State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Inland Deserts Region
3602 Inland Empire Boulevard, Suite C-220
Ontario, CA 91764
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

January 17, 2020
*Sent via email*

Mr. Michael Poland
City of Upland
460 North Euclid Avenue
Upland, CA 91786
(909) 931-4135

Subject: Initial Study and Mitigated Negative Declaration
Bridge Point Upland
State Clearinghouse No. 2019129066

SA-1

Dear Mr. Michael Poland:

The California Department of Fish and Wildlife (CDFW) received the Mitigated Negative Declaration (MND) for Bridge Point Upland Project (Project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.[1]

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

**CDFW ROLE**

CDFW is California's **Trustee Agency** for fish and wildlife resources, and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

SA-1

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

**PROJECT DESCRIPTION SUMMARY**

The proposed Project includes a warehouse/parcel delivery service building with an ancillary office/retail space on approximately 50.25 acres located between Central Avenue and Benson Avenue, north of Foothill Boulevard and south of Cable Airport, in the City of Upland, San Bernardino County: Assessor's Parcel No.1006-351-09,1006-351-10,1006-572-11, 1006-551-12, 1006-551-22, and 1006-574-10.

**COMMENTS AND RECOMMENDATIONS**

CDFW is concerned about the adequacy of the MND to avoid potentially significant impacts, including cumulative impacts, and the ability of the City of Upland (City; the CEQA lead agency) to mitigate significant impacts to declining natural vegetation communities and species that rely on these habitats. CDFW's comments and recommendations are presented below.

Burrowing Owl

According to the MND, a habitat assessment was prepared for the proposed project by ELMT Consulting Inc. (August 2019) that concluded "*the Project site does not provide suitable habitat for special-status wildlife species known to occur in the area since the Project site has been heavily disturbed from on-site disturbances and existing development*". CDFW does not agree that suitable foraging and nesting habitat may not occur within the project area or vicinity. Current known occurrences of burrowing owls (*Athene cunicularia*), a state species of special concern, have been documented recently within the immediate area. CEQA requires public agencies in California to analyze and disclose potential environmental impacts associated with a project that the agency will carry out, fund, or approve. Based on burrowing owl(s) being observed immediately adjacent to the project site, a habitat assessment should have been conducted and, if warranted based on the habitat assessment, focused surveys should have been completed such as described in the Staff Report on Burrowing Owl Mitigation (CDFW, March 2012) within the Project footprint and an appropriate buffer. CDFW recommends that the City advise the Project proponent to follow the recommendations and guidelines provided in the *Staff Report on Burrowing Owl Mitigation*, including habitat assessment and surveys, to provide the information needed to determine the potential effects of the proposed Project on burrowing owls, and to avoid take in accordance with FGC sections 86, 3503, and 3503.5. In addition, an impact assessment to evaluate the extent to which

SA-1

burrowing owls and their habitat may be impacted, directly or indirectly, should be included in the MND.

Once the project is properly assessed for its' effects of burrowing owl, the MND should provide specific mitigation that is roughly proportional to the level of impacts, including cumulative impacts, in accordance with the provisions of CEQA (CEQA Guidelines, §§ 15126.4(a)(4)(B), 15064, 15065, and 16355). Mitigation measures should be effective, specific, enforceable, and feasible actions that will improve environmental conditions. Current scientific literature supports the conclusion that mitigation for permanent burrowing owl habitat loss necessitates replacement with an equivalent or greater habitat area for breeding, foraging, wintering, and dispersal. This often includes the presence of burrows, burrow surrogates, fossorial mammal dens, well drained soils, and abundant and available prey within close proximity to the burrow.

Alluvial Fan Sage Scrub

The MND and habitat assessment identify Riversidean alluvial fan sage scrub (RAFSS) within the project. The MND describes the habitat as heavily disturbed, isolated, located outside of a floodplain, and cut off from the active stream channel, and because of that, determined that the impact "*is not considered a significant impact and requires no mitigation*". CDFW disagrees with the assertion that the impacts to this sensitive plant alliance are not significant and should not require mitigation. CDFW strongly encourages the City to include feasible mitigation measure into the MND that will compensate for loss to state sensitive alliances.

Please also note, CDFW recommends the City describe the vegetation communities using a standardized, systematic classification. The standard vegetation classification that has been adopted by CDFW is the 2008-second edition of the *Manual of California Vegetation* (Sawyer, Keeler-Wolf and Evens 2009). Although many reports and mapping continue to use the RAFSS classification system as described by Holland (1986), the *Manual of California Vegetation* categorizes scalebroom (*Lepidospartum squamatum*) into a series based on one or two dominant species, with the member rule being the presence of >1% cover of this indicator species.

**CONCLUSION**

CDFW appreciates the opportunity to comment on the MND and recommends that the City address CDFW's comments and concerns prior to approving the MND. If you should have any questions pertaining to the comments provided in this letter, please contact Kim Romich at (909) 980-3818 or at Kimberly.Romich@wildlife.ca.gov

Sincerely,

Scott Wilson

Scott Wilson
Environmental Program Manager

cc: Office of Planning and Research, State Clearinghouse, Sacramento
ec: HCPB CEQA Coordinator

**LITERATURE CITED**

California Department of Fish and Game (CDFG). 2012. Staff report of burrowing owl mitigation. State of California, Natural Resources Agency. Available for download at: http://www.dfg.ca.gov/wildlife/nongame/survey_monitor.html

Holland, R. F. 1986. Preliminary Descriptions of the Terrestrial Natural Communities of California. State of California Department of Fish and Game, Nongame Heritage Program, Sacramento, CA.

Sawyer, J. O., T. Keeler-Wolf, and J. M. Evens. 2009. A Manual of California Vegetation. 2nd edition. California Native Plant Society Press, Sacramento, CA. Available for download at: https://wildlife.ca.gov/Data/VegCAMP/Publications-and-Protocols/Vegetation-Manual

STATE OF CALIFORNIA

Governor's Office of Planning and Research

State Clearinghouse and Planning Unit

Gavin Newsom
Governor

Kate Gordon
Director

January 21, 2020

RECEIVED
JAN 28 2020
DEVELOPMENT SERV DEPT

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

Subject: Bridge Point Upland
SCH#: 2019129066

Dear Michael Poland:

SA-2

The State Clearinghouse submitted the above named MND to selected state agencies for review. The review period closed on 1/17/2020, and the comments from the responding agency (ies) is (are) available on the CEQA database for your retrieval and use. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

> "A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

**Check the CEQA database for submitted comments for use in preparing your final environmental document: https://ceqanet.opr.ca.gov/2019129066/2 .** Should you need more information or clarification of the comments, **we recommend that you contact the commenting agency directly**.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

cc: Resources Agency

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS: January 21, 2020

mpoland@ci.upland.ca.us
Mike Poland, Contract Planning Manager
City of Upland, Development Services Department
Planning Division
460 North Euclid Avenue
Upland, CA 91786

**Mitigated Negative Declaration (MND) for the Proposed Bridge Point Upland Project**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final MND.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to construct 201,096 square feet of non-refrigerated warehouse and parcel delivery services with office uses on a 50.25-acre site that is currently used for outdoor rock/gravel stockpiling and processing[1] (Proposed Project). The Proposed Project is located on the northeast corner of Foothill Boulevard and Central Avenue in the City of Upland. Construction of the Proposed Project is anticipated to occur over seven months[2]. Once operational by the third quarter of 2020, the Proposed Project will have 16 dock doors and eight van loading doors[5], and involve 50 truck trips per day[3]. Based on reviews of Figure 2: *Project Vicinity Map* in the MND and aerial photographs, the Proposed Project is surrounded by existing commercial uses[4].

South Coast AQMD Staff's Summary of the Air Quality and Health Risk Assessment Analyses

The Lead Agency analyzed the Proposed Project's air quality impacts based on 276,250 square feet, which were 75,154 square feet greater than 201,096 square feet as currently envisioned for the Proposed Project[5]. The Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to South Coast AQMD's recommended regional and localized CEQA air quality significance thresholds. Based on the analysis, the Lead Agency found that the Proposed Project's construction and operational air quality impacts would be less than significant[6]. The Lead Agency is committed to implementing three air quality mitigation measures AQ-1 through AQ-3[7]. AQ-1 requires compliance with South Coast AQMD Rules 402 and 403. AQ-2 requires architectural coating products to have a volatile organic compound (VOC) rating of 50 grams per litter or less. AQ-3 requires, among others, at least six percent of vehicle parking spaces (including trucks) designed to accommodate electric vehicle (EV) charging stations, all service equipment such as fork lifts and yard trucks be powered by electricity or natural gas, and providing building occupants with information related to the South Coast AQMD's Carl Moyer Program or other programs that promote truck retrofits or clean vehicles[8]. The Lead Agency did not perform a health risk assessment in the MND.

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[1] MND. Page 10.
[2] *Ibid*. Page 2.
[3] *Ibid*. Page 17.
[4] *Ibid*. Page 26.
[5] *Ibid*. Page 1.
[6] *Ibid*. Page 22, 27-28.
[7] *Ibid*. Pages 3-4.
[8] *Ibid*.

South Coast AQMD Staff's General Comments

RA-1a

In the Air Quality Analysis, the Lead Agency used a trip length of 6.9 miles to calculate the Proposed Project's operational air quality impacts from mobile sources. The default one-way trip length is 20 miles[9]. Using a trip length of 6.9 miles likely underestimated the Proposed Project's operational air quality impacts, particularly NOx emissions, from trucks that will visit the Proposed Project during operation. Additionally, although the Proposed Project involves operation of warehouse uses, the Lead Agency did not perform a mobile source health risk assessment analysis. Please see the attachment for more information. To further reduce the Proposed Project's long-term emissions from mobile sources, South Coast AQMD staff recommends revisions to the existing air quality mitigation measures and a list of new mitigation measures that the Lead Agency should review and incorporate in the Final MND. The attachment also includes a discussion on South Coast AQMD Rule 403(e).

Conclusion

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, responses should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and the public who are interested in the Proposed Project. Further, when the Lead Agency makes the finding that the additional recommended mitigation measures are not feasible, the Lead Agency should describe the specific reasons supported by substantial evidence for rejecting them in the Final MND (CEQA Guidelines Sections 15070 and 15074.1).

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Margaret Isied, Assistant Air Quality Specialist, at misied@aqmd.gov or (909) 396-2543, should you have any questions.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

Attachment
LS:MI
SBC191220-07
Control Number

[9] CalEEMod Appendix A: Calculation Details for CalEEMod. Page 14.

**ATTACHMENT**

**Air Quality Impact Analysis – Operational Mobile Source Emissions**

RA-1a cont.

1. The Lead Agency used a trip length of 6.9 miles to quantify the Proposed Project's operational emissions from mobile sources but did not discuss how this trip length was developed. CalEEMod is the software model that quantify land use projects' emissions. The Lead Agency used CalEEMod to quantify the Proposed Project's construction and operational emissions. The default one-way trip length in CalEEMod is 20 miles[10]. Using a trip length of 6.9 miles likely underestimated the Proposed Project's air quality emissions, particularly NOx, from trucks during operation. To conservatively analyze a worst-case operational impact scenario, South Coast AQMD staff recommends that the Lead Agency recalculate the Proposed Project's operational emissions based on a 20-mile one way trip length, or provide substantial evidence to support the use of 6.9 miles in the Final MND. distance included in CalEEMod. If the Lead Agency finds, after revising the Air Quality Analysis, that the Proposed Project's air quality impact would be significant and cannot be mitigated to be less than significant with the existing three air quality mitigation measures, the Lead Agency should strengthen existing air quality mitigation measures or include new air quality mitigation measures in the Final MND. (See also Comment No. 3).

**Mobile Source Health Risk Assessment (HRA) Analysis**

2. As stated above, the Proposed Project involves operation of warehouse and parcel delivery services, which are expected to generate approximately 50 truck trips per day. Diesel particulate matter (DPM) will be emitted from the transportation and idling of trucks visiting the Proposed Project. DPM has been identified by the California Air Resources Board (CARB) as a toxic air contaminant (TAC) based on its carcinogenic effects[11]. However, upon review of the MND, South Coast AQMD staff found that the Lead Agency did not perform a quantitative mobile source HRA analysis.

   One of the basic purposes of CEQA is to inform decision-makers and the public about the potential, significant environmental effects of proposed activities (CEQA Guidelines Section 15002(a)(1)). A mitigated negative declaration is appropriate when the Lead Agency finds that the project will not have a significant effect on the environment after incorporating mitigation measures (CEQA Guidelines Sections 15070 to 15075). Reasons to support this finding shall be documented as substantial evidence in the initial study. Therefore, South Coast AQMD staff recommends that the Lead Agency perform a mobile source HRA analysis[12] in the Final MND and compare the results to South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk[13]; otherwise, the Lead Agency has not met CEQA's requirement for documentation. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating air pollutants should also be included.

**Recommended Changes to Mitigation Measures Air Quality (AQ)-2 and 3**

3. South Coast AQMD staff recommends that the Lead Agency incorporate the following changes to mitigation measures AQ-2 and AQ-3 in the Final MND.

[10] Appendix A-1: Air Quality Assessment. Page 152.

[11] CARB. August 27, 1998. Resolution 98-35. Accessed at: http://www.arb.ca.gov/regact/diesltac/diesltac.htm.

[12] South Coast Air Quality Management District. *Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*. Accessed at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis.

[13] South Coast AQMD has developed the CEQA significance threshold of 10 in one million for cancer risk. When South Coast AQMD acts as the Lead Agency, South Coast AQMD staff conducts a HRA, compares the maximum cancer risk to the threshold of 10 in one million to determine the level of significance for health risk impacts, and identifies mitigation measures if the risk is found to be significant.

RA-1a cont.

*Mitigation Measure AQ-2*

a) The Lead Agency requires architectural coating products used at the Proposed Project to have a VOC rating of 50 grams per litter or less. To further reduce VOC emissions from architectural coatings, South Coast AQMD staff recommends that the Lead Agency requires the use of water-based or low VOC cleaning products that go beyond the requirements of South Coast AQMD Rule 1113[14].

*Mitigation Measure AQ-3*

b) The Lead Agency has committed to implementing Mitigation Measure AQ-3. One of the requirements for the developer/successor-in-interest is to provide building occupants with information related to the South Coast AQMD Carl Moyer Program, or other such programs that promote truck retrofits or "clean" vehicles[15].
Pursuant to CEQA Guidelines Section 15126.4, mitigation measures are those capable of minimizing or reducing significant adverse impacts. While it is important to share information about South Coast AQMD's Carl Moyer Program and the State's clean truck fleets programs, providing information alone does not minimize or reduce emissions. The Lead Agency should go beyond providing information by requiring the use of zero-emission (ZE) or near-zero emission (NZE) heavy-duty trucks during operation, such as trucks with natural gas engines that meet the CARB's adopted optional NOx emission standard of 0.02 grams per brake horsepower-hour (g/bhp-hr). At a minimum, the Lead Agency may require that operators of heavy-duty trucks visiting the Proposed Project during operation commit to using 2010 model year or newer engines that meet CARB's 2010 engine emission standards of 0.01 g/bhp-hr for particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks.

To monitor and ensure ZE, NZE, or 2010 model year or newer trucks are used at the Proposed Project, the Lead Agency should require that operators maintain records of all trucks associated with the Proposed Project's operation, and make these records available to the Lead Agency upon request. The records will serve as evidence to prove that each truck called to the Proposed Project during trucks visiting the Proposed Project meet the minimum 2010 model year engine emission standards. Alternatively, the Lead Agency should require periodic reporting and provision of written records by operators, and conduct regular inspections of the records to the maximum extent feasible and practicable.

**Additional Recommended Mitigation Measures**

4. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. To further reduce the Proposed Project's air quality impacts during construction and operation, and in addition to mitigation measures AQ-1 through AQ-3, South Coast AQMD has compiled a list of additional recommended mitigation measures as guidance that the Lead Agency should review for incorporation in the Final MND. For more information on potential mitigation measures as guidance to the Lead Agency, please visit South Coast AQMD's CEQA Air Quality Handbook website[16].

[14] South Coast AQMD. Rule 1113 – Architectural Coatings. Accessed at: http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf.
[15] MND. Page 4.
[16] South Coast AQMD. Accessed at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook.

*Mitigation Measures Construction Air Quality Impacts*

RA-1b

a) Require construction equipment that meets U.S. EPA Tier 4 Final off-road emission standards. To ensure that Tier 4 Final construction equipment or better would be used during the Proposed Project's construction, South Coast AQMD staff recommends that the Lead Agency include this requirement in applicable bid documents, purchase orders, and contracts. Successful contractor(s) must demonstrate the ability to supply the compliant construction equipment for use prior to any ground disturbing and construction activities. A copy of each unit's certified tier specification or model year specification and CARB or South Coast AQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment. Additionally, the Lead Agency should require periodic reporting and provision of written construction documents by construction contractor(s) to ensure compliance, and conduct regular inspections to the maximum extent feasible to ensure compliance. In the event that construction equipment cannot meet the Tier 4 Final engine certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by the Lead Agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction equipment with Tier 4 Interim or reduction in the number and/or horsepower rating of construction equipment and/or limiting the number of construction equipment operating at the same time.

RA-1c

b) Maintain equipment maintenance records for the construction portion of the Proposed Project. All construction equipment must be tuned and maintained in compliance with the manufacturer's recommended maintenance schedule and specifications. All maintenance records for each equipment and their construction contractor(s) should be made available for inspection and remain on-site for a period of at least two years from completion of construction.

*Mitigation Measures for Operational Air Quality Impacts from Mobile Sources*

RA-1d

a) Limit the daily number of truck trips allowed at the Proposed Project to the level that was analyzed in the MND (e.g., 50 daily truck trips). If higher daily truck volumes are anticipated during operation than what were analyzed in the MND, the Lead Agency should commit to re-evaluating the Proposed Project's air quality and health risks impacts through a CEQA process prior to allowing higher truck activity levels (CEQA Guidelines Section 15162).

RA-1e

b) Design the Proposed Project such that any check-in point for trucks is well inside the Proposed Project site to ensure that there are no trucks queuing outside of the facility.

RA-1f

c) Establish area(s) within the Proposed Project site for repair needs and ensure that these designated areas are away from any sensitive receptors.

*Mitigation Measures for Operational Air Quality Impacts from Area Sources*

RA-1g

d) Maximize the use of solar energy including solar panels. Installing the maximum possible number of solar energy arrays on the building roofs and/or on the Proposed Project site to generate solar energy for the facility and/or EV charging stations that the Lead Agency requires in mitigation measure AQ-3.

RA-1h

e) Require the use of electric landscaping equipment, such as lawn mowers and leaf blowers.

RA-1i

f) Maximize the planting of trees in landscaping and parking lots.

g) Use light colored paving and roofing materials. RA-1j

h) Utilize only Energy Star heating, cooling, and lighting devices, and appliances. RA-1k

**Compliance with South Coast AQMD Rule 403(e)** RA-1l

5. The Lead Agency included a discussion of general compliance with South Coast AQMD Rule 403 – Fugitive Dust in the MND. Since the Proposed Project is a large operation of approximately 50.25 acres[17] (50-acre sites or more of disturbed surface area; or daily earth-moving operations of 3,850 cubic yards or more on three days in any year) in the South Coast Air Basin, the Lead Agency is required to comply with Rule 403(e) – Additional Requirements for Large Operations[18]. Additional requirements may include, but are not limited to, Large Operation Notification (Form 403 N), appropriate signage, additional dust control measures, and employment of a dust control supervisor that has successfully completed the Dust Control in the South Coast Air Basin training class[19]. Therefore, South Coast AQMD recommends that the Lead Agency include a discussion to demonstrate specific compliance with South Coast AQMD Rule 403(e) in the Final MND. Compliance with South Coast Rule 403(e) will further reduce regional and localized emissions from particulate matters during construction.

[17] MND. Page 1.

[18] South Coast AQMD. Rule 403. Last amended June 3, 2005. Accessed at: http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf.

[19] South Coast AQMD Compliance and Enforcement Staff's contact information for Rule 403(e) Large Operations is (909) 396-2608 or by e-mail at dustcontrol@aqmd.gov.

**CITY OF CLAREMONT**

Community Development Department

City Hall
207 Harvard Avenue
P.O. Box 880
Claremont, CA 91711-0880
FAX (909) 399-5327
www.ci.claremont.ca.us

Building • (909) 399-5471
Planning • (909) 399-5470
Engineering • (909) 399-5465
Community Improvement • (909) 399-5467
Administration • (909) 399-5321

January 21, 2020

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

Dear Mr. Poland:

LA-28a

The City of Claremont Community Development Department thanks you for the opportunity to provide comments on the Draft Mitigated Negative Declaration proposed for the Bridge Point Upland Project. The project as proposed, includes a single warehouse structure totaling 201,096 square feet that includes 191,096 square feet of warehouse/parcel delivery uses and 10,000 square feet of office/retail uses on a 50.25 acre site (AINs: 1006-351-09, 1006-351-10, 1006-572-11, 1006-551-12, 1006-551-22, 1006-574-10) .

The City of Claremont is currently completing a $17 million revitalization of Foothill Boulevard and has concerns that this projects' nearby location, if not studied adequately, could have a detrimental effect on future traffic flows on nearby Claremont streets and intersections. The City of Claremont has several concerns with the adequacy of the Traffic Impact Analysis (TIA) prepared for the project by Translutions Inc., dated November 15, 2019. Claremont staff believes that the land use determination underestimates the amount of project trips, the project description lacks operational details, and trip-distribution assumptions for trucks using Central Avenue only, is unrealistic and un-enforceable.

If the traffic modeling is not realistic, other technical studies in the document, including air quality impacts are also underestimated. Claremont requests that driveway counts be conducted at three different Amazon facilities within this region and of similar size. The City of Claremont prepared a third party peer review of the TIA (attached) which includes our comments. Please review our Comments and provide detailed responses to each comment at least two weeks prior to presenting this project to the Upland Planning Commission and City Council. Thank you for your consideration.

Sincerely,

Brad Johnson
Community Development Director
City of Claremont

Inclusions:

Review of TIA (Traffic Impact Analysis) Traffic Issues Relevant to the City of Claremont
High Cube Warehouse Vehicle Trip Generation Analysis, prepared by ITE October 2016

**REVIEW OF TIA (TRAFFIC IMPACT ANALYSIS)**
**FOR FOOTHILL BOULEVARD WAREHOUSE**
**TRAFFIC ISSUES RELEVANT TO THE CITY OF CLAREMONT**
**January 16, 2020**
**Prepared by: Transtech Engineers, Inc.**

**This includes a Review of:**

LA-28b

- **TIA for Foothill Boulevard Warehouse prepared by Translutions Inc, dated November 15, 2019 Appendix H-1.**
- **TIA for Baseline Road Master Plan: Sycamore Hills prepared by David Evans and Associates, dated November 15, 2018.**
- **HIGH CUBE WAREHOUSE VEHICLE TRIP GENERATION ANALYSIS prepared for South Coast Air Quality Management District and National Association of Industrial and Office Properties and Prepared by Institute of Transportation Engineers, October 2016. (Attachment 1)**

**The following comments are provided relative to the project's potential traffic impacts.**

1. **Original TIA was prepared by Translutions Inc, dated November 15, 2019**

   The **primary conclusion** of the Traffic Impact Analysis was that the project would have a significant impact at one intersection of Benson Avenue and Baseline Road under 2020 Opening Year Conditions as well as 2040 Conditions With and Without the Project. All other intersections will operate within acceptable City Thresholds. This location is expected to operate at LOS E in the AM peak for 2020 Conditions With and Without the Project (Table E page 29 in TIA) and 2040 Conditions the intersection will operate at LOS E in the AM peak for both AM and PM peak periods With and Without the project (Table F page 33 in the TIA). This intersection is located in the City of Upland.

   Mitigation: for this item is lane striping and contributing their Fair Share of the cost for a total of $2,560.00. Table G.

