Appendix G

Cable Airport Land Use Compatibility Plan Consistency Review

TECHNICAL MEMORANDUM

To: Elizabeth Camacho, Loeb & Loeb LLP

From: Ken Brody, Senior Airport Planner

Date: March 5, 2024

Subject: Cable ALUCP Consistency Review of Roberts Campus Sports Bowl

1. OVERVIEW

Claremont McKenna College (CMC) proposes to construct a sports field complex known as the Roberts Campus Sports Bowl (the "Sports Bowl") on a 66.5-acre portion of an approximately 74−acre site known as the "Roberts Campus East" (formerly known generally as East Campus) The site straddles the boundary between San Bernardino County on the east and Los Angeles County on the west and is situated in the Cities of Upland and Claremont in those counties, respectively. The project site is also located within the influence area of Cable Airport as established in the *Cable Airport Land Use Compatibility Plan* (ALUCP) adopted by the City of Upland. The current proposal modifies and refines the project that was approved by the two cities in 2016 but has not been constructed.

Mead & Hunt reviewed the prior proposal in April 2016. Our findings were detailed in a Memorandum to the City of Upland Development Services Director. This present Memorandum updates the previous one, focusing on concerns noted at that time and changes that have been made to the project since then. As was the case previously, the purpose of this Memorandum is to evaluate whether the proposed project is consistent with the criteria set forth in the ALUCP.

As documented herein and further described in the conclusions section of this Memorandum, Mead & Hunt finds that the Sports Bowl project can be deemed consistent with the ALUCP criteria provided that the City of Upland determines, based on appropriate findings, that the proposed football/track/lacrosse stadium and soccer/rugby field bleachers are compatible in accordance with ALUCP Policy 3.1.6. The proposed capacities of each of these facilities exceed the single-acre intensity safety criterion of the ALUCP. However, the soccer/rugby facility would meet, or come close to meeting, this criterion under typical less-than-capacity usage and its design alleviates the safety concern. Similarly, the proposed design of the stadium addresses the safety concern represented by this criterion. ALUCP Policy 3.1.6 provides for consideration of special conditions unique to a project when a local agency assesses a project's compatibility with Cable Airport. As discussed in detail below, the design and other features of the proposed football/track/lacrosse stadium and soccer/rugby field bleachers are among the types of findings that Policy 3.1.6 is intended to take into account and therefore would support a City of Upland determination of compatibility under the provisions of this policy.

A. Background

Mead & Hunt began work with the City of Upland and its General Plan consultants in 2008 to prepare an airport land use compatibility plan (ALUCP) for Cable Airport. State law requires that an ALUCP be prepared

for each public−use and military airport in the state. In most counties, this work is accomplished by a countywide airport land use commission (ALUC). San Bernardino County, however, has opted to utilize a provision of the state law known as the "alternative process" which delegates the ALUCP preparation process to each local agency—city or county—that has an airport in its territory.

Preparation of an ALUCP must be guided by information in the *California Airport Land Use Planning Handbook* (*Handbook*) published by the Caltrans Division of Aeronautics. The current edition is dated 2011. Mead & Hunt was the primary author or a major contributor to all editions of the *Handbook*. With regard to airport land use compatibility criteria, the *Handbook* dictates that four types of compatibility concerns be addressed: noise, overflight, safety, and airspace protection. Each of these factors as reflected in the Cable ALUCP and as they relate to the proposed Sports Bowl project are examined in this Memorandum. The City of Upland adopted the Cable ALUCP in September 2015. A new General Plan was adopted at that time as well. The ALUCP replaced the previous plan, *Cable Airport Comprehensive Airport Land Use Plan*, dated 1981. The older plan was greatly outdated and did not meet the guidelines of the state *Handbook*.

Importantly, the ALUCP officially applies only to the parts of the airport influence area that are within the Cities of Upland and Montclair. Although relevant to the City of Claremont, that city is in Los Angeles County and therefore the ALUCP has no enforceability there. The ALUCP encourages the Los Angeles County Airport Land Use Commission to adopt compatibility policies for its part of the Cable Airport environs, but that Commission has yet to do so. Nevertheless, it is Mead & Hunt's understanding that the Los Angeles County ALUC staff advises project applicants to voluntarily comply with the Cable ALUCP. Furthermore, Mead & Hunt understands that CMC desires for its project to comply with the ALUCP policies not only for the portions within the City of Upland but also the area within the City of Claremont. Our review in this Memorandum applies the Cable ALUCP criteria to the entire project site.

B. Proposed Project

Proposals for construction of sports fields on Roberts Campus East go back to before 2008 and have evolved over time. A February 2008 memorandum prepared by Walter E. Gillfillan and Associates evaluates the land use compatibility issues associated with a prior proposal. An exhibit included with that memo identified a proposed project consisting of baseball, softball, soccer, club sports, and multipurpose fields plus various other smaller facilities. None of the facilities in the 2008 proposal appear to have any large amount of spectator seating. A September 2008 letter from the Cable Airport management commented on the proposal and the Gillfillan analysis and found the project to be "acceptable," although acknowledging that the site is in the airport's direct departure route and the ability to limit aircraft overflights is "minimal at best."

The 2008 proposal was later modified to add a football/track stadium with spectator seating to the mix of proposed sports fields. In 2016, the cities of Upland and Claremont approved a project that included the football/track stadium as well as other sports fields. Furthermore, a letter dated April 2016 from Robert Cable, President of Cable Airport, Inc., stated that "Cable Airport is in full support of the project and has no issues with the project's proposed purpose and proposed use."

The current proposal, details of which were provided to Mead & Hunt by CMC, includes the same types of uses approved in 2016 but has fewer playing fields and modifies the layout and positions of the various components. No changes to the types or intensity of uses are proposed. The proposed project calls for development of approximately 66.5 acres of the approximately 74−acre site. The current project area includes approximately 8.87 acres in the northeastern corner of the site that was not part of the conceptual site plan approved in 2016 but does not include the approximately 7.6 acres along the southern edge of the site which is not proposed for development as part of this project. Approximately 60% of the site falls within the City of Upland and the western 40% within the City of Claremont.

The corner of the site nearest to Cable Airport, the northeast corner, is approximately 2,500 feet southwest of the western end of the runway and the southern edge of the site is about 4,500 feet distant. The ground elevation at the northeast corner is approximately 60 feet below the nearby runway end and perimeter elevations slope downward from there. Because the site is a former quarry, elevations elsewhere within it are even lower.

As with the 2016 plan, the current proposal contains a mixture of different types of playing fields plus supporting facilities and automobile parking. Five playing areas are designed for specific sports with some areas usable by more than one sport: baseball; softball; soccer/rugby; football plus track and field and lacrosse; and golf practice. A sixth, large playing area is multi-purpose and can also function as several smaller fields for simultaneous use. The soccer/rugby field, football/track/lacrosse venue and the baseball and softball fields will each have spectator seating. As depicted in Attachment 1, the current plan places the football/ track/lacrosse stadium at the south end of the site. The baseball and softball fields and the golf practice facility are in the central area and the soccer/rugby and multi-purpose facilities are in the northern portion.

