



February 6, 2020  
(2020-020)

Robert Dalquest, Development Services Director  
City of Upland, Development Services Department  
460 N. Euclid Avenue  
Upland, CA 91786  
Via email: [rdalquest@ci.upland.ca.us](mailto:rdalquest@ci.upland.ca.us)

**RE: Third-party Review Comments on the Draft Mitigated Negative Declaration for the Bridge Point Upland Project**

Dear Mr. Dalquest:

ECORP Consulting, Inc. (ECORP) is pleased to submit comments on the Draft Initial Study/Mitigated Negative Declaration (IS/MND) and related documentation for the Bridge Point Upland Project.

Our comments are provided as a general peer review of the IS/MND for CEQA adequacy and conformance with professional standards, along with several attachments that review key technical studies prepared to support the IS/MND. These attachments include:

- ◆ **Attachment A: Air Quality Assessment and Greenhouse Gas Emissions Assessment Peer Review (ECORP)**
- ◆ **Attachment B: Noise & Vibration Study Peer Review (ECORP)**
- ◆ **Attachment C: Habitat Assessment Peer Review (ECORP)**
- ◆ **Attachment D: Traffic Impact Analysis Peer Review (Fehr & Peers)**

As a general observation, the IS/MND appears to have been prepared as an unbiased, objective statement of the impacts that would be anticipated from a warehouse type project of approximately the same size in a similar urban setting. For the most part, the analysis and impact conclusions appear to be supported by substantial evidence and sources referenced in the document. These sources include the General Plan, areawide plans, and project-specific technical documentation. The IS/MND includes the required contents under CEQA.

### **Draft Initial Study/Mitigated Negative Declaration**

Our comments in review of each section of the Draft IS/MND follow below. These comments are offered to strengthen the information and evidence presented in the IS/MND, but do not identify substantial errors or omissions that reflect on the overall CEQA adequacy of the document.

**II. Description of Proposed Project.** The description of the Building Design should be supported by elevations of the warehouse building on all four sides, providing a representation of building architecture, massing and height. The Landscaping summary would benefit from additional detail as

to tree types, particularly as to screening of the van loading areas. The Construction timeline of 7 months within 2020 appears to be particularly aggressive. Though not a part of the Project, is removal of existing sand, gravel and rock stockpiles factored in, along with remaining site demolition, site preparation, grading, construction, paving and painting included in this timeline? The project description should also describe infrastructure, including the onsite LID retention/water quality treatment system and offsite mainline storm drain extension. If proposed, any fuel storage and/or fleet vehicle maintenance facilities for vans should be identified. An estimate of the number onsite employees at the warehouse/parcel delivery site on a daily basis would be useful to support utility demand, risk of hazard, and traffic/parking analysis in other sections of the IS/MND. Project Design Features (PDF) should be identified under the Project Description or listed with the Mitigation Measures under a separate Project Design Features heading.

**IV. Environmental Factors Potentially Affected.** It appears the Transportation box should be checked with inclusion of Mitigation Measure TRAF-1 Benson Avenue/Baseline Road.

**Aesthetics.** Substantial evidence is provided to support the conclusions that impacts are less than significant or no impact. The discussion supporting the finding that the Project does not result in a substantial impact on views of the San Gabriel Mountains is adequately supported.

**Agricultural and Forestry Resources.** The No Impact conclusions are adequately supported with standard references and facts.

**Air Quality and Greenhouse Gas Emissions.** Adequacy of the air quality and greenhouse gas (GHG) analysis in the IS/MND and supporting Air Quality Assessment and Greenhouse Gas Emissions Assessment is addressed in Attachment A. With the City's Responses to Comments, additional project design features for Air Quality (PDF-AQ-1, PDF-AQ-2) and Greenhouse Gas Emissions (PDF-GHG-2, PDF-GHG-3) are added, providing additional support for Draft IS/MND findings. The review finds that the Air Quality and Greenhouse Gas analyses are adequate and fully defensible under CEQA.

**Biological Resources.** A review of the biological resources section of the project IS/MND, the Habitat Assessment, and results of a supplemental biological survey is included as Attachment B. The review concludes that with the additional Mitigation Measures BIO-2 and BIO-3 potential impacts of the project on biological resources would be reduced below the level of significance under CEQA.