   **2020 Mitigation page 31**:

   *"Opening Year 2020 With Project Conditions Under opening year 2020 with project conditions, the following improvements are recommended to restore satisfactory operations: Benson Avenue/Baseline Road – Re-stripe the northbound through lane to a through-left turn lane and convert the northbound and southbound left-turn phasing from protected to split-phase. This improvement is not included in the 2016 SBCTA Development Mitigation Nexus Study. Two receiving*

*lanes exist on the west leg of the intersection. Therefore, this improvement can be achieved by striping and signal head modifications. The total cost of these improvements is anticipated to be approximately $75,000. The project's fair share has been calculated at 3.413% based on year 2040 conditions. The project's fair share for these improvements is $2,560. Table G shows the project's fair share calculations."* LA-28b cont.

**2040 Mitigation Page 36**:

*"Benson Avenue/Baseline Road – Re-stripe the northbound through lane to a through-left turn lane and convert the northbound and southbound left-turn phasing from protected to split-phase. This improvement is not included in the 2016 SBCTA Development Mitigation Nexus Study. Two receiving lanes exist on the west leg of the intersection. Therefore, this improvement can be achieved by striping and signal head modifications. The total cost of these improvements is anticipated to be approximately $75,000. The project's fair share has been calculated at 3.413% for these improvements ($2,560). Table G shows the project's fair share calculations."*

**General Comments:**

The key to all Traffic Impact Analysis is the determination of the Land Use which guides the Trips Generated at the Site and then how the trips are distributed throughout the study network.

TRIP GENERATION

Comment 1. The traffic analysis has defined the project as a High Cube Parcel Hub Warehouse. This is acceptable as a designation for a regular Warehouse but will under-estimate the amount of project trips that are generated if the Warehouse becomes an Amazon Fulfillment Center.

The project as proposed is assumed to be around 191,096 square feet of warehouse/parcel delivery use, 10,000 office/retail some of which is where retail visitors can pick up packages, with 16 Truck loading docks, 16 van loading docks, 12 truck trailer parking stalls, 337 automobile parking spaces and 1,104 van parking spaces. As a compromise the project assumed a warehouse with 266,825 sqf building and 10,000 sqf retail to provide a conservative estimate of project trips (pages 5 and 6 in the TIA).

Comment 2. The document does not provide a detailed project description that will allow the reader the ability to determine what type of Warehouse is proposed at this site. 1,104 van parking spaces along with a high amount of auto parking spaces implies a large work force is expected at the site. It is unclear from the traffic impact analysis how Vans will be used at the site. Will these vehicles only enter and exit during off peak hours or will deliveries occur at all LA-28c

times? Do employees take the vans home and arrive in the vans? Or will employees arrive and leave by personal cars, driving these vans for local deliveries throughout the day. 1,104 parking spaces for vans is a significant amount of parking spaces. LA-28c cont.

Comment 3. A clearer description of shift hours and expected operation hours should also be included. Will there be 24 hour operation of staff at the warehouse as well as for deliveries or daily services? LA-28d

Comment 4: Project site layout and parking fits the description of a Fulfillment Center rather than a Parcel Hub Warehouse. LA-28e

A report was conducted by ITE in 2016 which further defined different types of High Cube Warehouse Facilities. They found that there are 5 types of High Cube Warehouses. These include:

- Transload – usually pallet loads or larger handling products of manufacturers, wholesalers/distributors, or retailers with little or no storage durations
- Short-Term Storage – products held on-site for a short time
- Cold Storage – HCW with permanent cold storage in at least part of the building
- Fulfillment Center – storage and direct distribution of e-commerce product to end users
- Parcel Hub – transload function for a parcel delivery company

A report was also prepared by **Western Riverside Council of Governments** Public Works Committee Staff Report Subject: High-Cube Warehouse Trip Generation Study
Contact: Daniel Ramirez-Cornejo, Program Manager, dramirez-cornejo@wrcog.us, (951) 405-6712 Date: December 13, 2018.

The purpose of this study was to present the findings of a Trip Generation Study for high-cube warehouses in western Riverside County. Although the report found that fulfillment centers and Parcel Hubs have different trips than regular High Cube Warehouses and that fulfillment centers produced a higher rates of trips than parcel hubs more samples would need to be taken to change rates from the Trip Generation Manual.

Both Studies attempted to further define the definition of Fulfillment Centers versus Parcel Hubs High Cube Warehouses.

<u>Fulfillment Center Characteristics as defined by ITE study</u>: Storage and direct distribution of ecommerce product to end users; smaller packages and quantities than for other types of HCW; often multiple mezzanine levels for product storage and Pick-and-pack area comprises majority of space, larger parking supply ratio than for all other HCW types.

LA-28e cont.

Typical Fulfillment Centers

1. Walmart: 6750 Kimball Ave, Chino, CA 91708
2. Amazon: 24208 San Michele Rd, Moreno Valley, CA 92551
3. Lineage Logistics: 1001 Columbia Ave Riverside, CA 92507
4. P&G: 24015 Iris Ave, Moreno Valley, CA 92551 5.
5. Big 5: 6125 Sycamore Canyon Blvd, Riverside, CA 92507
6. Nestle USA: 3450 Dulles Drive, Jurupa Valley, CA
7. Home Depot: 11650 Venture Drive, Jurupa Valley, CA
8. ACT Fulfillment Center: 3155 Universe Drive, Jurupa Valley, CA
9. Petco: 4345 Parkhurst Street, Jurupa Valley, CA
10. Komer: 11850 Riverside Drive, Jurupa Valley, CA
11. Ross: 3404 Indian Ave Perris, CA 92571

Parcel Hub Characteristics as defined by ITE study:

Regional and local freight-forwarder facility for time sensitive shipments via air freight and ground (e.g., UPS, FedEx, USPS); site often includes truck maintenance, wash, or fueling facilities, limited or no breakbulk, repack or assembly activities, larger employee parking ratios; truck drivers often based at facility (i.e., parking may be for both site employees and drivers, typically in close proximity to airport; often stand-alone.

Typical Parcel Hubs

12. UPS: 15801 Meridian Pkwy, Riverside, CA 92518
13. FedEx: 330 Resource Dr, Bloomington, CA 92316
14. FedEx Freight: 12100 Riverside Drive, Jurupa Valley, CA
15. UPS Chain Logistics: 11811/11991 Landon Drive, Jurupa Valley, CA
16. DHL: 12249 Holly St N, Riverside, CA 92509

LA-28f

Comment 5: The Trip Generation Rates from the ITE Trip Generation Manual 10th Edition (ITE Code 155) for a Warehouse Fulfillment Center should be used for the analysis of this project. The redo of the trip generation will provide for lower AM peak hour trips but higher PM peak and Daily Vehicle trips for the project.

LA-28g

Comment 6: If the applicant knows that the project will be an Amazon Fulfillment Center than driveway counts of trucks, vans and cars should be conducted at a similar site and then factored to account for the actual warehouse square foot dedicated to the center to determine actual trip generated at the site. There are now several Amazon facilities located in the same region (Fontana, San Bernardino) that would provide the applicant with good comparison data.

LA-28h

Comment 7: the amount of Vehicle mix during peak hours from the ITE study at Fulfillment centers shows that there would be daily: 91%cars, 8% 2-3 axle trucks and 1% 4-5 axle trucks in the vehicle mix in the AM Peak 96% Cars, 3% trucks and 1% 4-5 axle trucks, and in the PM Peak

98% cars, 2% 2-3 axle trucks and no 4-5 axle trucks. The applicant may want to review and consider this data since it provides a more detailed analysis of vehicle mix for this type of high cube facility. LA-28h cont.

TRIP DISTRIBUTION OF PROJECT TRAFFIC

Comment 8: All Truck Trips for the project are assumed 100% to use the Central Avenue Route to the I-10 Freeway. Since Monte Vista Avenue, Benson Avenue and Baseline Road are all considered as Truck Routes with access to the I-210 Freeway it is reasonable to assume that not all truck trips will travel to the I-10 freeway but that the I-210 freeway and the routes to this ramps will also experience some truck traffic. This will add more vehicle trips and possibly impact Claremont Streets. LA-28i

Comment 9: based on the amount of Van and Auto parking available at the site the trips generated and distributed at the site during peak hours seems to be under-represented. LA-28j

CUMULATIVE PROJECTS:

Comment 10: from the report it is difficult to determine the related projects that were used as part of the cumulative analysis. It appears that most of the projects located in the City of Claremont were included in the list. It would have been helpful if in Table C from the TIA the City in which the project is located was included. It is also unclear how the estimated trips were distributed throughout the street network. LA-28k

COMPARISON OF LEVEL OF SERVICE AND VOLUME DATA FROM THIS REPORT TO THE ANALYSIS SUBMITTED FOR SYCAMORE HILLS MASTER PLAN DATED NOVEMBER 15, 2018. LA-28l

Comment 11: When comparing the level of service output and data between the mentioned report and the analysis for the Warehouse project it was found that the LOS at several Claremont intersections had improved between the 2018 and 2019 Warehouse report. In the 2018 analysis the ramp at Baseline and the I-210 Freeway would require mitigation and is expected to operate at LOS E for Existing Plus Project Condition. The Warehouse projects analysis indicates that the intersection will operate at LOS D under all conditions. (This could be due to the projects using different versions of the Synchro program -Sycamore uses HCM 2000 method and Warehouse uses the HCM 6$^{th}$ Edition method.)

All other items were reviewed and there are no further comments. Typical Engineering methods were followed in the preparation of the report. Main concerns are the trip generation and trip distribution of project traffic.

# HIGH-CUBE WAREHOUSE VEHICLE TRIP GENERATION ANALYSIS

**PREPARED FOR**

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

**AND**

**NATIONAL ASSOCIATION OF INDUSTRIAL AND OFFICE PROPERTIES**

**PREPARED BY**

**INSTITUTE OF TRANSPORTATION ENGINEERS**

**WASHINGTON, DC**

**OCTOBER 2016**

**ACKNOWLEDGEMENT AND DISCLAIMER**

This report was prepared as a result of work sponsored, paid for, in whole or in part, by the South Coast Air Quality Management District (SCAQMD) and NAIOP (National Association of Industrial and Office Properties (NAIOP). The report is the product of a collaborative process by which ITE, SCAQMD, and NAIOP embarked upon an effort to better understand vehicle trip generation rates at high-cube warehouse facilities.

The opinions, findings, conclusions, and recommendations are those of the author and do not necessarily represent the views of SCAQMD or NAIOP. SCAQMD, NAIOP, their officers, employees, contractors, and subcontractors make no warranty, expressed or implied, and assume no legal liability for the information in this report. SCAQMD and NAIOP have not approved or disapproved this report, nor has SCAQMD or NAIOP passed upon the accuracy or adequacy of the information contained herein.

The NAIOP Inland Empire and Southern California Chapters provided direct input for various items of the report, including a suggested high-cube warehouse classification system.

## EXECUTIVE SUMMARY

**Purpose** – South Coast Air Quality Management District (SCAQMD) and NAIOP (National Association of Industrial and Office Properties) provided funding to the Institute of Transportation Engineers (ITE) to help in the establishment of national guidance for the estimation of vehicle trip generation at what are commonly called high-cube warehouse distribution centers (HCW).

**Definition of High-Cube Warehouse** – A high-cube warehouse is a building that typically has at least 200,000 gross square feet of floor area, has a ceiling height of 24 feet or more, and is used primarily for the storage and/or consolidation of manufactured goods (and to a lesser extent, raw materials) prior to their distribution to retail locations or other warehouses. A typical HCW has a high level of on-site automation and logistics management. The automation and logistics enable highly-efficient processing of goods through the HCW. For the purpose of this trip generation analysis, HCWs are grouped into five types: fulfillment center, parcel hub, cold storage facility, transload facility, and short-term storage facility.

**Data Sources** – The analysis contained herein is based on data from 15 separate data sources, including recent data collected under the sponsorship of SCAQMD and NAIOP. The database includes trip generation information from 107 individual sites.

**Findings** – The HCW market continues to evolve as individual tenants/owners implement different e-commerce business plans. For example, some deliver goods to the customer within two days and others deliver orders to the nearest store for customer pick-up. As business plans and technology continue to evolve, these should continue to be monitored. Although the tenant or its planned operations are often unknown at the time of site development review, for the purpose of estimating vehicle trip generation, it may be as important to know the tenant as much as other facility factors.

For transload, short-term storage, and cold storage HCWs, the proportionate mix of types of vehicles (i.e., cars versus trucks) accessing the site is very consistent, both daily and during the AM and PM peak hours.

For a cold storage HCW, the currently available data demonstrates a useable, direct correlation between building size and vehicle trip generation.

The single data points for fulfillment centers and parcel hubs indicate that they have significantly different vehicle trip generation characteristics compared to other HCWs. However, there are insufficient data from which to derive useable trip generation rates.

For transload and short-term storage HCW sites, additional data sites and additional information on past sites are needed in order to derive useable trip generation rates.

**Recommendations (Action Plan)** – A strategically-developed data collection program is needed that targets each type of HCW individually. The strategy should include a prioritized plan for collecting additional data at five classifications of HCWs that are representative of the types of facilities expected to be commonly developed in coming years. The data should be collected at mature facilities, each of which clearly fits within one HCW classification, during periods of typical levels of activity based on the types of facilities and businesses served.

All future data collection should seek to acquire an enhanced set of site descriptive information that will enable development of better predictive models than are currently available.

## STUDY PURPOSE AND PROCESS

South Coast Air Quality Management District (SCAQMD) and NAIOP (National Association of Industrial and Office Properties) provided funding to the Institute of Transportation Engineers (ITE) to help in the establishment of consensus-based national guidance for the estimation of trip generation at what are commonly called high-cube warehouses (HCW). This report documents the results of that effort to develop a credible and defensible procedure for collecting and analyzing site trip generation data for use in transportation impact analyses (TIA) and air quality/vehicular emissions analyses (AQA[1]) for HCW-type facilities.

ITE convened a meeting of practitioner-based experts at ITE Headquarters on April 1, 2015. The meeting participants are listed in Table 1. At the meeting's conclusion, several individuals were tasked with development of specific products, including the following:

- An overall work plan for this report and for subsequent data collection and analysis
- A clear and consistent definition of HCW for this report and for future studies and analysis
- A vehicle classification scheme that satisfies ultimate data requirements for TIA and AQA and complies with reasonable data collection capabilities and budgets

ITE staff assumed responsibility for compilation and analysis of existing HCW trip generation data.

The full expert panel provided comments and suggestions on each interim product that eventually became part of this complete report. Nevertheless, responsibility for content completeness and data analysis accuracy rests with ITE staff.

**Table 1. Expert Panel for High-Cube Warehouse Trip Generation Study**

| | |
|---|---|
| Mr. Brian Bochner | Texas A&M Transportation Institute, College Station, Texas |
| Mr. Paul Basha | City of Scottsdale, Arizona |
| Mr. Milton Carrasco | Transoft Solutions, Inc., Richmond, British Columbia |
| Dr. Kelly Clifton | Portland State University, Portland, Oregon |
| Mr. Henry Hogo (for Mr. Barry Wallerstein) | South Coast Air Quality Management District, Diamond Bar, California |
| Mr. Kim Snyder | Prologis, Cerritos, California |
| Ms. Cecilia Ho | Federal Highway Administration, Washington, DC |
| Mr. Ian Macmillan | South Coast Air Quality Management District, Diamond Bar, California |
| Mr. Thomas Phelan | VHB, Newark, New Jersey |
| Mr. Jeremy Raw | Federal Highway Administration, Washington, DC |
| Mr. Erik Ruehr | VRPA Technologies, San Diego, California |
| Mr. Frank Sherkow | Southstar Engineering and Consulting, Inc., Yachats, Oregon |
| Mr. Joe Zietsman | Texas A&M Transportation Institute, College Station, Texas |
| Mr. Tom Brahms | Institute of Transportation Engineers, Washington, DC |
| Mr. Kevin Hooper | Institute of Transportation Engineers, Washington, DC |
| Ms. Lisa Tierney | Institute of Transportation Engineers, Washington, DC |

[1] In California, when a new warehouse project is proposed, it undergoes environmental review pursuant to the California Environmental Quality Act (CEQA). Air quality analyses conducted pursuant to CEQA typically compare project emissions against local air district thresholds to determine the potential significance of the project's air quality impacts. These emission estimates rely on trip generation rates to determine the volume of cars and trucks that could visit the proposed project site.

## HIGH-CUBE WAREHOUSE DEFINITION

A high-cube warehouse (HCW) is a building that typically has at least 200,000 gross square feet of floor area, has a ceiling height of 24 feet or more, and is used primarily for the storage and/or consolidation of manufactured goods (and to a lesser extent, raw materials) prior to their distribution to retail locations or other warehouses. A typical HCW has a high level of on-site automation and logistics management. The automation and logistics enable highly-efficient processing of goods through the HCW.[2]

A classification scheme for different types of HCWs is presented in Table 2 along with their distinctive characteristics. The characteristics of a typical standard warehouse are provided for comparative purposes. The five types of HCW are the following:

- Transload – usually pallet loads or larger handling products of manufacturers, wholesalers/distributors, or retailers with little or no storage durations
- Short-Term Storage – products held on-site for a short time
- Cold Storage – HCW with permanent cold storage in at least part of the building
- Fulfillment Center – storage and direct distribution of e-commerce product to end users
- Parcel Hub – transload function for a parcel delivery company

[2] High-cube warehouses are classified as Land Use Code 152 in ITE *Trip Generation Manual*, 9th Edition. The definition provided in *Trip Generation Manual* for HCW is as follows:

> "High-cube warehouses/distribution centers are used for the storage of materials, goods and merchandise prior to their distribution to retail outlets, distribution centers or warehouses. These facilities are typically characterized by ceiling heights of at least 24 feet with small employment counts due to a high level of mechanization. High-cube warehouses/distribution centers generally consist of large steel or masonry shell buildings and may be occupied by or multiple tenants. A small ancillary office use component may be included and some limited assembly and repackaging may occur within these facilities.
>
> "High-cube warehouses/distribution centers may be located in industrial parks or be free-standing. Intermodal truck terminal (Land Use 030), industrial park (Land Use 130), manufacturing (Land Use 140) and warehousing (Land Use 150) are related uses."

When the 10th edition of *Trip Generation Manual* is developed, the findings and recommendations of this report will be reflected in an updated definition for high-cube warehouses.

## Table 2. High-Cube Warehouse Classifications

| | Standard Warehouse/ Storage | Transload Facility | Short-Term Storage | Cold Storage | Fulfillment Center | Parcel Hub |
|---|---|---|---|---|---|---|
| **Description and Key Warehouse Functions** | | | | | | |
| **Typical Functions** | Products stored on-site typically for more than one month | Focus on consolidation and distribution of pallet loads (or larger) of manufacturers, wholesalers, or retailers; little storage duration; high throughput and high-efficiency | Focus on warehousing/ distribution with distribution space operated at high efficiency; often with custom/special features built into structure for movement of large volumes of freight | Temperature-controlled for frozen food or other perishable products stored in any type of HCW; building built with substantial insulation, including foundation, walls, and roof[3] | Storage and direct distribution of e-commerce product to end users; smaller packages and quantities than for other types of HCW; often multiple mezzanine levels for product storage and picking | Regional and local freight-forwarder facility for time-sensitive shipments via air freight and ground (e.g., UPS, FedEx, USPS); site often includes truck maintenance, wash, or fueling facilities |
| **Break-Bulk or Assembly** | Can include break-bulk and assembly activities | Very limited pick-and-pack area within facility | May or may not include break-bulk, repack or assembly activities | Limited or no break-bulk, repack or assembly activities | Pick-and-pack area comprises majority of space | Limited or no break-bulk, repack or assembly activities |
| **Place in Supply Chain** | | Usually for final distribution to retail stores but can be for manufacturer to wholesale distribution | | Typically, late in the supply chain for final distribution to retail stores or local, smaller distribution centers | Typically, freight for final consumption (business-to-business and consumers) | Can be situated at multiple points in the supply chain (intermediate or final delivery) |

[3] Cold storage products (e.g., flowers and other perishables) that are not frozen must be shipped within hours or a few days. Cold storage products that are frozen may take a long time to ship. Products in these facilities may be treated more like typical HCW products.

| | Standard Warehouse/ Storage | Transload Facility | Short-Term Storage | Cold Storage | Fulfillment Center | Parcel Hub |
|---|---|---|---|---|---|---|
| **Location** | Typically in an industrial area within urban area or urban periphery | Typically in an area with convenient freeway access; often in rural or urban periphery area | Typically in an area with convenient freeway access | Depends on supply and demand markets | Often near a parcel hub or USPS facility, due to time sensitivity of freight | Typically in close proximity to airport; often stand-alone |
| **Overall Site Layout** | | | | | | |
| **Employee Parking** | | Smaller employee parking ratio (per facility square foot) than fulfillment center or parcel hub | Smaller employee parking ratio (per facility square foot) than fulfillment center or parcel hub | | Larger parking supply ratio than for all other HCW types | Larger employee parking ratios; truck drivers often based at facility (i.e., parking may be for both site employees and drivers) |
| **Truck & Trailer Parking** | Limited truck parking area; increases with distance to major distribution hub | Large, open trailer parking area surrounding facility; produces high land to building ratio | Ratio of truck parking spaces to docks can vary between 0.5:1 and 1.5:1, with 1:1 being very common | Can vary with whether products are frozen or perishable[4] | Significantly higher truck parking ratios than for other HCWs | Very high truck parking ratios to dock positions, often 2:1 or more |
| **Loading Dock Location** | Either on one side or on two adjacent sides | Minimum of two sides (adjacent or opposite); can be on four sides | On either one or two sides | | | Usually on both long sides of building; can be on four sides |
| **Building Dimensions** | | | | | | |
| **Length vs. Depth** | | Typical length vs. depth ranges between 3:1 and 2:1; shallower than Standard | Typical length vs. depth is 2:1; shallower than Standard | | | Typical configuration is cross-dock; building typically more shallow (150-300 feet across) than other HCWs |

[4] Cold storage product handling must be done quickly. Any product stored in a trailer on the site requires either an idling truck or an external power supply to maintain the temperature within the required ranges.

| | Standard Warehouse/ Storage | Transload Facility | Short-Term Storage | Cold Storage | Fulfillment Center | Parcel Hub |
|---|---|---|---|---|---|---|
| **Ceiling Height** | Typically between 28 and 40 feet | Typically, lower than for other HCW | Typically between 28 and 34 feet, with some facilities in excess of 40 feet | Typically higher (70-100 feet) to maximize efficiency of refrigeration; frozen food tends to have a higher ceiling than produce handling | Often as high as 40 feet in order to accommodate up to three levels of interior mezzanines | Typically not as tall as other HCW; commonly between 18 and 20 feet range; racking not usually provided (i.e. floor-stack only) |
| **Number of Docks** | Low number of dock positions to overall facility, 1:20,000 square feet or lower | Typical dock-high loading door ratio is 1:10,000 square feet; common range between 1:5,000 & 1:15,000 square feet | Typically, 1:10,000 square feet or lower | | | |
| **Automation** | | | | | | |
| **Material Handling Systems** | Little or no automation; mechanization limited to pallet jacks and forklifts | Very highly-mechanized material handling systems | Very highly-mechanized material handling systems; high ratio of material handling equipment to overall floor area | Very high clear height requires sophisticated material handling equipment | High levels of automation in material handling equipment | High levels of automation in material handling equipment |
| **Conveying Systems** | Little or no automation | Usually automated mechanized conveying | Usually limited automated conveying | Very high clear height requires a sophisticated conveyance system | High levels of automation in conveying systems | High levels of automation in conveying systems |
| **Warehouse Mgmt Systems (WMS)** | | Some facilities use ASRS (Automated Storage and Retrieval Systems) | | | High levels of automation; some use of ASRS | High levels of automation |

**Table 2. Additional Descriptive Features**

Typical Floor Area Ratios range between 35 and 60 percent. Standard, Fulfillment Center, and Parcel Hub sites tend to have higher values than Transload and Short-Term Storage HCW.

Office/Employee Welfare[5] Space is highly variable and is insignificant within overall building square footage. Common values are between 3,000 and 5,000 square feet for Cold Storage and between 5,000 and 10,000 square feet for Transload Facility, Fulfillment Center, and Parcel Hub.