Support facilities, including locker rooms, classrooms, office space, and maintenance and equipment areas, are to be situated close to the stadium and baseball and softball fields. Most automobile parking will be located in a parking structure on the west side of the site. Smaller surface parking lots are planned for adjacent to the south end of the parking structure and in the northeast and southeast corners of the site. Solar panels are proposed for the roofs of most of the structures including on the shade structures over the spectator seating bleachers and above the parking structure and the surface parking along Claremont Boulevard. Pedestrian paths wrap around each venue and along the site's perimeter.

The only difference between the proposed primary plan and its variation shown in Attachment 2 is that the latter consolidates the football stadium field structures into one building on the north side of the stadium as opposed to having two smaller structures, one at each end of the stadium and a separate field house between the baseball and softball fields. The two individual structures are primarily locker rooms and restrooms. In either the primary plan or the alternate, the north field house will contain a multipurpose room, office space, and at least some locker room and restroom facilities.

As documented in the analysis that follows, a key factor regarding the proposed project is its usage intensity; that is, the number of people who could be on the site at one time or concentrated in one area. CMC provided the following details regarding the maximum numbers of people, including participants and spectators, likely to occupy each facility at one time.

Facility	Maximum Participants	Spectator Capacity	Notes
Multi−Purpose Fields (3)	150	—	• Participant number includes all three fields • No fixed spectator seating
Baseball Field	100	250	• Bleacher seating with shaded covering
Softball Field	100	250	• Bleacher seating with shaded covering
Soccer / Rugby Field	100	500	• Bleacher seating with shaded covering • All on north side of field
Football Field / Track / Lacrosse	250	1,800	• Bleacher seating with shaded covering • Located on both sides of field • Maximum 900 seats on either side
Golf Practice	25	—	• No fixed spectator seating

2. AIRPORT LAND USE CONSISTENCY EVALUATION

A. ALUCP Criteria

The Cable ALUCP addresses the four airport land use compatibility factors required by the state *Handbook*: noise, overflight, safety, and airspace protection.

- *Noise and Overflight:* The noise factor deals with high noise levels that may be disruptive to activities on the ground. Overflight addresses noise from individual aircraft overflights in locations outside of the noise contours and not necessarily disruptive to activities, but which may nevertheless be annoying to some people.
- *Airspace Protection:* The objective of airspace protection criteria is to ensure that proposed land uses do not have features that can cause or contribute to causing an aircraft accident. These features can be physical, visual, or electronic in character. The primary component of airspace protection criteria is a limitation on the height of structures and other objects. The specific limits are set by the Federal Aviation Administration (FAA) in Part 77 of the Code of Federal Regulations (14 CFR 77), *Safe, Efficient Use and Preservation of Navigable Airspace*. Another important component of airspace protection is glare. Bright lights along routes flown by aircraft at low altitudes can create hazards by momentarily blinding pilots. Yet another concern is any land use that attracts birds near a runway or its approach and departure paths. FAA guidance with regard to bird strike hazards is noted in Cable ALUCP Policy 3.4.3 and Footnote 12.
- *Safety:* The safety factor addresses the potential consequences of an aircraft accident should one occur. Safety compatibility criteria limit the density (dwelling units per acre) of proposed residential uses and intensity (people per acre) of proposed nonresidential uses and also restrict creation of certain particularly risk-sensitive uses such as children's schools. The ALUCP safety criteria take into account two different types of aircraft accidents. For events in which the aircraft is descending but under control, the pilot will try to land on any available relatively flat and open area free of large objects and people. Because buildings and other development of most projects are not evenly spread over the site, the risks to people on the ground can be reduced by limiting the overall usage intensity, thus creating areas that are relatively unoccupied. Clustering of people in one part of a site presents

a different type of risk, however. This risk arises from accidents in which the aircraft is not under the pilot's control and will fall on whatever is in its path. The ALUCP addresses this potential consequence by restricting the number of people concentrated in a small area, specifically a single acre, and by limiting the percent lot coverage of the building footprint.

To facilitate compatibility reviews by the City of Upland, Table 3A of the ALUCP addresses most aspects of the four factors in a composite manner. The table provides a list of land use categories and indicates whether that use is "Normally Compatible," "Conditional," or "Incompatible" depending upon proximity to the airport runway. The criteria in Table 3A are supplemented and further detailed in Sections 3.2 through 3.5 containing policies for each of the four compatibility factors separately. The airport influence area within which the compatibility criteria apply is illustrated in Map 3A (included here as Attachment 3). This map divides the airport environs into nine compatibility zones having varying degrees of airport impacts. Although each zone is affected to different degrees by the four compatibility factors, the boundaries of the zones take into account the impacts of all factors in a composite manner.

B. Compatibility Evaluation

The project site falls within three compatibility zones, B1, B2, and B3 (see Attachment 4). As indicated in Table 3B of the ALUCP, these are zones within which noise impacts are moderate to high, safety concerns range from low/moderate in B3 to high in B1, and airspace protection is critical. Zones B1 and B2 are both exposed to a high concentration of aircraft overflights, particularly departures. Unlike at most airports where aircraft typically proceed on the runway heading until they gain altitude, aircraft departing to the west at Cable Airport turn left shortly beyond the departure end of the runway. This procedure keeps aircraft over the currently uninhabited area that is the Sports Bowl project site and enables them to avoid overflight of the Claremont Colleges campus but means many overfly the project site at altitudes below that of the airport traffic pattern (800 feet above the airport elevation).

The northern edge of the project site is proposed to be devoted to 80 parking spaces for nearby campus facilities. Nearly all of the parking area along the northern edge is within Compatibility Zone B1. No functions other than the northern parking lot and a segment of walking path are in Zone B1. In Zone B2, the only sports facilities are the eastern half of the multi-purpose field, about two-thirds of the soccer/rugby field, and small pieces of the baseball outfield and the golf practice area. All of the occupied structures and most of the sports facilities are placed in the Zone B3 part of the site.

3. NOISE AND OVERFLIGHT FACTORS

Noise and overflight are not a concern for the Sports Bowl project. Although aircraft departing Cable Airport already overfly the project site on a routine basis, will continue to do so, and will certainly be audible, the activities that would take place at the sports complex would not be materially impacted by the noise.

4. AIRSPACE PROTECTION

The height of objects to be placed on the site is also not a concern for the Sports Bowl project. Due to the site's elevation at least 60 feet below that of the runway, any object would need to be nearly 150 feet tall to become an airspace penetration even at the most critical northeast corner. The ground elevation at the

western end of the runway is 1,393 feet above mean sea level (MSL). At the northeast corner of the project site, the FAR Part 77 airspace protection surface is about 1,480 feet MSL and the ground elevation is about 1,330 feet MSL—a difference of about 150 feet.

