

Response to Comments
Buffalo Grove Specific Plan Project
SCH# 2026050222
Final Initial Study / Mitigated Negative Declaration

General Plan Amendment (GPA-25-0002)
Zone Change (ZC-25-0001)
Specific Plan (SP-25-0002)
Airport Land Use Compatibility Review (ALUC-25-0001)
Tentative Tract Map (TTM-25-0004, Tract 20820)
Development Plan Review (DPR25-0004)

Prepared for:
City of Upland Planning Department



Prepared by:



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July 14, 2026

1.0 CEQA Requirements Regarding Comments and Responses

Section 15088 of the California Environmental Quality Act (CEQA) Guidelines requires the Lead Agency—in this case, the City of Upland—to evaluate and respond in good faith to substantive comments concerning environmental issues that are submitted during the public review period for an Environmental Impact Report. The intent of this requirement is to ensure that the environmental record reflects meaningful consideration of public and agency input, and that decision-makers are fully informed of environmental issues raised by reviewers before acting on the project.

While CEQA does not require a written response to comments on a Mitigated Negative Declaration, the City of Upland has elected to prepare responses to comments received on the Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) as a matter of good public policy and transparency. Accordingly, this Final IS/MND includes written responses to comments received during the public circulation period.

1.1 Public Review Process

Consistent with Sections 15072 and 15073 of the CEQA Guidelines, a Notice of Intent to Adopt a Mitigated Negative Declaration for the Buffalo Grove Specific Plan Project (General Plan Amendment (GPA-25-0002); Zone Change (ZC-25-0001); Specific Plan (SP-25-0002); Airport Land Use Compatibility Review (ALUC-25-0001); Tentative Tract Map (TTM-25-0004, Tract 20820); Development Plan Review (DPR25-0004) was circulated for a 30-day public review and comment period beginning May 6, 2026, and ending June 4, 2026. During this period, the Draft IS/MND and supporting technical studies were made available for review at the City of Upland Planning Department 460 N. Euclid Avenue, Upland, CA 91786, and on the City's Planning Department webpage at:

https://www.uplandca.gov/development_services/planning/environmental_review/index.php

2.0 Comment Letters and Responses

This section presents all written comments received during the public review period for the Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the Buffalo Grove Specific Plan Residential Project, along with the City of Upland's written responses. Each comment letter has been assigned a unique identifier (e.g., Letter A), and individual comments within each letter are numbered sequentially for reference (e.g., Comment A-1, A-2). Corresponding responses immediately follow each comment.

Table 1, *List of Comments Received on the ISMND*, on page 2 lists the comment ID, name of the commenter, and the date the comment was received by the City.

Table 1. List of Comments Received on the ISMND.

Comment ID	Name	Date Received
A (Email)	Andy Salas, Chairman Gabrieleno Band of Mission Indians-Kizh Nation	May 6, 2026
B (Email)	William Liao Southern California Gas Company	May 7, 2026
C (Email)	Youssef Kaddeche Omnitrans	May 12, 2026
D-1 (Email)	Gil Caughman	June 1, 2026
D-2 (Email)	Gil Caughman	June 2, 2026
E (Email)	Natasha Walton	June 4, 2026

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COMMENT A

From: Andy Salas <admin@gabrielenoindians.org>

Sent: Wednesday, May 6, 2026 11:02 AM

To: Joshua Winter <jwinter@uplandca.gov>

Cc: Sophia Pina <sophia_pina@gabrielenokizh.org>; Andy Salas <chairman@gabrielenoindians.org>

Subject: [EXTERNAL] Re: Upland Buffalo Grove Project Mitigation - AB-52

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COMMENT A-1

Dear Mr. Winter:

The Gabrieleno Band of Mission Indians – Kizh Nation is following up on our correspondence dated April 7, 2026, regarding the Buffalo Grove Specific Plan Residential Project. As previously stated, the project site at 1812–1816 W. Foothill Boulevard lies directly within the traditional and ancestral homelands of the Kizh people. Our Tribe has provided the City with substantial evidence—fact-based, documented proof including archaeological and historical records—establishing our unique cultural affiliation to this specific area.

COMMENT A-2

We must reiterate our formal objections to the City's current mitigation language:

- Clarification of "Consulting Tribes": We again request that the City clarify for the record whether the Yuhaaviatam of San Manuel Nation (YSMN) submitted any substantial evidence demonstrating ancestral or historical affiliation to this specific APE. Under CEQA and AB 52, participation in consultation and monitoring must be based on documented affiliation, not merely being listed on a contact list or a lead agency's desire for symbolic inclusivity.

COMMENT A-3

- Correction of MM TCR 2(d): The proposed language allowing the City to render a final decision on the disposition of Tribal Cultural Resources when a "mutual agreement cannot be reached" is legally and culturally unacceptable. This creates a precedent where the City, rather than the ancestrally affiliated Tribe, dictates the fate of sensitive cultural materials.

COMMENT A-4

We request that the City restore Tribe-specific identification within the mitigation measures. The protective measures provided by the Kizh Nation are based on our proprietary cultural

protocols and should not be generalized or re-attributed to non-affiliated entities. The Kizh Nation remains committed to a good-faith consultation process.

We look forward to your written confirmation regarding the evidentiary basis for other tribes' inclusion and your acceptance of our proposed revisions to ensure the record accurately reflects the ancestral affiliation of this land.

Respectfully,
Sophia Pina

]

A-5

RESPONSE TO COMMENTS FROM GABRIELENO BAND OF MISSION INDIANS – KIZH NATION

Comment A-1: The commenter states that the comments are a follow-up to their correspondence dated April 7, 2026, reiterates that the project site lies within the traditional and ancestral homelands of the Kizh people, and states that the Tribe has provided the City with documented archaeological and historical evidence establishing its cultural affiliation to the area.

Response to Comment A-1: This introductory comment is noted. The comment does not raise an issue regarding the adequacy of the ISMND. No further response is required.

Comment A-2: The commenter objects to the inclusion of the Yuhaaviatam of San Manuel Nation (YSMN) in the mitigation measures and inquires whether YSMN submitted substantial evidence demonstrating ancestral or historical affiliation to the area of potential effect (APE). The commenter asserts that under CEQA and AB 52, participation in consultation and monitoring must be based on documented affiliation.

Response to Comment A-2: The City conducted consultation under AB 52 to determine potential impacts to tribal cultural resources. The Yuhaaviatam of San Manuel Nation (YSMN) has previously submitted a written request to the City to be notified of projects pursuant to Pub. Res. Code § 21080.3.1(b). The YSMN notified the City that they wished to engage in formal consultation regarding the project. Inclusion of YSMN as a Consulting Tribe is therefore consistent with Pub. Res. Code § 21080.3.1. The comment does not raise an issue regarding the adequacy of the ISMND. No further response is required.

Comment A-3: The commenter requests correction of MM TCR 2(d), asserting that the proposed language allowing the City to render a final decision on the disposition of Tribal Cultural Resources when a "mutual agreement cannot be reached" is legally and culturally unacceptable.

Response to Comment A-3: There is no language under MM TCR 2(d) that allows the City to "render a final decision on the disposition of Tribal Cultural Resources when a mutual agreement cannot be reached." However, MM TCR 2(e) contains language that states in part: *"...If multiple Consulting Tribes are involved and cannot reach agreement regarding the treatment or disposition of the resources, the City shall consider the input of all Consulting Tribes, may seek guidance from the Native American Heritage Commission, and shall make a final determination that reasonably balances the interests of the Consulting Tribes and complies with applicable laws."* This language requires an inclusive process. No revision to the mitigation measures is required.

Comment A-4: The commenter requests that the City restore Tribe-specific identification within the mitigation measures. The protective measures provided by the Kizh Nation are

based on our proprietary cultural protocols and should not be generalized or re-attributed to non-affiliated entities

Response to Comment A-4: Mitigation measures TCR-1 through TCR-3 are consistent with the mitigation requirements specified in Pub. Res. XX as described below.

(e) If the mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of the consultation or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to subdivision (b) of Section 21084.3.

(1) Avoidance and preservation of the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.

(2) Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:

(A) Protecting the cultural character and integrity of the resource.

(B) Protecting the traditional use of the resource.

(C) Protecting the confidentiality of the resource.

(3) Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.

The proposed mitigation measures are protective of any Kizh Nation tribal cultural resources that may be encountered. The comment does not raise an issue regarding the adequacy of the ISMND, and no revisions to the ISMND are required.

Comment A-5: The commenter states that they "look forward to your written confirmation regarding the evidentiary basis for other tribes' inclusion and your acceptance of our proposed revisions to ensure the record accurately reflects the ancestral affiliation of this land."

Response to Comment A-5: This closing comment reiterates the requests addressed in Responses to Comments A-2 through A-4. As stated in Response to Comment A-2, YSMN's participation is consistent with Pub. Res. Code § 21080.3.1, and as stated in Responses to Comments A-3 and A-4, the adopted mitigation measures are protective of tribal cultural resources and require an inclusive process among all Consulting Tribes. These written

responses will be provided to the commenter and included in the Final IS/MND for consideration by the City's decision-makers. No revision to the ISMND is required.

COMMENT B FROM SOUTHERN CALIFORNIA GAS COMPANY

From: Liao, William

Sent: Thursday, May 7, 2026 12:55 PM

To: 'jwinters@uplandca.gov' <jwinters@uplandca.gov>

Cc: SCG SE Region Redlands Utility Request

<SCGSERegionRedlandsUtilityRequest@semprautilities.com>; Shen, Wilton N.

<WNShen@socalgas.com>; Ruiz, Janel R <JRuiz@socalgas.com>; 'j davidson@uplandca.gov'

<j davidson@uplandca.gov>

Subject: RE: Notice of Intent (NOI) of an Initial Study/Mitigated Negative Declaration (IS/MND) - Buffalo Grove Specific Plan Project - City of Upland (Revised)

COMMENT B-1

Hello, Joshua.

SoCalGas has existing gas facilities within the proposed Buffalo Grove Specific Plan Project area. Please help us ensure everyone's safety and require 811/DigAlert prior to any excavation and/or demolition activities so that we can get out to Locate & Mark out our facilities.

Should the developer need new gas service or alteration to existing service, please have them reach out to our Builder Services group to begin the application process as soon as practicable, at [Builder Services | SoCalGas](#). Plans and load information would be required.

Please let me know if you have any questions.

*does the City of Upload hold utility coordination meetings at all? Would be great to see what's upcoming so we can work together to review/resolve conflicts.

Will Liao

Region Planning Supervisor

Redlands HQ / Southeast Region

Mobile: 840-213-5899

RESPONSE TO COMMENT B FROM SOUTHERN CALIFORNIA GAS COMPANY

Comment B-1: The commenter states that SoCalGas has existing gas facilities within the project area and requests that 811/DigAlert notification be required prior to any excavation or demolition activities so that facilities can be located and marked. The commenter also requests that the developer contact SoCalGas Builder Services as early as practicable should new gas service or alteration of existing service be needed, and asks whether the City holds utility coordination meetings.

Response to Comment B-1: Notification of Underground Service Alert of Southern California (DigAlert) at least two working days prior to excavation is required by California Government Code § 4216.2 and will occur as a standard condition of construction. The comment has been forwarded to the applicant, who is responsible for coordinating with SoCalGas Builder Services regarding any new or altered gas service. The commenter's question regarding utility coordination meetings has been forwarded to City staff. The comment does not raise an issue regarding the adequacy of the ISMND. No further response is required.

COMMENT C FROM OMNITRANS

From: Youssef Kaddeche <Youssef.Kaddeche@omnitrans.org>
Sent: Tuesday, May 12, 2026 8:53 AM
To: Joshua Winter <jwinter@uplandca.gov>
Cc: Alexander Shippau <Alexander.shippau@omnitrans.org>
Subject: Subject: Subject: Re: [EXTERNAL] Site Plans? -- Buffalo Grove Specific Plan Project

COMMENT C-1

Thank you for forwarding, Josh.

The only comment I was prepared to make was sidewalk in front of the development would be great to ensure access to our two bus stops at Foothill @ Central. Looking at the site plans, it looks like that has been addressed.

Thank you again!

Best,

Youssef Kaddeche
Planner I



1700 West Fifth Street
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Email: youssef.kaddeche@omnitrans.org

Follow @OmniTrans:



RESPONSE TO COMMENT C FROM ONMITRANS

Comment C-1: The commenter states that their only anticipated comment concerned providing sidewalk in front of the development to ensure access to the two Omnitrans bus stops at Foothill Boulevard and Central Avenue, and that, based on review of the site plans, this has been addressed.