**Cultural Resources.** We find no indication of a project-specific cultural records search or reference to a Cultural Resources Report in this section or the Appendices. Given the anticipated maximum depth of excavation (i.e. up to 25 feet bgs), it is reasonable to assume the possibility of undiscovered subsurface resources. Nevertheless, adequate mitigation measures for potential impacts to undiscovered resources and human remains are identified in the IS/MND.

**Energy.** The conclusions that energy resources impacts are less than significant are strengthened with the addition of design features or mitigation measures requiring EV charging stations, EV van fleets, and solar PV roof for the warehouse buildings. The analysis in the Greenhouse Gas Emissions section provides additional support for the energy impact conclusions.

**Geology and Soils.** Reliance upon conformance with the Geotechnical Investigation Report as mitigation for identified soil conditions is appropriate. If available, evidence should be provided of depth to groundwater if encountered with boring at the site.

**Hazards and Hazardous Materials.** The response to issue a) regarding routine transport, use, or disposal of hazardous materials, would be strengthened with an explanation as to why hazardous materials associated with operation of warehouse/parcel delivery service facility are differentiated from a traditional warehouse facility, which may involve transport and storage of hazardous materials other than the common hazardous materials listed (i.e. cleaners, paints, solvents, fertilizers and pesticides). This would provide additional support for impact conclusion for issue areas b) and c) that follow. With regard to issue e), to respond to public comments concerning Project location within Airport Compatibility Zones C1, C2, C3, a Figure 4 enlargement of these zones, the project boundary and warehouse building footprint, is needed. An affirmative statement indicating use of drones for parcel delivery is not proposed, or if subsequently proposed would require further environmental review, possibly pursuant to a CUP. The response to issue f) regarding emergency evacuation during construction, could also reference PDF NOI-1. Construction Management Plan, for additional support. The discussion under issue g) concerning risk involving wildland fires fails to indicate why the Project site is included in a Very High Fire Hazard Severity Zone (VHFHSZ) on the LRA Map and General Plan Exhibit 5.14.-1.

**Hydrology and Water Quality.** The Less than Significant and No Impact conclusions [a) through e)] are generally well supported by discussion of existing conditions, drainage plans and Project features. Under issue c)(i), the explanation of why the Project would not result in substantial erosion or siltation on- or off-site is not explicitly provided. Under the Cumulative Impacts discussion, are there projects downstream of the Proposed Project that are approved and pending implementation that would contribute additional storm flows to storm drains downstream of the Project site? If so, have these cumulative projects been taken into account in the storm drain capacity analysis?

**Land Use and Planning.** The impact conclusions of Less than Significant and No Impact for issues a), b), and c) are supported by the analyses.

**Mining.** The impact conclusions of Less than Significant for issues a) and b) are adequately supported by the analyses.

**Noise.** Adequacy of the noise analysis and supporting Noise & Vibration Study is addressed in Attachment C. The review finds the acoustical analysis is adequate and fully defensible under CEQA.

**Population and Housing.** The analysis under issue a) regarding unplanned population growth makes references to "the relatively small number of jobs created by the proposed Project compared to those on a regional basis". An estimate of the number of jobs created by the Project should be provided.

**Public Services.** The impact conclusions of Less than Significant and No Impact for issues a) (i through v) are adequately supported by the analyses.

**Recreation.** The impact conclusions of No Impact for issues a) and b) are supported by the analyses. The statement that a warehouse project is not subject to a Development Impact Fee (DIF) should be confirmed.

**Transportation.** A map of the locations of the projects in the vicinity of the Proposed Project is needed that corresponds with Table 27, Cumulative Projects. The Traffic Impact Analysis Peer Review by Fehr & Peers is attached (Attachment D).

**Tribal Cultural Resources.** Compliance with AB 52 is demonstrated through the discussion of issue a) i and ii, and Mitigation Measures CR-1 through CR-7.

**Utilities and Service Systems.** The impact conclusions of Less than Significant for issues a) through f) are adequately supported by the analyses.