Even if light poles and trees on the site would not penetrate the airport airspace, federal aviation regulations could require that notice be given to the FAA so that they can conduct an Aeronautical Study to determine whether the objects would be a hazard to flight. Notice is required for most proposed objects (permanent or temporary such as construction cranes) exceeding a 100:1 slope from the runway end. However, at 2,500 feet from the runway end, an object at the northeast corner would need to be taller than 85 feet (2,500/100 + 60) to necessitate FAA notice. Objects elsewhere on the site would need to be even taller. None of the light towers, trees, or any other tall objects contemplated on the site thus appear to represent a potential hazard to flight. That said, if any objects on the site would reach an elevation higher than light poles or other objects along the surrounding streets, notice to the FAA would be warranted to determine if obstruction lighting would be beneficial.

With respect to glare, the criteria for evaluating it are less precise than those for the height of objects. In general, any lighting that has an upward component would be a concern. Shielding of the sports field lights may be required. The project does not propose upward lighting, but the applicant should nonetheless provide an analysis by a lighting expert, preferably one who is familiar with aviation, to document that glare will be minimized. The solar panels proposed for building roofs, stadium seating canopies, and above the parking structure and surface parking on Claremont Boulevard do not present a concern provided that, as proposed, they will be comprised of flat panels similar to ones typically found on residences and businesses.

Finally, with respect to the bird attraction aspect of airspace protection, the proposed Sports Bowl project does not appear to contain any components that might tend to attract more birds than now visit the undeveloped site (e.g., new retention basins or other water features). Nevertheless, the proximity of the project site to the airport warrants that this potential concern be considered in the selection of plants and design of drainage features. Because the proposed project as reviewed in this Memorandum consists of conceptual site plans and does not provide all design details, Mead & Hunt has not conducted a review of the plant selection or drainage design. However, it is understood that the drainage system will not allow for any ponding water for more than 48 hours and will avoid a need for an aboveground retention pond by using a system of drywells and belowground retention for stormwater. On this basis, bird attraction due to water retention should not be an issue. Nevertheless, prior to issuance of vertical building permits, the applicant should be required to provide additional design detail, including landscape plans, which can be reviewed by the approving cities for consistency with this criterion.

5. SAFETY FACTOR

Safety is the primary issue to be considered for the proposed Sports Bowl. The large number of people expected to be on the site and particularly the large number that would be in the several spectator stands requires careful evaluation. Among the land use categories listed in Table 3A of the ALUCP, the two most relevant to the proposed sports complex are:

- Outdoor Major Assembly Facilities (capacity ≥1,000 people): spectator-oriented outdoor stadiums, amphitheaters, fairgrounds, zoos.
- Group Recreation (limited spectator stands): athletic fields, water recreation facilities, picnic areas.

Table 3A sets site-wide average intensity limits of 40, 80, and 120 people per acre in Compatibility Zones B1, B2, and B3, respectively, and 80, 160, and 300, people per any 1-acre area. Outdoor Major Assembly Facilities are therefore considered incompatible within all three of these zones as they are presumed to be unable to meet these criteria. Group recreation uses are deemed incompatible only in the zones adjacent to the runway: A, B1 and C1. In Compatibility Zones B2 and B3, as well as C2, this type of use is conditional, with the condition being that the intensity criteria must be met, and farther away from the runway it is compatible. The major issue presented by Outdoor Major Assembly Facilities as compared to Group Recreation uses is the high concentration of people in a confined area. Moreover, an outdoor stadium provides no protection that the structure of an indoor arena would offer from a crash by a small airplane like those that operate at Cable Airport. *Important to emphasize here is that both the overall site and each of its individual components are subject to the intensity criteria regardless of which land use categories apply.*

CMC proposes to limit the football/track/lacrosse stadium facility's spectator capacity to be no more than 1,800 people split into two bleachers, one on each side of the field, with neither having more than 900 seats as was conditioned in the 2016 approval.[1] The combined fixed seating capacities of the soccer/rugby, baseball and softball venues are also within the range approved by the 2016 approval. Together with the site plan shown in Attachments 1 and 2, conceptual designs of the seating areas including capacity data (Attachment 5), egress locations (Attachment 6), and cross-sections (Attachment 7), have served as the basis for this review.

To determine whether the 2023 Sports Bowl project meets the ALUCP safety criteria, average-acre and single-acre intensities within each of the three affected compatibility zones must be examined individually. Compatibility Zone B1 contains approximately 3.0 acres of the 66.5−acre project site; Zone B2 is 16.0 acres; and Zone B3 is 47.5 acres. The intensity numbers can be calculated as described below. For the purposes of these calculations, no distinction need be made for the portions of each zone that are in San Bernardino County (City of Upland) versus Los Angeles County (City of Claremont).

<u>Compatibility Zone B1</u>

- *Average-Acre Intensity:* At the intensity limit of 40 people per average acre, the 3.0 acres in this most highly restricted zone is allowed to have up to 120 people. The major use of this area is 80 automobile parking spaces. If there were to be an average of two people per vehicle, 60 vehicles could be occupied or have people walking to or from them in the lot and remain consistent with the criterion. Assuming that the lot will be used in a typical manner for campus facilities with vehicles coming and going at various times and people not loitering in the parking lot (e.g., tailgate parties), it seems doubtful that more than 120 people would be present at the same time, even allowing for

[1] The condition from the 2016 approval limited seating to no more than 999 seats on each side, but the present Sports Bowl proposal reduces this limit to a maximum of 900 seats on each side.

some people to be walking along the nearby paths. The planned uses for Compatibility Zone B1 therefore are deemed consistent with the average-acre criterion.

- *Single-Acre Intensity:* Assuming that the number of people in vehicles or walking in the parking lot are distributed relatively equally, the number of people concentrated in a 1.0-acre area would be well below the limit of 80 people.

Compatibility Zone B2

- *Average-Acre Intensity:* The average-acre intensity limit of 80 people per acre for Zone B2 will be met if no more than 1,280 people are present in the 16.0-acre area. The only sports facilities in Zone B2 are about half of the multi-purpose field and two-thirds of the soccer/rugby field. Although the latter facility is proposed to have up to 500 spectator seats, the multi-purpose facility will have no fixed seating.
- *Single-Acre Intensity:* The most highly concentrated occupancies within Zone B2 are the soccer/rugby field bleachers. A 1-acre area encompasses the soccer/rugby bleachers and a portion of the playing field, thus giving a maximum capacity of nearly 600 people. The 500-seat soccer/rugby bleachers by themselves would exceed the 160-persons-per-acre intensity limit for Zone B2 even if half of the seats are on each side of the field. Most of the soccer/rugby field is in this zone and therefore its 500-seat bleachers would exceed the single-acre intensity limit even if half were to be on each side of the field. However, under typical low-capacity usage, the proposed plan likely would come close to meeting the intensity limit. Also, as shown in Attachment 6 and discussed below with regard to the football/track/lacrosse stadium in Zone B3, an important safety benefit is that the bleachers are designed to follow the slope of the ground, thus enabling egress from both the front and back edges.