Movement of Goods in Trucks – For a Transload site, typical truck movements are comprised of full load, large trailers, both inbound and outbound. For some "last mile" or local distribution centers, long-haul trucks or international containers can arrive loaded and depart empty, while local delivery trucks arrive empty and depart loaded. For national and regional distribution centers, trucks can come in loaded and re-load with different product mix and depart loaded.

Hours of Operation and Peak Periods – Peak truck movement activity is often outside the peak commuting period on the adjacent street system. HCW operations are often 24 hours per day, every day of the year. For a Standard site, there is a greater likelihood that the site peak period of traffic operations may coincide with or be near the street peak period.

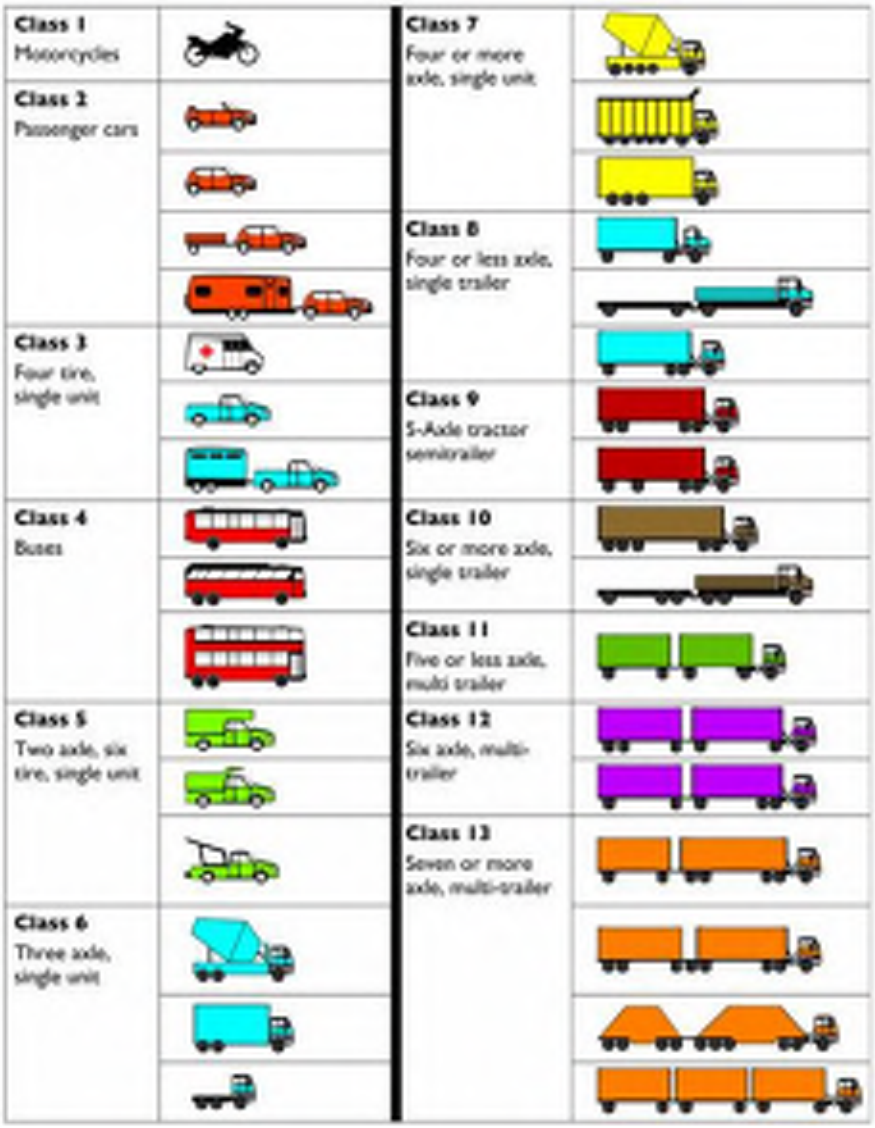
Truck Sizes – Truck size can vary significantly between similar sites. Sizes and types are a function of the origins and destinations of the goods processed at the facility (i.e., location in the supply chain). Local deliveries to business/residential customers are commonly made with smaller trucks (except warehouses that, for example, deliver bulky items to a home improvement store). Longer distance travel or deliveries at early stages in the supply chain are typically with larger trailers. For Cold Storage and Fulfillment Center, the outbound trucks are often smaller because of cargo weight and last-mile distribution needs. Intermediate hubs accommodate large trucks on both the inbound and outbound side (e.g., FedEx Ground). "Final delivery" hubs have small trucks on the outbound side (e.g., FedEx Overnight).

[5] Employee welfare area includes restrooms, locker rooms, and break rooms.

## VEHICLE CLASSIFICATION FOR WAREHOUSE TRIP GENERATION DATA

The preferred vehicle classification scheme should satisfy both the ultimate needs for TIA and AQA analysis and comply with reasonable data collection capabilities and budgets. FHWA maintains a 13-category classification system for motorized vehicles (presented in Figure 1 and maintained at the following website: http://www.fhwa.dot.gov/policyinformation/tmguide/tmg_2013/vehicle-types.cfm).

**Figure 1**. **FHWA Vehicle Classification Types**




The vehicle types that enter and exit a HCW site can be separated to correspond to individual "markets:"

- Vehicles used for employee and facility service access (i.e., for goods and services consumed on site)
- Vehicles used for local delivery access (e.g., wholesale and retail delivery for consumption in the local metropolitan area)
- Vehicles used for high-volume transfer (e.g., long-distance freight, relay distribution to other distribution or warehouse facilities)

A simple and straightforward correlation between “markets” and the 13 FHWA classifications is as follows:

1. Facility Access: includes Classes 2 and 3 (passenger cars and light trucks), and Classes 1 and 4 (motorcycles and buses) if observed
2. Local Goods Movement: includes Classes 5 through 7 (two-, three-, and four-axle single-unit trucks)
3. Long Distance Goods Movement: includes Classes 8 through 13 (multi-unit trucks)

A significant limitation to this classification scheme is the growing disconnect between truck size and trip length over time. They do not correlate as well for many carriers as they did in the past. There is a wide range of practices in deliveries and many prominent retail chains currently use trucks in Classes 8 and 9, for example, for local deliveries. In other words, a Class 8-13 vehicle is not necessarily a long-distance truck trip.

The primary advantage of mapping these vehicle types to the FHWA classification scheme is that commercially available automated monitoring equipment is generally capable of reporting the FHWA vehicle classes without specialized data interpretation.

Encouraging agencies to develop local counts of these facilities will also be more successful if the agencies can use standard automated counters without specialized software, even at the expense of occasional misclassification relative to “ideal” categories for a warehouse trip generation study. Video detection could make more information available, but at greater expense for data processing.

It is also important to recognize that counting equipment manufacturers (and often representatives of a public agency) are able to reprogram automated counters to use an alternate classification scheme. For example, if there is a specific axle configuration commonly used for domestic container freight versus international container freight at a particular data collection site, it may be feasible to detect. Such schemes are relatively easy to share among agencies using the same types of equipment.

As noted above, the observed physical vehicle type based on a FHWA class may not provide sufficient information on its own to identify the “purpose” of the truck trip. The classification scheme may need to be adjusted to reflect the specific trip-making to and from a subject warehouse site. The following are examples of refinements that could be necessary given the particular characteristics of a warehouse site:

1. Even in a standard traffic monitoring application, the distinction between a passenger car (Class 2) and a light truck (Class 3: pickups, large SUVs, vans) has limited benefit and is difficult to establish decisively. For the warehouse trip generation application, the merging of these classes should improve overall accuracy.
2. Local goods movement may also include Class 3 vehicles (specifically two-axle vans). If separate driveways are used for goods movement and general facility access, the Class 3 vehicles in the goods movement driveway can be considered local goods movement vehicles.
3. It is sometimes difficult for automated equipment to distinguish between a Class 4 vehicle (bus) and a Class 5/6 truck. In the rare circumstance where a bus enters or exits a warehouse site driveway, a manual count or simple reference to a published transit service schedule may be necessary.
4. Class 5 vehicles include “dualie” pickups which may operate as personal vehicles for facility access or as larger panel trucks often used for local goods delivery. The presence of and use of separate driveways for goods movement and general facility access may be the only means to distinguish between the two types of uses.

## DATA NEEDS FOR TIA AND AQA

Typical data requirements for TIA and AQA are listed in Table 3. Some measures are used to classify a building type. Some measures can be used as independent variables with a direct relationship to the quantity of vehicle trips generated by a site (by vehicle type).

**Table 3. Data Needs for HCW Trip Generation Analysis**

| **Vehicle Trip Data** | TIA | AQA |
|---|---|---|
| ***Vehicle Trips by Vehicle Classification*** | | |
| • 2 classifications – car, truck | √ | |
| • 4 classifications – personal passenger vehicle, parcel delivery, single unit truck, tractor-trailer combination | *[6] | √ |
| ***Vehicle Trips by Time-of-Day*** (by vehicle classification) | | |
| • Directional 15-minute volumes on a weekday (typically Tuesday, Wednesday, or Thursday) | | |
| o AM peak hour for generator | √ | |
| o AM peak hour for adjacent street | √ | |
| o PM peak hour for generator | √ | |
| o PM peak hour for adjacent street | √ | |
| • Non-directional 24-hour volume on a weekday | | √ |
| ***Vehicle Trips by Driveway*** (if employees and freight delivery use separate driveways) | √ | √ |
| ***Vehicle Trips within Context of Seasonal Variations*** | | |
| • Daily Variations | √ | √ |
| • Monthly Variations | | √ |
| • Highest Day of Year | | √ |
| | | |
| **Independent Variable Data** | | |
| ***Building Size*** | | |
| Building GSF[7] (total, office, retail, manufacturing/enhancements, storage/distribution) | √ | √ |
| Building Volume (cubic feet) | √ | √ |
| Building Shape (length-to-depth ratio) | | √ |
| Number of High-Loading docks | √ | √ |
| ***Building Function*** | | |
| Cold Storage Provided | √ | √ |
| NAICS Industrial Code | √ | √ |
| Employees | √ | √ |
| Commodity type (retail, manufacturing, other) | √ | √ |
| Where in Supply Chain (parts, manufacturer/assembly, wholesale/distributor, retailer) | | √ |
| ***Site Size*** | | |
| Site acres | √ | √ |
| Floor area ratio (FAR) | √ | √ |
| Parking spaces (employee/visitor, truck/trailer) | √ | √ |
| ***Site Context*** | | |
| Area type (urban, suburban, rural) | √ | √ |
| Distance to port (seaport, intermodal center, regional air cargo) | √ | √ |

[6] Some TIA may require truck classification information.
[7] GSF is gross square footage of the building.

## ASSEMBLY AND CLASSIFICATION OF CURRENTLY AVAILABLE DATA

Data from the following studies were compiled and analyzed for possible use in the trip generation analysis for the High-Cube Warehouse study:

- Warehouse Truck Trip Study, Data Results and Usage, South Coast Air Quality Management District, Diamond Bar, CA 2014
- Trip Generation Analysis for High-Cube Warehouse Distribution Center, prepared for NAIOP by Kunzman Associates, Laguna Hills, CA 2011
- Trip Generation Characteristics of Discount/Home Improvement Superstores, Major Distribution Centers, and Small Box Stores, prepared for Florida Department of Transportation by Wilbur Smith Associates 2011
- Western Riverside County Warehouse/Distribution Center Trip Generation Study, prepared for NAIOP by Crain & Associates, Los Angeles, CA 2008
- Westside Industrial Park Warehouse Trip Generation, prepared for Premier Airport Park by King Engineering Associates, Jacksonville, FL 2008
- Trip Generation Study, Existing High-Cube Warehouse Facilities, Visalia CA, prepared for The Allen group by Peters Engineering Group, Clovis CA 2008
- Large-Scale Retail Distribution Centers, prepared for Walmart Sores, Inc. by Kimley-Horn and Associates, Tampa, FL 2007
- Trip Generation Study, High-Cube Warehouse Buildings, Fresno, California, prepared for Diversified Development Group by Peters Engineering Group, Clovis CA 2007
- Trip Generation Study, High Cube Warehouse, prepared by Schoor Depalma, Manalapan, NJ 2006
- San Bernardino/Riverside County Warehouse/Distribution Center Vehicle Trip Generation Study, prepared for NAIOP by Crain & Associates, Los Angeles, CA 2005
- Truck Trip Generation Study, prepared for City of Fontana (CA) by Transportation Engineering and Planning, Inc. 2003
- Trip Generation Analysis for High-Cube Warehouses, prepared for City of Livermore, CA by Fehr & Peers Associates, Lafayette, CA 1989

The data also includes site trip generation data provided by Texas A&M Transportation Institute (2008-2009), Randall Parker (2007), and Washington State Department of Transportation (2002).

The data were reviewed for their applicability and only acceptable sites with appropriate data are used in the analysis presented in the following section of this report. Some of the purported high-cube warehouses are instead standard storage warehouses or multi-building industrial parks. Some of the high-cube warehouse data for individual sites could not be used due to unexplained data characteristics (e.g., a significant imbalance in inbound and outbound daily vehicle trips).

The final current database of HCW sites contains 107 data records with varying degrees of vehicle classification data and of daily and peak hour traffic counts.

## HIGH-CUBE WAREHOUSE TRIP GENERATION DATA ANALYSIS[8]

### Classification of Individual Data Records

Each record in the database of HCW sites was classified as one of five building types, defined earlier in this report. The criteria used to classify the sites represent information that is likely to be available at the time of site development review.

The database includes one fulfillment center, one parcel hub, and nine HCWs with a significant cold storage component[9]. The remaining 95 HCWs were separated into transload and short-term storage HCW based on two building configuration criteria:

- A transload building is assumed to have a length-to-depth ratio of at least 2:1 and has loading docks on at least two sides (either opposite or adjacent); there are 56 transload data points
- The remaining HCW sites (i.e., those that are not considered transload, cold storage, fulfillment center, or parcel hub) are classified as short-term storage HCWs; they total 39 sites

Building configuration is known at the time of site development review but has the limitation of not necessarily being indicative of the function of the HCW activities. If additional characteristics can be identified that (1) are predictive of the HCW function and (2) are available at the time of site development review, the database can be reexamined and potentially reclassified and reanalyzed.

### Key Findings – Cars vs. Total Vehicles

There is a significant correlation between the number of cars that enter and exit a HCW site and the total number of vehicles that enter and exit a HCW site.

Table 4 lists the weighted averages for cars as a percentage of the total site-generated traffic at the five types of HCW. At short-term storage, transload, and cold storage HCWs, nearly 68 percent of the total daily site-generated vehicle trips are cars. During the AM peak hour, the measured percentage of cars is markedly similar (69 percent) to the daily (68 percent). During the PM peak hour, the measured percentage of cars is significantly higher (78 percent) than the daily value. The higher car percentage (and therefore, the lower truck percentage) is likely due to truck operations avoiding the afternoon peak period.

The fulfillment center has a significantly higher percentage of cars during the AM and PM peak hours and daily (due largely to the significantly higher number of employees at a fulfillment center compared to the other types of HCWs). The parcel hub has a significantly lower percentage of cars (and therefore a higher percentage of trucks) during the AM and PM peak hours and daily.

**Table 4. Weighted Averages for Percentage of Total Daily Vehicles that are Cars, by Type of HCW**

| Type of High-Cube Warehouse | Cars as Percentage of Total Vehicles | | |
|---|---|---|---|
| | Daily | AM Peak Hour | PM Peak Hour |
| Short-Term Storage, Transload & Cold Storage (100) | 67.8% | 69.2% | 78.3% |
| Fulfillment Center (1) | 91.2 | 97.2 | 98.2 |
| Parcel Hub (1) | 62.3 | 50.3 | 70.7 |

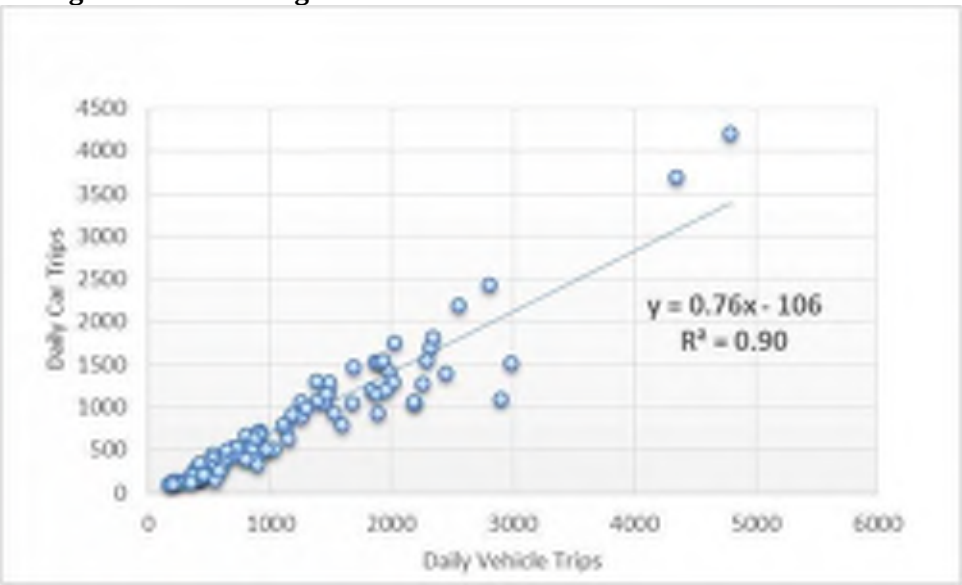
Note: The values in parentheses represent the number of data collection sites for HCW type.

[8] This section presents key analysis findings. Appendix A presents additional analyses of the HCW data.

[9] Sites were classified as cold storage either through self-categorization by data submitter (e.g., Walmart), by type of tenant (e.g., Ralphs, Publix), or by online site description (e.g., Americold, Millard Refrigeration Services).

Figure 2 is a plot of daily car trips versus daily vehicle trips generated at transload, short-term storage, and cold storage HCWs. The plot demonstrates strong correlation between the two trip-making characteristics of HCW sites. The data yields a linear fitted curve equation with an $R^2$ value of 0.90. The correlation between the daily truck trips and daily vehicle trips is not as strong and yields a linear fitted curve equation $R^2$ value that is less than the ITE acceptability threshold of 0.50.

**Figure 2. Correlation between Daily Cars and Total Daily Traffic at Transload, Short-Term Storage and Cold Storage HCW Sites**




**<u>Key Findings – Daily Trip Generation</u>**

Table 5 compares daily trip rates for the five different types of HCWs. The table includes weighted average rates for all vehicles, cars, trucks, and 5-or-more-axle trucks. The table also includes the weighted average rate for daily vehicle trips contained in ITE *Trip Generation Manual* 9th Edition, for high-cube warehouses (land use code 152). The single fulfillment center count was taken during a holiday shopping season when activity would be expected to be higher than an annual average.

**Table 5. Weighted Average Rates for Daily Trips at High-Cube Warehouses**

| Type of High-Cube Warehouse | Weighted Average for Daily Trips per 1,000 GSF[10] | | | |
|---|---|---|---|---|
| | All Vehicles | Cars | Trucks | 5+ Axle Trucks |
| Transload & Short-Term Storage (91) | 1.432 | 1.000 | 0.454 | 0.233 |
| Cold Storage (9) | 2.115 | 1.282 | 0.836 | 0.749 |
| Fulfillment Center (1) | 8.178 | 7.461 | 0.717 | 0.242 |
| Parcel Hub (1) | 10.638 | 6.631 | 4.007 | 0.982 |
| ITE *Trip Generation Manual* – 9th Edition | 1.68 | -- | -- | -- |

Note: The values in parentheses represent the number of data collection sites for HCW type.

[10] The weighted average rates for cars and trucks may not sum to match the "all vehicle" rates because some data sources collected total vehicle trips and did not separate cars and trucks.

*Fulfillment Center and Parcel Hub*

Based on data from single data points, it is likely that vehicle trip generation rates for fulfillment centers and parcel hubs are significantly different from those at other HCW sites.

The single fulfillment center has a substantially higher vehicle trip generation rate than transload, short-term storage, and cold storage HCW sites. The higher rate is due both to a higher number of passenger cars (i.e., employees) entering and exiting the site and to the count being conducted in December during the holiday shopping season.

The single parcel hub HCW has a rate that is higher than even the fulfillment center for all vehicles. The rate for trucks (both total and 5+ axle) is substantially higher than for the other HCW types.

*Cold Storage*

For the relatively small number of data points in the HCW database that are classified as cold storage facilities, there is a strong correlation between vehicle trips and building gross square footage.

Figure 3 is a plot of daily total vehicle trips versus building gross square footage at all cold storage facilities in the database. The data yields a linear fitted curve equation with an $R^2$ value of 0.69. As recommended in ITE *Trip Generation Handbook* 3rd Edition, the fitted curve should be considered acceptable only within the building site size range in the dataset[11]. The weighted average rate (shown above in Table 5) is 2.115 total vehicles per 1,000 GSF for a cold storage HCW site.

**Figure 3. Correlation between Daily Total Vehicles and Cold Storage GSF (All Sites)**

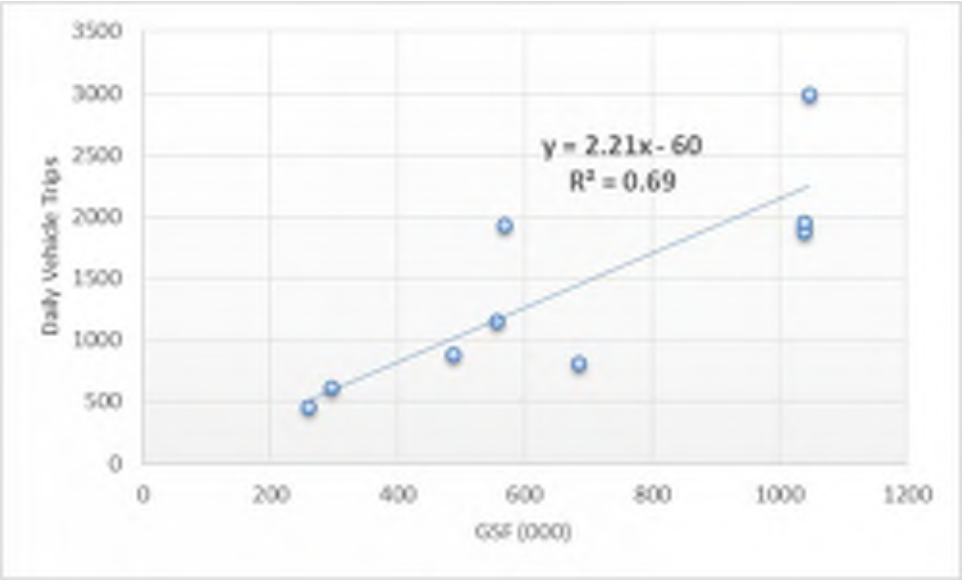
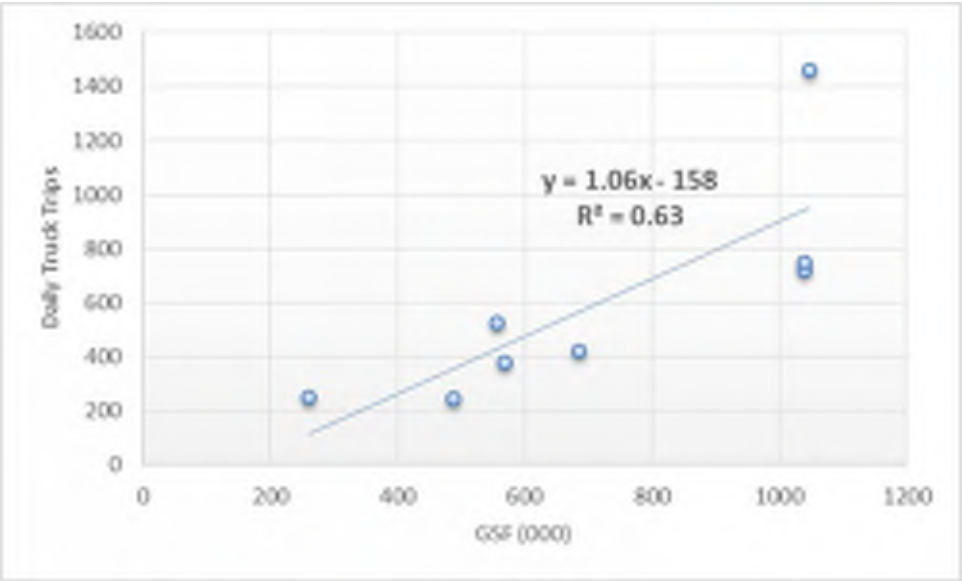



Figure 4 presents the data plot for daily trucks. The plot includes a fitted curve equation with an acceptable $R^2$ value. The weighted average rate for daily trucks at a cold storage HCW is 0.836 trucks per 1,000 GSF.