**Wildfire.** The impact conclusions of Less than Significant and No Impact for issues a) through d) are adequately supported by the analyses. Why is the Project site included in a Very High Fire Hazard Severity Zone (VHFHSZ) on the LRA Map and General Plan Exhibit 5.14.-1?

**Mandatory Findings of Significance.** As Mitigation Measure BIO-1 is proposed, Mandatory Finding a) is arguably Less than Significant with Mitigation. The Habitat Assessment and adequacy of proposed mitigation are reviewed as part of Attachment B. Cumulative Impacts (Finding b) are identified as Less than Significant here and in the individual IS/MND topical sections. Adequacy of the key Transportation, Air Quality, Greenhouse Gas, and Noise findings are considered in the corresponding Attachments to this review.

## Notice of Availability/Notice of Intent (12/16/19)

The NOA/NOI includes the required contents pursuant to CEQA Guidelines 15072 (g).

## Response to Comments

ECORP has reviewed the City's Responses to Comments (Draft). The responses are substantive, thorough and responsive to each of the comments provided by agencies and the public. The responses provide additional detail as to the operational characteristics of a Last Mile Delivery Station/Warehouse that facilitates the public's understanding of this type of facility and the factors that distinguish them from other Warehouse centers. The additional mitigation measures for Biological Resources (BIO-2, BIO-3), and project design features for Air Quality (PDF-AQ-1, PDF-AQ-2) and Greenhouse Gas Emissions (PDF-GHG-2, PDF-GHG-3) provide additional support for Draft IS/MND findings.

## Conclusions

In ECORP's estimation, the Draft IS/MND with Responses to Comments provide substantial evidence to support adoption of the MND. The additions to the Draft IS/MND do not appear to represent substantial revisions that would require recirculation of a negative declaration prior to adoption or preparation of an EIR pursuant to CEQA 15073.5. Section 15073.5 (d) states in part:

“(d) If during the negative declaration process there is substantial evidence in light of the whole record, before the lead agency that the project, as revised, may have a significant effect on the environment which cannot be avoided, the lead agency shall prepare a draft EIR and certify a final EIR prior to approving the project.”

The IS/MND and Responses to Comments indicate support of the conclusion that there are no significant effects on the environment which cannot be avoided. All impacts are thoroughly evaluated, and the IS/MND appears to be an appropriate environment document for the proposed Project. Please see Attachments A through D for additional CEQA adequacy and technical study review.

Should you have any questions, please do not hesitate to contact the undersigned at (909) 307-0046 or [folmos@ecorpconsulting.com](mailto:folmos@ecorpconsulting.com).

Sincerely,

**ECORP Consulting, Inc.**



Jesus “Freddie” Olmos

Senior Environmental Scientist/CEQA Group Manager

Attachments: A – Air Quality Assessment and Greenhouse Gas Emissions Assessment Peer Review  
B – Habitat Assessment Peer Review  
C – Noise & Vibration Study Peer Review  
D – Traffic Impact Analysis Peer Review



## ATTACHMENT A

### MEMORANDUM

**TO:** Robert D. Dalquest, Development Services Director, City of Upland

**FROM:** Seth Myers, Air Quality/GHG/Noise Analyst

**DATE:** January 31, 2020

**RE:** Peer Review of Bridge Point Upland Project Air Quality Assessment and Greenhouse Gas Emissions Assessment (December 2019)

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ECORP Consulting, Inc. (ECORP) has reviewed the Bridge Point Upland Project Air Quality Assessment and Greenhouse Gas Emissions Assessment included as appendices to the *Bridge Point Upland Initial Study/Mitigated Negative Declaration* dated December 2019 and prepared by Kimley-Horn. ECORP has also reviewed the associated Initial Study subsections, which are based on these appendices. Additionally, ECORP is familiar with the updated Supplemental Greenhouse Gas Emissions analysis prepared by Kimley-Horn in response to public comments received concerning the Project and contained within a memorandum dated January 24, 2020.