Response to Comment C-1: The comment is noted. As the commenter acknowledges, the project site plan provides sidewalk along the project frontage, maintaining pedestrian access to the existing Omnitrans bus stops at Foothill Boulevard and Central Avenue. The comment does not raise an issue regarding the adequacy of the ISMND. No further response is required.

COMMENT D-1 FROM GIL CAUGHLIN

From: gcaugh@roadrunner.com <gcaugh@roadrunner.com>

Sent: Monday, June 1, 2026 1:26 PM

To: Joshua Winter <jwinter@uplandca.gov>

Cc: James Breitling <jbreitling@uplandca.gov>; Rudy Zuniga <rzuniga@uplandca.gov>; Carlos Garcia <cgarcia@uplandca.gov>; onalarktoo@aol.com

Subject: [EXTERNAL] Comments: HISTORICAL/ARCHAEOLOGICAL RESOURCES SURVEY REPORT Buffalo Grove.

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COMMENT D-1-1

Dear Mr. Joshua Winter, Senior Planner

I hope all is well with you and thank you for the opportunity to comment on the Historical / Archaeological Resources Report on the Buffalo Grove Project. In summary I give valid rationale in my comments that address the assertions made and inaccuracies made on the report. I feel not enough research has been done to solicit public comment and there is insufficient consultation from Subject Matter Experts in the area of the Buffalo Inn being a Historic Resource not only regarding the architecture and the local community, but also for Route 66 preservation. In my comments you will find various object informed comments that address the conclusions in the report that I feel are invalid and unjustified and require more formal evaluation. Please review these comments as I have spent many hours across three days pulling this information together.

It is my opinion it is imperative that we do all we can to preserve the Buffalo Inn.

Attached you will find the files;

- 1) Buffalo Inn comments 1.docx (Comments on Appendix C-1 attached)
- 2) Appendix C-1 Historical and Archaeological Resources.pdf (This is the document opened for public comment)
- 3) Get Your Kicks at Route 66's Buffalo Inn - The Student Life.mhtml (Then Claremont colleges accounting of the venue / Food)
- 4) "https://www.youtube.com/watch?v=m_he4v8EIAg" (Is a link to YouTube video of TV series Route 66)

If there are any questions you have or if there are any questions from the City Council or Upland Heritage, please feel Free to contact me.

I know you may have followed the correct protocol for getting the information out but I also know that there are many folks that wish to comment but it looks like the suspense date will end before folks can comment.

Thank-you again for the opportunity to respond the Appendix C-1 and please accept my comments to the Archaeological resources Survey.

Sincerely,

Gil Caughman

714-728-6261

Attachment to Comment D-1**HISTORICAL/ARCHAEOLOGICAL RESOURCES SURVEY REPORT TENTATIVE TRACT MAP NO. 20820****COMMENT D-1-2**

This document herein is to comment on the above noted Historical / Archaeological Resources Survey Report for tentative tract Map No. 20820 dated August 25th 2025.

Generally speaking there are many inaccuracies and assertions that are made on this report that do not give a fair representation of the facts and there are many inaccurate characterizations of the history, end use and the current condition of the structure and design characteristics. There are inaccuracies about the history of the use of the building and nature of the venues the facility offered and the significance that it played to Route 66 legacy and the legacy of the community. The condition of the property was significantly understated and it is clear that the report writers were misinformed or uninformed about the historical nature of the site. There is a lot of opinion in the report and wrong assertions made to point of ignorance. In my research I have found through talking to members of the Upland Heritage that they did not provide any recommendations and they were not consulted with on this matter.

COMMENT D-1-3

Additionally, with short order to respond to this offering for public comment not enough time was given to vet the opinions of California Historic Route 66 Association. Due to low organizational resources it is the general consensus of historic site owners that the California Historic Route 66 Association has not completely vetted most of the significant prominent sites on Route 66. The travelers guide called blackbellproject.com / bbp66.com highlights many sites that have been recognized and sites that have not been recognized. In one case is the Association recognized Mel's Drive-in on Lincoln and Olympic in Santa Monica, which is the current official end of the route. Mel's Drive-in, a restaurant chain did not open this location until 2018. Although the building is considered a landmark as it opened late during route 66 commission in 1959 as the Penguin restaurant which closed permanently in 1991. From 1991 until 2018 the Penguin site operated as dentist office. Meanwhile, the Route 66 culture was more directed at the traditional end of the route and most Route 66 travelers sought out the Santa Monica Pier which is historically recognized but not recognized by the Association. In another instance as an example, the Association did not recognize Barney's Beanery which was where travelers ended their travel during the great depression and the Dust Bowl migration from the Mid-West to California via Route 66. All of the prominent celebrities from John Barrymore, Dick Van Dyke, Sammy Davis jr. to the artist movement like Billy Al Bengston Andy Warhol, to the seventies rock movement like Janice Joplin and Jim Morrison then later to the eighties rock bands like U2, Police, Led Zeppelin all made this a place they frequented, yet the association does not recognize this fact. In Fact, the night that Janice Joplin OD' on heroin she was at the Beanery. Additionally is the Tail O' The Pup which was a hot dog stand featured in many TV shows and movies and which was placed on the Doors recording studio where they recorded LA Woman. In the site blackbellproject.com link I provide 27 significantly historic sites that the Association has not recognized as historic sites in their portfolio, which are known sites to visit while traveling Route 66. Anyone who has visited this site or these locations cannot dispute the providence of these locations and the current interest of Route 66 Travelers. In short, the Association is

not well aligned with the Route 66 culture and misses the mark in most cases. Route 66 travelers don't care about misguided criteria for measuring historic significance.

In terms of the City of Upland and Route 66, if you look at other cities who have embraced Route 66 culture like, San Bernardino, Rialto, Fontana, Rancho Cucamonga, Claremont, Laverne, San Dimas, Glendora there are many examples of Route 66 historic sites left because the cities have gone against the status quo and have done a better job of preserving Route 66 legacy. In the Black Bell Project site that are many Nearby locations of the noted sites that highlight many motels and lodging sites that are still in existence on the route as they were when the route was ins commission. Again, examples can be found on the site. In one case the City of Upland Deemed the Taco King Sign located at Better Buzz coffee as a historical landmark as the local community has embraced this and is also featured on the site. The Taco King building has been completely modified without any resemblance of it's original configuration or materials, but yet the culture recognizes the significance of the site. There is no other location remaining in Upland that has a connection to Route 66 other than the Buffalo Inn.

There was mention of "As it appears today, the Buffalo Inn certainly would not be considered stereotypical of a Route 66 diner." What is considered a stereotypical Route 66 diner? There is no such thing as a "stereotypical Route 66 diner" as the BBP66.com highlights each site has a uniqueness onto itself. Actual history doesn't need to be stereotypical of cultural view to represent a true historical experience. I would argue that route 66 in California is atypical of the experience felt in other States. Route 66 travelers have lost sight and cognition of Route 66 in California and tend by-pass most if not all of the historical sites in California once travelers hit the Cajon Pass or maybe Rancho Cucamonga Gas Station Museum. Through my involvement in the Gas Station museum (I donated some of the artifacts), I have discovered that people traveling the Route from all over the world have been stopping at the museum with their destination and proceeding onto the 10 freeway straight to the Santa Monica Pier. Guided by the Association publishing of historic places they have no situational awareness of all of the prominent sites running through the foothills of the San Gabriel mountains. They are misguided and unaware. More importantly, younger generations don't gain the cognition and understanding of the significance or Route 66 and won't be able to experience the culture.

COMMENT D-1-4

With regard to Buffalo Inn, the "Buff" started out as a Route 66 Road Side Cafe, continued operating as a Road Side Cafe through it's existence. The report characterizes the Buffalo Inn as a local watering hole that served bar food. For those who experienced the Buff throughout the years knew if for it's very unique full menu offering. As it did from its beginning as it did until it's end it offered chicken sandwiches, chili but expanded to Chili Burgers, Chili Buffalo Burgers, Bowls of Chili, Chili Size Burger, Turkey Sandwiches, and patty melts. The Buffalo Burger was very Special and it was made with Buffalo Bison meat. You could have it served with steak fries or Buffalo Chips which were homemade thin cut potato chips and served with the best tasting Mexican salsa. The chips and salsa were not merely bar food as they were an artisan preparation of a classic not matched anywhere to this day. You had to experience it to know. The same with the Chili, without a doubt it was the best Chili in Socal, anyone who went to the "Buff" would know. Buffalo Inn had a full menu offering non-alcohol beverages like Soda, unsweetened ice tea with lemon, salads and other sandwiches. If I am not mistaking it even offered coffee. It was not uncommon for the whole

family to go to the Buffalo Inn where there were times were I personally experienced children along with parents eating throughout the facility mostly enjoying the garden experience. Certainly alcohol consumption was well guarded and servers without fail carded drinkers in accordance with state law. The Buffalo Inn was not known for mixed drinks and largely served beer. In my forty years of regularly visiting the Buff I don't recall ever seeing mixed drinks or even wine for that matter. In the later years the Buff offered entertainment occasionally mostly on weekends and were mostly during the daylight time treating the outdoor area like a beer garden. In the 70's, 80's, 90's and into the early 2000's it was not offering entertainment much like Magic Lamp Inn didn't. In terms of alcohol sales report mentions offered "reportedly bootleg alcohol sales during prohibition". It was common for speakeasy's to do this which in fact was common to many route 66 sites for example the Aztec Motel and Formosa. That just adds to the "stereotype of Route 66". It was a local tradition for the community in the 60's, 70's, and 90' to introduce the Buffalo Inn to newcomers to the state and local area as a historic route 66 experience. Myself coming here from Upstate New York moving into Claremont in 1977 was introduced the Buffalo Inn as the coolest eatery around. I was 16 years old and I ate there but although California in 1963 -1964 started removing the route 66 street signs in Santa Monica and officially removed all of the street signs in 1979 and route 66 decommissioned on June 27, 1985. From 1927 until it's close the only way you could go to this restaurant was to park roadside on the gravel shoulder. In fact, the parking lot was very poorly improved and was only there to handle overflow parking. The experience of parking on the Route 66 shoulder never changed as a roadside Cafe on Route 66. As a historic site as viewed from the Buffalo Inn menu claims itself as such. It was introduced to me as a Route 66 Roadside Cafe when I first visited it in 1977 well within the official interstate decommissioned date. But by the 1960s no one was traveling Route 66 and opted to travel by way of the 10 freeway when commission in 1957 and to make any claim that there is no evidence to suggest that during that period route 66 travels went to the Buffalo Inn is certainly ignoring the fact that travelers were diverted to the 10 freeway for all of route 66 below the San Gabriel Mountains. The providence of route 66 in the greater San Gabriel of Southern California as an interstate was in the 20's, 30', 40's and 50's, but form the local foothill communities it remained important travel route and was revered as Route 66. Even today while others call it foothill Blvd, or Huntington Drive, Glendora still maintains the Route 66 designation. Cities like Rancho Cucamonga, Fontana, Claremont and Glendora still maintain the Route 66 signage. Attached is a video of Route 66 show showing then time scenes of Route 66 as it really was. In the background you see cobble stone walls and buildings, Craftsman wood structures with ship lap siding just like the Buffalo Inn. When simple Goggling "What is the history of Buffalo Inn at 1814 W. Foothill Blvd?" the return is that it is know as Rustic Route 66 attraction. Even noticed during the time Route 66 was still in commission. Attached is that inquiry search.

COMMENT D-1-5

The Buffalo Inn was a fixture in the Upland and Neighboring community, a legendary roadside attraction of Route 66 historically, emblematic of wooden and stone craftsman structures shown in the 1960 Route 66 TV series and curb-less entries and shoulders. Even during the time when Route 66 was still in commission it was considered historic for Being a Route 66 Roadside Cafe and reestablished the original name due to the precisely for the historic providence. It is a true historic site not a contrived historic site.

Because of misguidance from historical societies and social media Route 66 through Southern California has been eroded and cloaked over at the detriment of the fabric of this

community. Unlike the rest of Route 66, travelers don't readily travel this section of Route 66 like they do the others. They miss the roadside towns like Upland, Claremont, Laverne and San Dimas. They miss downtown packing houses of Upland, Claremont and Laverne. They miss the Cucamonga Valley Wineries that still exist and function today. The people in the local community and city officials don't even know and remember the history. They celebrate with a Lemon Festival while the packing houses lay dormant with notions of replacing the use into apartments. Even at the lemon festival you would not even see one lemon or nothing resembling the historic culture. Things like packing houses, lemon groves, Route 66 should be focused on by Upland Heritage and not solely on Craftsman houses which is what they tend to do. I feel it is a lack of due diligence.