[11] The best correlation is found for sites with gross square footage of 500,000 or less, with greater data scatter for larger buildings. Nevertheless, there are several sites with gross square footage of more than 500,000 that have daily vehicle trip generation rates that mirror the small sites.

**Figure 4. Correlation between Daily Trucks and Cold Storage GSF (SCAQMD & NAIOP Sites)**




*Transload and Short-Term Storage*

It would be expected that a transload site could generate a different number of vehicle trips than a short-term storage HCW. But, as currently classified in this report, the sites that fall into the two categories show very little difference between the two. Therefore, the two types are analyzed together in this report. If an appropriate building characteristic can be identified at the time of site development review, the sites in the database can be re-examined and potentially reclassified and the trip-generating characteristics reanalyzed.

For this combination of HCW types, the relationship between building gross square footage and vehicle trips does not produce an acceptable level of correlation to develop a fitted curve equation. Figure 5 presents a plot of daily vehicle trips against building square footage.

The weighted average rate for transload and short-term storage HCW sites is 1.432 daily vehicle trips per 1,000 GSF (listed earlier in Table 5). As a point of comparison, this rate is lower than the weighted average rate of 1.68 provided in ITE *Trip Generation Manual* 9$^{th}$ Edition, for the High-Cube Warehouse land use.

The transload and short-term storage HCW dataset is much larger than the other HCW datasets. This larger dataset exhibits much greater scatter than the smaller datasets. This circumstance suggests that more data for the other HCW facility types are necessary to determine if the small dataset high correlations are accurate and justified.

**Figure 5. Daily Vehicle Trips at Transload and Short-Term Storage HCW**

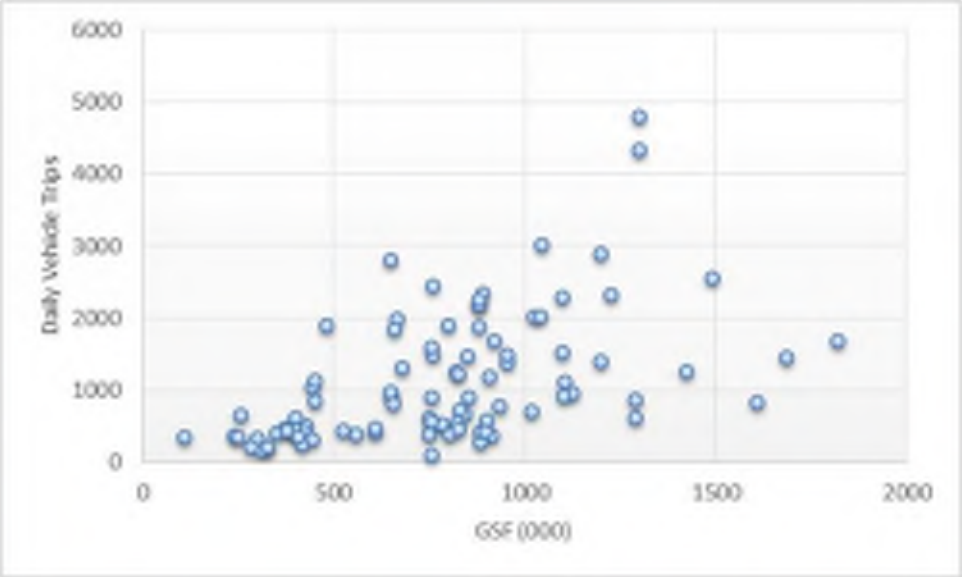
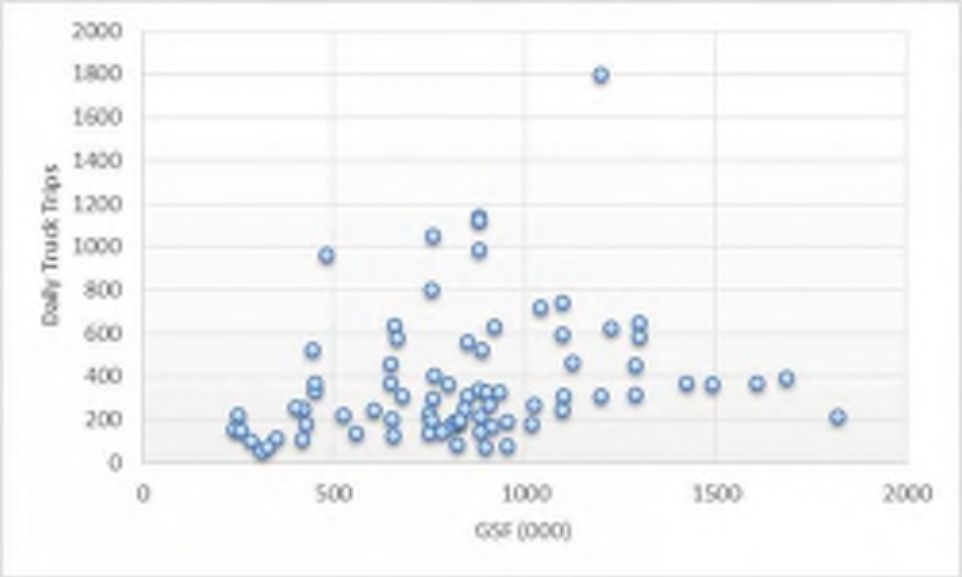



Figure 6 presents a plot of daily truck trips against building square footage at transload and short-term storage HCW. For trucks, the weighted average rate is 0.454 trucks per 1,000 GSF.

**Figure 6. Daily Truck Trips at Transload and Short-Term Storage HCW**



**Key Findings – Peak Hour Trip Generation**

Tables 6 and 7 list the weighted average rates for the AM and PM peak hours, respectively, for the five types of HCWs. The tables also include the weighted average rate for peak hour vehicle trips contained in ITE *Trip Generation Manual* 9th Edition, for high-cube warehouse (land use code 152).

**Table 6. Weighted Average Rates for AM Peak Hour Trips at High-Cube Warehouses**

| Type of High-Cube Warehouse | Weighted Average for AM Peak Hour Trips per 1,000 GSF | | | |
|---|---|---|---|---|
| | All Vehicles | Cars | Trucks | 5+ Axle Trucks |
| Transload & Short-Term Storage (94) | 0.082 | 0.057 | 0.024 | 0.015 |
| Cold Storage (9) | 0.103 | 0.061 | 0.038 | 0.027 |
| Fulfillment Center (1) | 0.841 | 0.818 | 0.023 | 0.009 |
| Parcel Hub (1) | 0.851 | 0.428 | 0.423 | 0.041 |
| ITE *Trip Generation Manual* – 9th Edition | 0.11 | -- | -- | -- |

Note: The values in parentheses represent the number of data collection sites for HCW type.

**Table 7. Weighted Average Rates for PM Peak Hour Trips at High-Cube Warehouses**

| Type of High-Cube Warehouse | Weighted Average for PM Peak Hour Trips per 1,000 GSF | | | |
|---|---|---|---|---|
| | All Vehicles | Cars | Trucks | 5+ Axle Trucks |
| Transload & Short-Term Storage (95) | 0.108 | 0.086 | 0.023 | 0.010 |
| Cold Storage (9) | 0.129 | 0.087 | 0.042 | 0.031 |
| Fulfillment Center (1) | 1.979 | 1.944 | 0.035 | 0.013 |
| Parcel Hub (1) | 0.803 | 0.568 | 0.235 | 0.009 |
| ITE *Trip Generation Manual* – 9th Edition | 0.12 | -- | -- | -- |

Note: The values in parentheses represent the number of data collection sites for HCW type.

*Fulfillment Center*

The single surveyed fulfillment center HCW has a significantly higher rate for passenger cars during both the AM and PM peak hours (as is the case for daily trips at the fulfillment center). The single fulfillment center count was taken during the December holiday shopping season.

The single surveyed parcel hub HCW has significantly higher rates for both cars and trucks during both the AM and PM peak hours (as is the case for daily trips at the fulfillment center).

*Cold Storage*

For cold storage HCW, fitted curve equations can be developed for estimating total vehicles during the AM and PM peak hours. The equations are:

- AM peak hour: $y = 0.17x – 40$ ($R^2 = 0.82$)
- PM peak hour: $y = 0.17x – 35$ ($R^2 = 0.83$)

The cold storage HCW weighted average rates during the AM and PM peak hours are, respectively, 0.103 and 0.129 total vehicle trips per 1,000 GSF. Both rates are close to the ITE *Trip Generation Manual* 9th Edition rate for all high-cube warehouses (land use code 152).

*Transload and Short-Term Storage*

Data plots for the AM and PM peak hours (not presented in this report) are comparable to the daily plot in terms of data scatter and little correlation. The weighted average rates for the AM and PM peak hours are:

- 0.082 total vehicles per 1,000 GSF during the AM peak hour
- 0.108 total vehicles per 1,000 GSF during the PM peak hour

As points of comparison, these rates are lower than the AM and PM weighted average rates of 0.11 and 0.12, respectively, provided in ITE *Trip Generation Manual* 9th Edition for the High-Cube Warehouse land use.

The weighted average rates for truck trips at transload and short-term storage HCWs during the AM and PM peak hours are:

- 0.024 trucks per 1,000 GSF during the AM peak hour
- 0.023 trucks per 1,000 GSF during the PM peak hour

## RECOMMENDATIONS

The preceding analysis of available HCW trip generation data identified significant weaknesses in the ability to forecast vehicle trips with confidence. The following recommendations present a plan of action for quantifying necessary vehicle trip estimates to an acceptable level of precision for all types of HCWs.

### Fulfillment Center HCW

The single available data point indicates that the trip generation characteristics (total vehicle trips and trips by vehicle type) for a fulfillment center HCW are significantly different from those for all other types of HCWs. A targeted data collection effort should be undertaken (as described below) to achieve a total of at least six sites. Included should be circulation of a Call for Data by ITE that specifically requests data for fulfillment centers. If future analysis reveals an unacceptable level of stability in the trip generation relationships, data should be collected at additional sites.

### Parcel Hub HCW

The single available data point indicates that the trip generation characteristics (total vehicle trips and trips by vehicle type) for a parcel hub HCW are significantly different from those for all other types of HCWs. It is recommended that ITE circulate a Call for Data that specifically requests data for parcel hubs. A targeted data collection effort should be undertaken (as described below) to achieve a total of at least six sites. If future analysis reveals an unacceptable level of stability in the trip generation relationships, data should be collected at additional sites.

### Cold Storage HCW

The limited data available for cold storage facilities produce acceptable levels of statistical precision for the estimation of vehicle trips. However, vehicle trip generation rates based on recently collected data are higher than those derived from data collected at least 10 years ago. It is recommended that (1) further investigation be made into the existing data and (2) additional data be collected.

The cold storage sites in the database are classified as such based on the interpretation of the data submitter. Confirmation of the applicability of the cold storage classification can be completed through determination of the proportion of the HCW building space devoted to cold storage. This information will also help in the development of a clear definition of cold storage facilities and their characteristics.

If some of the cold storage sites are reclassified, a targeted data collection effort should be undertaken (as described below) to achieve a total of at least six sites. Included should be circulation of a Call for Data by ITE that specifically requests data for cold storage facilities. If future analysis reveals an unacceptable level of stability in the trip generation relationships, data should be collected at additional sites.

### Transload and Short-Term Storage HCW

The current database of sites for this subset of HCW types has been separated in accordance with building and dock configurations specified earlier in this report. To use a metaphor, it is possible that instead of separating the sites into apples and oranges, the sites have been separated into two sets that each contain both apples and oranges. The result is a pair of databases that (1) are not significantly different from each other in terms of trip generation and (2) do not yield satisfactory levels of correlation between building gross square footage and vehicle trips. It is possible that a more accurate allocation of the available data points between the two types of HCWs could produce better predictive relationships.

It is recommended that an analysis and evaluation of potential stratifications be undertaken and an appropriate set of data (along with a weighted average rate) be selected for use as interim rates until further study is complete (as described below).

**Overall**

It is recommended that a targeted data collection plan be undertaken in an attempt to further define and identify relationships between potential independent variables and vehicle trips generated at each type of HCW. A six-step process is presented below.

Step 1: Select 15 Sites[12] with Similar Characteristics for Data Collection and Further Analysis

- For each site, compile the data specified earlier in Table 3
- If the Table 3 data are available for the sites at which SCAQMD or NAIOP collected data, these sites and their data can be considered part of the initial 15
- Limit sites to one or two metropolitan regions. Preference should be given to a region with an existing freight model that disaggregates truck trips and commodity flow to the county or traffic analysis zone level, for cross-referencing purposes.

Step 2: Collect Data at the Initial 15 Sites

- Collect the vehicle volume data specified in Table 8

Step 3: Analyze Complete Data for Consistency and Correlation with One or More Independent Variables

- If consistency and correlations are found, skip to Step 5

Step 4: Identify 15 Additional Sites and Undertake Data Collection

- Summarize and analyze results, assessing consistency
- The results will set an approximate expectation for future data. They may be described statistically and/or in other clear terms.
- If variability is still considered significantly high by ITE standards, assess probable causes, further partition data into more subgroups, and reanalyze data. Use results to determine how to classify warehouse types for future data collection.

Step 5: Identify 15 Sites and Collect Data for Next Priority HCW Classification

- 15-30 sites (including usable existing data) in at least two metropolitan regions (may be selected to reflect funding sources)
- 3 year-long counts
- Compare year-long counts from second HCW type with those from first HCW type to determine if additional year-long counts are needed to show variability in different types of HCWs

[12] For a database with substantial uniformity in the characteristics that influence trip generation, a relatively small number of sites can produce predictive relationships with excellent statistical reliability (for example, perhaps the cold storage facilities). However, for sites with substantial variability, a database total of approximately 30 sites is typically recommended based on the central limit theorem. The theorem states that the sampling distribution of the means will approach that of a normal distribution with that quantity of data points even if the population being sampled is not normally distributed.

Step 6: Summarize and analyze data for each type of HCW, developing rates and equations where correlation is suitable. Identify patterns, trends, and other findings relevant to estimating HCW trip generation for use in TIAs and AQAs. Assess how many HCW types are needed/justified.

**Table 8. Minimum Data Collection for Each HCW Type**

| |
|---|
| • 15 sites including those for which there are usable existing data |
| • One or two metropolitan regions – preference should be for a region with an existing freight model that disaggregates truck trips and commodity flow to the county or TAZ level, for cross-referencing purposes |
| • Similar site characteristics (to minimize variability of results (desirably most common in metro region where data to be collected) |
| • 1-2 NAICS industrial codes – we may need to loosen this requirement in order to find 15 acceptable sites in a single metropolitan area; we may need to use data from sites in multiple metropolitan areas; should be used in site selection process, not as a prescriptive requirement |
| • Year-long count at 3 sites |
| • All counts by video; all files to be retained for possible future use; examine via simultaneous video and tube counts what the discrepancy rates might be for purpose classification based physical vehicle types and standard FHWA classes versus actually seeing the trucks on video |
| • All counts to follow ITE site trip generation count procedures with counts being made directionally by vehicle classification and recorded by driveway, by direction, and by 15 minute period so they can be checked (and reconstructed if necessary) |

## APPENDIX A. SUPPLEMENTAL DETAILED DATA ANALYSIS

### Data Analysis Process

The database of 106 HCWs with vehicle trip generation data consists of one fulfillment center, one parcel hub, nine cold storage, 56 transload, and 39 short-term storage.

For each data record, a range of traffic count data is available.

- For many records, a daily count is provided. For many records, AM and PM peak hour traffic counts are provided.
- For some data records, the count data is reported simply as total vehicles. In some records, the vehicle counts are classified as cars or trucks. In some records, the vehicle counts are classified as cars and trucks, disaggregated by number of axles.

The data were disaggregated and aggregated in a variety of ways to help determine the effects of certain potential variables on vehicle trip generation.

- The entire database for each facility type
- Only the recent SCAQMD-sponsored data collection sites
- Only the recent NAIOP-sponsored data collection sites
- The combination of the recent SCAQMD- and NAIOP-sponsored data collection sites
- All data except for the recent SCAQMD- and NAIOP-sponsored data collection sites
- Sites with at least 500,000 gross square footage
- Sites with at least 800,000 gross square footage
- Sites with at least 1 million gross square footage
- Sites with data collected prior to 2007
- Sites with data collected after 2006
- Sites with data collected prior to 2010
- Sites with data collected after 2009
- Only California sites
- Only sites with close proximity to major port facilities

The vehicle count data were analyzed separately for the fulfillment center, parcel hub, cold storage, transload, and short-term storage HCWs.

- The results for fulfillment center, parcel hub, and cold storage are distinctly different from each other and are addressed separately below
- The results for transload and short-term storage HCWs are not substantially different from each other and are treated in combination below

The database enabled the compilation of over 1,500 subsets of HCW trip generation data that reflect:

- 7 different combinations of building types,
- 6 different sets for individual vehicle classifications or combinations,
- 13 different subsets of the database, and
- 3 different time periods (daily, AM, PM)

Weighted averages of vehicles per 1,000 gross square feet in the building were computed for each subset. Data plots with best fit linear curves were prepared for each subset. Examination of the data yields very few definitive relationships between site characteristics and vehicle trip generation. Key findings from these analyses are presented below.

**Cars vs. Total Vehicles**

Table A1 presents the weighted averages for cars, trucks, and 5+ axle trucks as a percentage of total daily vehicles measured at HCW sites. Separate calculations are presented for the entire database and for13 different subsets. When the complete set is included, the overall average is approximately 68 percent cars and 32 percent trucks of the total daily vehicles. There is minimal variation between the most recent data sources (SCAQMD and NAIOP) or between different building sizes. However, the more recent average data (post-2006 and post-2009) has a higher proportion of cars than does the older data collection sites.

**Table A1. Weighted Averages for Percentage of Total Daily Vehicles for Cars and Trucks**

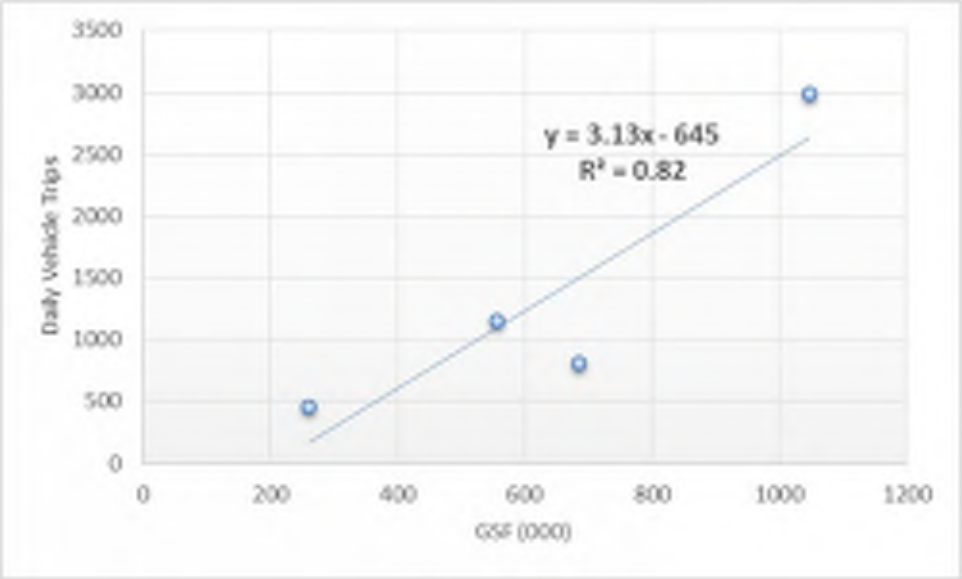
| Data Site Subset | Percentage of Total Daily Vehicles | | |
|---|---|---|---|
| | Cars | Trucks | 5+ Axle Trucks |
| All | 67.8% | 32.2% | 19.4% |
| SCAQMD | 69.0 | 31.0 | 17.7 |
| NAIOP | 68.6 | 31.4 | 21.8 |
| SCAQMD & NAIOP | 68.8 | 31.2 | 19.0 |
| Non-SCAQMD or NAIOP | 66.6 | 33.4 | --- |
| More than 500,000 GSF | 68.7 | 31.3 | 19.2 |
| More than 800,000 GSF | 69.4 | 30.6 | 18.5 |
| More than 1,000,000 GSF | 70.3 | 29.7 | 21.2 |
| Pre-2007 | 62.1 | 37.9 | --- |
| Post-2006 | 70.1 | 29.9 | 19.5 |
| Pre-2010 | 60.9 | 39.1 | 28.2 |
| Post-2009 | 70.7 | 29.3 | 19.0 |
| California Only | 67.6 | 32.4 | 18.9 |

**Cold Storage HCW**

If the cold storage HCW data are restricted to only include data collected under sponsorship of SCAQMD and NAIOP within the past eight years, the correlation between daily total vehicles and site gross square footage can be improved beyond the full dataset correlation. Figure A1 presents the data plot and associated fitted curve[13]. As recommended in ITE *Trip Generation Handbook* 3rd Edition, the fitted curve should be considered acceptable only within the building site size range in the dataset.

[13] Granted, the improved correlation in Figure A3 is due in part to requiring correlation to only four data points.

**Figure A1. Correlation between Daily Total Vehicles and Cold Storage GSF (SCAQMD & NAIOP Sites)**




Correlation is also exhibited for cars, trucks, and 5+ axle trucks for daily traffic generated at cold storage facilities. Figures A2, A3, and A4 present the data plots for cars, trucks, and 5+ axle trucks, respectively. As recommended in ITE *Trip Generation Handbook* 3rd Edition, the fitted curves should be considered acceptable only within the building site size range in the dataset.