ECORP finds that the analyses are adequate and fully defensible under CEQA. All impacts are evaluated sufficiently, and a mitigated negative declaration is an appropriate environment document to represent Project impacts. In consideration of the related issues raised at the Joint Workshop on the CEQA Document with the City Council and Planning Commission, ECORP offers the following comments:

- a) Both the Air Quality Assessment and Greenhouse Gas Emissions Assessment meet regulatory requirements and "state of the practice" methods. A review of the CalEEMod modeling outputs do not show a change in operational trip length from 20 miles to 6.9 miles. All operational trip lengths rely on CalEEMod model defaults. It should be noted that the SCAQMD recommends adjusting CalEEMod model defaults associated with heavy-duty truck trip lengths accommodating cube warehouse projects to *the average distance between the Project site and the Port of Los Angeles/Long Beach, the Project site and the Banning Pass, the Project Site and the San Diego County line, the Project site and the Cajon Pass, and the Project site and downtown Los Angeles.* However, the nature of the Project as a "Last Mile" facility is ample justification for not instituting this recommendation in the case of the proposed Project.

Instead of adjustments to default operational trip lengths in CalEEMod, the construction-related trip lengths associated with hauling excess soil material from the site has been adjusted from a default value of 20 miles to 10 miles. This deviation of the model default is justified with the following statement: "*Export site is less than 1 mile from Project site*". Thus, modeling emissions based on haul trucks traveling 10 miles is conservative. (It is noted that "6.9 miles" represents the

CalEEMod model default for construction-related vendor trips, prepares this is related to the confusion.)

- b) It is considered appropriate to employ the threshold of 10,000 metric tons of CO<sub>2</sub>e annually in the case of the Project. As Ramboll notes in its January 27, 2020 Peer Review of the analysis, although this threshold was not specifically intended for such projects (it was initially intended for stationary source projects), it has evolved into an acceptable threshold through the “state of the practice” and has been consistently relied upon for several years. The use of this threshold will not draw critical comments from SCAQMD.

Nonetheless, the updated Supplemental Greenhouse Gas Emissions analysis prepared by Kimley-Horn mandates several mitigation measures that reduce the Project’s increase of greenhouse gas emissions from existing conditions to levels below 3,000 metric tons.

In summation, ECORP agrees with the conclusions of these analyses that the Project’s Air Quality and Greenhouse Gas Emissions-related impacts would be less than significant.



## **ATTACHMENT B**

### **MEMORANDUM**

**TO:** Robert D. Dalquest, Development Services Director, City of Upland

**FROM:** Donald Mitchell, Vice President, Southern California Operations

**DATE:** January 31, 2020

**RE:** Peer Review of Bridge Point Upland Project Habitat Assessment (November 2019) and Supplemental Biological Survey (January 2020)

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ECORP Consulting, Inc. (ECORP) senior biologists have reviewed the biological resources sections of the project's Initial Study/Mitigated Negative Declaration (IS/MND), the Habitat Assessment prepared by ELMT Consulting, Inc. (ELMT 2019), the results of a supplemental biological survey conducted by Rocks Biological Consulting (Rocks 2020), and comments on the biological resources sections of the IS/MND received by the City from the California Department of Fish and Wildlife (CDFW) and several members of the public. We also reviewed recent and historic (1994) aerial imagery of the project site. ECORP biologists did not conduct a site visit as part of this peer review.

ECORP agrees with most of the concerns raised in the comment letter from CDFW. Although the ELMT report generally accurately describes the relatively degraded/disturbed nature of the project site, it appears to mischaracterize the potential of the site to support burrowing owls, a California Species of Special Concern. In addition, the vegetation community description uses an outdated reference- Holland 1986 which is now generally relied on only to classify the very few plant communities not adequately described by more recent references.

We agree with the updates provided by Rocks 2020. Specifically, the description of the disturbed scale broom scrub on the site and the assessment that the site provides suitable, although quite disturbed, potential habitat for burrowing owls. Burrowing owls are known to occur in proximity to disturbance and development. In addition, California ground squirrels were observed and this species' burrows are known to be used by burrowing owls. Furthermore, the debris piles described and shown in photographs represent potential foraging perches for burrowing owls.

Although a delineation of waters potentially falling under the jurisdiction of the U.S. Army Corps of Engineers or CDFW (Aquatic Resources Delineation) was not conducted, review of aerial imagery and the results document in ELMT 2019 and Rocks 2020 show no evidence of jurisdictional waters.

