no substantial adverse effects on human beings, either directly or indirectly. Any future development would be subject to project level CEQA review and would be required to comply with local, regional and state regulations and building codes. Therefore, impacts under Project are less than significant.

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