Compatibility Zone B3

- *Average-Acre Intensity:* The preponderance of the Sports Bowl project site, some 47.5 acres, falls within Zone B3. The most intensive uses of the proposed Sports Bowl are also within this zone. For All of the major sports facilities except the soccer/rugby field are in Zone B3, thus creating a maximum occupancy of 2,750. Even using the 2,750-people number and adding some for people who might remain in parking areas which total 710 spaces, the average-acre intensity would be only about 60 people per acre, well below the limit of 120 people per acre.
- *Single-Acre Intensity:* The most highly concentrated usage within Zone B3 is in the football/track/ lacrosse stadium spectator stands and field house facilities. Also, the baseball and softball field bleachers, each with 250 seats, are situated nearby although neither are quite within the same 1-acre area as each other or the stadium stands. In any case, simultaneous use of these three facilities would be rare and certainly not all at their capacities. Considered separately, the baseball and softball bleachers together with these venues' participants each will typically meet the ALUCP's 300-people-per-single-acre criterion. Thus, the single-acre intensity issue with Compatibility Zone B3 is realistically just with the football/track/lacrosse stadium.

  As noted earlier the difference between the primary plan (Attachment 1) and the alternate configuration (Attachment 2) involves the stadium field house arrangement. The primary plan has

three separate structures while the alternate configuration has one combined building. The stadium seating is the same with both options.

The alternate field house configuration would result in a higher potential number of people in a single acre than is the case for the primary configuration. However, heavy usage of the larger field house in the alternate configuration and nearby spectator stands for multiple sports simultaneously is unlikely and, for the purpose of this analysis, is assumed not to occur. Thus, considering just the football/track/lacrosse stadium, its anticipated maximum occupancy as provided by CMC is 2,050 people including participants and spectators. No more than half of the stadium fits within a single acre. Nevertheless, half of the total occupancy means that over 1,000 people could be in a 1-acre area and this number could theoretically be somewhat higher if there were to be moderate use of the three proximate spectator stands at the same time. As noted above, the ALUCP's single-acre limit for Zone B3 is 300 people, therefore the facility is inconsistent with that criterion. Also, as noted earlier, Table 3A of the ALUCP deems Outdoor Major Assembly Facilities (capacity >1,000 people) as incompatible within Zone B3.

The ALUCP, however, acknowledges that the specified intensity limits may not be the only way to evaluate compatibility of a proposed use and that other factors can be considered where appropriate. The intensity limits are intended to address the issue of whether high concentrations of people in a small area are able to quickly get out of harm's way if an aircraft were to crash into that area. This is particularly an issue with respect to most sports bleachers in that they typically are built on flat ground with egress only from the front edge as the upper rows would be too far above ground for people to exit unless stairs are provided. However, the proposed design of the football/track stadium at the CMC Sports Bowl is different. Because it is literally to be built in a bowl, the seating would be on the ground as the terrain rises, thus enabling egress not only from the front but also the back and ends of the seating area as depicted in Attachment 6. Another drawing provided to Mead & Hunt by CMC shows that each set of seats would have no more than 20 rows (Attachment 7). The length of these stands is not indicated, but for 900 seats could be about 200 feet. If several aisles are provided in the middle of the rows plus at the ends, emergency egress would be significantly enhanced over that of a typical set of bleachers.

Another relevant factor is that the project proposes a layout that orients the football stadium east/west. This orientation is perpendicular to the north/south direction of aircraft overflights of this area with virtually all being departures. Thus, if an aircraft were to strike one of the bleachers it is more likely to do so in the narrow direction rather than along its length. This factor also likely reduces the number of people who would be in harm's way. We note that the east/west orientation of the football stadium is a change, and improvement, from the project approved in 2016, which oriented the football stadium north/south.

A third consideration is that, unlike most facilities on the main CMC campus, the football/track/lacrosse stadium will not be in use on a daily basis. Moreover, even on days it is used, it likely will be at or near capacity on only a few days per year. The ALUCP compatibility criteria generally use seating capacity as the basis for intensity calculations for facilities with fixed seating. For most other uses, retail stores for example, the criteria focus on "the total number of occupants during normal busiest periods" (see Policy 3.3.2(e)). Thus, if this methodology is applied and,

say, only two−thirds of the stadium is occupied during most games, the single−acre intensity would drop to about 700, but would still exceed the 300-persons-per-acre limit.

One more point to consider comes from the 2011 Caltrans *Airport Land Use Planning Handbook*, the document that provides statewide guidance in preparation of ALUCPs. The Handbook suggests that for Safety Zone 4, a zone with similar runway proximity as Cable Airport's Compatibility Zone B3, a single-acre intensity limit of three times the average-acre limit be used. Applying this multiplier to the Cable ALUCP's average-acre limit of 120 people per acre, the single-acre limit would increase from 300 to 360. While this still does not bring the proposed project within the specified intensity criteria, it would bring it a little closer.

6. CONCLUSIONS AND RECOMMENDATIONS

Based upon the preceding analysis, Mead & Hunt concludes that the Claremont McKenna College Sport Bowl project meets the compatibility criteria established in the *Cable Airport Land Use Compatibility Plan* with the exception of the single-acre intensity limits as applied to the occupant capacities of the football/track/lacrosse stadium and soccer/rugby field spectator stands. Nevertheless, the project could be found consistent with the ALUCP policies if the City of Upland were to determine that the project meets the criteria for a consistency finding based on ALUCP Policy 3.1.6. In essence, Policy 3.1.6 enables a normally "Incompatible" use to "be considered compatible because of terrain, specific location, or other extraordinary factors or circumstances related to the site."

To utilize this provision, the decision-making body must make specific findings tied to the state statutes governing airport land use compatibility planning (Public Utilities Code Section 21670). These findings must be aeronautically based, demonstrating that the proposed land use "will neither create a safety hazard to people on the ground or aircraft in flight nor result in excessive noise exposure for the proposed use." Statements presenting other factors such as the importance of a project to the community are not relevant to the objectives of airport land use compatibility and therefore are not suitable as findings. In accordance with ALUCP Policy 3.1.6(e), approval of a special conditions exception requires a two−thirds vote of the local agency's decision-making body for the project voting on the matter.