COMMENT D-1-6

In terms of use of terminology and language. Let's clear the air with use of terms and assertions of identity toward use cases or end uses of the Buffalo Inn

The term Inn from google search.

Steakhouses and restaurants are sometimes referred to as inns due to historical context. Historical Significance

- The term "inn" traditionally referred to establishments that provided both food and lodging.
- In medieval times, inns served as places for travelers to rest and eat, often featuring a tavern or dining area.

Evolution of Terminology

- Over time, the distinction between inns, taverns, and restaurants blurred.
- Modern restaurants may retain the term "inn" to evoke a sense of hospitality and tradition, even if they do not offer lodging.

Culinary Experience

- Many steakhouses and restaurants aim to create a warm, inviting atmosphere similar to that of traditional inns, focusing on quality food and service.

This historical connection helps explain why some dining establishments still use the term "Inn" today.

In terms of roadside attractions on Route 66, the term Inn in California refers to a restaurant and tavern.

Restaurants on California Route 66 or greater Southern California with 'Inn' in Their Name

- Magic Lamp Inn - Located in Rancho Cucamonga, is a steakhouse known for its vintage charm and live entertainment located on Route 66.
- The Apple Pan Inn - A historic spot in Los Angeles, famous for its burgers and pies.
- The Red Rooster Inn - Located in Victorville, offering a cozy atmosphere with a variety of American dishes.
- [Swing Inn Cafe](#): Located in Old Town Temecula, this historic 1927 spot is owned by actor Dean Norris and serves hearty breakfasts alongside Texas-style craft BBQ.
- Sycamore Inn: A historic steakhouse in Rancho Cucamonga, originally opened in 1848 as a stop for stagecoach travelers. It features classic steakhouse vibes and a rich history.
- Grand Canyon Caverns & Inn: Located along Route 66, this rustic restaurant offers

a relaxing dining experience for travelers.

- [The Cafe at The Inn](#): A highly-rated, fresh seasonal cafe located in Benicia, California.
- [The Cafe at The Inn at Rancho Santa Fe](#): An upscale cafe featuring sandwiches, salads, and wellness items in North County San Diego.
- U-Drop Inn
Located in Shamrock, Texas, the U-Drop Inn, also known as Tower Station and U-Drop Inn and Tower Café, was built in 1936 and is a historic landmark along Route 66.
- Parkview Inn
This restaurant is the oldest continuously operating establishment in Bloomington, Illinois, offering classic comfort food and a nostalgic atmosphere for travelers along the original Route 66 alignment.
- Buffalo Inn. Legendary Restaurant and Tavern offering with full dinning menu, Never offered lodging.

All the above noted restaurants on and near Route 66 used the term Inn under the context of restaurant and tavern and never offered lodging are part of their business offering while using that name.

The term Cafe from Merium Webster (Three definitions):

Café

1 of 2

noun

ca fé [ka- 'fā](#)

kə-

variants or less commonly cafe

Synonyms of café

often attributive

1

: a usually small and informal establishment serving various refreshments (such as coffee)

broadly : [restaurant](#)

2

: [barroom](#)

3

: [cabaret](#), [nightclub](#)

As you can see the definition of a Café is a restaurant or bar. The point is that to try to

distinguish Café from Restaurant or Bar is without basis. A Café is a restaurant, is a bar and an Inn.

COMMENT D-1-7

Next is to address the actual structures.

The original design is of early open beam gable Craftsman bungalow design architecture but built as a store front with a Bungalow just east of the Café. The siding contains early century Craftsman shiplap siding. The west sided building in picture 1 and figure 9 are a match as the typography of the Café restaurant Building is still intact. The full original building is completely intact evidence by the narrow redwood ship lap siding that started in the early 1900's but did not start changing to wider style shiplap until the early 30's. This would be strong evidence that the two original buildings are still fully intact on all four sides.

The narrow redwood shiplap (or drop) siding originally used on California Craftsman bungalows began to change after the **mid-1920s to early 1930s**. As the Craftsman era faded, milling standards and regional architectural preferences shifted, bringing new siding styles to the housing market.

This transition occurred through three major phases:

The End of the Craftsman Era (Late 1920s–1930s)

The popularity of the traditional Craftsman bungalow peaked between 1905 and the early 1920s. By the late 1920s, the style fell out of favor as tastes shifted toward Spanish Colonial Revival and Minimal Traditional homes. During this time, the narrow, hand-milled old-growth redwood shiplap gave way to wider profiles or alternating wood shingle patterns.

The above was taken from Google AI.

Picture 2 shows a hexagon plate window in the front with plank wood siding draped over the pre-existing siding which could be easily pulled off. You can tell this by the spacing under the eaves. From early pictures in figure 9, evidence shows there were plate windows in the front and if historians had an issue with that, it would not be very hard or costly to add plate windows in the front if they didn't end up hidden under the wood planks. As for covering the hexagon window, you could do that as well as the 1920's style wood planks are still available at \$60 a square foot. It appears to be about 100 square feet or about \$600 of shiplap, plus installation. Looking at pictures 1,2,6, and 3, I would conservatively estimate 4600 linear feet of shiplap or \$46,000 of replacement shiplap. With the new law of California's Construction and Demolition (C&D) Debris Recycling requirements—primarily governed by the state's **CALGreen Building Code** and enforced by local municipalities—mandate that **at least 65%** of all construction, renovation, and demolition waste be diverted from landfills through reuse or recycling

A Construction Disposal and Recycling Plan (CDRP)—often called a Construction Waste Management Plan—is an environmental document required to obtain building or demolition permits. It outlines how a project will divert at least 65% to 70% of construction and demolition debris from landfills through recycling, reuse, or salvage.

For buildings shown in pictures 5 and 4 in picture order, those appear to be added

subsequently and along with the bar on picture 3, those appear to be part of an event center not commonly accessible to the patrons visiting the restaurant. At least in my visits, I have never seen those. I say they appear to be added after because even though it is clearly Craftsman Construction, the shiplap is of the wider size shiplap, I would say mid 1930's because the shiplap is wider, but the construction is unmolested Craftsman style because it had ended around 1940 and certainly after WWII that style did not exist.

For that building and the garage the structures and siding looks completely intact to include the fireplace and stonework. I consulted data from the internet and used my own knowledge as I own two early 20's craftsman in Historical Downtown Upland and two historic properties in Ontario. I am being considered for a Historic Preservation Award by the City of Ontario on June 2nd, 2026 for my ADU and restoration project. There are two types of dormers that were added but they are consistent with craftsman design characteristics.





As you can see in the attached pictures both dormers are consistent with the period correct Craftsman architectural design and do provide the appropriate roof pitch. Any imperfections can be improved with a simple reroof as required.

If the new owner was so inclined or the historians particular, the added additions can easily be removed from that basic Café adjoining structure. It appears the room additions are not per current code and need to be finished.



The above picture is of 1920's California Craftsman Bungalow construction.

All the structures appear to be intact and can be improved to Craftsman and current day standard without significant modification.

COMMENT D-1-8

The following comments are intended to address certain assertion's on the report itself.

On Page 3 of 47 (Page i) Paragraph 4.

"It does not, however, appear to be eligible for individual listing in the California Register of Historical Resources, nor does it qualify as a substantial contributor to the historical significance of Route 66 due to the loss of historical integrity. As such, the Buffalo Inn does not meet the CEQA definition of a "historical resource."

Comment: I would disagree with the assertion of "loss of historical integrity" What is the basis of loss of historical integrity. Historically it was a roadside café from its inception up until its closure. That is what it was and that is what it is today albeit it's closed and has been run into disrepair. Its closest end use would be for that specific use. It is on Route 66 without obstruction. It still maintains shoulder parking. It still holds the same construction characteristics as when it was in operation as a Café, a Restaurant and an Inn altogether continuously. It is true to the history of Route 66 as example in the noted website, comments and 1960's accounting of real sites. If made available as a historical resource people would travel Route 66 to experience the real ambience of a roadside Inn as was in operation from 1929 to 2015 as a restaurant, Café and / or Inn. It has the same structural character as it always has and it is the same structure as it was for nearly 50's years as I witnessed it, and from the pictures of 1929, it remained with the same general appearance an character as it always has. It would be a great resource for Route 66 travels who would like to experience California culture and the mother road. Local folks would continue to experience the act of pulling over the side of the road having a burger, chili, maybe a beer and relax and watch a band entertain, roadside Café fashion on Route 66 exactly like they did in 1929. No difference. Same street side ambience. Certainly not as status quo, but it has the potential to continue as it was.

COMMENT D-1-9

Records Research,

From page 13 of 27 or Page 8 of document numbering.

"According to SCCIC records, the project area had not been surveyed for cultural resources prior to this study, and no such resources had been recorded on the property."

Not sure of the relevance to this section other than to say that the list was narrow to one mile but there is a historical site 1.7 miles to the west Wolfs Market since 1917 in Claremont and the Taco King Sign a little over 2 miles to the East on Route 66 in upland and a little further three miles you have Red Hill Coffee Shop from the 40's, The Magic Lamp Inn, from the 50's and Sycamore Inn since 1848.

COMMENT D-1-10

Consultation from historic Groups

“As stated above, on August 7, 2025, written inquiry was sent via e-mail to California Historic Route 66 Association and the Upland Heritage group seeking information and comment about the Buffalo Inn and the removal of the buildings as part of the proposed project. In e-mail replies on August 8 and 8, California Historic Route 66 Association President Scott Piotrowski stated he would share the information with other members and that there are “certain aspects” that would be worthy of preserving. He specifically mentioned the stonework features and structures, and further stated that the Buffalo Inn property was worthy of study to determine its significance as an “early traveler stop along what would become Route 66.” No response has been received from Upland Heritage to date.”

As noted above you still don’t have conclusions from Scott Piotrowski from California Historic Route 66 Association. You reached out, but that is all. He stated the following:

“that there are “certain aspects” that would be worthy of preserving. He specifically mentioned the stonework features and structures, and further stated that the Buffalo Inn property was worthy of study to determine its significance as an “early traveler stop along”

I can tell you firsthand that it was a legendary stop on Route 66, locally, nationally, and internationally as the report states that many Celebrities visited and it was always busy with travelers. I have personally met people from all over the world there. Because of the Nearby Colleges people from every corner of the world would go there. For sure from Claremont it was a go to place. Keep in mind that the Buffalo Inn did not close due to lack of business, it closed as a result of a lawsuit for sexual harassment the owner could not pay. It was always crowded with people. Sometimes you would have to wait for an open seat. It was and still is an amazing place.

COMMENT D-1-11

HISTORICAL BACKGROUND RESEARCH

Page 14 out of 47 (Page 11 of document) Last paragraph

“At Louise Haefner’s behest and wish for a lunch diner on Route 66, and brother built her a restaurant on the property out of fir wood (Allen 2012). Specialties were chicken sandwiches, chili and waffles, and reportedly bootleg alcohol sales during prohibition.”

From it’s inception until it’s closure 2015 it served lunch and entertainment was usually during daylight hours. It served lunch, dinner, sandwiches and Chili, Chili burgers. As for serving alcohol, many Cafes and speak easy’s served alcohol during prohibition. I never heard of any documented arrests.

COMMENT D-1-12

FIELD SURVEY

Page 20 of 47 (page 16 of document) Second Pargraph

“A restroom structure extends from the southern end of the building but has been largely dismantled.”

This must have been the restroom for the event center where they had catering. I have never been to that part of the facility but I know the main Café restaurant like the back of my hand. The main restroom area was just left of the restaurant entrance on the southeast side of the building. It was inside the restaurant.

COMMENT D-1-13

"All of the buildings in the group appear altered in modern times, much of it likely after Helen Haefner leased out the restaurant in 1975 (see above)"

Regardless of the appearance, I disagree that all the buildings appear to be altered. I would say only the Restaurant was altered with the Dormers and hexagon pain window. The main structure with Shiplap is intact with the additions attached. This could easily be brought to Craftsmen standard or removed. Any other alternations are consistent with Craftsman styling and could be corrected by minor roof replacement.

COMMENT D-1-14

APPLICABLE STATUTORY/REGULATORY GUIDELINES

Page 21 or 27 (Page 17 on document) First paragraph.