**Figure A2. Correlation between Daily Cars and Cold Storage GSF (SCAQMD & NAIOP Sites)**

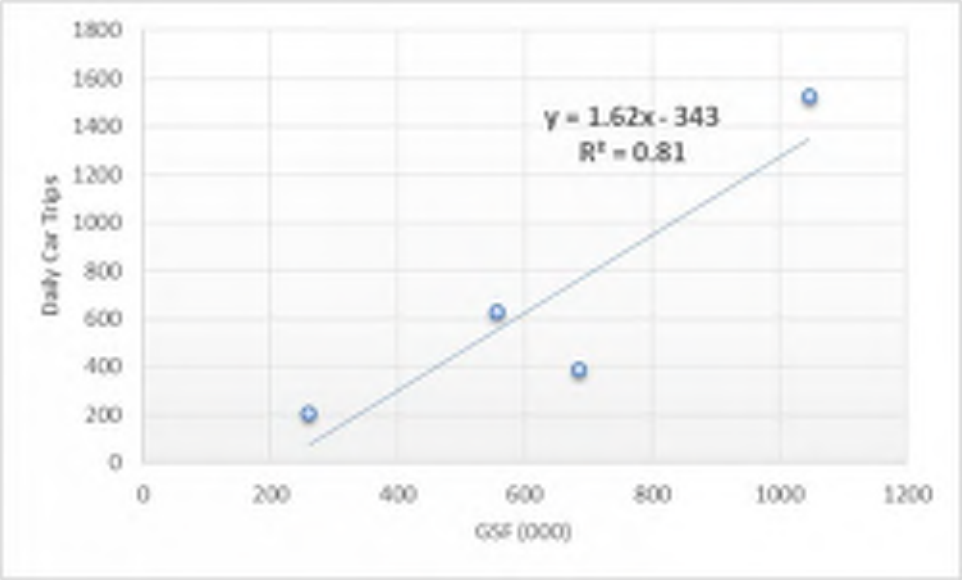


**Figure A3. Correlation between Daily Trucks and Cold Storage GSF (SCAQMD & NAIOP Sites)**

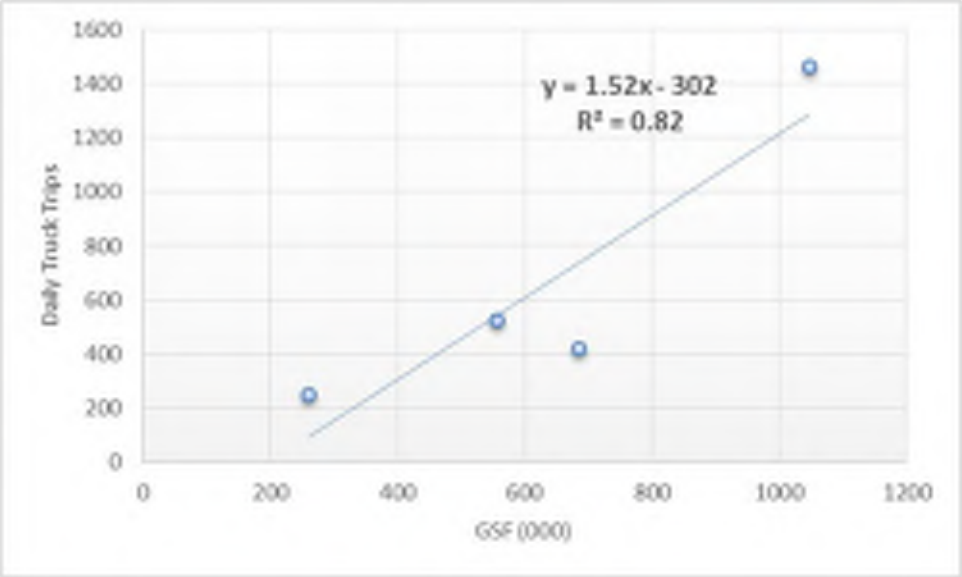



**Figure A4. Correlation between Daily 5+ Axle Trucks and Cold Storage GSF (SCAQMD & NAIOP Sites)**

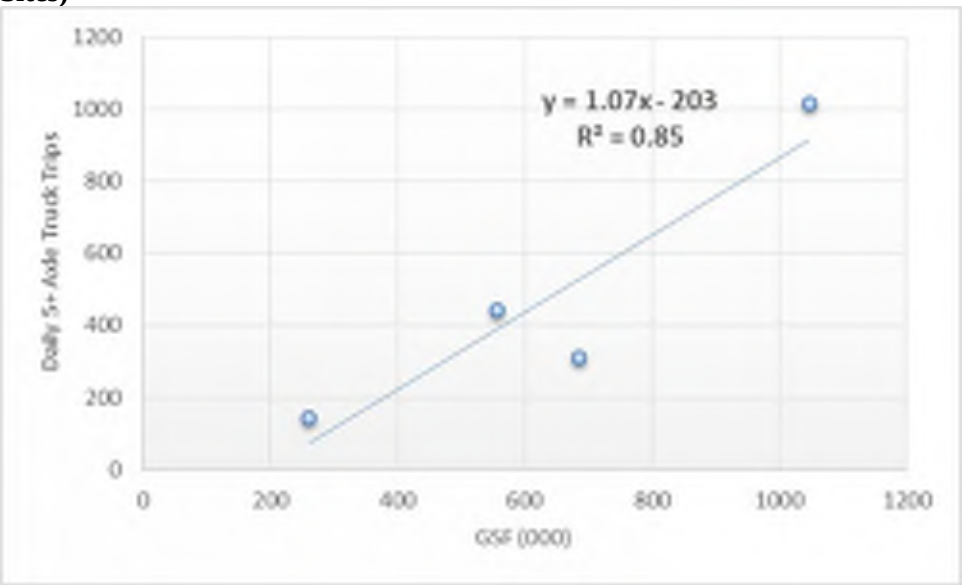



Table A2 presents the weighted average rates for all vehicles, cars, trucks, and 5+ axle trucks per 1,000 GSF at cold storage sites. Separate calculations are presented for the complete database plus 13 different subsets. When the complete set is included, the overall weighted average rate for all vehicles is 2.12. The rate is nearly identical whether calculated with only the SCAQMD and NAIOP data or with the other data points in the complete dataset.

Another observation from the table is that newer data (post-2006 and post-2009) have higher rates than do the older data, sometimes substantially higher. The newer and older datasets are comprised of relatively small numbers of data points, 6 and 3, respectively. Additional data points would be helpful to derive a more reliable estimate of cold storage HCW trip generation.

**Table A2. Weighted Average Rates for Daily Trips at Cold Storage Facilities**

| Data Site Subset (Cold Storage) | Weighted Average for Daily Trips per 1,000 GSF | | | |
|---|---|---|---|---|
| | All Vehicles | Cars | Trucks | 5+ Axle Trucks |
| All (9) | 2.115 | 1.282 | 0.836 | 0.749 (4) |
| SCAQMD (3) | 2.466 | 1.265 | 1.201 | 0.858 |
| NAIOP (1) | 1.179 | 0.564 | 0.615 | 0.455 |
| SCAQMD & NAIOP (4) | 2.120 | 1.077 | 1.043 | 0.749 |
| Non-SCAQMD or NAIOP (5) | 2.111 | 1.449 | 0.667 | --- |
| More than 500,000 GSF (5) | 2.009 | 1.121 | 0.888 | 0.772 |
| More than 800,000 GSF (3) | 2.179 | 1.242 | 0.938 | 0.968 |
| More than 1,000,000 GSF (3) | 2.179 | 1.242 | 0.938 | 0.968 |
| Pre-2007 (3) | 1.868 | 1.134 | 0.706 | --- |
| Post-2006 (6) | 2.278 | 1.368 | 0.910 | 0.749 |
| Pre-2010 (3) | 1.868 | 1.134 | 0.706 | --- |
| Post-2009 (6) | 2.278 | 1.368 | 0.910 | 0.749 |
| California Only (5) | 2.114 | 1.077 | 1.043 | 0.749 |
| Port Only (5) | 2.114 | 1.077 | 1.043 | 0.749 |

Note: The values in parentheses represent the number of data collection sites for that particular subset of cold storage sites.

Tables A3 and A4 repeat the information presented in Table A2, but for the AM and PM peak hours, respectively.

**Table A3. Weighted Average Rates for AM Peak Hour Trips at Cold Storage Facilities**

| Data Site Subset (Cold Storage) | Weighted Average for AM Peak Hour Trips per 1,000 GSF | | | |
|---|---|---|---|---|
| | All Vehicles | Cars | Trucks | 5+ Axle Trucks |
| All (9) | 0.103 | 0.061 | 0.038 | 0.027 |
| SCAQMD (3) | 0.124 | 0.070 | 0.054 | 0.026 |
| NAIOP (1) | 0.071 | 0.039 | 0.032 | 0.029 |
| SCAQMD & NAIOP (4) | 0.110 | 0.062 | 0.048 | 0.027 |
| Non-SCAQMD or NAIOP (5) | 0.098 | 0.061 | 0.030 | --- |
| More than 500,000 GSF (5) | 0.092 | 0.054 | 0.038 | 0.028 |
| More than 800,000 GSF (3) | 0.099 | 0.058 | 0.041 | 0.030 |
| More than 1,000,000 GSF (3) | 0.099 | 0.058 | 0.041 | 0.030 |
| Pre-2007 (3) | 0.084 | 0.046 | 0.025 | --- |
| Post-2006 (6) | 0.115 | 0.070 | 0.045 | 0.027 |
| Pre-2010 (3) | 0.084 | 0.046 | 0.025 | --- |
| Post-2009 (6) | 0.115 | 0.070 | 0.045 | 0.027 |
| California Only (5) | 0.116 | 0.062 | 0.048 | 0.027 |
| Port Only (5) | 0.116 | 0.062 | 0.048 | 0.027 |

Note: The values in parentheses represent the number of data collection sites for that particular subset of cold storage sites.

**Table A4. Weighted Average Rates for PM Peak Hour Trips at Cold Storage Facilities**

| Data Site Subset (Cold Storage) | Weighted Average for PM Peak Hour Trips per 1,000 GSF | | | |
|---|---|---|---|---|
| | All Vehicles | Cars | Trucks | 5+ Axle Trucks |
| All (9) | 0.117 | 0.080 | 0.037 | 0.029 |
| SCAQMD (3) | 0.129 | 0.087 | 0.042 | 0.031 |
| NAIOP (1) | 0.089 | 0.050 | 0.039 | 0.026 |
| SCAQMD & NAIOP (4) | 0.118 | 0.077 | 0.041 | 0.029 |
| Non-SCAQMD or NAIOP (5) | 0.117 | 0.083 | 0,034 | --- |
| More than 500,000 GSF (5) | 0.106 | 0.069 | 0.037 | 0.029 |
| More than 800,000 GSF (3) | 0.116 | 0.079 | 0.037 | 0.029 |
| More than 1,000,000 GSF (3) | 0.116 | 0.079 | 0.037 | 0.029 |
| Pre-2007 (3) | 0.097 | 0.058 | 0.037 | --- |
| Post-2006 (6) | 0.131 | 0.093 | 0.038 | 0.029 |
| Pre-2010 (3) | 0.097 | 0.058 | 0.037 | --- |
| Post-2009 (6) | 0.131 | 0.093 | 0.038 | 0.029 |
| California Only (5) | 0.117 | 0.077 | 0.041 | 0.029 |
| Port Only (5) | 0.117 | 0.077 | 0.041 | 0.029 |

Note: Values in parentheses represent the number of data collection sites for that particular subset.

## Transload and Short-Term Storage HCW

Weighted average rates for daily trips at transload and short-term storage HCWs are listed in Table A5 for four vehicle classifications (all vehicles, car, truck, and 5+ axle truck) and for the complete database plus 13 subsets. One observation about the data is that the more recent data sites have, on average, lower daily trip generation rates (for all vehicle types) than the older sites[14]. This relationship is also found for the AM and PM peak hours presented in Tables A6 and A7.

**Table A5. Weighted Average Rates for Daily Trips at Transload and Short-Term Storage HCW**

| Data Site Subset (Transload & Short-Term Storage) | Weighted Average for Daily Trips per 1,000 GSF | | | |
|---|---|---|---|---|
| | All Vehicles | Cars | Trucks | 5+ Axle Trucks |
| All | 1.432 | 1.000 | 0.454 | 0.233 |
| SCAQMD | 1.412 | 1.006 | 0.406 | 0.217 |
| NAIOP | 1.069 | 0.749 | 0.339 | 0.276 |
| SCAQMD & NAIOP | 1.275 | 0.901 | 0.374 | 0.221 |
| Non-SCAQMD or NAIOP | 1.701 | 1.183 | 0.603 | --- |
| More than 500,000 GSF | 1.433 | 1.008 | 0.431 | 0.223 |
| More than 800,000 GSF | 1.417 | 0.978 | 0.405 | 0.200 |
| More than 1,000,000 GSF | 1.493 | 1.044 | 0.392 | 0.257 |
| Pre-2007 | 1.653 | 1.203 | 0.732 | --- |
| Post-2006 | 1.397 | 0.994 | 0.402 | 0.233 |
| Pre-2010 | 1.621 | 1.097 | 0.708 | 0.614 |
| Post-2009 | 1.347 | 0.970 | 0.377 | 0.221 |
| California Only | 1.226 | 0.871 | 0.388 | 0.221 |
| Port Only | 1.258 | 0.871 | 0.388 | 0.221 |
| ITE *Trip Generation Manual* – 9th Edition | 1.68 | -- | -- | -- |

[14] A decline in HCW auto traffic is likely because of a reduction in employee density as HCWs have become more automated. The reduction in truck trips does not have a clear explanation. Continued data collection is recommended to enable the development of current trip generation rates that do not need to rely on older data.

Tables A6 and A7 list the weighted average rates for the AM and PM peak hours, respectively.

**Table A6. Weighted Average Rates for AM Peak Hour Trips at Transload and Short-Term Storage HCW**

| Data Site Subset (Transload & Short-Term Storage) | Weighted Average for AM Peak Hour Trips per 1,000 GSF | | | |
|---|---|---|---|---|
| | All Vehicles | Cars | Trucks | 5+ Axle Trucks |
| All | 0.082 | 0.057 | 0.024 | 0.015 |
| SCAQMD | 0.073 | 0.049 | 0.024 | 0.013 |
| NAIOP | 0.060 | 0.040 | 0.019 | 0.016 |
| SCAQMD & NAIOP | 0.068 | 0.046 | 0.022 | 0.014 |
| Non-SCAQMD or NAIOP | 0.100 | 0.075 | 0.028 | 0.022 |
| More than 500,000 GSF | 0.078 | 0.055 | 0.023 | 0.014 |
| More than 800,000 GSF | 0.074 | 0.050 | 0.022 | 0.014 |
| More than 1,000,000 GSF | 0.078 | 0.049 | 0.025 | 0.022 |
| Pre-2007 | 0.110 | 0.087 | 0.032 | 0.016 |
| Post-2006 | 0.079 | 0.057 | 0.022 | 0.015 |
| Pre-2010 | 0.101 | 0.073 | 0.032 | 0.022 |
| Post-2009 | 0.072 | 0.051 | 0.021 | 0.014 |
| California Only | 0.067 | 0.045 | 0.023 | 0.014 |
| Port Only | 0.071 | 0.046 | 0.023 | 0.014 |
| ITE *Trip Generation Manual* – 9th Edition | 0.11 | | | |

**Table A7. Weighted Average Rates for PM Peak Hour Trips at Transload and Short-Term Storage HCW**

| Data Site Subset (Transload & Short-Term Storage) | Weighted Average for PM Peak Hour Trips per 1,000 GSF | | | |
|---|---|---|---|---|
| | All Vehicles | Cars | Trucks | 5+ Axle Trucks |
| All | 0.108 | 0.086 | 0.023 | 0.010 |
| SCAQMD | 0.081 | 0.060 | 0.021 | 0.010 |
| NAIOP | 0.091 | 0.075 | 0.016 | 0.010 |
| SCAQMD & NAIOP | 0.085 | 0.066 | 0.019 | 0.010 |
| Non-SCAQMD or NAIOP | 0.135 | 0.117 | 0.028 | 0.015 |
| More than 500,000 GSF | 0.108 | 0.087 | 0.022 | 0.010 |
| More than 800,000 GSF | 0.110 | 0.087 | 0.022 | 0.009 |
| More than 1,000,000 GSF | 0.120 | 0.097 | 0.019 | 0.010 |
| Pre-2007 | 0.145 | 0.133 | 0.031 | 0.012 |
| Post-2006 | 0.107 | 0.086 | 0.020 | 0.010 |
| Pre-2010 | 0.141 | 0.122 | 0.031 | 0.015 |
| Post-2009 | 0.091 | 0.072 | 0.019 | 0.010 |
| California Only | 0.082 | 0.063 | 0.019 | 0.010 |
| Port Only | 0.086 | 0.065 | 0.019 | 0.010 |
| ITE *Trip Generation Manual* – 9th Edition | 0.12 | | | |

Tables A5, A6, and A7 also include the ITE *Trip Generation Manual* 9th Edition, weighted average rate for high-cube warehouses (land use code 152). The data analyzed in this report generally produce lower rates than contained in *Trip Generation Manual*.

MONTCLAIR

BUILD THE *GOLD LINE* TO MONTCLAIR

January 21, 2020

Mr. Michael Poland
Contract Planning Manager
City of Upland
Development Services Department/Planning Division
460 N. Euclid Avenue
Upland, CA 91786

**Bridge Point Upland Project – Northeast of Central Avenue and Foothill Boulevard**

Mr. Poland:

LA-29

Thank you for providing a copy of the Initial Study/Draft Mitigated Negative Declaration for the above-referenced project. We have reviewed the document and understand the project has been significantly downsized from the original 1-million-square-foot project proposed in mid-2019.

Although we recognize the jurisdiction of the City of Upland over the project, the City of Montclair remains concerned about the potential impacts to Central Avenue from increased traffic generated by the project despite the project's downsizing. As you may know, Central Avenue is the only complete north-south truck route through the City of Montclair and is already used by trucks (e.g., tractor-trailers and bottom dump trucks, etc.) coming from points outside our jurisdiction in order to connect to the I-10 Freeway at Central Avenue, or to proceed further south towards the City of Chino.

Given the above concern, the City of Montclair recommends the project be conditioned to use Mountain Avenue as the primary truck route to and from the I-10 Freeway, and only Central Avenue as an alternative. Mountain Avenue has both direct connectivity to both the I-10 and I-210 freeways and would be closer to the main entry point to the project site from Benson Avenue, as indicated in the Initial Study.

Lastly, please be advised that Monte Vista Avenue (north-south) and Arrow Highway (east-west) are also currently designated truck routes, but the City of Montclair is currently in the process of approving plans to implement "Complete Street" improvements on Arrow Highway (between Central Avenue and Monte Vista Avenue) which is likely to affect the designation of this segment of Arrow Hwy as a truck route in the near future. Moreover, this area is being developed with high density residential projects as part of the North Montclair Downtown Specific Plan (NMDSP), with 511 units recently constructed, 234 under construction, and another 450 units in the entitlement review process.

If you or the project proponent have any questions or would like to meet to discuss our comments, please let me know so we can make arrangements for a call or meeting.

Cordially,

Michael Diaz
Director of Community Development
c: Edward C. Starr, City Manager
Noel Castillo, Director of Public Works

CITY OF MONTCLAIR
5111 Benito Street, P.O. Box 2308, Montclair, CA 91763 (909) 626-8571 FAX (909) 621-1584

Mayor Javier John Dutrey • Mayor Pro Tem Carolyn Raft • Council Members: Bill Ruh, Tenice Johnson, Corysa Martinez • City Manager Edward C. Starr

**From:** Michael Poland
**To:** Schooner, Casey; Heather Crossner (hcrossner@bridgedev.com); Brendan Kotler
**Subject:** FW: Bridge Point Upland
**Date:** Wednesday, December 18, 2019 1:56:16 PM

---

**From:** Charlene Contreras [mailto:charlenecontreras@icloud.com]
**Sent:** Wednesday, December 18, 2019 9:58 AM
**To:** Michael Poland <mpoland@ci.upland.ca.us>; Richard.Boyd@arb.ca.gov; lsun@aqmd.gov
**Subject:** Bridge Point Upland

**WARNING: External email. Please verify sender before opening attachments or clicking on links.**

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Hello Mr. Poland,

I-1

I would like confirmation that the Initial Study and Draft MND for the Bridge Point Upland project (site plan 19-09) is being reviewed by the South Coast Air Quality Management Control District, the California Air Resources Board, and the California Department of Transportation to determine if the proposed mitigation is sufficient to protect residents from health and safety impacts due to the lack of infrastructure to support an increase in traffic and emissions from mobile and stationary sources. The project can be found at https://ci.upland.ca.us/bridge-development-project

Thank you,
Charlene Contreras
1646 Redwood Way,
Upland CA 91784

**From:** Michael Poland
**To:** Schooner, Casey; Heather Crossner (hcrossner@bridgedev.com); Brendan Kotler
**Subject:** FW: Bridge Point Upland - InitialStudy/Mitigated Negative Declaration - Public Comment
**Date:** Wednesday, December 18, 2019 1:56:34 PM

---

**From:** Candice Moffitt [mailto:cndice6@gmail.com]
**Sent:** Wednesday, December 18, 2019 9:14 AM
**To:** Michael Poland <mpoland@ci.upland.ca.us>
**Subject:** Bridge Point Upland - InitialStudy/Mitigated Negative Declaration - Public Comment

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Mr. Poland,

After reading through the "Bridge Point Upland - Initial Study/Mitigated Negative Declaration" document, I had a few questions.

The MND States: “All trucks would only access the site via the driveway at the north leg of Central Avenue/Foothill Boulevard. As stated previously, the majority of truck traffic would occur during the off-peak hours, with one truck entering and exiting the Project each peak hour. No more than 5 trucks would travel to the site during daytime hours. The proposed warehouse Project is anticipated to generate 50 daily truck trips.”

I-2

If only one truck is expected to be entering and exiting the Project each peak hour and no more than 5 trucks would travel to the site during daytime hours, does this mean only 7 trucks will be entering and exiting the site between the hours of 5am to 6pm? The rest will be 6pm-5am, at night? What about vans or other delivery vehicles? The PCE number is significantly higher.
Table 30, it shows in Year 2040 that there will be an impact to Benson and Baseline. It is still at the LOS D standard. How is this showing an impact? With that said, I think this intersection operates much worse than this is showing. I do not know if the problem is Baseline before the 210 onramp, the lights are not timed right, or what, but the traffic in the am and pm on Baseline between the 210 and Benson is horrible.

I do like the Mitigation Measure adding the left turn lane with split-phase. I really think this will help with all of the cars that back up trying to turn left in the am hours, except when Baseline is backed up past Benson west bound, then that will not solve anything.
I realize that the project doesn’t necessarily boarder Foothill Blvd, but I think the City should add a condition of approval to require the overhead power lines to be under-grounded with this large project.

Also, is there room to add bike lanes to Foothill Blvd? If the applicant will be providing to curbs, gutters, and sidewalks on Foothill, this seems like the right time to add some bike lanes to connect to Claremont’s.

Thank you for your time and good luck with this project!

Sincerely,

Candice Moffitt
1424 Coronado Street, Upland
909-645-8981

**From:** Michael Poland
**To:** Schooner, Casey; Brendan Kotler; Heather Crossner (hcrossner@bridgedev.com)
**Subject:** FW: WAREHOUSE
**Date:** Monday, December 23, 2019 10:03:25 AM

---

FYI

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**From:** JILL Paul [mailto:abacolady@verizon.net]
**Sent:** Friday, December 20, 2019 4:28 PM
**To:** Michael Poland <mpoland@ci.upland.ca.us>
**Subject:** WAREHOUSE

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---

Mike - This is just disgraceful. Upland is not San Bernardino, Ontario or Fontana. What is the planning board thinking??? I understand that the revenue from this project is going to be nominal. Not only will you lose money from Lowe's (who, by the way, will close), but from the real estate taxes on all of the surrounding homes - not only, the new homes built this year on 16th St. west of Benson. This project is abominable & has to be axed immediately. Apparently you are the Contract Planning Manager - I assume you have some say in something. if you do, let it be known that the home owners of Upland are furious & are up in arms!!! If you want a rebellion on your hands, then continue with this project & see what transpires. Cable airport is going to benefit from this project - you have to be joking. So, what is Cable Airport??? compared to all of the tax paying citizens who use Benson & live near by. Their property values are going to "tank". Every property value in Upland will "TANK". Apparently this wasn't well thought out or someone has their hands in their pockets being lined. Please - rethink this horrible project & tell people on the board to come to their senses - if they have any. If you want a mutiny on your hands, just continue with it. Thanks for listening. Jill Paul Upland

I-3

**From:** Michael Poland
**To:** Schooner, Casey; Heather Crossner (hcrossner@bridgedev.com); Brendan Kotler
**Subject:** FW: Against Bridge Development Project
**Date:** Monday, December 30, 2019 10:05:58 AM

---

**From:** George Di Giovanni [mailto:the_dgs@sbcglobal.net]
**Sent:** Sunday, December 29, 2019 11:53 AM
**To:** Michael Poland <mpoland@ci.upland.ca.us>
**Subject:** Against Bridge Development Project

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Dear Mr. Poland,

We own our home near the corner of 14th St and Mountain. The road and airplane noise is significant and quite annoying. Despite the noise assessment in the Bridge Development IS/MND, there will undoubtedly be a substantial increase in road noise. The Bridge Project proposes **1,104 delivery van parking stalls**. That is a tremendous number of vehicles. The Mercedes-Benz Sprinter 2500 van is 170 inches long. **If you took 1,104 of those vans and lined them up bumper-to-bumper, they would form a line 3 miles long. To visualize that, think of a solid line of vans, bumper-to-bumper, stretching from Central Avenue to Campus Avenue.** Regardless of the route(s) the vans will take, other street traffic will re-route to avoid congestion. This will take a toll on the city's infrastructure that will never be recouped, plus create endless headaches for residents. Obviously, we are not in favor of the development. I-4

Sincerely,

George and Jill Di Giovanni

**From:** Michael Poland
**To:** Schooner, Casey; Heather Crossner (hcrossner@bridgedev.com); Brendan Kotler
**Subject:** FW: Bridge Development Project - Request for Copy of the Economic Impact Report
**Date:** Monday, December 30, 2019 10:05:13 AM

---

**From:** irmalinda.osuna@gmail.com [mailto:irmalinda.osuna@gmail.com]
**Sent:** Sunday, December 29, 2019 6:40 PM
**To:** Michael Poland <mpoland@ci.upland.ca.us>
**Subject:** Bridge Development Project - Request for Copy of the Economic Impact Report

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Hello Mr. Mike Poland,

In regards to the Bridge Development project, has your office drafted an Economic Impact report? If so, where in the city website is this located? Otherwise, please provide me with an electronic copy via email. I-5

Thank you and look forward to hearing from you.