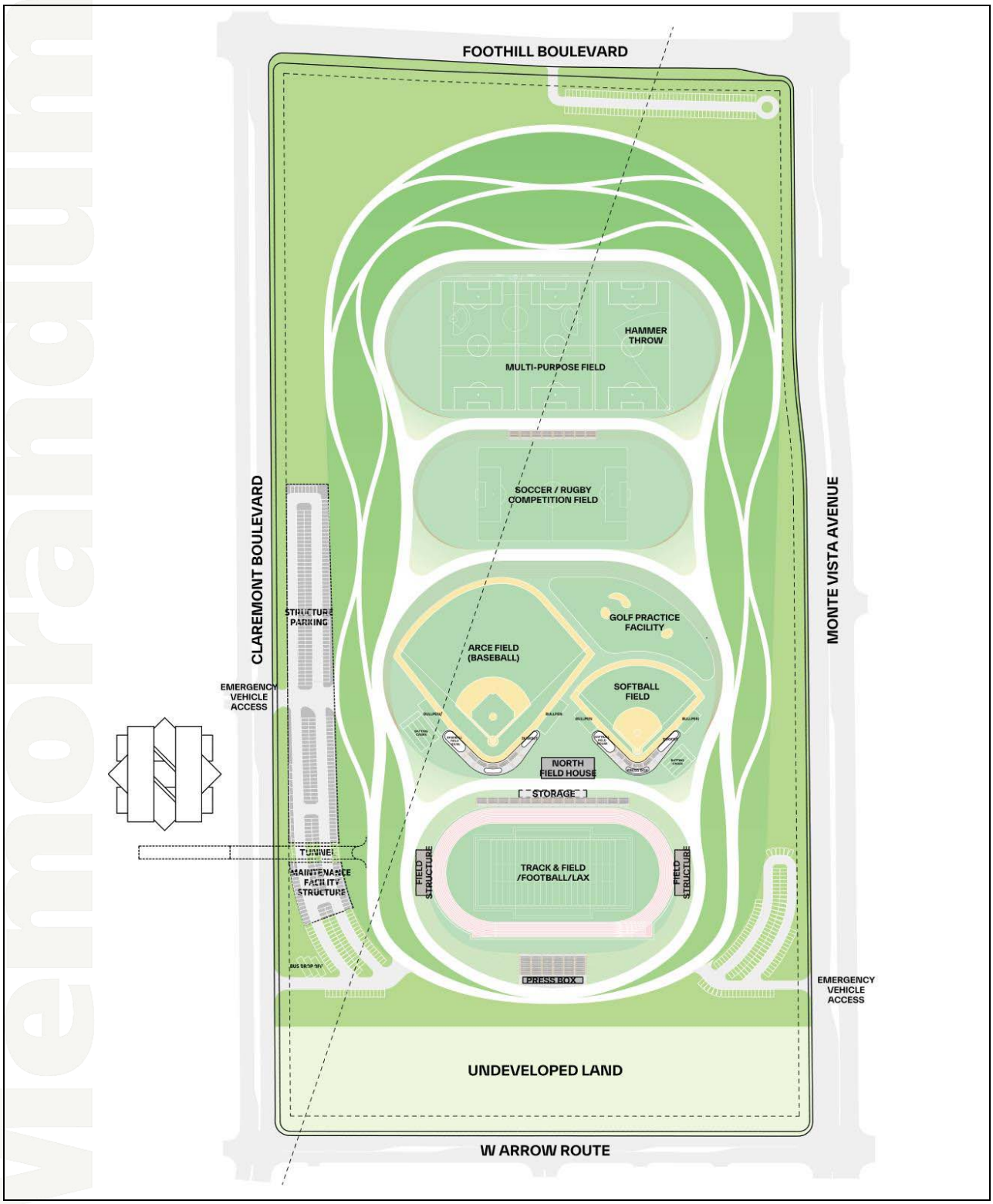
The factors noted in the above analysis are aeronautically based and would support the required findings for a compatibility determination based on Policy 3.1.6. Policy 3.1.6 was utilized by the City of Upland in 2016 as the basis for its consistency finding in connection with its approval of the previous version of the Sports Bowl project. As discussed above, the changes to the layout in the proposed project to an east/west orientation for the football field provide an even stronger basis for determining compatibility based on Policy 3.1.6 as compared to the project approved in 2016.

The ALUCP and its Policy 3.1.6 only apply to the City of Upland. The City of Claremont has not formally adopted the ALUCP as its policy, so it can presumably evaluate the project through its normal approval process.

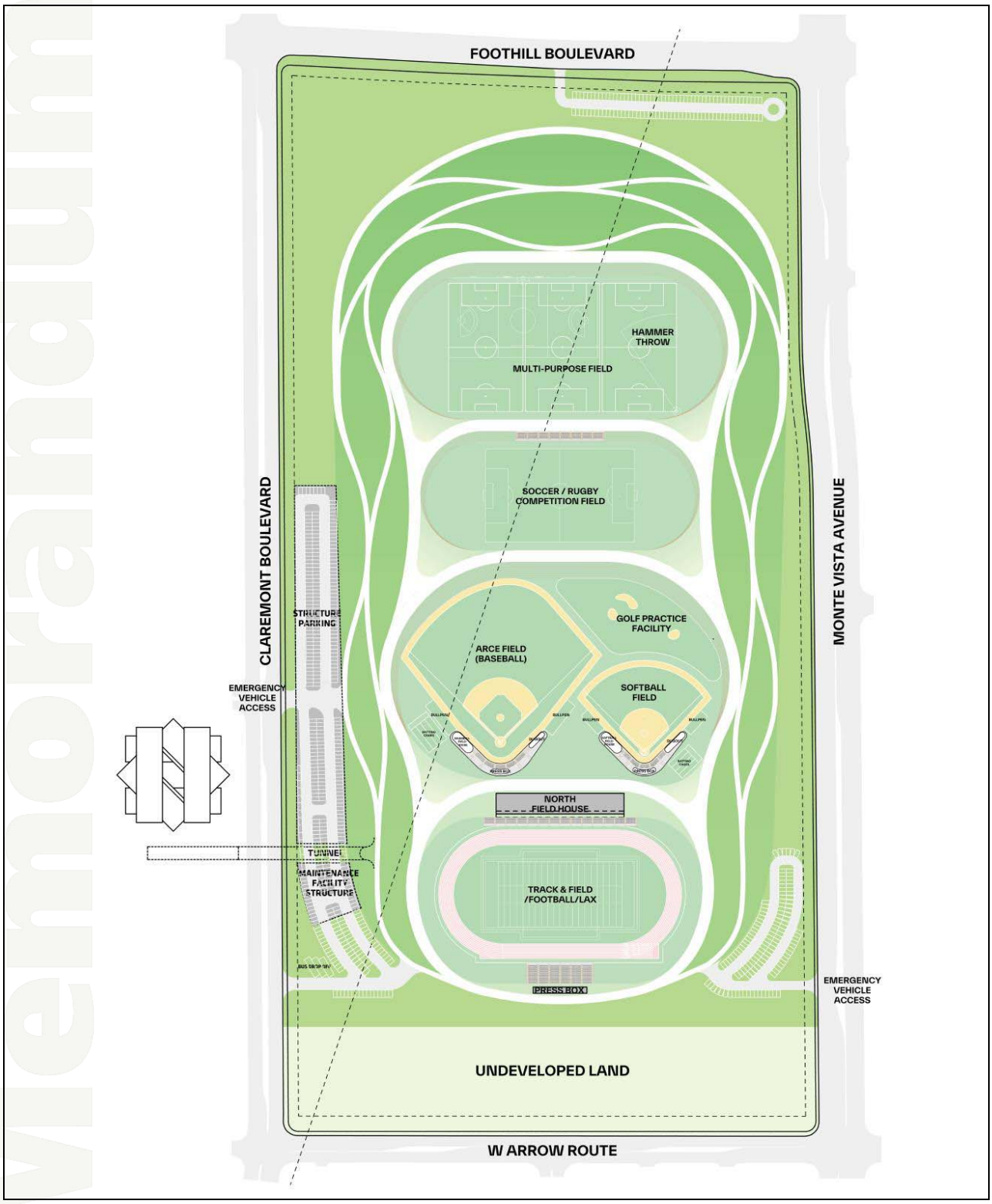
Also, while the project is consistent with the other ALUCP criteria, the following conditions should be required to be met:

- Documentation that the football/track/lacrosse stadium seating is designed in the manner discussed in this review including maximum capacity of 900 seats per side and sufficient aisles to enable rapid egress from both the front and back of the bleachers onto the ground.
- Documentation of Notice of Proposed Construction submitted to the FAA if any structures, objects such as antennas, light standards, construction cranes, or trees would protrude through any of the 14 CFR 77 100:1 notification surfaces. The outcome of the FAA Aeronautical Study needs to be provided as well. Also, agreement to comply with any conditions that the FAA may attach to its findings needs to be stated in the application package.
- Documentation that field lighting will not be directed upward so as to create glare in the eyes of aircraft pilots.
- Once a final landscape plan is prepared, documentation that none of the facilities or proposed landscaping and drainage features will attract an increased number of birds and create a bird strike hazard.
- Agreement, as required by ALUCP Policy 3.6.1, that the project proponent dedicate an avigation easement to Cable Airport to ensure the prevention of airspace obstructions and other hazards to flight and acknowledge the impacts generated by aircraft overflights. Avigation easements were previously dedicated and recorded following approval of the 2016 project and are expected to remain sufficient for purposes of compliance with Policy 3.6.1.
- Lastly, during those limited times when the football stadium is anticipated to attract larger crowds, CMC will comply with EIR Mitigation Measure 4.6.B-2, which requires CMC to issue advance notice to Cable Airport management to issue a "Notice to Airmen" to avoid overflight of the event.