"The purpose of this study is to identify any cultural resources within the project area and to assist the City of Upland in determining whether the Buffalo Inn buildings in the project area meet the official definition of "historical resources," as provided in the California Public Resources Code, in particular CEQA. According to PRC §5020.1 (j), "'historical resource' includes, but is not limited to, any object, building, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California"

In my opinion, the Buffalo Inn personified the theme of a wild Buffalo Americana theme of the wild west and the early days of the American West when Buffalo first roamed the land. The Buffalo was a migration animal. It was a well known very exposed part of the landscape on Route 66 during all of the duration of Route 66 commission. The architecture was innately indicative of the 1920's Craftsman architecture and Fieldstone walls, foundations built in that era. See pictures below from Claremont Russian Village just 2.2 miles away from the Buffalo Inn which was essentially the next neighborhood to the west at that time a couple blocks south of Upland and a few blocks south of Route 66. This is in the Russian Village Historic District in Claremont. Buffalo Inn again is legendary as a Route 66 Roadside Inn. Upland is know for stone structures and foundations. I personally own a historic house that has stone pillars in the Downtown Historic District in the first neighborhood in Upland if all you want to talk about is structures.





The above two pictures are from Russian Village Claremont.

COMMENT D-1-15

Page 22 out of 47 (page 18 of document) Second paragraph

"In summary of the research results presented above, the Buffalo Inn property recorded during this study does not contain any building or feature that has been listed in the California Register of Historical Resources, formally determined eligible for such listing, or designated by the City of Upland as being historically significant. Therefore, it does not meet the definition of "historical resources" in the "mandatory" or "presumptive" categories but require evaluation under the California Register criteria as potential "discretionary historical resources.""

To date there has not been any historic listing but that doesn't mean that there are not features on the property that would not be criteria of significance to Upland or represent features of characteristic that would be Presumptive. Below are the building features that

certainly would be worthy of California registry. The fact that it is not listed is a lack of Due Diligence on the City's part to recognize the historic providence as might other cities like Claremont, Rancho Cucamonga, Fontana, Glendora or Laverne. It has never been formally presented for eligibility for formal historic resource so no presumption should be made on what has not been done.

Prominent features:

Craftsman Bungalow Design on a Commercial Property. Very Unique.
Fieldstone construction indicative of Upland early Craftsman Designs
Historic Roadside Inn and Café on Route 66.
Early Craftsman California Bungalow on site.
Cultural Providence of the local community and popular site
Common celebrity visits and social gathering spot.

COMMENT D-1-16

Page 22 out of 47 (page 18 of document) Third paragraph

Regarding the proper criteria of historic significance evaluation of potential "discretionary historical resources,"

"

1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.

(2) Is associated with the lives of persons important in our past.

(3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.

(4) Has yielded, or may be likely to yield, information important in prehistory or history. (PRC §5024.1(c))"

I address each of the above criteria of historic significance.

- 1) The significant contributions to Broad Patterns of California history and cultural heritage is that it was a Roadside Café and Inn during the heyday of California Route 66 where people stopped to rest, eat and drink. It carried the original theme of a Buffalo which is within itself a historical migration animal that roamed the west. It had a California Craftsman feel which was the architecture at the time with fieldstone. It was known across the country as a Route 66 stop. There was pride in the local community to show newcomers this cool place to go that was historic, on Route 66, had great food, Burgers Made with Buffalo Bison Meat, chili, World famous Potato Chips combined with Mexican Salsa, was old school, authentic, unique and an all around fun place to go.
- 2) As said: The Los Angeles Rams, Kirk Douglas, John Travolta, Mike Scioscia, and Richard Nixon were all visitors to the Buffalo Inn during this period to include Mark Patten a Prominent celebrity historian. Nearly everyone from the local

- community went there because it was old school, on route 66. Many classic car clubs, bike clubs would have rides on route 66 and stop there.
- 3) As shown above the construction of indicative of the construction of the time and of the type of construction that is historic to Upland. Carries those design features as is exemplified on the TV show Route 66 that the show travels and shows this type of road characteristic of that era. Possessed high Artistic values when the sign was up with Buffalo Western theme. Carried and still carries the design features of fieldstone and Craftsman reminiscent of the 1920s and Claremont's Russian Village.
 - 4) No known prehistoric history.

COMMENT D-1-17

Page 22 out of 47 (page 18 of document) Paragraph 5&6

Report statement : "As the story goes, early property owner Louise Heafner wanted to open a restaurant on Route 66, the road she and her husband Ed Heafner traveled along with their daughters from Buffalo in a move aimed at improving Ed's health.

Route 66 in California was officially listed in the National Register of Historic Places in 2012 through a Multiple Property Documentation Form with a period of significance set between 1927 and 1974, when Interstate Highway 10 took over the role of the main thoroughfare across the San Bernardino Valley. The listing includes many buildings and features adjacent to the roadway that provided traveler services and were built during the 1927-1974 era as contributors to Route 66's historical significance. For this reason, the Buffalo Inn must be considered for historical significance both individually and as a potential contributor to Route 66 as a National Register-listed property"

Comment: It's very clear here what the intended uses were for this site and how it played a prominent role. The story line says it all and in itself tells the story of Route 66 to go west for a better life. I agree with paragraph 6 and submit that this should remain for traveler's to enjoy and the local community to enjoy and not forget the road that brought us here. One small correction from San Bernardino Valley when it is actually San Gabriel Valley.

COMMENT D-1-18

RESOURCE EVALUATION

Page 23 out Of 47 (page 19 of document) Paragraph 2

Report statement: " As it appears today, the Buffalo Inn certainly would not be considered stereotypical of a Route 66 diner. In fact, changes over time to the property has since left it practically hidden from the eyes of passersby, not to mention a change in purpose since at least the mid-1970s to that of a tavern with "bar food" offerings and local band music. Coupled with extensive conspicuous alterations to the restaurant, including a chalet-themed overhaul, the Buffalo Inn's ability to relate to the heyday of Route 66 has been

diminished to a degree that renders it ineligible as a contributor to the significance of historic highway. With no other apparent association to either specific events or patterns of events of recognized significance, it does not appear eligible for listing in the California Register under Criterion 1”

Comment: Totally disagree.

Definition of Bar food:

Bar food refers to a variety of appetizers and snacks typically served in bars and pubs. These dishes are designed for sharing and complementing alcoholic beverages, making them a crucial part of the bar experience. Common characteristics include:

- **Simplicity and Affordability:** Bar food is often easy to prepare and budget-friendly, appealing to a wide range of customers.
- **Popular Items:** Typical offerings include wings, fries, nachos, and fried pickles, which are quick to serve and pair well with drinks.
- **Social Aspect:** The food is meant to be enjoyed in a social setting, enhancing the overall experience of dining out

Page 23 out of 47 (page 19 of document) Paragraph 2

Although some of the food there could be considered shareable food with two or more people, but the Buffalo Inn offered a full menu to include non-alcoholic beverages, sandwiches, Buffalo Bison Meat burger, Hamburgers, Chili and Chili burgers, Chili Size, chili dogs, patty melts, the same as there original offering and similar to Mel's diner. They did not have Nachos or fried pickles. It was known for its Chili, Chili burger, Buffalo Burger and homemade potato chips. Most of the servings were personal servings and not budget friendly and all homemade. They even offered take-out food. The Buffalo Inn had a huge round sign that was plainly seen from the road larger than life by no means hidden unless you were blind. I don't see any chalet themed overhale (someone is on crack). I address this more in my discussion on question 1. I see no rational thinking in the comments above. Just because some local bands played there doesn't make not meet some contrived notion of what a route 66 site should look like. If every site on route 66 looked the same and had the same pattern, no one would travel it. It is a contributing factor to route 66 because it was different, it was a roadside attraction, it was unique and it was a destination of travelers, classic car clubs and classic motorcycle clubs. I adamantly disagree with the comments and feel they come from left field made by a person that has no knowledge of route 66 and culture. I guess to be a route 66 attraction you have to have neon signs, dingle balls hanging from the window, Elvis pictures on the wall and courtyards with huts in the middle. Laughable.

**COMMENT D-1-19****Page 23 out Of 47 (page 19 of document) Paragraph 3**

"Historical research has revealed no evidence that the Haefners or any subsequent lessees of the property or anyone else associated with the property have attained a sufficient level of historic significance to meet the requirement of California Register Criterion 2. In terms of architectural, structural, or engineering merits, the group of modest, largely nondescript buildings do not stand out as important or particularly notable examples of any style, property type, period, region, or method of construction, nor are they known to represent the work of a distinguished architect, designer"

The statement above shows clear evidence of lack of research. In criteria 2 there was a list of well-known celebrities that went there. The Buffalo Inn was legendary and thousands of people traveling near or far on route 66 sought out to specifically go there for the ambiance and feel of going to a historic place on route 66. As shown in my comments above, the architecture did stand out as craftsman fieldstone unique to Upland and surrounding areas and special like what is considered in Claremont's Russian village. The signage, the hard structure and wooden doors stood out as one of a kind with a garden appeal from the outside. Notable examples provided above, Property type Craftsman which is a desirable property type typical or early 20th century California Bungalow style and method of construction. Gustav Stickley was the principal designer of the Craftsman design

movement. I think it has great promise for travelers who want to experience the real California experience and that they would flood the place from near and afar. Remember that the Buff don't not go bankrupt because people didn't want to go, it went bankrupt through sexual assault from the owner.

In terms of the conclusion statement. There is an adverse effect to people who admired Route 66 and hope maybe someday it could be saved. There are people who could go and experience a real California roadside Café / Restaurant / Tavern / Inn as part of California's Gold.

COMMENT D-1-20

The next set of comments specifically address Primary Record.

P3a statement:

"Despite the name, no evidence of the property functioning as a lodging facility was found during extensive research."

Comment: The Buffalo Inn in its name did not suggest lodging it was in context of restaurant using the term as was used in many examples in this document. It is common to use the term "Inn" for restaurant and tavern. Along with the name Buffalo Inn were both the words restaurant and tavern in its signage.

COMMENT D-1-21

Building A is largely of Craftsman style with early 20th century narrow shiplap with fieldstone common to the time the structures were built consistent to nearby neighborhood Claremont Russian Village.

B1. They were employing the intended uses of Roadside Restaurant Tavern without any lapse in use.

B10 From it's inception Buffalo Inn was called the Buffalo Inn and held that name for most of the years of operation. The intended uses of this property were clearly that of a Route 66 Café, Tavern and Inn to patronage Route 66 travelers to offer full menu services of Lunch and Dinner and refreshment for travelers as stated in this section.

P3. Building A is a description of a period correct Craftsman structure with narrow shiplap consistent with 1920s with fieldstone walls planters and surrounds consistent with early 19th century construction indicative of Upland California much like exemplified in the 1960s route 66 episode shown in the following provided with this comment document.

COMMENT D-1-22

B6 This section of the report that "The move to Upland was predicted by Edward's resulting emphysema and related health issues from the poison. At Louise Haefner's behest and wish for a lunch diner on Route 66, Ed Haefner and his brother built her a restaurant on the property out of fir wood (Allen 2012). Specialties were chicken sandwiches, chili and waffles, and reportedly bootleg alcohol sales during prohibition"

Article attached shows that the Buffalo Inn had a full service menu offering the same things it originally had. It describes the later view of the Buffalo Inn in the later years by a Claremont student, I would say though they might not have been totally informed but does discuss the menu offerings.

COMMENT D-1-23

Another comment to address:

“ The 1929-1931 photograph (Fig. 9) also shows a second building that may be the westernmost building currently on the property or, if the original café building did not survive, could be the restaurant standing today, but historical research and a comparison of building scales and aerial photographs could not definitively document either scenario”.

The pictures clearly show that the original building survived and at the typographic view shows the original building in plain sight. I don't know why one with think aerial photographs would be needed for what is in plain sight. Pictures on the report shows surviving construction as stated in their report of narrow Craftsman shiplap. This type of material is not been commonly available on the market since the mid 1930's and is nearly impossible to find today. In fact, the only lumberyard you can get it at is C&E Lumber on Town Avenue in Pomona at \$60 a square foot only offered as New Old Stock (NOS) as this was a common material for construction built in the area and there are many historical properties with that siding. It's were I had to go to get shiplap for my 1924 Craftsman. This section mentions extensive alterations. I would consider myself as an expert as I am going to receive an award on Craftsman Preservation from the City of Ontario on June 2, 2026 and I would say that the main structure has very little alteration with the Dormer add-on and venting, but the rest of the main Café is intact. The dormers are in keeping with Craftsman design characteristics. The typographic changes from the air may reveal additions, but the additions are adjunct to the building while preserving the original structure.

See article below:



Get Your Kicks at
Route 66's Buffalo Inn

COMMENT D-1-24

B6 “Two local men, James Bassett and Forrest Rinard, took up the offer and undertook revamping the property and reclaiming the name Buffalo Inn for their enterprise (Rancho Cucamonga Times 1977; Allen 2012)”



A recent Facebook post by the Daggett Historical Society in Daggett, California, sent me down a rabbit hole regarding the weirdly shaped house called Ski Lodge Roof House, Ski Slope Lodge or Russian House along Route 66 in town.