Irmalinda Osuna
Upland Resident

**From:** Michael Poland
**To:** Schooner, Casey; Brendan Kotler; Heather Crossner (hcrossner@bridgedev.com)
**Subject:** FW: Bridge Development Warehouse Project
**Date:** Wednesday, January 8, 2020 10:44:33 AM

---

Good morning all,

Mike is out of the office and I am forwarding Bridge emails on his behalf. He is scheduled to be back in the office on Monday.

Thank you,
Jamie
jdavidson@ci.upland.ca.us

---

**From:** Denise Hill [mailto:hill.021912@gmail.com]
**Sent:** Monday, January 6, 2020 10:24 AM
**To:** Michael Poland <mpoland@ci.upland.ca.us>
**Subject:** Re: Bridge Development Warehouse Project

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I believe I left off my name in my email. I apologize.

Denise Hill

On Mon, Dec 30, 2019 at 5:20 AM Denise Hill <hill.021912@gmail.com> wrote:

> Mr. Poland,
>
> My husband and I have lived in Upland for over 40 years on 14th Street between Mountain and Benson (closer to Benson). We have dealt with the noise and flight patterns of Cable Airport. We have seen a decline in city services as well as the increasing homeless people camping out in our city. We have seen the corruption in our past city government officials which have turned our city close to bankruptcy. In addition, the City has allowed adult book stores and strip clubs in our city.
>
> But after reading the reports on the Bridge Development Warehouse Project, this one takes the award for being the dumbest idea yet. What happened to the bedroom community of Upland? Any warehouse/logistics facility is not appropriate for the City of Upland and would only add more traffic and pollution and noise. The noise would be day and night from the trucks. There is no revenue stream under the

I-6

proposal. Why not? Is the City only looking for some "fast" money.

I-6

We believe that the developer should find a parcel in Fontana, Ontario or Riverside County instead. Those locations have the room to shoulder such a large building with trucks going in and out day and night.

My husband and I do not want the Bridge Development Warehouse Project to go forward or to be built in our city. If the City still wants to go forward with this plan, we want this to go for a vote of the people in all districts of the City of Upland, especially District 1 who would be most impacted by this project, before any final decision is made. Be fair with the people of Upland.

Thank you. I appreciate your time and willingness to read my opinion on this matter and hope you will consider our opinions.

Denise Hill

**From:** Michael Poland
**To:** Schooner, Casey; Brendan Kotler; Heather Crossner (hcrossner@bridgedev.com)
**Subject:** FW: Warehouse project
**Date:** Monday, December 30, 2019 3:56:37 PM

---

**From:** SAKSAN DACHARUX [mailto:d2s1c2j@msn.com]
**Sent:** Monday, December 30, 2019 11:51 AM
**To:** Michael Poland <mpoland@ci.upland.ca.us>
**Subject:** Warehouse project

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Our house locates close to Benson and 16th Streets. We have been living here now over 22 years. When the new shopping mall where Whole food is located, we have seen the increase in traffic. We realize that the shopping center is good for Upland since it brings in revenue therefore we are OK with it.
The new warehouse proposed with over 1,000 loading doors brought fear to us. The warehouse this big definitely will bring in the traffic not just for delivery vans but tractor trailers as well.
We are opposed of this project not just on the disruption standpoint. It's also not good for Upland since it does not bring in the monthly, yearly revenue.
We hope you will take our viewpoint in your decision. Thank you. I-7

Get Outlook for iOS

**From:** Michael Poland
**To:** Schooner, Casey; Heather Crossner (hcrossner@bridgedev.com); Brendan Kotler
**Subject:** FW: Upland Bridge Development Project
**Date:** Wednesday, January 8, 2020 10:41:05 AM

---

Good morning all,

Mike is out of the office and I am forwarding Bridge emails on his behalf. He is scheduled to be back in the office on Monday.

Thank you,
Jamie
jdavidson@ci.upland.ca.us

---

**From:** Susan Patterson [mailto:susan.patterson411@gmail.com]
**Sent:** Friday, January 3, 2020 3:42 PM
**To:** Michael Poland <mpoland@ci.upland.ca.us>
**Subject:** Re: Upland Bridge Development Project

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# Michael: I'm sorry the attachment did not appear. I will try to copy it into the body of this email.

January 1, 2020

Upland City Council:
citycouncil@ci.upland.ca.us

Mayor Debbie Stone
Mayor Pro Tem Janice Elliott
Council member Ricky Felix
Council Member Rudy Zuniga
Council Member Bill Velto

Upland Planning Commission:
via email

Robin Aspinall, Chair
Gary Schwary, Vice Chair
Carolyn Anderson, Commissioner
Linden Brouse, Commissioner
Alexander Novikov, Commissioner
Yvette Walker, Commissioner

Mike Poland
Contract Planning Manager
mpoland@ci.upland.ca.us

Dear Upland Civic Leaders:

I-8

I am writing to strongly urge you to carefully review the proposed warehouse distribution center project on Foothill Boulevard south of Cable Airport known as Upland Bridge Development Project. Unlike many who are making predictions based on environmental impact and other reports, I can speak to this proposal from first-hand knowledge of a similar project built and operated by Amazon in Newark (Fremont) California, where my sister lived for several years and where I visited frequently for overnight stays.

I believe the Upland project now includes a smaller footprint than originally proposed and "only" 25 trucks will be leaving the site each day. As an added incentive, those trucks will leave at night. First, those 25 trucks are very noisy, and if they leave at night, whichever route they take to a freeway they will be passing residential areas. Those big trucks also have been known to use what are commonly referred to as "jack" brakes, which have been compared to the sound of gunfire. I personally have experienced the departure of large trucks leaving the Newark Amazon distribution center at approximately 3 am. In fact, I believe only deaf people or very sound sleepers would be unaware of their departure.

Presumably the 25 trucks will return to the Upland distribution center, so it would be 50 trucks leaving and returning each day. This does not include smaller delivery vans that would also likely be coming and going on a daily basis.

Traffic and environmental disruption would be a minor annoyance compared to the dramatic change in the neighborhood ambience of this area, which is currently a combination of light industrial and commercial enterprises. More significantly, housing projects are now well north on Central Avenue and I understand that another residential project will soon be built that abuts Foothill Boulevard almost directly across from the proposed distribution center.

It is my understanding that the proprietor of this distribution center (presumably Amazon) has agreed to make a one-time payment of approximately $2.5 million to the city and that no tax revenue will accrue to Upland once the project is operational. (Note: if Amazon is the operator of the project, keep in mind that it reported revenue of $70 *Billion* for the 2019 third quarter). I know Upland is facing financial hardship, but this project will not provide an ongoing income stream and its presence will fundamentally change the appearance and flavor of this area of Upland. It is quite simply inconsistent with Upland's reputation as the City of Gracious Living.

Sincerely,

Susan Patterson
19-year Upland resident
susan.patterson411@gmail.com

On Thu, Jan 2, 2020 at 8:17 AM Michael Poland <mpoland@ci.upland.ca.us> wrote:

> Good Morning,
>
> I have received your email and comments related to Upland Bridge Development Project. Your email notes that there is an attached letter. However, in opening your email I could not find any attachments.
>
> Mike Poland
> Contract Planning Manager | Planning Division

City of Upland | Development Services Department
460 N. Euclid Avenue, Upland, CA 91786
Phone: (909) 931-4135
mpoland@ci.upland.ca.us

12.22.2019

TO: City of Upland Planning Commission
City of Upland Interim City Manager
City of Upland City Council
City of Upland City Clerk
(Sent Individually Via Email)

**SUBJECT: How Many Signatures You Would Require to Pursue EIR vs. MND; Bridge Point Project**

Chairman Aspinall; Members of the City Council; Ms. City Manager;

I-9

I would respectfully request that Individually, so as not to cause Brown Act concerns, you respond by email as to your thoughts on how many City of Upland Registered Voters Signatures from District 1, you would require to give direction that an EIR be completed, vs. accepting the presented MND regarding the Bridge Point Project. This is a VERY big decision moving forward for the City.

I prefer not to waste our time or yours with rhetoric or other political castaway on this subject. The topic has come up in conversation that this is/was a done deal. For the record, I personally believe that it was a done-deal 2 years ago when City-owned easements(West End Consolidated Water) were quit claimed to Bongiovanni Construction for the site and Marty Thouvenell entered into a "Settlement Agreement" with Bongiovanni Construction Co., versus enforcing the law. That being said, there are many, who believe in the political process and that the Planning Commission and subsequently the City Council, still believes in the Democratic process and represent we the Citizens / residents of the Community.

So, respectfully Ladies and Gentlemen, what would it take? Please respond individually if you have an opinion and care to. I will be sharing the responses with D1 Community members and Upland Residents, but will NOT SHARE WHO THE RESPONSES CAME FROM. That is my word.

I hope that you care enough to consider this, even if your mind is made up. Let's be real and honest.....Please.

Merry Christmas and God's Blessing to you and your Families.

Respectfully,

Steve Bierbaum
2052 Windemere Way
Upland, CA 91784
Uplandccc@gmail.com

From: Michael Poland <mpoland@ci.upland.ca.us>
Sent: Wednesday, January 8, 2020 7:42 AM
To: Schooner, Casey; Brendan Kotler; Heather Crossner (hcrossner@bridgedev.com)
Subject: FW: Warehouse project

Good morning all,

Mike is out of the office and I am forwarding Bridge emails on his behalf. He is scheduled to be back in the office on Monday.

Please note- I did not open this link and am not sure what it contains.

Thank you,
Jamie
jdavidson@ci.upland.ca.us

---

From: Ann King [mailto:anniemooneyking@gmail.com]
Sent: Saturday, January 4, 2020 2:54 PM
To: Michael Poland <mpoland@ci.upland.ca.us>
Subject: Fwd: Warehouse project

**WARNING: External email. Please verify sender before opening attachments or clicking on links.**

---

---------- Forwarded message ---------
From: **Ann King** <anniemooneyking@gmail.com>
Date: Sat, Jan 4, 2020, 2:52 PM
Subject: Warehouse project
To: <mPoland@ci.upland.ca.us>

https://nextdoor.com/post/133219058?init_source=copy_link_share I-10

**From:** Michael Poland
**To:** Schooner, Casey; Brendan Kotler; Heather Crossner (hcrossner@bridgedev.com)
**Subject:** FW: Warehouse Distribution Center Workshop to be held on 1-9-2020
**Date:** Wednesday, January 8, 2020 10:43:12 AM

---

Good morning all,

Mike is out of the office and I am forwarding Bridge emails on his behalf. He is scheduled to be back in the office on Monday.

Thank you,
Jamie
jdavidson@ci.upland.ca.us

---

**From:** Jerry Dowdall [mailto:jerry.r.dowdall@gmail.com]
**Sent:** Saturday, January 4, 2020 9:09 PM
**To:** Michael Poland <mpoland@ci.upland.ca.us>; Janice Elliott <jelliott@ci.upland.ca.us>
**Subject:** Warehouse Distribution Center Workshop to be held on 1-9-2020

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January 4, 2020

Mike Poland
City of Upland
Development Services/Planning Division
460 N. Euclid Ave.,
Upland, CA 91786

RE: Warehouse Distribution Center

Dear Mr. Poland;

I will not be able to attend the public workshop on Thursday, January 9, 2020. Consequently, I write this letter of complaint and opposition to the negotiation of establishing a warehouse distribution center near Cable Airport. As a retiree of San Bernardino County who was involved with

HUD funded supportive housing for the homeless, I am very familiar with the long term impact on a community long after those who benefited from such decisions have left.

I-11

I have several objections that reflect political, financial impact, and ultimately what the community of Upland will be as a result of this decision.

This ware house will be located in the First District and its major impact will be in that area. However, this district has no councilmember who represents this district. Consequently, those members who are giving their approval have little political connection nor commitment to the constituents of the First District. Nor will they potentially feel any impact from their decisions. It's a variation on "Not in my backyard," meaning- build it somewhere but not in my district. I heard the same voice so often when attempting to build HUD affordable housing.

Secondly, as you are aware, the costs associated with this project will fall directly onto the taxpayers. This is part of the negotiated plan being reviewed. So not only will those in District One be overwhelmed with the additional traffic and noise, but also we will shoulder the funding to support the usage of public land. Of course the houses near these proposed roads will drop in value as well, not to mention the congestion and noise.

Thirdly, this discussion will forever change the trajectory of the future of the City. It will no longer be the city of "gracious living" or a bedroom community but rather another truck hub for one of the largest companies in the United States who is extending itself in many directions. Amazon will soon establish and become a driving force in medical insurance, equipment and services. Maybe in the near future, your doctor will be funded and directed by Amazon as that company will soon dictate the future of Upland if this proposal is accepted.

Finally, I am very concerned that you, as a contracted employee is central in making this decision rather than District One's elected councilmember. You as with any contract employee make decisions and then soon leave once the contract has ended. My fear is that you will have little to nothing to do with this community after your contract ends. Nor will you feel any negative consequence of your decision. I am very concerned that such authority has been given to someone who can permanently change the very fabric of the community and then simply move on to another position. I-11

I can only watch from a distance as to what unfolds. If upon your recommendation the councilmembers approve and move forward, I will be very unhappy. The only thing I can do is to simply move away. My three decades of living in Upland will end. Nor do I believe I will be the only one who will relocate.

Respectfully,

*Jerry Dowdall, MA-MFT*

Jerry Dowdall, MA-MFT
1395 West 15th St.
Upland, CA 91786

cc: Janice Elliott, Upland Councilmember

--
Jerry Dowdall
1395 West 15th St.
Upland, CA 91786

**From:** Michael Poland
**To:** Schooner, Casey; Brendan Kotler; Heather Crossner (hcrossner@bridgedev.com)
**Subject:** FW: Bridge Development Project Opposition & Specific revenues question
**Date:** Wednesday, January 8, 2020 10:46:29 AM

---

Good morning all,

Mike is out of the office and I am forwarding Bridge emails on his behalf. He is scheduled to be back in the office on Monday.

Thank you,
Jamie
jdavidson@ci.upland.ca.us

---

**From:** Upland Coalition of Concerned Citizens [mailto:uplandccc@gmail.com]
**Sent:** Tuesday, January 7, 2020 10:40 AM
**To:** Rosemary Hoerning <rhoerning@ci.upland.ca.us>; robin.aspinall@gmail.com; Debbie Stone <debbiestoneforupland@gmail.com>
**Cc:** Michael Poland <mpoland@ci.upland.ca.us>; Gary Schwary <gary.schwary@closingmark.com>; anovikov.upland@gmail.com; Carolyn.6@yahoo.com; Yvette <yvette@premier-ie.com>; Ricky Felix <rfelix@ci.upland.ca.us>; Janice Elliott <janiceelliott4upland@gmail.com>; Bill Velto Gmail <billveltoupland@gmail.com>; Rudy Gmail. Zuniga <rudy4upland@gmail.com>
**Subject:** Re: Bridge Development Project Opposition & Specific revenues question

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Ms. City Manager; Members of the City Council and Planning Commissioners;

I am again sending you a request to have questions answered regarding the $200K traffic donation fund. The following questions will be asked at the Thursday night meeting, so I want to give you, Staff or whomever the opportunity to "research" your responses, or decide if you will response Thursday night.

<u>The proposed $2.25M Development Fee:</u>

1. Who from the City of Upland ***specifically*** negotiated for that amount ("Staff" is not an adequate answer)
2. Where ***specifically*** will that money go, Finance wise (General Fund?). If there is a breakdown, please be willing to provide that breakdown and who made that decision.

<u>The proposed $2M in "future road maintenance":</u>

1. Does the City receive this money specifically?
2. Is any of this $2M being alloted for the widening/repaving of 13th St west of Benson?
3. How much of these monies ***specifically*** is going into the Public Works Street Maintenance

Fund and NOT being used for any maintenance/improvements on the proposed project?
4. Does the money go to Public Works in addition, or in-lieu of allocated monies? (Increase in already identified/approved budget)
4. Who ***specifically*** (Again, Staff is not appropriate response please) negotiated this amount of monies?

*$1.4M to the Upland School District:*

1. NON-City entitity; Who ***specifically*** authorized/negotiated this portion of deal?

$400K to the Parks:

1. Which City Council member(s) specifically negotiated this deal?
2. If your response is none, than who specifically within the City negotiated for this revenue?
3. Does the money go into Parks & Recs Fund, or a specific identified category for the parks in addition, or in-lieu of allocated monies? (Increase in already identified/approved budget)

$50K to the Chamber of Commerce:

1. Really?
2. Which City Council member(s) specifically negotiated this deal?
3. If your response is none, than who specifically within the City negotiated for this revenue?

I-12

I respectfully request that someone, be prepared to provide feedback Thursday to share with the Community at this meeting.

Respectfully Submitted,

Steve Bierbaum
Upland Resident; District 1

On Mon, Dec 30, 2019 at 11:21 AM Upland Coalition of Concerned Citizens <uplandccc@gmail.com> wrote:

> Mr. Poland and All;
>
> I hope you enjoyed your Christmas Holidays.
>
> The City is allegedly receiving $2M from Bridge for "Future Road Maintenance".
>
> Can Someone confirm:
>
> 1. Assuming the Bridge Deal goes through; is that monies actually going into the designated Public Works account for maintenance, or;
>
> 2. Are those monies being utilized for 13th st. Widening/revamping from Cable Airport to Benson?
>
> Mr. Poland, you probably can not answer this question, but wanted to include you to ensure

everyone is in the loop.

That being said, let this serve as my official notice in opposition of the Bridge Project.

I am not opposed to developing the site.

I am opposed due to the manner in which the process has been handled in the past 2-years by the City.

I am opposed due to zero continuous, future revenues to the City of Upland, especially based upon the Multi-Millions of dollars the Developers and Occupants will earn from it.

I am opposed to the current MND which in Conclusion finds no issue with the proposed development. Specifically, the amount of VAN traffic that SHALL be generated 24-7 onto our streets in THAT particular area will destroy the allure of District 1 & District 3 residential living; specifically Sycamore Hills and Baseline/Benson/210 access.

As a resident, I realize that the project meets Zoning Standards, but I implore upon the Planning Commission to look, listen and FEEL the opposition to this particular project, at this location, based upon the lack of financial future revenues to be received by the City of Upland.

Respectfully,

Steve Bierbaum
2052 Windermere Way
Upland, CA 91784

**From:** Michael Poland
**To:** Schooner, Casey; Brendan Kotler; Heather Crossner (hcrossner@bridgedev.com)
**Subject:** FW: Bridge Point Development
**Date:** Thursday, January 9, 2020 2:16:24 PM

---

Good morning all,

Mike is out of the office and I am forwarding Bridge emails on his behalf. He is scheduled to be back in the office on Monday 1/13/20.

Thank you,
Jamie
jdavidson@ci.upland.ca.us

---

**From:** Gary Jensen [mailto:gljensen@gmail.com]
**Sent:** Wednesday, January 8, 2020 10:15 AM
**To:** Michael Poland <mpoland@ci.upland.ca.us>
**Subject:** Bridge Point Development

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Mr Poland,

1. I own the old Dineen trucking property at the top of Airport Drive. I would like to develop the properties and would like to have sewer connections. During the construction, it would be good if Upland could put a sewer line from Foothill up to the Cable airport runway on the east side of properties that face Airport Drive. The utilities could also be put underground at the same time. This would make it easier to improve those properties and allow a sewer line and utilities for any potential new development running along the south side of the airport. I noticed that the northwest corner of the site drawing has a property line adjustment lining up with the airport runway.
2. Is the road access into the new development warehouse property off the extension of Central Ave a public road or is that private for the warehouse? If it is public I'll try to get a curb cut and access from my property. It would be good to do it at the time of construction. If private, I won't.

I-13

Thank you.
Gary Jensen
gljensen@gmail.com
909-560-2970 (cell)

Sent from Mail for Windows 10

**From:** Michael Poland
**To:** Schooner, Casey; Brendan Kotler; Heather Crossner (hcrossner@bridgedev.com)
**Subject:** FW: Bridge Point
**Date:** Thursday, January 9, 2020 8:37:17 PM

---

Good evening,

Forwarding this email on Mikes behalf.

Thank you,
Jamie
jdavidson@ci.upland.ca.us

---

**From:** Lori Hocking [mailto:loribob1@mac.com]
**Sent:** Thursday, January 9, 2020 3:22 PM
**To:** Michael Poland <mpoland@ci.upland.ca.us>
**Subject:** Bridge Point

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I-14

I will be at the meeting tonight to see the results from the environmental consultants. Hard to imagine how they can defend their findings. I reside at 876 N. 1st Ave and know the noise of the trucks will wake me at night, especially in the summer. The emissions will be horrendous for walking to nearby shopping centers and even downtown. I also think we need to negotiate a permanent annual income. I think this statement has to be false: The Mitigated Negative Declaration concluded "the project would not cause new substantial direct or indirect adverse effects on human beings."
Lori Hocking

The following comments are from the City of Upland Joint Workshop of the City Council, Planning Commission, and Airport Land Use Committee held on January 9, 2020.

The comments include oral responses from individuals (I-15 through I-42), followed by oral comments made by the City Councilmembers and Planning Commissioners (LA-1 through LA-27).

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15 MAYOR STONE: Good evening every one and welcome

16 to our special meeting on January the 9th of 2020.

17 We're here for the joint workshop of the City

18 Council, Planning and Airport Land Use Committee.

19 Can we have roll call --

20 I'm going to ask the City clerk to do roll

21 call.

22 (Roll call of the City Council taken.)

23 MAYOR STONE: All right. So we'll -- I'll turn

24 it over to --

25 PLANNING COMMISSIONER CHAIR: And we are calling



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2 to order the meeting of the Planning Commission and

3 Airport Land Use Committee and I'll ask you for a

4 roll call please.

5 (Roll call of the Planning/Airport

6 Land Use Commission taken.)

7 MAYOR STONE: All right. Thank you very much,

8 care.

9 Well, I note I just wanted to -- Mr. S had

10 called and asked to make a statement that he reason

11 he isn't here this evening is he had a commitment

12 with his daughter in Orange County that he could not

13 miss and that he welcomes any phone calls, emails

14 from anyone that's here this evening to please reach

15 out to him if you have any questions for him.

16 All right. So the first thing is I would

17 just like to thank each and every one of you for

18 being here this evening. We all look forward to the

19 presentation.

20 This is a workshop and an opportunity for

21 the Planning Commission and the City Council to hear

22 all of your concerns.

23 There will be no decision made tonight for

24 this is information only; so thank you again for

25 being here and if you do have comments or concerns,





2 please fill out a card and make sure that you get it

3 to our city clerk.

4 So thank you again.

5 So at this time, Keri, we'll move on to oral

6 communication.

