

**Delivered via Electronic Mail**

Michael Poland  
City of Upland  
Contract Planning Manager  
460 N. Euclid Avenue  
Upland, CA 91786

**PEER REVIEW OF GREENHOUSE GAS TECHNICAL REPORT FOR  
THE BRIDGE UPLAND PROJECT  
UPLAND, CALIFORNIA**

Dear Mr. Poland:

Ramboll completed a peer review of the Bridge Point Upland Project Greenhouse Gas (GHG) Emissions Assessment that was included as part of the *Bridge Point Upland Mitigated Negative Declaration (MND)*, dated December 3, 2019. Ramboll also peer reviewed the updated GHG analysis prepared in response to comments on the MND.

As background, Ramboll is a leading engineering, design and consultancy company employing 15,000 experts that works across the markets: Buildings, Transport, Planning & Urban Design, Water, Environment & Health, Energy and Management Consulting. Ramboll's air quality professionals apply cutting-edge science and methodologies to the development of tailored solutions to facility, local and regional air quality issues. We helped develop the South Coast Air Quality Management District's (SCAQMD) preferred GHG emissions model, CalEEMod®, which was used to develop the GHG emissions inventory for the Project.

As described below, our peer review confirms that the information contained in the GHG Report was prepared using the most-recent, agency-recommended model consistent with SCAQMD guidance and industry standards for estimating GHG emissions and environmental impacts under CEQA. The updated GHG Report estimates the project's GHG emissions while taking into account mitigation measures and project design features that the project will be required to implement. Although the MND did not identify a significant GHG impact, the project has committed to further reducing GHG emissions by installing solar panels (to achieve net zero electricity), installing EV chargers, planting trees and other measures. The project's GHG emissions would continue to be below the significance threshold identified in the MND. The GHG Report also demonstrates that the project's GHG emissions would be below 3,000 metric tons of CO<sub>2</sub>e per year.

**1. Emissions Inventory**

Ramboll reviewed the emissions inventory as reported in the MND and the responses to comments and found that the GHG analysis was prepared using the most-recent, agency-recommended model, consistent with SCAQMD guidance and industry standards for estimating GHG emissions and environmental impacts under CEQA. The emissions inventory reasonably represents the potential GHG emissions from the Project as required for CEQA. The MND relied upon the modeling tool,

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Ramboll  
5 Park Plaza  
Suite 500  
Irvine, CA 92614  
USA

T +1 949 261 5151  
F +1 949 261 6202  
[www.ramboll.com](http://www.ramboll.com)

CalEEMod® to generate the GHG emissions inventory. CalEEMod® was developed by the SCAQMD in consultation with other air districts and has become the industry standard for estimating GHG emissions for CEQA projects. In addition to using CalEEMod®, the analysis also used available Project specific information to ensure that the emissions inventory reasonably represents the Project including, land use subtypes and quantities, mobile trip rates, fleet mix assumptions, on-site equipment (i.e., forklifts), and assumptions to reflect water and solid waste reductions related to code compliance.

In response to comments on the GHG analysis included in the Draft MND, we understand that updates to the GHG analysis were made which included the following:

- a. Updates to the existing emissions inventory;
- b. A more accurate utility emission factor;
- c. Incorporation of the GHG reduction from electric vehicle chargers;
- d. Incorporation of the GHG reduction from solar panels;
- e. Incorporation of electric forklifts instead of compressed natural gas forklifts; and
- f. Incorporation of the increased carbon sequestration based on the Project's commitment to planting of trees.

We reviewed these updates, and they are appropriate based on the information available. It is common to refine an analysis to more accurately represent a project's GHG emissions inventory, notably in response to comments. The specific updates as to additional mitigation measures proposed are discussed further below.

## **2. Thresholds of Significance**

Ramboll also reviewed the GHG significance thresholds used to assess the Project's GHG emissions. The MND uses a 10,000 metric ton (MT) of carbon dioxide equivalent emissions (CO<sub>2</sub>e) per year threshold to assess significance of the Project.

The SCAQMD has not adopted a GHG significance threshold that applies to most land use development projects. The 10,000 MT CO<sub>2</sub>e per year threshold was adopted to capture 90 percent of total emissions from all new or modified industrial (stationary source) projects.<sup>1</sup> A 3,000 MT CO<sub>2</sub>e per year value was proposed as a screening threshold for land use development projects but was never adopted in any form by SCAQMD. In the absence of an adopted threshold, the lead agency has discretion to select a significance threshold. Thus, in this context, many lead agencies have applied the 10,000 MT CO<sub>2</sub>e per year as a significance threshold because it was adopted by SCAQMD.