Comment: It would not be uncommon for a Ski Chalet tagged as historic on route 66 as shown in the picture above. But ski Chalet's are usually shown from a building that had Craftsman Features which would be consistent with the Craftsman Architecture as shown below. Below is a ski chalet at Mammoth Lake California. Clearly a Craftsman Structure. I guess the Buffalo Inn was always a Ski Chalet, but I would not say putting a plate window is extensive or not in keeping with Craftsman Styling or styling related to a Wyoming Buffalo Theme. There are many Craftsman Ski Chalets in Wyoming where the Buffalo roam and live. I would say the Buffalo Inn concept for Restaurant theme is much like adopting a "North Woods Inn" type theme, oh there is that Inn word again.



"1990, at which point Rinard would gain full ownership (County Assessor 1989). A second round of modifications to the buildings occurred in 1993-1994 and included a small addition, the installation of dormer skylights to the restaurant, and extension of the kitchen/bar/patio."

Comment: The dormers were there in 1977 when I sat up there when I visited.

B10 "large display windows and free-standing signs to catch the attention of passing motorists. As it appears today, the Buffalo Inn certainly would not be considered stereotypical of a Route 66 diner."

"In fact, changes over time to the property has since left it practically hidden from the eyes of passersby, not to mention a change in purpose since at least the mid-1970s to that of a tavern with "bar food" offerings and local band music. Coupled with extensive conspicuous alterations to the restaurant, including a chalet-themed overhaul, the Buffalo Inn's ability to relate to the heyday of Route 66 has been diminished to a degree that renders it ineligible as a contributor to the significance of historic highway."

Comment; Again there is no justification for making the comment that the menu offering was merely bar food and why is there continual mention of bar food. Is there some assertion that bars on route 66 are not historical. There was not a chalet-themed overhaul, this is a mythical assertion as specially designed plate window was added, which by the way a California Chalet and a Wyoming Chalet are both Craftsman structures. The author would make the suggestion that an owners wishes as stated in reality actualized extensive alterations. It so very much related itself to the heyday of Route 66 representing itself as a roadside Inn, like the Sycamore Inn, The Northwoods Inn, The Magic Lamp Inn or any other Inn for that matter. People traveling the route would want to go there, see it, eat there because it is representative of a route 66 stop, because it was. Nothing conspicuous about it, It was in your face "The Buffalo Inn" and true to its intention from day one until it's closing. Also, author has such a strong opinion without getting a response from route 66 historians about the significance. Honestly I think the author is numb to anything route 66. In terms of

patterns, everything about route 66 has to do with “patterns”. The route is a pattern from point A Chicago to point B Santa Monica.

It is a true representation of what you would see on route 66 in the early 60's. I attached is a MP4 of one such journey that includes stops just like the Buffalo Inn. Oh buy the way, route 66 was pretty much decommissioned by 1970s. There is no relevance to mention that.

COMMENT D-1-25

Assertion: “In terms of architectural, structural, or engineering merits, the group of modest, largely nondescript buildings do not stand out as important or particularly notable examples of any style, property type, period, region, or method of construction,”

Comment: I give clear examples of historic Craftsman Styling exactly like the Claremont Russian Village a neighborhood that was close by. The closest next neighborhood at the time from the west side is the Russian Village. Buffalo Inn even with its vandalism keeps intact ALL of the design features of its time. Notable example is Craftsman shiplap and fieldstone indicative of the local area and one of the only few remaining on route 66. Property type is Route 66 Café establish in 1929 and remained until its closure during all of the time route 66 was in commission. Region was route 66 in Upland utilizing materials common to the area as fieldstone was the soil composition for the San Gabriel foothills which prevailed and was utilized across all the communities at the foothills of San Gabriel Mountains (Foothill Blvd. Aka Route 66). If you were to start digging in the soil in the area you would hit fieldstone and boulders. I can't imagine a more regional representation than that. The notable style is the exact style like Russian Village a highly regarded nearby neighborhood. Method and style is Craftsman bungalow and fieldstone method common to that region.

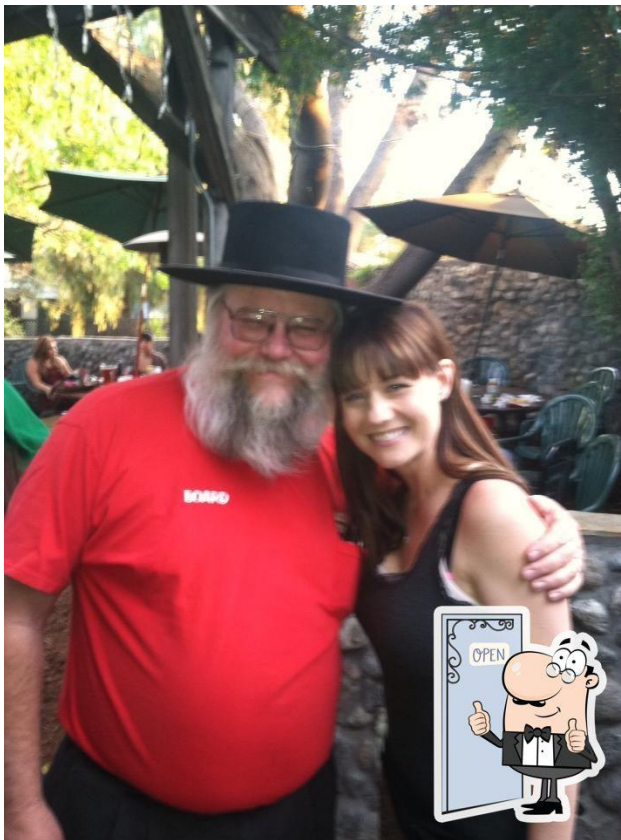
COMMENT D-1-26

In conclusion, the dismantling of the Buffalo Inn would be a great loss to Route 66 as a Historic Resource. Additionally, it would be a tragic loss to the City of Upland because it would be the last free-standing Craftsman and fieldstone architecture on route 66 (Foothill Blvd.). If there were no historic places to visit on Route 66 then it would not be traveled. The only other thing in Upland is a neon sign at an once Taco King. Everything else on foothill resembling Route 66 has been dismantled or torn down. Seemingly Upland is the only place that doesn't have a historic place on route 66. This is Upland's last chance to try to save this Route 66 resource, and it is very much part of California's Gold.

The Buffalo Inn would be a part of the collective that would interest travelers to travel and stop in Upland. Maybe they would pull off and go a couple blocks south of the route and visit downtown Upland, drive by some of the existing packing houses. Pick up something along the way. Buy a drink heaven forbid from one of the microbreweries. People are longing to experience California and don't expect to see rows of fake 50s diners with Elvis Pictures and red soda fountain bar stools. They would be more inclined to visit a Mitla Café in San Bernardino on Mount Vernon (Route 66) that hasn't changed owners since 1937 but it could be claimed that it is not stereotypical of Route 66, whatever that means, but has deep roots in the Mexican Culture and the civil rights movement where Cesar Chavez held rallies and where Taco Bell and Del Taco got their taco recipes from and where Tacos were introduced to the world. Additionally see prominent historian Mark Hall Patten below.



Mark Hall Patten, Curator of the Clark County Nevada Museum. Mark is most known as for his expert opinions on "Pawn Stars". He's pictured above with two examples of the Massachusetts State Constable badges from 1865



Picture of Mark Hall Patten at the Buffalo Inn. and this is not AI. I would be curious on his opinion about the preservation of Buffalo Inn.

Mark Hall-Patton, now retired, is a prominent historian with expertise in various historical topics, including Route 66. He serves as the Museum Administrator for the Clark County Museum System, where he oversees multiple museums and engages in historical education and preservation efforts.

Connection to Route 66 While specific details about his work on Route 66 are not extensively documented, Hall-Patton's role as a historian likely involves understanding the cultural and historical significance of this iconic highway. Route 66 is known for its rich history as a major route for migration and commerce in the United States, symbolizing freedom and adventure.

Public Engagement Hall-Patton is recognized for his public speaking and educational outreach, which may include discussions about Route 66's impact on American culture and history. His engaging style has earned him the nickname "Beard of Knowledge," making him a well-known figure in historical discourse.

There is no background on how he out of all people became a visitor of the Buffalo Inn. Maybe someone should ask him. From the picture above you can see he was there when it was in full operation.

There is no question about it, we need to save Buffalo Inn, for various historical reasons because of its architecture, because of the provenance of the visitors that went their, because of its contributions to Route 66 and early travel, because it was a beloved place for the citizens of Upland, because it was cool, because it represented the high-country of Wyoming and Upland, because it's the one of only regions on the route the would introduce fieldstone into its building construction in the United States. That's why the Route 66 show introduced it as part of California, this part of California obviously. It is indicative of Upland. I would be the first one tagging the Buffalo Inn on blackbellproject.com a Route 66 travel guide, and I would entice folks to visit.

Please save the Buffalo Inn,

Gil

Attachment-news article*October 4, 2010 12:31 pm***Get Your Kicks at Route 66's Buffalo Inn**By [Trevor Felch](#)

The Buffalo Inn sits along historic Route 66, that magnificent stretch of road now known as Foothill Boulevard, just beyond the eastern border of L.A. County. Located in the ever-so-scenic town of Upland, it's actually as close to the 5Cs miles-wise as the Claremont Village. Yet there's just nothing sexy about walking or driving along Foothill past Claremont Boulevard into a sea of muffler shops, Walmarts, and liquor marts, and, of course, Tropical Lei. It probably never occurs to most 5C students, or Claremont townies for that matter, to cross the Upland border for some food or drinks, except maybe to go to the closest In-N-Out in Upland.

This is too bad, because what is perhaps the most atmospheric restaurant and bar in the Claremont area happens to be in Upland—just across from Hubcap Annie's!—at the Buffalo Inn. The buffalo burgers share the stage with an impressive domestic beer list, a wonderful outdoor patio, a cozy wood cabin interior, and of course, live honky-tonk and country music to get your inner cowboy on. It's quite a transporting experience to leave the bro-dom of CMC and the labs of Mudd and arrive in a John Ford-type Western within a three-minute drive, though John Wayne and Ricky Nelson weren't there when I visited.

The Buffalo Inn experience starts with the dirt parking lot, a perfect introduction to the evening ahead. Pulling off the side of Route 66 with a cloud of dust enveloping the car, aspiring diners soon realize that they're not in Claremont anymore. The Inn has two seating areas, and given our year-round summer weather, almost everyone sits on the patio, tan bark at feet and stray cats prowling around. For the record, the cats do not like the potato chips, but they do enjoy pieces of bread. The inside is a cozy, two-tier wooden domain, exuding the type of warmth that galvanizes cowboys to enjoy an extra shot or two of Jack.

Drinking is probably the main reason the Buffalo Inn is a destination for the Inland Empire's cowboys, since most bottles are served in 22-ounce sizes for the usual price of a cheap pint. These aren't bottles of Pabst Blue Ribbon or Schlitz either. The choices include Fat Tire Ale, Sierra Nevada, Stone's outstanding Self Righteous Ale, and many more craft brews. These are often available on draught, though at press time the bar was remodeling its keg system. Though there is no student discount night like at many village bars, this should be one of the major stops for 5C students to enjoy a quality beer at a very reasonable price with a fascinating atmosphere.

The Buffalo Inn also serves food to complement its drink menu, and some of the selections are somewhat noteworthy. The Inn's cuisine is more of the chuckwagon, western-diner variety, holding down hunger until the cavalry arrives in the next town. The wholesome food and setting sent me back to the days when my family would have chuckwagon Hoedown barbecues at our ranch in the Colorado Rockies. This being the Buffalo Inn, it's no surprise that the signature dish is the buffalo burger, served on a toasted sourdough bun and topped with American cheese, too few grilled onions, and too much mayonnaise, which dominates the meat flavor. The bison patty itself, which comes from the McCoy Ranch in Wyoming, has the terrific gamey taste unique to buffalo meat, but it's pounded too thin, spreading the juice to the outside and leaving the interior of the patty too dry.