7 THE CLERK: Okay. This is the time for any

8 citizen to comment on any item listed on the agenda

9 only.

10 Anyone wishing to address the legislative

11 bodies is requested to submit a speaker card. And

12 everyone is requested to their keep comments to 3

13 minutes.

14 At this time I have 13 cards, I will call up

15 two people at a time, ask that the second speaker to

16 be on my right at the end of the aisle. And the --

17 MAYOR STONE: All right. Thank you.

18 THE CLERK: First is Steve Beerbong followed by

19 Ray Lesser.

20 STEVE BIERBUAM: Good evening, City Council and

21 members of the Planning Commission.

22 I want to first go on record as saying that

23 I have attempted personally on many occasions to

24 communicate with the City Council, with the Planning

25 Commission and to the developmental services staff on

I-15





2 this. And on three separate occasions via email I

3 have received zero response, none whatsoever.

4 The first was on December 22nd, I asked

5 about what would it take for this not to go through,

6 basically asking about if we gathered signatures,

7 what would it take for the City to say from the

8 citizens that this isn't going to work. I received

9 zero response.

10 On December 30th I contacted the City, the

11 same people that I've already previously mentioned

12 and said that we're supposed to be receiving

13 2 million dollars in future road maintenance from

14 Bridge Development as part of this project. My

15 question was simply is that 2 million dollars

16 supposed to go into the General Fund or into public

17 works, or is that 2 million dollars part of the

18 calculated improvement to 13th Street and Benson in

19 front of Cable Airport?

20 No response.

21 That being said, I want to make sure, and

22 I've already sent and received no response, that this

23 is my official notice of opposition to the Bridge

24 project. It has nothing to do with Bridge. I

25 absolutely believe that that development should be --

I-15 cont.

5

1 UNOFFICIAL UNCERTIFIED REALTIME ROUGH DRAFT TRANSCRIPT

2 that site should be developed; however, I'm opposed

3 to it being developed in this manner because over the

4 past two years I've seen quite frankly how the City

5 has operated, the position that they've taken, the

6 direction that they've taken in making sure that this

7 particular development moves forward.

8 They've been aware of it, the illegal

9 operations that have occurred, the deals that were

10 made two years ago over this. Subsequent deals over

11 a year and a half ago to provide easements from the

12 west end water to Bridge Development, actually they

13 didn't go to Bridge Development, they went

14 specifically to Giovanni, and then subsequent to that

15 my own personal observations of the illegal

16 operations that have been occurring on Airport Drive

17 and the Giovanni site, and what breaks my heart is to

18 continue -- I can tell everybody here who's sitting

19 here watching I absolutely can prove by

20 documentation, video and photographs that the City

21 was aware of illegal operations being the um of dirt

22 onto that site which did not discontinue until

23 San Bernardino County Environmental Health got

24 involved, yet there's an MND that we're supposed to

25 just accept and move on when there's all these new

I-15 cont.





2 projects going on on the west end of the City.

3 Okay. Numerous projects. Industrial

4 buildings being built, educate yourself. New

5 residential complexes.

6 I'm not against Bridge Development, please

7 ensure that you request an EIR on this. Thank you.

8 THE CLERK: After Mr. Messer, is Eric Weiss.

9 RAY MUSSER: Good evening, City Council and

10 Planning Commission. This is the first I've been

11 here except to honor a person that had been with the

12 Upland Community Foundation Sister City some time

13 ago.

14 I was the one that brought this project to

15 Marty Theo back in 2016. It wasn't in this form. We

16 sent it to -- we called in Majestic Realty, the

17 largest financial real estate firm in America,

18 private is the key word, and they did a pass on this

19 project. Then it went to Lewis Group and they did a

20 pass.

21 And now we have Bridge and there might have

22 been a player there between there, I don't know for

23 sure, but what we tried to do, and I don't quite see

24 all of it here, I do see 370,000 annually coming here

25 according to the brochure I received as I walked in,

I-16





2 that helps a lot, that's a whole lot better than

3 zero.

4 We have a firm in the City that has 33 other

5 locations and is doing a building right here in

6 Upland. We get the tax base on all 33 of those. And

7 I'm not going to mention the name but that's

8 happening. I just talked to them about a month ago

9 and said is it still a thing? They said yeah, we

10 have a bid for -- I think it's this area and it may

11 run out. That's what we should do.

12 If we're selling something or moving it to

13 sale, it ought to be taxed and that's exactly what's

14 happened to this other firm.

15 This other firm, when you say 33 -- it's

16 unbelievable. They're our third and fourth highest

17 sales tax, independent what data are you looking at.

18 That's huge. You put two Home Depots together and it

19 can't match that.

20 So I would say I don't know a better

21 project. I walked with this project with Howard and

22 when it had a lot of homeless people up there, I

23 should never be with tumble weeds, I close up real

24 fast, but here was a gang group, he was here was an

25 alcoholic group, and here was a drug group, all

I-16 cont.



2 different camps.

3 I'm saying this is much better than what we

4 have. This is good and if we can just get more sales

5 tax every year, because Upland is rich in profit but
6 cash poor; so the more we can drive this to get sales
7 tax every year in that direction is what I would see
8 to be improved on this project.

I-16 cont.

9 Thank you for your time. I appreciate being
10 here. And God bless.
11 THE CLERK: After Mr. Weiss is Mark Walters.
12 ERIC REESE: Hello. My name is Eric Weiss.
13 My suggestion would be for the City to
14 partner with the developer and consider the use of
15 porous reflective payments as approved for the
16 material for the proposed project.
17 Inserting porous reflective pavements would
18 help enhance environmental mitigations, will also
19 help in reduce costs for the City and the developer.
20 Portions of the pavements can reduce paving
21 surface temperature by up to 11 degrees Fahrenheit,
22 therefore helping to provide for reduced air
23 conditioning which results in lower energy costs and
24 reduced air pollution.
25 Porous reflective payments can reduce noise

I-17

levels by nearby source by up to 6 decibels, which porous reflective pavement can also recharge * by absorbing up 9120 percent of *.

By reducing stormwater runoff the developer is able to reduce the --

This helps enormously in complying with state and federal clean water standards by reducing discharge of untreated stormwater into the ocean.

Through stormwater percolation the developer is able to absorb the majority of stormwater into the ground which allows the developer to use this the water for landscaping and irrigation purposes.

This helps tremendously in reduce costs by reducing the need to use municipal water supplies. Groundwater percolation also helps reduce nearby surface temperatures by evapotranspiration.

The porous reflective pavements also helps filter out stir make L. again, this helps tremendously in complying with state and federal clean water standards.

One of the side benefits of the porous reflective pavements is that due to their flexibility

I-17 cont.

24 they're able to handle extreme temperatures and **.

25 This decreases pavement cracks and all that occur

I-17 cont.



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2 from pavement stress, resulting in reduced costs to

3 repair and replace worn-out pavements.

4 I would highly recommend the City to partner

5 with the development looking into porous reflective

6 pavements as they could help the developer and the

7 City be better stewards to an the environmental

8 impact that will use its own roads in the future.

9 Thank you for your time and hopefully you'll

10 consider my proposal that can make the City and the

11 developer better convenient environmental stewards.

12 THE CLERK: After Mr. Walters is Ermalinda

13 Osuna.

14 MARK WALTERS: Good evening, before I begin

15 today I'd just like to let everyone know that it's

16 national law enforcement appreciation day.

17 Please thank a police officer tonight.

18 Good evening Mayor, City Council persons and

19 Planning Commissioners. My name is Mark Walters, I

20 am a retired police officer with 25 years experience,

21 seven of these years were devoted specifically to

22 traffic cyst.

23 I'm a member of the City of Upland's Traffic

24 and Safety Committee and Director of the Upland

25 Coalition of Concerned Citizens and a resident of





2 Upland for the last five years.

3 A cost-benefit analysis, CDA, is the process

4 used to measure the benefits of a decision minus the

5 costs associated with this decision. I've been doing

6 some brief calculations to help me understand this

7 development and associated CDAs.

8 Bridge Development states this unknown

9 company's vehicles which include semi-trucks, vans

10 and cars, will only be using Baseline Road, Basin

11 Avenue, Foothill Boulevard and Central Avenue to

12 access their facility.

13 Using my calculations it has been determined

14 that these four roadways are 24,051 feet long, or

15 another wards 4.55 miles long.

16 Using the national average it costs

17 1.25 million dollars per mile to repave a roadway.

18 To repave this designated roadway that

I-18

19 they're going to be using on a one-time only event,

20 it will cost the City of Upland $5,687,500.

21 Also using national averages on a heavily

22 traveled roadway, you can expect the need to repave

23 these roadways every 10 to 15 years. Being a 50-year

24 lease and using a national average, the City of

25 Upland will spend $22,750,000 out of Upland's General

I-18 cont.





2 Fund to maintain these designated roadways.

3 Please keep in mind this does not include

4 inflationary costs nor does it include lane striping,

5 Botts' dots or intersection sensors.

6 Since our city is already broke we will

7 obviously need to cut costs.

8 Are we going to cut our city staff? Are we

9 going to cut our police staff? Are we going to quit

10 trimming trees? Are we going to shut down the

11 library? Are we going to close our parks down? Will

12 we have to do all of the above?

13 Based on the above cost-benefit analysis

14 this project will cost the City of Upland way more

15 than the benefit and I recommend you vote no to this

16 potentially city-bankrupting project.

17 Thank you.

18 THE CLERK: After Ms. Osuna is Roger Stevenson.

19 IRMALINDA OSUNA: Good evening my name Ermalinda

20 Osuna. I am a 60-year resident and hopefully we can

21 get the video projector public.

22 Again, I'm a 60-year resident, and I'm also

23 on the the mother of two college-age and bound boys,

24 one is not, he's trying to find his way and trying to

25 find a good living wage job. And the reason why I

I-19



1 UNOFFICIAL UNCERTIFIED REALTIME ROUGH DRAFT TRANSCRIPT

2 bring this up is because two months ago when I came

3 forth in front of the Planning Commission I

4 expression the my concern that having Amazon in our

5 city would -- is very concerning for me.

6 If you look at the history over the years,

7 Amazon has a very bad reputation. This is why

8 they -- their name is not disclosed in this there

9 plan and many of the other plans you see in Inland

10 Empire.

11 So with that the reason why is because they

12 pay poverty wages. Okay? They are -- they pour

13 millions of dollars in cities who implement these

14 policy decisions and I'm just very concerned that you

15 know this is -- this -- this -- the president of this

16 company and it's not a very popular company.

17 But I'm here to annoyance announce that we

18 are having a grass roots community workshop on

19 Saturday and the reason why is because then just two

20 months after I spoke, we a recent report came out

21 from the current round table, it's a scathing report,

22 fact-based highly researched report, very

23 comprehensive that talks about the actual economic

24 impact as a result of Amazon's footprint in our

25 community, especially in Inland Empire.

I-19 cont.



1 UNOFFICIAL UNCERTIFIED REALTIME ROUGH DRAFT TRANSCRIPT

2 And it's very important that we educate the

3 community just to give you a little bit of a preview,

4 Amazon is actually benefited from public subsidies.

5 We, the taxpayers, are subsidizing their employees.

6 Now keep in mind this is a 900 dollar --

7 900-billion-dollar company and they are really taking

8 full advantage of the public subsidies and this is

9 why they are monopolizing and really just diving into

10 eCommerce.

11 So it's very important that we educate our

12 community and in this slide here we're going to have

13 an expert, this person who was part of this study, to

14 talk about the actual impact. And, again, this is a

15 social impact.

16 And then we're going to talk -- we are going

17 to have someone talk about the environment impact and

18 be able to quantify what is the implication for

19 Upland. And so we need to be able to look at the

20 cost-benefit analysis as Mark mentioned and really do

21 a deep dive an and make sure that at the end of the

22 it all when we look at the studies, the information,

23 that we work with Bridge Development to formalize a

24 community benefit agreement.

25 This is where we're going to sit down and

I-19 cont.



1 UNOFFICIAL UNCERTIFIED REALTIME ROUGH DRAFT TRANSCRIPT

2 make sure that we can mitigate those costs.

3 I know that Bridge has been doing that with

4 Community Commercial, with other departments. I know

5 that Bridge Development would be willing to work with

6 us, the grass roots community to formalize a

7 community benefit agreement.

8 Thank you.

9 THE CLERK: After Mr. Stevenson is Carl Bunch.

10 ROGER STEPHENSON: Good evening, Council and

11 Commissioners. My name is Roger Stevenson. I'm here

12 to make some specific comments related to the draft

13 initial study and MND the.

14 In terms of my background I'm a civil

15 engineer. My career has been based on large scale

16 public works projects and before I forget, I will be

17 submitting these and other comments in writing with

18 discussion because three minutes is not enough time

19 for an engineer to get into technical stuff.

20 Okay. So first thing, project description. I-20

21 The building is smaller now, almost a third smaller

22 but the activity level hasn't decreased. There will

23 be highly active loading areas on either side, the

24 north and south side. Those areas should be included

25 within the overall square footage of the building





2 when you're figuring things like parking and employee

3 and other area rented -- excuse me, area-related

4 stuff.

5 So the square footage should really be up

6 around 300,000 or more square feet.

7 Careful reading of the Upland General Plan,

8 look at the zoning for the proposed site, you read

9 that, it says limited warehousing. That's how that

10 sentence works out.

11 Down on the south side of Foothill for

12 the -- the College Heights area it specifically says

13 warehousing and distribution. Okay. So the General

14 Plan is based on a distinction between limited

15 warehousing and warehousing and distribution. And on

16 that basis the proposed site doesn't meet the General

17 Plan.

18 And that finding -- also that indicates that

19 it's compatible, well, it might be compatible but

20 that does not mean it meets the zoning requirement.

21 In terms of traffic impact analysis, which

22 is a -- a big element of the initial study, the

23 existing traffic impact analysis did not adequately

24 represent the traffic that would result from this

25 particular facility and that's both total trips and

I-20 cont.





2 more importantly the hourly distribution of travel to

3 and from the facility.

4 The Institute of Transportation Engineers

5 land use classification that they use was developed

6 based on facilities that are different in character

7 than what is being proposed here as a van delivery

8 center; so therefore the data that they used isn't

9 appropriate and so therefore the results of the

10 transportation analysis, including any recommended

11 road improvements or whatever, aren't valid.

12 And then the last thing I want to make a

13 comment on, the -- the retail analysis memorandum.

14 Well, that's got nothing to do with anything. That

15 site isn't zoned that way and I think it was put in

16 there as a diversion from doing what is needed, which

17 is look at the details of the project.

I-20 cont.

18 THE CLERK: After Mr. Bunch then we have Leland

19 Marks.

20 CARL BUNCH: Hello. My name is Carl Bunch.

21 There's three points I want to make. The

22 first being that if another some reason this goes

23 through I think that median on Foothill must be

24 constructed so that there's no traffic that could

25 access those two access points on fruit hill that

I-21

2 they're planning on, because that would just be a mad
3 house if you had vans cutting across Foothill right
4 there at Central to get into the access, which you
5 know they will, because who knows what percentage of
6 these drivers are not going to be Amazon employees,
7 they're going to be independent contractor.
8 So if for some reason it about goes through
9 please construct a median so that you cannot access
10 the not side from the south side of Foothill.
11 The second thing is again if this goes
12 through, we must have specific financial penalties
13 in -- in the conditional use permit or whatever the
14 contract is. If or when Amazon exceeds the truck and
15 delivery trip total, because they're telling us it's
16 a certain amount right now, fine.
17 When they exceed that, what are their
18 financial penalties going to be and how do we
19 collect? Because we certainly should if they're
20 telling us it's one thing and of course it's going to
21 be more.
22 It would be very easy to have a couple of
23 police cadets you have there counting trucks and vans
24 and like hey oh, you guys are double what you said
25 you were going to be; so let's get that in writing so

I-21 cont.

UNOFFICIAL UNCERTIFIED REALTIME ROUGH DRAFT TRANSCRIPT

that they can pay us for breaking the agreement.

The third point, which is the most interesting, is that I believe it's possible that we could force in whatever agreement or conditional use permit to have Amazon designate Upland as the point of sale location for everything in that warehouse, because if they do that, then Upland will get its 1 percent out of the sales tax for everything that comes out of the warehouse, which will equate -- equated to like 3 million a year.

And keep in mind for Amazon to do that costs them nothing because they're already collecting a full state sales tax. They're already sending that 1 percent to Sacramento. Sacramento is just keeping it. They only have they don't have to send it out to any city.

The moment says okay everything? This warehouse at the point of sale supplement land, Upland gets it's 1 percent share. And that was how starting with the first Amazon warehouse back in 2012 in San Bernardino they set it up. They said hay

I-21 cont.

23 San Bernardino we'll designate this as a point of

24 sale but you kick us back half of the sales tax or

25 whatever the percentage was and San Bernardino is

I-21 cont.



1 UNOFFICIAL UNCERTIFIED REALTIME ROUGH DRAFT TRANSCRIPT

2 like, okay, it's free money to us we'll do that. And

3 that's what we've done subsequently in all the other

4 warehouses, some of them, no, ma'am not.

5 But I don't think we should ever enter into

6 a contract and we should make that specifically they

7 have to do that. They have to designate everything

8 in there Upland point of sale, then we would get our

9 revenue that we need and then it would be okay.

10 If -- you know, the rest of the City wanted it.

11 Thank you.

12 THE CLERK: After Mr. Marks is Bill Bahat.

13 LELAND MARKS: Good evening everybody. My name

14 is Leland Marks and I'm basically here today because

15 I live on 13th Street and I've seen the traffic

16 congestion. I don't have any real technical

17 situation set up because I just heard about this

18 meeting yesterday.

19 But I came here mainly to talk about -- I've

20 been here since 1978. I've been hearings and seeing

I-22

21 what's happening to the City for over 40 years. And

22 the street itself, when the police station was put in

23 25 or so years ago, the prior department, the county

24 workers, the impact of that, the school on

25 13th Street, the amount of traffic, I live on

I-22 cont.



1 UNOFFICIAL UNCERTIFIED REALTIME ROUGH DRAFT TRANSCRIPT

2 13th Street and I can't even get out of my driveway

3 most of the time or I get ran over.

4 Now, I don't know what, you know, a lot of

5 these people have come up with very good scenarios in

6 what's going on for the impact and so forth. But

7 basically I came up here to speak about the people

8 who have to live with this traffic, this horrendous.

9 That's why the 210 freeway was put in. I was in here

10 long before the 210 freeway.

11 I was here when 16th Street was the end.

12 Now you got Foothill getting as bad as it ever has

13 been.

14 And with all the impact of Amazon building

15 this facility and the impact of the traffic just for

16 what they're going to do, not counting what we

17 already have, we have a tremendous amount of traffic,

18 and you come down Foothill Boulevard in the evening

19 and you're back down to the San an tone waiting to

20 get to Euclid just to get across the street. This is

21 going to be madness and all the people who have to

22 live here are impacted.

23 Think about the persons and the people who

24 live here and what they have to put up with. It is

25 not enjoyable. It is not the City of gracious living

I-22 cont.



1 UNOFFICIAL UNCERTIFIED REALTIME ROUGH DRAFT TRANSCRIPT

2 like it used to be when we have to fight and put up

3 with this. And now we've got Amazon who's going to

4 bring in a million people.

5 I understand it's a 50-acre warehouse. The

6 impact of all of their cars, the people going to work

7 there, the people going home, it's just going to be

8 Benson Avenue and over to Foothill and the 210, isn't

9 just going to be all in one area.

10 So there's a lot of people here that I know

11 who live in the area that are here to listen because

12 of the impact of the traffic. It is horrendous.

13 Now I am a facilities person, director.

14 I've been a businessman. But just hearing about this

15 thing, I haven't had time to do some of the studies

16 except for living here for this amount of time, over

17 40 years.

18 So I hope the Council really looks into the

19 people also.

20 Why don't you take and put up this thing up

21 on the hill further instead of here.

22 Thank you very much for your time.

23 THE CLERK: After after Mr. Bahat is **

24 BILL BEHJAT: Hello. My name is

25 Bharat, I testify last time I was here.

I-22 cont.



1 UNOFFICIAL UNCERTIFIED REALTIME ROUGH DRAFT TRANSCRIPT

2 The consequences of the heavy traffic,

3 the -- occupying our roads and now -- and the area to

4 the residential and -- and the industrial come

5 commercial areas, so many people of this city request

6 that -- that I do a chart here.

7 I spend a couple of days doing that with a

8 consulting firm that is an environmental consulting

9 firm and the result was failure.

10 So I have the actual HRA here for the mayor;

11 so I can present it to you, that HRA fail.

12 As a result the SRA indicates that some

I-23

13 people would develop cancer and that does not include

14 health risk assessment for asthma or other illnesses.

15 This is just cancer.

16 I've been talking to head of pediatric

17 oncology at Kaiser who is -- who is right now present

18 here. And he also indicated that -- that the impact

19 on the children, on minors, that are going to

20 pediatric oncology at Kaiser are much higher in the

21 area that they have distribution centers because of

22 the trucks.

23 So it's black and white in front of you.

24 And for the sake of the children of the facility --

25 of the -- the Upland and -- and also the -- everybody

I-23 cont.



1 UNOFFICIAL UNCERTIFIED REALTIME ROUGH DRAFT TRANSCRIPT

2 who are more susceptible for illnesses, I recommend

3 no on this project for this area.

4 Should I present you this?

5 MAYOR STONE: You can leave it with the clerk.

6 Yes. Thank you.

7 THE CLERK: After Ms. Murray is John Winnert.

8 FARIBA NOORY: Good evening. I guess I'm

9 following with Mr. Bahat's comments since I heard

10 about this proposal I have been looking at the online

11 newspapers and whatever I can get my hands on.

12 And these two articles, one is

13 November 20 -- November -- I'm sorry, October 27th,

14 the other one is November 1st, LA Times. And this

15 one says limit, FAR to limit warehouses as falling

16 short. The other one says beg banking big warehouses

17 right next to homes.

18 The article goes even though assuming

19 1,000 feet away is still the impact of the pollution

20 on individuals, especially the children.

21 I'm just going to add -- I'm going to take a

22 moment of your time -- of your time but I'm going to

23 read only one paragraph over here.

24 It says experts have long worked to develop

25 elevated cancer near police, near warehouse,

I-24



1 UNOFFICIAL UNCERTIFIED REALTIME ROUGH DRAFT TRANSCRIPT

2 distribution centers and other hubs because of the

3 pollution immanent by trucks.

4 Physician have even labeled these places

5 diesel dead zone.

6 So I leave it to you guys, you make that

7 decision for these people, their children, their

8 grandchildren.

9 THE CLERK: After Mr. Wienert -- after

10 Mr. Wienert is Eric Gavin.

11 JOHN WEINERTH: Good evening. Thanks for the

12 time this evening.

13 My name is John Wienert, I've been an Upland

14 resident for the past 18 years. I've chosen to raise

15 my family here. I think for the very same reason

16 everyone in this in room has chosen Upland, right, it

17 was a safe community.

18 I live on 13th Street, right between San

19 Antonio and Mountain; so this is new for me.

20 Speaking in front of the Council and it's really to

21 share some concerns I have.

22 I have a son that walks those streets to

23 school every day. There's --

24 So if you will, I'm in the impact zone,

25 right?

I-25

26

1 UNOFFICIAL UNCERTIFIED REALTIME ROUGH DRAFT TRANSCRIPT

2 There's three schools within one square mile

3 of this project. You know, I know there is committed

4 traffic patterns that they say they'll -- they'll be

5 dedicated to. I find that highly realistic because

6 these are humans driving these tricks and vans,

7 humans that need to stop at the bank, they need to

8 stop at the drugstore.

9 So I would just implore you, I don't know if

10 you still have school age children, grasp

11 grandchildren in some cases, if you're living in

12 these neighborhoods, if your children are walking

13 these streets, if you're trying to sleep at night

14 with trucks zooming by for that matter, you know, I'd

15 implore you to really consider supporting this

16 project.

17 I don't have some of the tremendous

18 statistics or economics that others present but I

19 would start there. Right? This is why we chose to

20 raise our families in Upland.