Following the receipt of comment letters and the updated survey (Rocks 2020), the City revised the IS/MND, adding mitigation measures to offset the impacts to and loss of scale broom scrub. In addition, mitigation

measures were added to minimize or eliminate impacts to burrowing owls and other nesting birds protected under the Migratory Bird Treaty Act and consultation with CDFW, if burrowing owls are found, to develop any needed additional mitigation measures.

We believe that the mitigation measures proposed will reduce potential impacts of the project on biological resources below the level of significance under CEQA. Furthermore, based on the documentation provided, we believe that the project is unlikely to result in the violation of any relevant laws related to biological resources (e.g., Endangered Species Act, California Endangered Species Act, Clean Water Act, Migratory Bird Treaty Act).



## **ATTACHMENT C**

### **MEMORANDUM**

**TO:** Robert D. Dalquest, Development Services Director, City of Upland

**FROM:** Seth Myers, Air Quality/GHG/Noise Analyst

**DATE:** January 31, 2020

**RE:** Peer Review of Bridge Point Upland Project Acoustical Assessment (December 2019)

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ECORP Consulting, Inc. (ECORP) has reviewed the Bridge Point Upland Project Acoustical Assessment included as an appendix to the Bridge Point Upland Initial Study/Mitigated Negative Declaration dated December 2019 and prepared by Kimley-Horn. ECORP has also reviewed the associated Initial Study subsection, which is based on this appendix.

ECORP finds that the acoustical analysis is adequate and fully defensible under CEQA. All impacts are evaluated sufficiently, and a mitigated negative declaration is an appropriate environment document to represent Project impacts.

## ATTACHMENT D

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### TECHNICAL MEMORANDUM

**Date:** Updated 02.06.2020

**To:** Freddie Olmos, ECORP Consulting, Inc.

**From:** Jason D. Pack, P.E.

**Subject:** Upland Bridge Point Traffic Study Peer Review

OC20-1668

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Fehr & Peers has completed a peer review of the following documents in relation to the Upland Bridge Point Project:

- *Bridge Point Upland Project Initial Study/Mitigated Negative Declaration* (December 2019) – Section 17. Transportation
- *Summary of Responses to Public Comments on Bridge Upland's MND* (Received January 31, 2020)
- *Foothill Boulevard Warehouse Traffic Impact Analysis* (Translutions, Inc., November 15, 2019)
- *Evaluation of Additional Intersections Memorandum* (Translutions, Inc., January 26, 2020)
- *Supplemental Analysis Memorandum* (Translutions, Inc., February 6, 2020)

The findings of our updated peer review are noted below:

#### **Mitigated Negative Declaration Review**

##### Address SB 743

California Senate Bill (SB) 743 requires lead agencies under the California Environmental Quality Act (CEQA) to identify new methodologies for transportation analyses that will encourage "land use and transportation planning decisions and investments that reduce vehicle miles traveled [VMT] and contribute to the reductions in greenhouse gas emissions required in the California Global Warming Solutions Act of 2006."<sup>1</sup> SB 743 changes the way that significance related to traffic impacts will be determined under CEQA. The significance of traffic impacts under CEQA are changed from measuring impacts to drivers, to measuring the impact of driving. The change is being made by replacing Level of Service (LOS) with Vehicle Miles Traveled (VMT) for land use and transportation projects that will help reduce future VMT growth. This shift in transportation impact focus is expected to better align

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<sup>1</sup> California Legislative Information. 2013. *Senate Bill No. 743 CHAPTER 386*. Available: [http://leginfo.ca.gov/faces/billNavClient.xhtml?bill\\_id=201320140SB743](http://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=201320140SB743) Accessed: June 7, 2019.

transportation impact analysis and mitigation outcomes with the State’s goals to reduce greenhouse gas (GHG) emissions, encourage infill development, and improve public health through more active transportation.

In January 2019, the Natural Resources Agency finalized updates to the CEQA Guidelines including the incorporation of SB 743 modifications. The Guidelines changes were approved by the Office of Administrative Law and are now in effect. Specific to SB 743, Section 15064.3(c) states, “A lead agency may elect to be governed by the provisions of this section immediately. Beginning on July 1, 2020, the provisions of this section shall apply statewide.” Section 21099 subdivision (b)(2) of the Public Resources Code notes that, “Upon certification of the guidelines by the Secretary of the Natural Resources Agency pursuant to this section, automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment...”