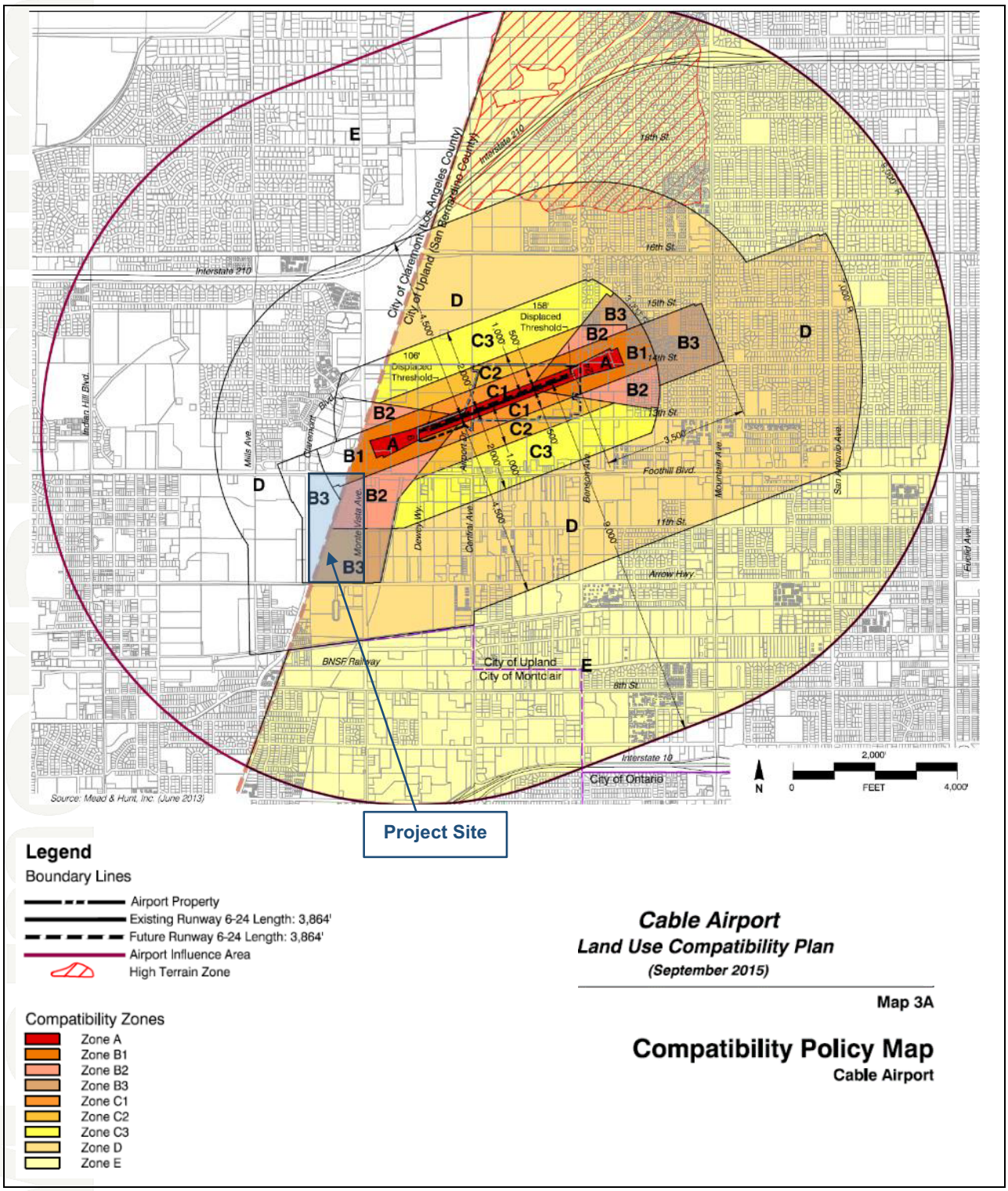
Attachment 1 – PRIMARY PLAN



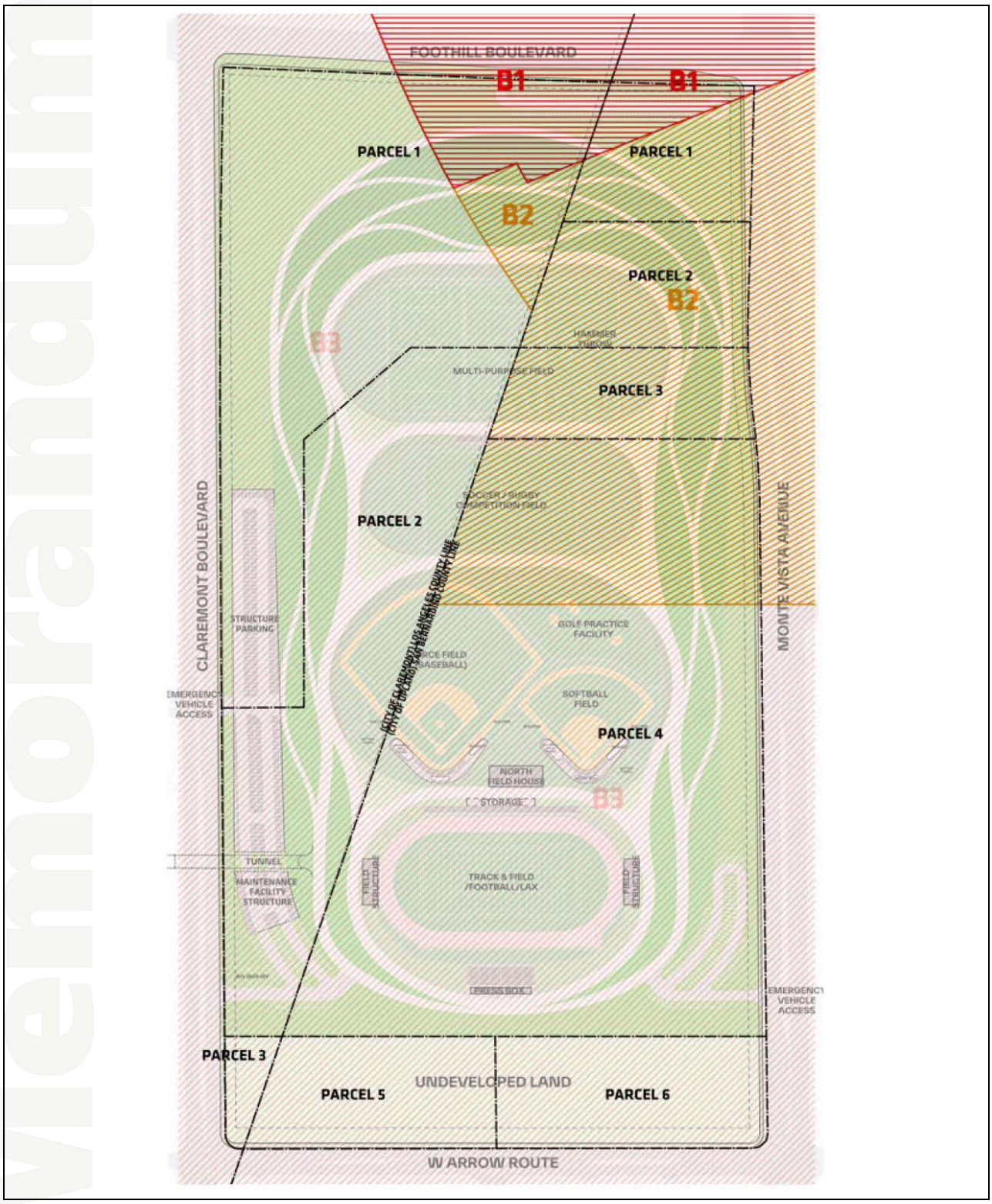
Attachment 2 – ALTERNATE PLAN



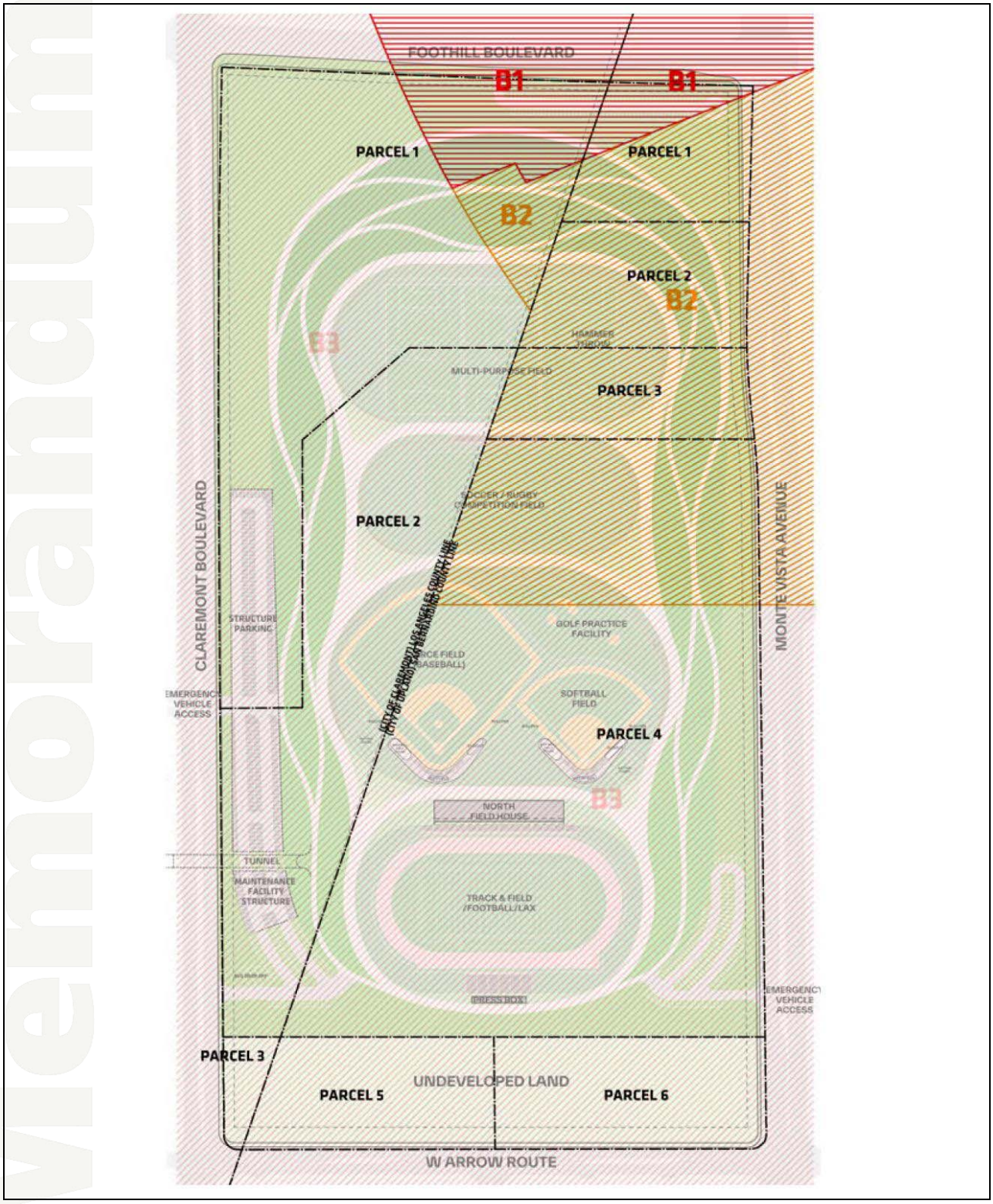
Attachment 3 – CABLE ALUCP COMPATIBILITY ZONES