Advertisement

Most burgers and sandwiches come with what is the highlight of a Buffalo Inn meal: homemade potato chips that make Lay's seem like child's play. You can ask for the chips to come topped with cheddar cheese in a riff on nachos, though our version came with so little melted cheese that the dish almost seemed slightly healthy. Chicken tenders are fine, as far as chicken tenders go—not dry, and with a pleasant breaded crust. The “Damn Good” chili is not quite damn good, but it is indeed delicious. It's thick with beans and shredded beef, not spicy in the least, but with a good rustic taste to it, enhanced by what tasted like a pinch of cumin along with peppers and onions. Chili rarely knocks you out of your saddle, but Wyatt Earp would approve of this rendition. Sadly, the regular burger didn't seem too different from a McDonald's quarter pounder, which simply won't cut it with the Back Abbey in the nearby Village and In-N-Out a block away. The barbeque beef sandwich was completely dominated by a nondescript sweet barbeque sauce. Vegetarians are out of luck outside of a plain dinner salad or veggie burger. For the meat eaters, though, the sandwich list is rather deep and displays some creativity in dishes like the spicy Cajun Chicken Sandwich.

The service could use some tweaking, as we had to walk inside and fetch a waitress to bring menus (which, with descriptions like “Sorry, Charlie—your time has come!” for the tuna melt or “It's not easy being cheesy!” for the cheesy chips, were quite entertaining). Food and drinks came out in a timely manner, but then the waitress bizarrely brought the check just as we were beginning to eat dinner. It's not like there was an hour-long waitlist of customers at the door or the restaurant was about to close. What if we wanted to listen to more of the concert? I didn't make a fuss that my party was charged 50 cents more than was supposed to be added if you request chili as a side dish in place of the chips.

I should have made a fuss, though, that the men's restroom had no soap as if it was still in the pioneer days. Perhaps we had to wait until the next toiletry wagons rolled into town from Durango at the end of the week. There is certainly a roughing-it edge at the Buffalo Inn when it comes to service and amenities. It wouldn't hurt for the Inn to become a little more civilized in this department, for those of us who aren't too keen on pretending we're camping in Upland.

Chuckwagon cuisine is not a gastronomic experience, but since 1929, pioneers, cowboys, and Route 66 journeymen have been patronizing the Buffalo Inn. It's only a mile away from the 5Cs, but a world and a century away from our bubble. Sometimes it's fun to pretend to be Gary Cooper sitting under the endless star-filled desert sky, listening to country tunes with Gene Autry and diving into a buffalo burger next to Buffalo Bill.

Attachment Route 66 Video

https://www.youtube.com/watch?v=m_he4v8ElAg&t=5s

RESPONSE TO COMMENT D-1 FROM GIL CAUGHMAN (Email dated June 2, 2026)

From: gcaugh@roadrunner.com <gcaugh@roadrunner.com>

Sent: Tuesday, June 2, 2026 8:50 PM

To: Joshua Winter <jwinter@uplandca.gov>

Cc: Carlos Garcia <cgarcia@uplandca.gov>; James Breitling <jbreitling@uplandca.gov>; onalarktoo@aol.com; Rudy Zuniga <rzuniga@uplandca.gov>

Subject: RE: RE: RE: RE: [EXTERNAL] Comments: HISTORICAL/ARCHAEOLOGICAL RESOURCES SURVEY REPORT Buffalo Grove.

Hi Josua,
I got my documents confused.

You can get this article from either one of the links below

:

[Get Your Kicks at Route 66's Buffalo Inn - The Student Life](#)

or

<https://tsl.news/life-style1575/>

This is also imbedded in the comments document as a thumbnail. I was including it just in case you weren't able to open it.

Please confirm that you got the comments.

I know of other reviews have been granted a Stay when considering CEQA requirements, it is not uncommon to grant a stay for others to comment as well. I would think that your interest would be to be fair and objective and to get the appropriate feedback from not only the community but from Subject Matter Experts on the matter which I don't feel has been fully vetted in this case. As a result I think it is appropriate to ask for a Stay of Execution to get full response and valid review which in my comments I have substitutive commentary to suggest more review is warranted, this was also commented by at least one of the solicited responders. From my personal inquiry from the other solicited party (Upland Heritage), I was told that the did not get a request to respond and was under the impression that this property was in unincorporated land and not City Land. I hold inform leadership from Upland Heritage of the ongoing review from the city. I also, have informed others and there is interest to comment on this matter. I would hope the city would exercise due diligence in following not only steps in the process but also the intent of the process.

Please give every attempt to seriously consider this request,
Gil Caughman

714-728-6261

RESPONSE TO COMMENT D-1 FROM GIL CAUGHMAN (Emails dated June 1 and June 2, 2026)

Comment D-1-1: The commenter states (cover email) that insufficient research and consultation with subject matter experts occurred, asserts that the Buffalo Inn is a historic resource with respect to its architecture, the local community, and Route 66 preservation, and lists the attached materials.

Response to Comment D-1-1: Mr. Caughman's comments in his cover letter are addressed within the following responses.

Comment D-1-2: The commenter asserts that the report contains inaccuracies and mischaracterizations of the property's history, use, and condition, and states that Upland Heritage was not consulted and provided no recommendations.

Response to Comment D-1-2: During the course of the study, CRM TECH conducted a historical/archaeological resources records search, initiated a Sacred Lands File records search, consulted with local historical groups, pursued historical background research, and carried out a systematic field survey. Cited during historical research were primary sources including San Bernardino County real property tax assessment records, historical aerial images dated 1938-2022, USGS maps dated 1903-1995, Upland Heritage publication *History of Early Upland*, and archival news accounts from a number of newspapers in the region. For the local consultation, both California Historic Route 66 Association and Upland Heritage were by contacted by e-mail. The Upland Heritage e-mail is found on the group's website, formatted as an automatic forward messenger with no direct e-mail address to confirm sent messages. No response was received. At least one follow-up call resulted in a message left on voice record that also received no response, but unfortunately the attempt was not documented in the report.

Route 66 President Scott Pietrowski's response can be found summarized on page 11 of the report, and provided here verbatim as follows:

Due to the extensive closure of the property it's condition may certainly be difficult, but we certainly know from the exterior alone that there are certain aspects of the property that are worth preserving and are historically significant, including at the very least the stone planters and walkway, if not also additional portions of the stone structure itself. The significance of the property as an early traveler stop along what would become Route 66, as well as the structural components that would become a key component of early builds in this area, make this destination worthy of a more-detailed inspection.

The report addresses the poor condition of the property, its historical significance and lack of sufficient historic integrity due to extensive alterations and change of use over the years from roadside fueling and diner stop for travelers to locally popular restaurant, tavern and entertainment venue. The report recommends memorializing the Buffalo Inn's role in local history through scaled mapping and photo-documentation to be archived at appropriate repositories.

Comment D-1-3: The commenter challenges the reliability of the California Historic Route 66 Association's vetting and criteria, citing examples of sites the commenter believes were incorrectly recognized or overlooked, and asserts the Association is misaligned with Route 66 culture, and further question the meaning of "stereotypical" in regards to a Route 66 diner.

Response to Comment D-1-3: Mr. Caughman states that: "In short, the Association is not well aligned with the Route 66 culture and misses the mark in most cases. Route 66 travelers don't care about misguided criteria for measuring historic significance." While his perspective may be shared by other Route 66 enthusiasts, historic building evaluations for CEQA compliance are held to regulatory guidelines and more specifically, to the criteria set forth for listing in the California Register of Historical Resources, as outlined on pages 17 and 18 of the report. Further, properties that rely on an association to Route 66 for their historical significance must have a direct association to the road, be able to identify character-defining features, meet the historic significance criteria, and retain historical integrity.

Mr. Caughman further states: "There was mention of 'as it appears today, the Buffalo Inn certainly would not be considered stereotypical of a Route 66 diner.' What is considered a stereotypical Route 66 diner? There is no such thing as a "stereotypical Route 66 diner." Again, Mr. Caughman's comment is well-taken that one person's idea of "stereotypical" does not necessarily comport with someone else's; however, some features common to the traveler-related buildings and services have been identified as "character-defining" in the Multiple Property Documentation Form (MPDF) for "U.S. Highway 66 in California," (NRHP #64501129), which was approved by the California SHPO and the Keeper of the National Register in 2011-2012. To wit: for diners and restaurants adjacent to Route 66 that fall within the established period of significance (1926-1974) the character-defining features include:

- Parking lot
- Interior area for seating or ordering (not food stands or drive-ins)
- Interior area for food preparation
- Area for car to park often under an overhead canopy (drive-ins)
- Signage as free standing, attached to, or painted on building to catch motorists attention
- Building form may serve as advertisement/signage

Source: Carol Roland, Heather Goodson, Chad Moffett, and Christina Slattery (2011): *National Register of Historic Places Multiple Property Form, U.S. Highway 66 in California*. https://planning.lacity.org/odocument/8d220e22-10e4-4217-b552-5091cf2ad65b/RT66_California_MPDF_withMaps.pdf.

The Buffalo Inn can lay claim to several of these requirements and was noted in the report as a potential contributor to the MPDF (see page 9). The recommendations presented in the report recognize the Buffalo Inn as a long-lived property on the Route 66 landscape and acknowledges local historical interest, which is why CRM TECH recommended that the buildings be further documented as a cultural resources mitigation measure prior to the commencement of the project.

Mr. Caughman's assertions actually highlight the crux of the issue of historical significance versus historical integrity. What may not have been expressed clearly enough in the report is that a cultural resource can possess strong historical significance under one or more criteria and still be ineligible for listing in the California Register of Historical Resources if it lacks sufficient historical integrity. Integrity is defined as the authenticity of a resource's physical identity, as evidenced by the survival of the historical characteristics that existed during a specified period of significance. It is evaluated with regard to seven aspects: location, design, setting, materials, workmanship, feeling, and association. While a resource may retain integrity of location (i.e., it remains in its original place), this single aspect is insufficient by itself to convey the resource's significance. Such is the case for the Buffalo Inn.

Any feature of the Buffalo Inn as an early diner with a direct association to Route 66 would carry heightened historical significance had it remained sufficiently intact to convey that significance. This has not been the case. Most conspicuously, extensive alterations to the original firwood restaurant building occurred after the end of Route 66's stated period of significance, namely 1974 when Interstate 10 was completed and Route 66 became localized in use as opposed to being the "Mother Road" for long-distance travel. Significant alterations occurring outside the period of significance can diminish the overall integrity of a property and may include large additions, altered original fenestration patterns, replacement exterior cladding, or removal of some buildings or structures within a complex. The Buffalo Inn has been the recipient of all of these changes through the addition of numerous lean-tos, extensions, sealed openings, but most clearly through a post-1974 chalet-style remodel, which included raising the roof form to two-stories and adding a large modern polygon plate glass window and dormers. As such, its integrity of design, materials, workmanship and feeling as they relate to Route 66 has been compromised, as the Buffalo Inn no longer evokes a 1920s–1950s Route 66 roadside café or traveler stop. Meanwhile, ongoing development in recent times has weighed on the setting of Route 66 itself as it increasingly becomes an altered urban commercial corridor of largely modern character.

It should be noted that a relative lack of comparable properties is also used to inform the degree of alterations acceptable in terms of retaining historic integrity, i.e., few alterations may be acceptable for more common property types because other examples with better

integrity can tell the same story. Mr. Caughman's comment highlighted several examples of intact eateries that he considers notable along Route 66.

Comment D-1-4: The commenter asserts Buffalo Inn always has been a Route 66 roadside café.

Response to Comment D-1-4: Mr. Caughman states: "With regard to Buffalo Inn, the 'Buff' started out as a Route 66 Road Side Cafe, continued operating as a Road Side Cafe through its existence." This statement does not exactly match the findings of the historical research. There were many turnovers in tenants that demonstrate the evolution of the Buffalo Inn from "Route 66 Road Side Café" catering to travelers to a well-known local hangout for drink, food and local music entertainment. As early as 1931, it operated briefly as an Indian restaurant, the "Sucha Singh Café." The establishment was noted in 1939 as El Montecito, a Mexican restaurant featuring mariachi musicians; in 1950-1965 as Ray's Place, a tavern (along with the Highway Café in 1955); in 1970 as Hazel's bar; and in 1974 as the Green Frog Bar. None of these uses demonstrates a particularly strong association with the Route 66 theme.

Further, as noted above, in contrast to shoulder and out-front parking, which Mr. Caughman states should be allowed as a part of the Buffalo Inn's significance, the MFDF counts parking lots as a character-defining feature. The parking area along the western boundary of the property dates to sometime after 2000 and was later abandoned, according to aerial images.

Comment D-1-5: The commenter asserts the Buffalo Inn was a fixture in the Upland and neighboring community and compares Upland unfavorably to neighboring cities' Route 66 preservation efforts, cites Taco King sign as precedent for recognizing altered structures, and asserts the Buffalo Inn is Upland's last remaining Route 66 connection.