In December of 2019, the 3rd District Court of Appeals in *Citizens for Positive Growth & Preservation v. City of Sacramento* found that **vehicle delay (e.g. level of service) cannot** be used to define a CEQA impact. The key excerpt from the discussion is shown below:

*Although CEQA Guidelines section 15064.3 applies prospectively, Section 21099, subdivision (b)(2) provides that, “[u]pon certification of the guidelines by the Secretary of the Natural Resources Agency pursuant to this section, automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment pursuant to this division, except in locations specifically identified in the guidelines, if any.”*

The 3rd District Court of Appeals ruling provided clarity for CEQA documents; that, upon certification of the guidelines, vehicle delay (e.g. LOS) cannot be used to define CEQA impacts. Page 118 of the Mitigated Negative Declaration states the following related to environmental impacts:

*b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)? **Less Than Significant Impact.***

*Section 15064.3 (b) of the CEQA Guidelines codifies the transition from Level of Service (LOS) to Vehicle Miles Traveled (VMT) as a metric for transportation impact analysis. This section was added to the CEQA Guidelines as a part of other modifications and finalized by the California Natural Resources Agency in late 2018. Section 15064.3 does not become applicable statewide until July 1, 2020. Until that time, pursuant to Section 15064.3(c), agencies are not required to use VMT as the basis for evaluation of traffic impacts and also may elect to use Section 15064.3 immediately. The City of Upland has not yet adopted a VMT methodology to address this updated Appendix G Checklist Question. Thus, at this time, traffic analyses within the City continue to be based on LOS to evaluate traffic impacts of a Project (consistent with Checklist Question XVII.b of the CEQA Guidelines prior to the latest update).*

As previously noted, the CEQA guidelines and the clarity provided by the court of appeals states that LOS should not be used to identify transportation impacts under CEQA; however, page 118 of the Mitigated Negative Declaration states that LOS was used to identify transportation impacts for this project.

*The supplemental assessment completed for the project (received February 6, 2020) evaluated VMT for the project. We would recommend updating the discussion within the Mitigated Negative Declaration or introduce it into the public record to reflect the provisions of the CEQA guidelines, the Public Resources Code, and the 3<sup>rd</sup> District Court of Appeals ruling.*

## **Summary of Responses to Public Comments on Bridge Upland’s MND**

### Inapplicability of VMT Assessment

Some of the responses are correct; others are false. Please see our notes to the responses provided (responses in italics):

- LOS (level of service) is the current required methodology for analyzing traffic impacts in the City of Upland and San Bernardino County (SBCTA), not VMT. *Fehr & Peers agrees that the City and SBCTA have guidelines related to LOS and neither have adopted VMT guidelines yet. However, CEQA no longer requires the use of LOS to identify transportation impacts (see discussion above).*
- There are a number of problems with attempting to use VMT to analyze the project:
  - Neither the City nor SBCTA has an adopted methodology, thresholds, or procedures to analyze VMT in the area. *As noted, this response is correct that the City nor SBCTA has not yet adopted methodology, thresholds, or procedures. However, CEQA no longer recognizes the use of LOS to identify transportation impacts (see discussion above).*
  - VMT only measures passenger vehicles miles of travel, not truck trips or truck VMT.<sup>2</sup> Therefore, VMT would not account for the distances traveled by the trucks or van trips related to the project. *This statement is incorrect. VMT is a function of trip generation multiplied by trip length. As such, VMT can be estimated for any use and for any portion of the vehicle fleet. Although Section 15064.3 describes VMT related automobile travel as part of SB 743, VMT related to truck travel can be estimated. Additionally, the Office of Planning and Research’s Technical Advisory state that lead agencies have the discretion to use total VMT inclusive of all vehicle types. Further, this form of VMT should have already been utilized in the Energy, GHG, and Air Quality assessment for the project.*
  - Finally, VMT does not analyze the amount of traffic that would be experienced in the local community due to a new project. On the other hand, the current metric of LOS (level of service) measures the delay caused by vehicles waiting in traffic at intersections, and therefore measures the actual traffic congestion experienced by drivers before and after the opening of a project. *As previously noted, LOS relates to measuring impacts (or inconvenience) to drivers; whereas VMT measures the impact of*

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<sup>2</sup> Section 15064.3, subdivision (a), states, “For the purposes of this section, ‘vehicle miles traveled’ refers to the amount and distance of automobile travel attributable to a project.” (emphasis added).