Various lead agencies have used different approaches as a GHG significance threshold for warehouse development projects, including relying on the 10,000 MT CO<sub>2</sub>e per year significance threshold. Thus, based on our assessment of the current state of the GHG CEQA practice, the MND approach to assess the significance of GHG emissions using 10,000 MT CO<sub>2</sub>e per year is consistent with the current common approaches by lead agencies to evaluate a warehouse project's GHG emissions under CEQA. Moreover, in the response to comments, the Updated GHG Report demonstrates that the Project's GHG emissions would be below 3,000 MT CO<sub>2</sub>e per year even if that threshold were applicable. Based on our peer review, the MND used a common approach to determine that the Project's GHG emissions would be less than significant, and the responses to comments used an even more conservative

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<sup>1</sup> Available at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds>. Accessed: January, 2020.

approach by incorporating Project Design Features to further reduce GHG emissions below 3,000 MT CO<sub>2</sub>e.

### 3. New Project Design Features

The following new project design features (PDFs) have been added as requirements of the project in response to comments:

- PDF-GHG-1: The project shall install 0.75 MW of rooftop solar; this equates to approximately 55,000 square feet of roof space; however the total square footage may vary provided that 0.75 MW of power is achieved.
- PDF-GHG-2: The project shall provide electric vehicle (EV) charging stations to service 30 parking spaces.
- PDF-GHG-3: The project shall provide the following EV-ready spaces, i.e. install, at a minimum, conduits for future plug-in of EV chargers; providing EV-ready spaces allows installation of the latest technology chargers at the time that electric delivery vans and trucks become operational, rather than installing charging stations immediately that become obsolete at the time that electric vans and trucks become used:
  - 50% of auto stalls, including 100% of ADA stalls
  - 100% of van parking stalls
  - 100% of trailer parking stalls
  - 100% of dock doors
  - 100% of van positions at van loading areas at north and south sides of the building
- PDF-GHG-4: The project shall include 1,000 trees throughout the parking lot and landscaped areas around the project site.
- PDF-GHG-5: The project shall use all electric powered forklifts.
- PDF-GHG-6: Electric landscaping equipment, such as lawn mowers and leaf blowers, shall be used on-site.

The new required measures described above incorporate the ideas and concepts that are important for warehouses. Notably, the Project has included substantial efforts to electrify onsite vehicles (i.e., forklifts); promote the conversion to electric vehicles (EVs); and to utilize roof space for solar photovoltaics (PV). The inclusion of 30 EV chargers far exceeds the current requirements to facilitate the conversion of electric vehicles. To illustrate this, note that for non-residential projects with more than 200 parking spaces, the 2019 California Green Building Standards Code, Title 24, Part 11 (CalGreen) requires only 6% of the total parking spaces be EV-capable spaces – meaning that they have the EV infrastructure in place, but chargers are not required - meeting the following:<sup>2</sup>

- Plan design shall be based on 40-ampere minimum branch circuits
- Electrical calculations shall substantiate the design of the electrical system, to include the rating of equipment and any on-site distribution transformers and have sufficient capacity to simultaneously charge all required electric vehicles at its full rated amperage.

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<sup>2</sup> Available at: <https://codes.iccsafe.org/content/CAGBSC2019/chapter-5-nonresidential-mandatory-measures>. Accessed: January 2020.

- The service panel or subpanel(s) shall have sufficient capacity to accommodate the required number of dedicated branch circuit(s) for the future installation of the EV chargers.

The Project goes above and beyond by installing the circuitry, wiring, and the actual EV chargers themselves, and thus promoting greater EV use.

The Project has also committed to making 50% of all auto stalls (including 100% of ADA stalls), 100% of delivery vehicle (i.e., van) stalls, 100% of trailer parking stalls, 100% of dock doors, and 100% of delivery vehicle loading areas EV-Capable, meaning all the EV infrastructure will be installed with project construction. This is far beyond what is required by the Title 24 code and will support future electrification of delivery vehicles.

The Project has also included the installation of solar panels. The Project has committed to being zero net electricity, which far exceeds the current Title 24 code for warehouse buildings.

### **CONCLUSION**

Ramboll's review finds that the GHG analysis included in the MND and responses to comments was prepared using the most-recent, agency-recommended model consistent with SCAQMD guidance and industry standards and represents a reasonable representation for the Project. The analysis appropriately considers the potential for a significant impact and incorporates mitigation measures that effectively reduce the GHG emissions associated with the Project. Ramboll agrees with the conclusions of the MND that the project's impacts would be less than significant.

Yours sincerely,



**Eric Lu, MS, PE**  
Principal

D 949-798-3650  
[elu@ramboll.com](mailto:elu@ramboll.com)



**Shaena Ulissi, MS**  
Managing Consultant

D 415-426-5033  
[sulissi@ramboll.com](mailto:sulissi@ramboll.com)