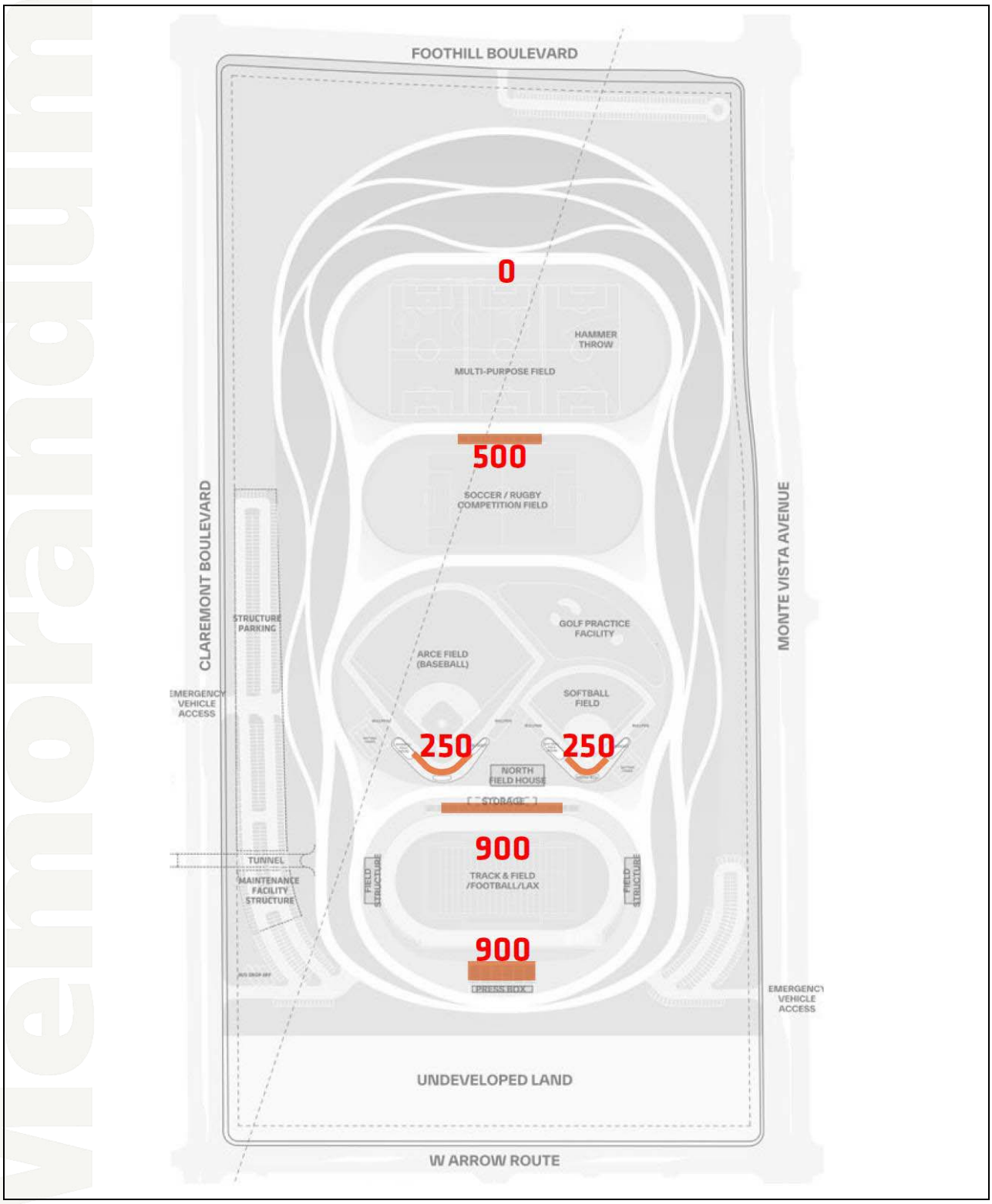
Attachment 4A – ALUCP ZONES OVERLAY OF PRIMARY PLAN



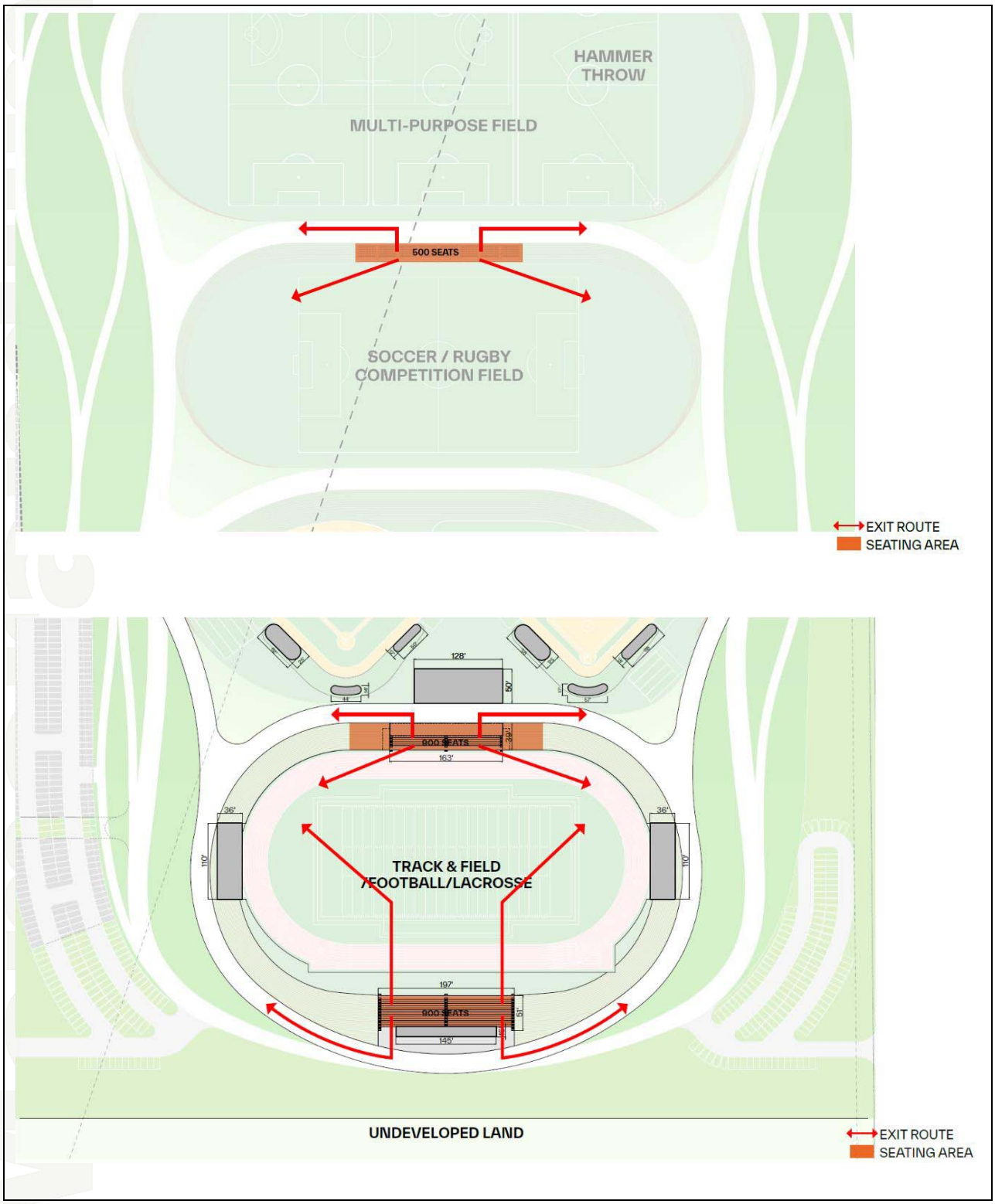
Attachment 4B – ALUCP ZONES OVERLAY OF ALTERNATE CONFIGURATION



Attachment 5 – SPECTATOR SEATING CAPACITIES



Attachment 6 – EXIT ROUTES FROM SPECTATOR SEATING



Attachment 7 – CROSS-SECTIONS THROUGH SPECTATOR SEATING