Response to Comment D-1-5: The Buffalo Inn has certainly been known to the local population for decades as an eatery and bar, with its association to Route 66 immediately recognizable by virtue of its location along the legendary roadway. However, Route 66 cafés commonly sought to be conspicuous in attracting customers through prominent or "Googie" signage or architecture, and open parking. These are not present at the Buffalo Inn property, which is obscured from view from the road by fencing, meanwhile the most recent sign, since removed, was installed post-2000. Other notable features in the City of Upland that demonstrate a Route 66 connection include the authentic circa 1959 Taco King neon, the replica-style 1950s McDonald's "Golden Arches" building at 100 E. Foothill Boulevard and the Giant Coffee Cup which was more recently installed as part of local efforts to highlight the highway's heritage. In contrast, the Buffalo Inn is nearly concealed from view and though known to locals would more likely be "discovered" by the unfamiliar when looking for a place to eat. Further, due to a loss of historic integrity, it is not recognizable as Route 66 era establishment dating to the 1926-1974 period.

Comment D-1-6: The commenter provides information relevant to defining inns, taverns, and restaurants.

Response to Comment D-1-6: Mr. Caughman's points on nomenclature are well taken. Buffalo Inn has been a café, a restaurant and a bar, as stated above in the response to Comment 4. The Buffalo Inn's place in local history is not in dispute. It is rather an inability to demonstrate a historically recognizable connection to Route 66 beyond the location itself that precludes it from meeting CEQA definition of a "historical resource."

Comment D-1-7: The commenter describes the elements of architectural design of the Buffalo Inn buildings and asserts they harken to the original design elements.

Response to Comment D-1-7: No response required; Mr. Caughman is providing his impression of the structural design and current conditions of the buildings.

Comment D-1-8: The commenter asserts continuous use of the property as a Route 66 roadside café from 1929 to its closure and questions the basis for "loss of historical integrity."

Response to Comment D-1-8: Mr. Caughman's comment regarding the use of the Buffalo Inn is addressed in comment 4. Historical integrity for properties like former Route 66 cafés refers to the ability of a building or site to convey its historic significance through the survival of original or compatible features, according to the National Register of Historic Places evaluation standards, which the California Register is modeled on. Route 66 resources often draw significance from their role as roadside traveler services serving motorists from the 1920s-1970s era. Integrity loss occurs when alterations, deterioration, or changes diminish or erase the property's ability to evoke its period of significance or maintain common factors including design and materials changes, major additions, removals, or incompatible remodels altering rooflines, fenestration, or massing. Many such changes result from stylistic overhauls that shifted the simple roadside diner/café aesthetic to a different theme that no longer reads as a mid-20th-century traveler stop. Properties that retain high integrity typically keep their original form, visible roadside presence, period materials/details, and contextual setting.

Comment D-1-9: The commenter questions the relevance of the records search results from the Southern California Information Center (SCIC) and cites nearby properties outside of the one-mile scope of the search results.

Response to Comment D-1-9: A records search in the California Historical Resources Information System is a required component of CEQA-compliance studies, for the purpose of identifying all known cultural resources within an appropriate geographic area. Standard scope of such records searches varies from ¼ mile, ½ mile, to one mile. The one-mile radius was used for this report.

Comment D-1-10: The commentor questions the vigor of the local consultation results.

Response to Comment D-1-10: Mr. Piotrowski has been a very reliable contact in past cultural resources studies along Route 66. His stance is ever protective of the remaining built-environment features associated with Route 66. His recommendations were further research to study the property in relation to Route 66 and to offer the local historical group an opportunity to removed stone features for preservation. In the past, Mr. Pietrowski has had no issue advocating for the preservation of buildings based on his own view of their importance to Route 66. Upland Heritage has not responded to the electronic mail or the telephone message.

Comment D-1-11: The commenter reiterates use of the Buffalo Inn being continually in use as a restaurant through 2015.

Response to Comment D-1-11: No comment. Mr. Caughman's statement is not disputed.

Comment D-1-12: The commenter comments on restroom location catered events.

Response to Comment D-1-12: No comment, though it is noted that Mr. Caughman twice refers to at least a portion of the property as "an event center where they had catering," which demonstrates an adaptive use that he states required additional structures.

Comment D-1-13: The commenter disputes that that all the buildings appear to be altered, and asserts only the main restaurant was altered.

Response to Comment D-1-13: It is agreed that of the buildings extant on the property, the main Buffalo Inn restaurant building is the most altered. The other buildings are more intact but in neglected condition and have been reroofed, a non-original garage door installed, access entries blocked by rockwork, the addition of concrete stairs or rockwork that has been removed from entry access to prevent entry.

Comment D-1-14: The commenter asserts the Buffalo Inn personifies an Americana theme and compares the architecture to Claremont's Russian Village

Response to Comment D-1-14: Mr. Caughman considers the Buffalo Inn historically significant for its architecture in addition to an association with Route 66 and compares it to Claremont's Russian Village. He further states that Upland is known for stone structures and foundations. The cultural resources study found the Craftsman- or Bungalow-style residential buildings on the property to retain sufficient historical characteristics to be potentially eligible for listing in the California Register of Historical Resources and accordingly they were evaluated as such (see further discussion of the evaluation under Comment 16).

Comment D-1-15: The commenter acknowledges the Buffalo Inn bears no previous historical designation, but contends its lack of appearance on a local historical register as a lack of due diligence by the City.

Response to Comment D-1-15: CEQA guidelines and past court proceedings have established three different categories of “historical resources” for properties with or without prior designation or evaluations, as outlined below and on pages 18 and 19 of the report:

- Mandatory historical resources: properties that are listed in or formally determined to be eligible for listing in the California Register of Historical Resources;
- Presumptive historical resources: properties that are designated in an officially established local register, recognized by local ordinance, resolution, or general plan, or identified in a local survey prepared in accordance with PRC §5024.1(g), unless determined not to be historically or culturally significant by the lead agency upon a preponderance of the evidence;
- Discretionary historical resources: properties that are determined to be historically significant in the lead agency's discretion, independent of any decision to list or designate them in a national, state, or local register of historical resources.

The Buffalo Inn falls within the third category and was thus evaluated under the appropriate criteria as a part of the study (see further discussion of the evaluation under Comment 16).

Comment D-1-16: The commenter provides a criterion-by-criterion argument for California Register eligibility under Criteria 1 through 3, citing Route 66 events and patterns, notable visitors, and Craftsman/fieldstone architecture comparable to Claremont's Russian Village.

Response to Comment D-1-16: Mr. Caughman states: “The significant contributions to Broad Patterns of California history and cultural heritage is that it was a Roadside Café and Inn during the heyday of California Route 66 where people stopped to rest, eat and drink.” Agreed. In Comment 15 above, Mr. Caughman provides a list of the Buffalo Inn's merits, and in this one he adds his thoughts based on the California Register criteria. As discussed in the report and summarized here, the historic value of the Buffalo Inn as a long-lived local establishment and its association to Route 66 is not in dispute, and thus the Buffalo Inn would meet Criterion 1, but the issue is the loss of historical integrity that compromise that historical association.

Mr. Caughman notes a number of well-known personalities and celebrities who spent time at the property. However, to meet Criterion 2, there would need to be documented evidence that the property is closely associated with their productive lives or important contributions in their respective professional fields. None of the other persons identified during the study appear to rise to a level of recognized importance to be eligible under Criterion 2.

Criterion 3 requires a property to represent an important example of a style, type, period, region, or method of construction, represents the work of an important creative individual, or possesses high artistic values. While the buildings of the Buffalo Inn do demonstrate the basic characteristics of certain architectural style, period, and method of construction from the early 20th century, they have not been documented as important or particularly notable specimens. Therefore, they do not meet Criterion 3.

Criterion 4 usually applies to archaeological resources, but it also can be added that the history of Route 66 is exhaustively documented, to which the Buffalo Inn in its current condition would be unlikely to contribute new, important data. Furthermore, as recommended in the report, the history of the Buffalo Inn would be further preserved by the scaled mapping, photo-documentation and curating of the collected materials, along with the report, at pertinent repositories.

Comment D-1-17: The commenter asserts the Buffalo Inn's contemporary is as it was intended historically and should remain a place for travelers and local enjoyment; the commenter notes the reports use of San Bernardino Valley is incorrect and suggests San Gabriel Valley.

Response to Comment D-1-17: There is general agreement on this point. Regarding the division between the San Bernardino Valley and the San Gabriel Valley, it is usually considered to be the Pomona Valley, leaving the Upland area on the western edge of the San Bernardino Valley.

Comment D-1-18: The commenter discusses the food offerings and menu items, disputes that alteration to the main restaurant building resulted in a Chalet-style design, mentions to signage and questions what demonstrable theme or pattern would be required to maintain an association to Route 66.

Response to Comment D-1-18: Mr. Caughman's comment addresses the food and camaraderie, which we have no disagreement with. The large sign is a post-1974 addition. In Mr. Caughman's reference to pattern, it appears he means in terms of architectural design, which is not the sense the word is used for in the evaluation. A "pattern of events" is that context refers to a recognizable historical theme.

Comment D-1-19: The asserts that the Buffalo Inn was a "legendary" and sought out place, visited by thousands, including the famous, with notable Craftsman architecture, and has "great promise" if it remains in use as in the past.

Response to Comment D-1-19: These comments are addressed in response to Comment 3, 24 and 25.

Comment D-1-20: The commenter addresses a specific entry in the report site record, P3a, where it is noted that Buffalo Inn did not offer lodging.

Response to Comment D-1-20: The statement in the site record (Appendix 3 in the report) is there to clarify that lodging was not available. Inns, motels, motor courts, etc., had their own role as contributors to Route 66.

Comment D-1-21: The commenter addresses specific entries in the report site record, B1, B10, and P3, and reiterates comments pertain to Craftsman-style architecture and continuous use of the Buffalo Inn name and its use as a stop by Route 66 travelers.

Response to Comment D-1-21: These comments are addressed in Comments 3, 24, and 25.

Comment D-1-22: The commenter addresses a specific entry in the report site record, B6, and notes the original menu offerings served for lunch were still available in recent times.

Response to Comment D-1-22: The original building sported clear signage announcing travelers that “lunch” was available (see photograph response to Comment 25), drawing an easy connection to services important to Route 66. The few items that were included in the report were to be informative but not meant to be exhaustive or in contrast to any other time, such as in 1931 when the Buffalo Inn specialized in Indian food and chicken.

Comment D-1-23: The commenter asserts the original restaurant building still stands, clad in shiplap siding and is relatively unaltered.

Response to Comment D-1-23: Architectural detail is addressed in responses to Comments 3, 24 and 25.

Comment D-1-24: The commenter revisits site record entry B6 to assert that California Chalet and a Wyoming Chalet styles are Craftsman style, that the dormers were present in 1977, asserts the use of “bar food” does not represent the totality of the menu, and that Buffalo Inn is a “true representation of what you would see on Route 66 in the early 60’s.

Response to Comment D-1-24: Item B6 in the site record pertains to whether the Buffalo Inn retains sufficient historical characteristics to be considered a contributor to the historic significance of Route 66. The following is a partial reiteration of the response to Comment 3:

Any feature of the Buffalo Inn as an early diner with a direct association to Route 66 would carry heightened historical significance had it remained sufficiently intact to convey that significance. This has not been the case. Most conspicuously, extensive alterations to the original firwood restaurant building occurred after the end of the period of significance, namely 1974, when Interstate 10 was completed and Route 66 became localized in use as opposed to being the “Mother Road” for long distance travel. Significant alterations occurring outside the period of significance can diminish the overall integrity of a property and may include large additions, altered original fenestration patterns, replacement exterior cladding,

or removal of some buildings or structures within a complex. The Buffalo Inn has been the recipient of all of these changes through the addition of numerous lean-tos, extensions, dormers, sealed openings, but most clearly through a post-1974 chalet-style remodel. As such, its integrity of design, materials, workmanship and feeling as they relate to Route 66 has been compromised, as the Buffalo Inn no longer evokes a 1920s-1950s Route 66 roadside café or traveler stop. Meanwhile, ongoing development in recent times has weighed on the setting of Route 66 itself as it increasingly becomes an altered urban commercial corridor with paved parking and modern surroundings.

Neither California Chalet or Wyoming Chalet are typically considered Craftsman style architecture, though there can be significant overlap to add confusion—especially with the California version. A California Chalet is typically an American adaptation of Swiss Chalet style, while Wyoming Chalet emphasizes dramatic pitched roofs, timber elements and stonework. The use of “bar food” is not pejorative; it is a convention used to indicate typical fare offered in casual eating establishments where food is optional.

Comment D-1-25: The commenter summarizes the Craftsman design elements of the Buffalo Inn and asserts the use of fieldstone in the area is common but rare on Route 66.