*driving on the environment. As such, this assessment is correct in how traffic impacts drivers, but it does not discuss how these metrics impact the environment.*

In general, and as described above, the provided responses do not address the following key concern noted above and should be addressed in the response:

Section 21099 subdivision (b)(2) of the Public Resources Code notes that, "Upon certification of the guidelines by the Secretary of the Natural Resources Agency pursuant to this section, automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment...."

*As noted above, the February 6, 2020 technical memorandum generally addresses these concerns and we would recommend including them in the public record for consideration by the decision makers.*

### **Traffic Impact Study**

#### Trip Generation

Truck trip generation was provided by the project applicant and states that two truck trip ends will occur during each peak hour and 50 daily truck trip ends will occur throughout the day. Although this estimate may be accurate, it does seem low for a 266,825 sq. ft. warehouse. It is recommended that the City request additional substantial evidence as to why the assumed truck trip generation estimates are appropriate and/or the project sponsor should provide a monitoring mechanism to ensure that no increases in truck trips are provided.

*The February 6, 2020 technical memorandum provides clarity on this subject and notes the monitoring of the site that will occur as part of a condition of approval for the project which addresses this concern.*

#### Signal timing input information

Based on information in the study, it is difficult to know if current signal timing sheets were obtained and utilized in the Synchro analysis.

*The February 6, 2020 technical memorandum provides clarity on this subject and notes that signal timing utilized in the assessment was optimized based on CMP guidance. Please note that, if any of the corridors evaluated in the study are interconnected or have signal timing coordination implemented along the corridor, isolated timing optimization may not be an accurate representation of operations on the system.*

#### Capacity Assessment

Saturation flow rates were used in the analysis are not documented in the report. Are they based on field-measured ideal saturation flow rates, Synchro defaults, or San Bernardino County Congestion Management Program (CMP) recommendations? Note, it appears that CMP capacity was used based on the Synchro output files but additional clarity could be provided in the report.

*The February 6, 2020 technical memorandum provides clarity on this subject and notes that the saturation flow rates are consistent with CMP recommendations. Please note, Fehr & Peers measurements of saturation flow rates in the study area tend to exceed those referenced in the CMP; as such, use of the CMP capacities would provide a conservative assessment of the system.*

## Forecasts

Forecasts were developed using the SBTAM travel demand forecasting model, but there is no discussion as to whether the model includes all of the approved and pending projects noted in the study.

Additionally, the City of Upland has a Citywide model (developed as part of their General Plan) which was locally calibrated for use in the City. Clarity could be added as to why SBTAM is superior to the Citywide model and whether the model includes the noted projects.

The study utilized a growth rate to estimate opening year conditions – it would be informative to identify the appropriateness for using this growth factor (e.g. it matches the model growth, is consistent with historic growth in the area, etc.).

*The February 6, 2020 technical memorandum provides clarity on this subject and provides justification and reasonableness checks for the use of the SBTAM model and growth rates applied.*

## Impact Analysis

Page 36 documents outdated CEQA guideline questions (and is inconsistent with the CEQA guideline questions used in the Mitigated Negative Declaration). We would recommend updating this section accordingly.

Additionally, although the report documents existing non-motorized facilities, it does not document planned non-motorized facilities in the study area (e.g. are there planned facilities in the area). Reviewing Figures 10 and 11 indicates significant gaps in the network; particularly along the project frontage. An assessment demonstrating policy consistency and how those identified gaps are addressed would be appropriate to support the study findings.

*The February 6, 2020 technical memorandum provides clarity on this subject and notes that the project will be providing a variety of pedestrian improvements along the adjacent corridors.*

We hope this information is useful. If you have any questions, please contact me directly at 949.308.6312.