Response to Comment D-1-25: In our professional opinion, although the original design of the one-story Buffalo Inn main building exhibited a few Craftsman elements, such as broad eaves and exposed rafter tails few, it lacks many others, such as a raised porch and front entry sheltered by a broad roof overhang supported by pier or columns. In any case few of its original architectural design elements exist today. In fact, questions remain regarding whether the current building is the same as the one in the photograph (see below) despite diligent background research. As written in the report: “The 1929-1931 photograph also shows a second building that may be the westernmost building currently on the property or, if the original café building did not survive, could be the restaurant standing today, but historical research and a comparison of building scales and aerial photographs could not definitively document either scenario, in part due to extensive alterations.”

As for the rest of the buildings, Craftsman or Bungalow style certainly applies. Their potential to be historically significant is as residential buildings dating to between 1929-1938 (1948 for the garage). They are in reasonable condition, but none of them represents a notable, unique or exceptional example of their style, nor are they known to have been occupied by any person or designed by any architect or builder of recognized importance in history. Field stone, flagstone, and shiplap cladding are not uncommon to the style and there are many good examples in the City of Upland, as Mr. Caughman notes. As such Craftsman or Bungalow-style buildings dating to this period and utilizing these materials are not considered rare, nor would they be elevated in importance due to their location along Route 66. In fact, residential properties do not fall within in any of the contexts developed for the MPDF.

Comment D-1-26: The commenter concludes that demolition of the Buffalo Inn would be an adverse effect and a loss to Route 66 and the City of Upland, and urges preservation.

Response to Comment D-1-26: The final section of Mr. Caughman's comments touches on a number of subjects, among which the most pertinent to the Buffalo Inn is the need to protect the remaining historical character of Route 66, which is a sentiment that we share with Mr. Caughman. In the meantime, we recognize that Route 66 is a working component of the modern transportation infrastructure and a "living entity" that has undergone extensive transformation in overall appearance since the end of its established period of significance. The segment across the project vicinity, for example, has received a landscaped median and seen much redevelopment along its course, so much so that it would no longer be considered representative of the historical character of the "Mother Road" in its heyday, especially when compared to other segments of the historic highway that remain more intact in less developed areas.

Overall, we do not believe there is a major difference of opinion between us and Mr. Caughman in recognizing the local historical value of the Buffalo Inn, as discussed in the final conclusion of our report (p. 20). The difference stems primarily from our technical conclusion under CEQA provisions that the Buffalo Inn does not meet the statutory/regulatory definition of a "historical resource." It has been not listed in the California Register of Historical Resources, formally determined eligible for such listing, or designated by the City of Upland as being historically significant, and thus it does not constitute a "historical resource" in the "mandatory" or "presumptive" categories. Balancing its level of significance and level of integrity, we conclude that the Buffalo Inn does not appear eligible for listing in the California Register. As such, it does not constitute a "historical resource" in the "discretionary" category, either.

COMMENT E FROM NATASHA WALTON (Email dated June 4, 2026)

From: Natasha Walton <notlaw2018@gmail.com>
Sent: Thursday, June 4, 2026 4:02 PM
To: Joshua Winter <jwinter@uplandca.gov>
Subject: [EXTERNAL] Buffalo Grove Specific Plan Project

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COMMENT E-1

Dear Mr. Winter:

Please accept my comments regarding the Buffalo Grove Specific Plan project. I am a wildlife biologist with extensive experience surveying for bats and birds in California. I am also very familiar with our native California flora and other types of fauna.

I appreciate that the project proponent analyzed the biological resources for this project and will be conducting western burrowing owl and nesting bird surveys prior to construction as part of their mitigation measures.

COMMENT E-2

However, I ask that the mitigation measures (MM) also include the following items:

1) Please add to the nesting bird preconstruction survey measure (MM BIO-2) that these surveys must be performed within 3 days prior to all ground-disturbing activities of vegetation removal and that they should be carried out regardless of the date since birds are now nesting at all times of the year as our weather becomes warmer. Please consult with the California Department of Fish and Wildlife (CDFW) on the most recent survey protocols. Also add appropriate nesting buffers to restrict construction until birds have fledged if nesting birds are found. Typically these buffers are 300 feet for passerines and 500 feet for raptors

COMMENT E-3

2) Please add a measure to include Crotch's bumblebee surveys within one year prior to any ground-disturbing activities according to CDFW 2023 Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species (<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline>). Surveys should be conducted between March 1 and September 1 when the species is most likely to be detected above the ground. The biological report for this project verified that flowering plants used by Crotch's bumble bee are present on the site and that this species has some

potential to be foraging on the site (table 5) . In addition, this report describes/shows rodent burrows, rubble, and other areas where this bee could nest or overwinter.

COMMENT E-4

3) Please conduct a more thorough preconstruction bat habitat assessment and conduct bat night-time emergence surveys. CDFW often requires emergence surveys 14 days prior to tree and structure removal and all construction activities. Photos 9 through 11 of the biological report show old buildings and trees that could be used by bats for both day and night roosts. Habitat assessments should include searches for bat guano, urine staining, and culled insects and up close photos of areas being surveyed for day and nights. If bats are detected in the area, I suggest that trees be removed in phases per recommendation of CDFW. Please consult with CDFW if bat signs are found and avoid carrying out project activities during the bat maternity season which typically runs from April 1 to August 31.

COMMENT E-5

4) Please include native shade trees (such as oak species) and other native vegetation throughout the project site to provide shade and habitat for wildlife being displaced by the project.

COMMENT E-6

5) Please expand the common open space area for the project site from 2,858 square feet to at least 10,000 square feet so that residents have a larger outside area to enjoy.

Thank You,

Natasha Walton, M.S.

Upland Resident

RESPONSE TO COMMENT E FROM NATASHA WALTON

Comment E-1: This is an introductory comment stating the commenters experience as a wildlife biologist. The commenter states that although they appreciate the project proponents' efforts to analyze impacts on biological resources and conduct additional surveys per the required mitigation measures, they request the mitigation measures be revised as recommended in their comments.

Response to Comment E-1: The city appreciates receiving the comments. Responses to specific comments are addressed in the following responses.

Comment E-2: This comment requests: 1) Clarification on the parameters of the pre-construction nesting survey; 2) Nesting surveys to be conducted beyond the currently established avian breeding season; 3) Explicit consultation with CDFW protocols; 4) The inclusion of specific nesting buffers (suggested to be 300 feet for passerines and 500 feet for raptors).

Response to Comment E-2. The current mitigation measure for nesting birds is consistent with established regulatory practices and provides all necessary protections required by the Migratory Bird Treaty Act and California Fish and Game Code. The requirement for a pre-construction survey serves as a trigger for agency-standard avoidance protocols. The term 'pre-construction' is a technical standard that inherently requires a survey to be conducted within an immediate timeframe prior to ground disturbance (typically within 72 hours) to ensure accuracy and regulatory compliance. Therefore, explicit duration constraints are not required in the mitigation measure, as professional biological standards already dictate this methodology. In the event that active nests are identified, the biologist is mandated to establish appropriate avoidance buffers to ensure no take occurs. It is not necessary to establish specific buffer distances in the mitigation measure, as these requirements must be determined on a case-by-case basis upon nest discovery by a qualified biologist to account for species variation in sensitivity, nest location, and local site conditions. Furthermore, the request to extend the survey requirement beyond the established seasonal windows is unwarranted. Our project adheres to the defined seasonal regulatory standards; applying an expansive, year-round blanket requirement exceeds current project-level needs and industry standards for this region. The existing mitigation framework is legally robust and operationally sufficient. The comment does not raise an issue regarding the adequacy of the ISMND, and no revisions to the ISMND are required.

Comment E-3: The comment requests: a multi-visit, protocol-level survey season for Crotch Bumble Bee (between March 1st and September 1st; pursuant to the CDFW 2023 Survey Considerations for CESA Candidate Bumble Bee Species protocol. This request is based on the presence of flowering plants and microhabitat features (rodent burrows, rubble) and other features identified during the survey conducted by HANA.

Response to Comment E-3: While the Biological Resource Evaluation (BRE) notes a "Low Potential" for occurrence in Table 5 (*Special-Status Wildlife Species*) based on regional proximity of the Crotch's Bumble Bee and occurrence data, a distinction must be made between transient foraging habitat with limited foraging potential and viable habitat capable of supporting colonial nesting or overwintering behaviors.

Referring to the survey data and photos compiled within the BRE (*Appendix A-Site Photographs*), it can be readily observed that the makeup of the site is overwhelmingly composed of invasive weed species such as Maltese star-thistle, short-pod mustard, non-native bromes and grasses [*please see Photos 3 through 6, which are representative photographs of the ruderal clearing that makeup the majority of the site*]. These are species typically omitted by Crotch's bumblebee due to the species' highly selective foraging preferences.

Certain native species documented within the BSA are either restricted to highly fragmented, micro-scale cracks in the asphalt along the perimeter [*please see Photo 12 and 14*] (representing less than 5% of the total absolute cover within the BSA) or they consist of strict early-season spring annuals, such as fiddleneck (*Amsinckia menziesii*), that die back by late spring [*please see Photo 13*]. Adequate forage cover is intermittently dispersed within the project site, rather than present as an established field or continuous clearing. While it is true that some features such as rock piles, animal burrows, and debris may provide refuge, that alone does not translate to a viable, quality habitat when the site lacks the necessary native food resources in the concentrations required. Since Crotch's bumblebee colonies require continuous, multi-month successions of blooming native floral resources extending from March through September to sustain their lifecycle, isolated native patches or temporary spring flashes of native annuals cannot support a persistent nesting structure. At most, these patches offer transient foraging opportunities for passing individuals, which does not equate to sustainable or viable colonial habitat and would mean that deploying a full-scale, seasonal survey protocol is disproportionate to the actual biological resources present on-site. The comment does not raise an issue regarding the adequacy of the ISMND, and no revisions to the ISMND are required.

Comment E-4: The commenter requests a more thorough preconstruction bat habitat assessment and night-time emergence surveys, noting that CDFW often requires emergence surveys 14 days prior to tree and structure removal, and states that Photos 9 through 11 of the biological report show old buildings and trees that could be used by bats for day and night roosts.

Response to Comment E-4: As documented during the initial biological survey, the subject structures and trees are subjected to intense, ongoing environmental stressors that heavily discourage bat colonization. The structures are directly adjacent to Foothill Boulevard, a major arterial roadway that generates continuous traffic noise and acoustic vibrations. Furthermore, the buildings exhibited signs of human disturbance, including broken fencing, accumulation of refuse, and clear evidence of frequent transient occupancy (e.g.,

breached door boarding, mattresses, and interior materials). Bats are highly sensitive to active human disturbance and low-frequency urban noise, rendering the site structurally unsuitable for colonial roosting. Additionally, a search of the California Natural Diversity Database (CNDDB) revealed no modern records (within the past 20 years) of special-status bat species within a 3-mile radius of the Biological Studies Area (BSA). Because the initial daylight survey found zero physical indicators of bat presence (e.g., culled insects, urine staining, or guano) and determined the habitat quality to be negligible, mandatory night-time emergence surveys are biologically unwarranted. The comment does not raise an issue regarding the adequacy of the ISMND, and no revisions to the ISMND are required.

Comment E-5: Please include native shade trees (such as oak species) and other native vegetation throughout the project site to provide shade and habitat for wildlife being displaced by the project.

Response to Comment E-5:

The project's conceptual landscape plan includes native shade trees and native vegetation throughout the site. Approximately 38% of the listed species are California native. The California native species shown include Western redbud, desert willow, California sycamore, coast live oak, valley oak, big berry manzanita, coffeeberry, sugar bush, white sage, hummingbird sage, coyote brush, Cleveland sage, sand dune sedge, creeping red fescue, Baltic rush, Canyon Prince wild rye, creeping wild rye, purple needlegrass, blue grama, and Little Sur manzanita. The Upland Municipal Code requires [CLIENT: insert required landscape/shade coverage, e.g., minimum landscaped area and parking lot shading percentage], and the project provides [CLIENT: insert provided landscaped area/shading]. Project landscaping is required to comply with the City of Upland Municipal Code landscape standards and the State Model Water Efficient Landscape Ordinance (MWELO), which will be verified through the City's plan check process. The comment does not raise an issue regarding the adequacy of the ISMND. No further response is required.

Comment E-6: Please expand the common open space area for the project site from 2,858 square feet to at least 10,000 square feet so that residents have a larger outside area to enjoy.

Response to Comment E-6: This comment does not pertain to an environmental impact under CEQA. The comment is included in the administrative record and will be considered by the Planning Commission separate from CEQA. No revisions to the ISMND are required.