21 And, you know, we also have a police

22 department right down the street that's going to be

23 trying to get emergency response on the very same

24 streets to support our residents.

25 So for all of those reasons, I question the

I-25 cont.

27

1 UNOFFICIAL UNCERTIFIED REALTIME ROUGH DRAFT TRANSCRIPT

2 logic in this. It seems like short-term gain, you

3 knee, for a lot of things that long term we're going
4 to pay for and the community is certainly going to
5 pay for.
6 So you know in the past few years I've just
7 had to worry about a plane crashing into my house. I
8 certainly don't want to have to worry about my son
9 getting to and from school safely.

I-25 cont.

10 So thank you very much.
11 THE CLERK: After Mr. Gavin is Eric Neilson.
12 ERIC GAVIN: Keri, I wonder if I can use the
13 overhead, please.
14 Good evening, my name is Eric Gavin, I'm
15 here in support of this project. I'm here in support
16 of this project because I want the City we all live
17 in to grow and prosper.
18 Here everything in life is considered
19 healthy if it's successful or -- and successful if
20 it's growing --
21 You haven't started my time.
22 When a child or a tree doesn't grow, we
23 assume that it's sick, even at maturity most people
24 extend the rest of their lives trying to grow their
25 minds, their families, their businesses, to grow

I-26

2 spiritually and emotionally. I want this city to

3 grow and I want us to say yes.

4 Upland now has a well established reputation

5 for being unfriendly to growth, change, opportunity

6 and we are already losing out.

7 While Upland is saying no to a regional

8 sports park, Rancho Cucamonga is about to add 4,000

9 acres, including thousands ever natural conservation.

10 While Upland is resisting transformation of

11 Memorial Park --

12 MAYOR STONE: Excuse me.

13 MALE SPEAKER: -- might I remind you Ontario has

14 received over 40 million dollars in grants to receive

15 recite lies their down tune.

16 While Upland is hereby tonight trying to

17 stop the development of private land, Montclair is

18 redeveloping Montclair place with an investment from

19 a build development company.

20 While Upland is busy saying no, now we all

21 have to admit Sycamore Hills did go through but not

22 without its share of Upland negativity, Fontana is

23 bringing Hi-Tech manufacturing and is the most

24 prosper Ross city in all of California.

I-26 cont.

25 While Upland is -- while Upland was opposing

I-26 cont.



1 UNOFFICIAL UNCERTIFIED REALTIME ROUGH DRAFT TRANSCRIPT

2 General Plan updates, and this is my favorite one,

3 and accusing their elected officials of being

4 communists, that was in the newspaper, Redlands will

5 be the first to bring the nation's first zero

6 emissions passenger rail train to the entire

7 continent of North America.

8 While Upland's sad narrative of nay saying

9 and stagnation becomes further cemented, our

10 neighboring communities are changing the narrative

11 and bringing prestige and growth to the Inland

12 Empire.

13 Please approve this project in accordance

14 with its merits and adherence to our common

15 documents, I will respond every single one of you our

16 Planning Commissioners, your job is not to determine

17 what you think or the residents think should be here,

18 but rather whether a project adheres to the General

19 Plan and our planning documents.

20 Thank you.

21 THE CLERK: After Mr. Nelson is Natasha Walton.

22 MAYOR STONE: Excuse me.

23 Let's give everyone the same courtesy that

24 we give everyone. All right? Thank you, sir.

25 ERIC NILSSON: My name -- my name is Eric



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2 Neilson. I seem to be the third Eric to speak. I

3 don't know what's going on there.

4 I'm a professor and a department chair of

5 the department of economics at Cal State

6 San Bernardino and --

7 Thank you.

8 I took a close look at the air quality

9 assessment and a close look at the green how's

10 missions -- greenhouse gas emissions assessment. And

11 frankly, I didn't like what I saw.

12 To -- to not mince words, the studies are so

13 poorly done they need to be set aside as inadequate.

14 And they there needs to be a full-scale environmental

15 impact study performed.

16 Let me tell you some of the problems. There

17 are mathematical errors in some of the tables. The

18 tables refer to appendices that do not have material

19 that's supposed to support the material in the

I-27

20 tables; so someone revised these reports and failed

21 to actually make things synchronize so it's really

22 pretty shoddy work.

23 Now, as one example of questionable

24 assumptions that are included in the air quality

25 assessment and the greenhouse gas assessment, built

I-27 cont.

31

1 UNOFFICIAL UNCERTIFIED REALTIME ROUGH DRAFT TRANSCRIPT

2 into the model that the consultants generated was the

3 assumption that when the vehicle leaves the warehouse

4 to deliver something, the average number of miles

5 they go is going to be 6.9 miles. 6.9 miles from

6 Amazon delivery.

7 It takes that long to get to Laverne. But

8 then once the truck gets to Laverne it drives around

9 for a couple hours delivering packages, ragging up

10 maybe 60 or miles more above the 6.9.

11 Now, the implication of that -- and that's

12 just one error out of many, or one questionable

13 assumption out of many, is that the reports, these

14 air quality assessment reports and the greenhouse gas

15 assessment reports are, what they do is they grossly

16 underestimate the number of miles that will be driven

17 by vehicles associated with the warehouse.

18 And by grossly underestimating the amount of

19 miles that will be driven by those vehicles, they

20 grossly underestimate the greenhouse gas emissions

21 and other sort of noxious fumes that will be

22 generated by those vehicles.

23 Now, I took it upon myself to reproduce both

24 of those reports and created my own alternative

25 report which you can get from here, it's right here

I-27 cont.



if you'd like to get it.

THE CLERK: After Ms. Walton is April McCormick.

NATASHA WALTON: Good evening. My name is Natasha Walton. I am a 15-year resident of Upland, one of those people who likes to say by-products help conserve open space. I consider that progress. And actually valuing our natural monument and our city.

So we can do smart growth. I'm not saying I'm for this -- this project, per se. But I am -- I think this definitely needs an environmental impact report, just looking over the biological section, the habitat assessment. People need to know that -- what they're going to be losing.

I-28

15 I'm a wildlife biologist. We should know

16 what we're going to be losing bio diversity wise,

17 we're going to b losing the cotton tails, the

18 habitat, the habitat there for raptors to come and

19 forage.

20 We're going to be losing the plant diversity

21 there. There's going to be one day that this -- the

22 biologist went out there and looked at the grids.

23 There's not enough time to do an adequate survey for

24 the birds.

25 And August it was done August 29th of 2019.

I-28 cont.





2 Those are not plants. Those are the time of the year

3 when native plants are dormant and so a lot of plants

4 got missed I'm sure. And just scanning the area for

5 one species that was not recorded in the species, a

6 dominant species in the area that's being impacted,

7 the seeds can be same for conservation purposes. We

8 can identify this species.

9 So please understand that you lose more than

10 just space or -- or something like that, we're losing

11 habitat for these animals.

12 The assessment said oh, yeah, no -- no loss

13 to wildlife. I understand this is private land but

14 there's not going to be any mitigation for it per

15 say. I don't appreciate that they're going to try

16 and plant some -- some new plants and trees. I would

17 hope that if this does go through but I don't really

18 recall seeing a plant pallet showing and having them

19 commit to something like this.

20 But basically what I've learned, I just kind

21 of looking at different EIRs over the years is when a

22 community wants to claim that they're saving you a

23 wildlife habitat, they'll just pick anything and say

24 yes it's -- you know, they want to get credit,

25 mitigation credit for it, they'll say that something

I-28 cont.





2 is transmission lines areas as well as habitat that

3 they're conserving but whenever they want to get rid

4 of it, it's considered useless, it's considered

5 something that has no value.

6 There are many species that live there. We

7 need to -- to determine and at least document what's

8 going to be lost and let the community decide is that

9 worth losing and can we mitigate for that in our

10 community.

11 Thank you.

12 THE CLERK: After Ms. McCormick is Brenda

13 Swarthy.

14 APRIL MCCORMICK: Hi. Here we are again, first

15 off.

16 Okay. A couple things. I was a former

17 county committee member and that is the -- and I've

18 been hearing on social media that this is approved

19 and that you're approved of being sued.

20 I just believe that it's a bad. I finally

21 decided yesterday to look that up and verify that and

22 well almost faint the.

23 I have never called this a warehouse

24 buildings, it's not a warehouse. What this is is a

25 logistical terminal; so I assumed that the planning

I-29





2 board and the unified development ordinances and the

3 permitted land uses would list a terminal as well as

4 a warehouse and that those two things would -- would

5 be allowed under the -- what could happen there.

6 Well, to my surprise, there is no terminal

7 classification in Upland. And the code says if

8 anything is not listed it's strictly permitted.

9 This thing couldn't be approved with a

10 special use permit or a variance.

11 Upon discovering this I started researching

12 Chino where they have an an some, Fontana to see if

13 anywhere else has put this into the simple warehouse

14 classification and of course they hadn't hadn't.

15 I can't even believe I'm the only one that's

16 noticed this when we have the City planner and other

17 people that are supposed to be doing this.

18 But I had to get a planner's dictionary

19 which was generated by Galveston, Texas. They took

20 terms from multiple states, cities and counties all

21 over the country to define every term in the natural

22 world for --

23 So, first of all, let's read this: Board

24 freight consists motor wait consists of various types

25 of moved which is not air or rail.

I-29 cont.

36

1 UNOFFICIAL UNCERTIFIED REALTIME ROUGH DRAFT TRANSCRIPT

2 What this needs to be is a terminal. Every

3 single terminal definition in a planner's dictionary

4 would fit this to an absolute -- is an absolute must.

5 A transportation facility which quantities

6 of goods or cargo are stored without undergoing any

7 manufactured process, transferred to other carriers

8 or stored out doors and/or transferred to other

9 locations I love this one, a facility to receive

10 transfer, short-term storage, and dispatching of

11 goods transported by trucks including these

12 includes s with the types of express male service and

13 packing distribution facilities, including such

14 facilities operated by the post offers.

15 If the post office and FedEx and UPS and

16 everyone express or DHL, they're all considered a

17 trucking terminal, so on. This is equivalent to say

18 a warehouse coming in here and saying it's a parts

19 warehouse and then they pave a 38-acre parking lot

20 and all of the sudden Foothill becomes a truck stop.

21 This is about what's about to happen here.

22 You know, there's 1100 delivery vans and

23 25 trucks. Anything over 5 trucks is considered a

24 terminal.

25 So you have a fiduciary duty not to approve

I-29 cont.





2 this because this is not permitted in the land use

3 code.

4 Thank you.

5 THE CLERK: After Ms. Swarthy is Lois

6 Sickendieter.

7 BRINDA SARATHY: Good evening, Councilmembers,

8 and members of the public. My name is Brenda

9 Swarthy. I'm a press for of environmental analysis

10 and I a Ph.D. in environmental science and policy

11 from the University of California Berkeley.

12 I thank you all for this opportunity to

13 learn more about the project. I am looking forward

14 to that.

15 And I -- there's thousands ever pages of

16 documents for Planning Commissioners, City Councils

17 to pour through, much of it very technical, including

18 technical appendices; so a couple of things that I do

19 want to raise some of my concern about and I'm

20 looking forward to hearing more about.

21 And I will be submitting comments that I but

22 I'll get them to you by January 21st so it's in the

23 documentary record.

24 First has to do with the Tier 3 thresholds

25 in the greenhouse gas appendix and this -- because

I-30

UNOFFICIAL UNCERTIFIED REALTIME ROUGH DRAFT TRANSCRIPT

Upland is the lead agency on this, you actually have discretionary authority in relation to that threshold variance for warehouse gas emissions.

And I was quite surprised to see that you chose the industrial threshold for a stationary source, which is a heavy industry threshold of about 10 thousand metric cubic metric tons of carbon based Co22 equivalent per year, whereas if you chose the commercial/retail threshold, that's around 3,000 to 3500 metric tons of Co2 equivalent per year.

Elsewhere in the report you actually categorize the project and do a lot of comparisons to a retail. And so I'm quite surprised that the City has used a higher bar in characterizing this project as industry.

And I did talk to South Coast AQMD about this, they thought it was quite a fair point and strongly encouraged me to put it into any commentary; so I ask you please to look at that and justify why you've categorized it with a higher threshold.

The second point has to do with the other professor's point or air quality emissions and

I-30 cont.

24 traffic studies and the you used level of service

25 measures and you might want to consider vehicle miles

I-30 cont.



1 UNOFFICIAL UNCERTIFIED REALTIME ROUGH DRAFT TRANSCRIPT

2 traveled. It's a common measure used in a lot of

3 metropolitan areas; so it is ground tested. And that

4 might give a more accurate numbers.

5 I am deeply concerned about traffic

6 congestion. It's not simply about the roads but

7 we're talking about air quality, idling, what does

8 that mean, some of it with a much more vaporized

9 impact.

10 This is a singularly use the type of

11 facility. You can't simply compare it to allows or a

12 home retail versus warehouse.

13 This is a semi-logistical hub. And so it is

14 incumbent upon you perhaps go look at facilities such

15 as Chino and elsewhere, there is the whole ITE study,

16 Institution of Transportation Engineering, this is a

17 recent development in the area, they're trying to

18 figure out how to quantify high warehouse projects,

19 there's even given degrees for it, parcel hub,

20 et cetera. So there's a lot there.

21 Please, I ask for an EIR. Thank you.

22 THE CLERK: After Ms. Sickendieter is **

23 LOIS SICKING DIETER: Got evening, Mayor and Council.

24 Thank you for the opportunity to share my thoughts on

25 this initial study.





2 I have reviewed the initial study but first

3 I have a master's in atmospheric chemistry and

4 environmental science. I work at the California Air

5 Resources Board evaluating diesel emissions,

6 et cetera.

7 Oh, as a mechanical engineer my focus is

8 engine studies.

9 I have reviewed much -- and I also have

10 background in CEQA, California environmental

11 protection act.

12 And I am passionate about the things that I

13 commit to. I am committed to having a thorough

14 process so far as CEQA and the environmental review

15 here and that it be at the best engineering practice

16 level.

17 Again, I have reviewed much of the initial

18 study. I am against this proposed project going

I-31

19 forward without an environmental impact report.

20 I find that this initial study has flawed

21 methodology, uses outdated software, in some

22 instances by 20 years. Indicated conclusions were

23 based on analysis and results not well defined.

24 Inputs to models were not defined. Analysis software

25 programs were not disclosed. And if they were, the

I-31 cont.





2 ref date and the revision number was not disclosed.

3 Most raw data output was not included. That

4 was unexpected.

5 In my opinion as an environmental engineer,

6 this initial study does not make standard engineering

7 best practices which also leads me to question

8 whether or not it was peer reviewed, which is part of

9 due diligence by City planning staff.

10 For example, on the hydrology calculations

11 we already know this project is 50.25 acres; however,

12 the proposed site only includes hydrology

13 calculations for 48 acres. What happened to the

14 other 2 acres? I don't know.

15 That would -- that should have been caught

16 in the peer review.

17 Another example, on the hydrology

18 calculation and analysis program done in May of 2018

19 on the existing site, a lot of these studies as

20 existing versus the proposed. On the existing site

21 they used a software program with a revision date of

22 2016 and a version date of 20023. It was good -- it

23 was good data, it was a good output.

24 And then I compared that to the proposed.

25 The proposed used version 8 dated 1999. Dated 1999.

I-31 cont.





2 As a reg writer, I write specifications and

3 what I am acutely aware of is that going from a 2016

4 version which is still the most current to a 1999,

5 you miss 20 years, over 20 years of regulatory

6 updates, improved mathematical modeling, improved

7 mathematical relationships.

8 I ask that you direct staff to conduct the

9 necessary actions to take -- to develop an

10 environmental impact report.

11 Furthermore it needs to be peer reviewed.

12 And that review disclosed.

13 Thank you for your time and consideration.

14 THE CLERK: After Mr. Nunez is David Wade.

15 MIKE NUNEZ: Hello good evening folks. Thank

16 you for hosting this again.

17 Just very quick. We're here -- we're here

18 on the a second time basis. The first time basis,

19 people behind us thought they were very confident in

20 demonstrating their -- their project. And I think

21 they were wrong.

22 What's happened since -- actually, a few

23 things happened since.

24 We kind of discovered that very little

25 benefit -- financial benefit was going to be going to

I-32



1 UNOFFICIAL UNCERTIFIED REALTIME ROUGH DRAFT TRANSCRIPT

2 Upland; so they decided to start throwing money

3 around and, you know, and try to get a favorable view

4 of the project.

5 But it's striking that we still do not know

6 who the lease person or the lease company that will

7 be going.

8 I think that's very, very wrong to not tell

9 the City who going to be leasing 55 acres of property

10 on our west end when there's houses around there.

11 And they still refuse to this date to tell

12 us who it is.

13 We all have an idea at this point.

14 But the main point I wanted to make was the

15 traffic study. Who in this room believes that there

16 is zero impact on this traffic study? That's --

17 that's very evident.

18 Yeah.

19 And I'd like to know if our police

20 department was involved in this study since they hold

21 the statistics particulars on traffic enforcement, on

22 traffic citation, traffic collisions, were they

23 involved?

24 I think corroboration between a police

25 department and a developer is warranted at this

I-32 cont.





2 point.

3 Give our chiefs -- we all hold this -- we

4 hold our chief in high regard in this city; so he's a

5 voice that most of us will probably listen to. If he

6 tells us it's going to be okay, we're probably going

7 to be okay.

8 So why not involve our police chef?

9 So going back to the developer again, you

10 know, I understand what's going -- you know, money

11 going to the schools and money going for road repairs

12 finally because I believe they initially said they

13 were not going to live us for road repairs

14 Why in the world is our Upland chamber

15 receiving $50,000 from the developer when they should

16 be leading the front against this project because

17 they're going to kill every single small business in

18 this town?

19 So that answer needs to be answered. Why is

20 our chamber involved in this?

I-32 cont.

21 Thank you.

22 THE CLERK: After Mr. Wade is Chris Garcia.

23 DAVID WADE: Good evening, council, Planning

24 Commission.

25 I'd like to -- somebody mentioned 1,100 vans

I-33



1 UNOFFICIAL UNCERTIFIED REALTIME ROUGH DRAFT TRANSCRIPT

2 going out, coming back. I don't know how many times

3 a day, but going out and coming back is 2,200 trips.

4 We have, if they come back a couple times,

5 3,300, 4,400. We don't need this kind of traffic

6 running through here. We've already got two-hour

7 delivery from Amazon, why do we need it here to be

8 supporting other cities when we don't make any sales

9 tax, local sales tax off it?

10 It is ridiculous.

11 And I'd also like to point out the zoning

12 issue. Industrial zoning does not state anywhere

13 anything about having a distribution hub or a -- or a

14 terminal facility in it, nor does the commercial

15 zoning for Upland.

16 All of these other cities mentioned have it,

17 which leads me to believe that our Planning

18 Commission has not been doing a proper job in

19 updating our codes, updating our General Plan.

20 This is why we need to have term limits and

21 we need to have a fresh perspective in here and to

22 stay on top of this.

23 I don't see any benefit from -- from

24 something that's not zoned properly that's going to

25 overburden our roads. You put apartments on Central

I-33 cont.





2 Avenue and now you want to run semis right by them.

3 It's ridiculous. It's ridiculous.

4 You're going to be crossing Foothill. We

5 don't -- this isn't what we need.

6 Show me an Amazon distribution center

7 anywhere on Foothill Boulevard? You won't find one.

8 And there's a reason for it. It's not the proper

9 place to be in our commercial corridor.

10 We need to have proper studies and we need

11 to have a Planning Commission that's willing to

12 represent us.

13 It is not about progress, it is not about

14 the best wishes of the community, it's the best use

15 of that land.

16 Is this really the best use of that land?

17 No local tax, all of these environmental issues and

18 more traffic than I even care to try to imagine per

19 day. It's not a good idea.

I-33 cont.

20 Thank you for your time.

21 THE CLERK: After Chris Garcia is Lucy Humbolt.

22 CHRIS GARCIA: Good evening everyone my name is

23 Chris Garcia, a local resident of Upland, 14 years.

24 What I have a reference -- kind of the same

25 nature of conversations everyone has been kind of

I-34

2 already entering is some of the traffic and some of
3 the congestion -- some of the congestion and the
4 traffic that's been projected for the project.
5 It looks like from the initial study for
6 reference, I have a map here, and from the project
7 obviously the 13th Street looks to see the access
8 area for the vans that's possibly employees and
9 distribution for the vans. Their goods. It looks
10 like it's 2,400 possibly vans that are going to be
11 participating in the -- in the delivery. And from
12 reference from some of the initial study it looks
13 like there's an apple shift, obviously it's 2,400,
14 that would be you know 600 divided by four, a
15 concentration of AM shift, a PM shift for 600
16 hundred, the difference being 1,200.
17 With that amount of traffic being congested
18 in the streets you have know there would be
19 definitely some I think initial studies of how
20 congested some of the streetlights would be.
21 But -- and the initial study it doesn't seem
22 like there's a lot of data within those studies, like
23 some of the streetlights it shows reference of barely
24 being a couple seconds later in wait times in those
25 perimeters parameters such as you know the mash the

I-34
cont.

main cross streets of whenever traffic is going to be compiling from the -- from the -- from the warehouse.

Isn't there a way that maybe Bridge Point could possibly narrow in some other studies, possibly from other studies, possibly like in Chino, Fontana or even in Redlands to see exactly what's their capability of -- facility wise to -- you know, how it impacts some of the streets?

I'd just like someone had mentioned before, with some of the data that's available through the police department, I think there's studies of 985 percent pile traffic collision report, data is already there. There's a lineal projection I think on the study initial where it shows in 2040 what the wait times would be. What would be the cap of some of the traffic of this growth from the warehouse?

We have 2,400 vans operating, if it's -- if it's approved. Five years from now is that going to double or is that going to be trimmed, is it going to be a 20 percent increase? I think those are some questions that all of would like to -- to know. And

I-34 cont.

23 you no he that could be a little more clarity for all

24 of us to understand.

25 Thanks.

I-34 cont.



1 UNOFFAICIAL UNCERTIFIED REALTIME ROUGH DRAFT TRANSCRIPT

2 THE CLERK: After Ms. Humbolt is Bridget James.

3 LIBBY HUMMEL: Good evening. I am extremely

4 opposed to the biggest development project effort.

5 It is not a proper location for an Amazon facility

6 due to its location and residential area. I am --

7 We also have emergency services directly

8 across the street from the proposed location. This

9 is the fire department on and the police department

10 on 16th Street.

11 We all know that time is of the essence in a

12 life and death situation since this is a residential

13 area our quality of life will be affected by traffic,

14 noise and pollution.

15 This will come from trucks, vans, autos,

16 airplanes and in the future goes with the bus noise.

17 Furthermore our property needs -- our property will

18 depreciate along with our health.

19 I have a suspicion -- I have a suspicion

20 that our voting rights were taken unconstitutionally

I-35

21 I believe two years ago in District 21, about the

22 time this was started. To date we still don't have

23 any representation on the council.

24 The least the City and its representatives

25 can do is provide a proper environmental impact

I-35 cont.



report from someone other than a something cohort.

Thank you.

THE CLERK: After Ms. James is Charlene Contrares.

BRIGITTE JAMES: Hi, good evening. Happy New Year.

I'm not here to say I'm for the project or against the project but what I'm here to say is continue the negotiations. The constant no, no, no does not get us anywhere.

Let's put forth the concerns that the -- the community has. The original project was quite large, as obviously we all know. It has been scaled down because people are -- Bridge is listening to the City sense issues and their complaints and what they're concerned with.

I-36

18 But if you just say no, then nothing

19 happens.

20 We live in a capitalistic society, if we do

21 not grow we die. We cannot live off of home tax base

22 only.

23 Retail is -- doesn't have the strong foot

24 hold that it used to have. We have to move into

25 different kinds of commerce. ECommerce is strong.

I-36 cont.

51

1 UNOFFICIAL UNCERTIFIED REALTIME ROUGH DRAFT TRANSCRIPT

2 ECommerce is also making break and mortar

3 stores. Why not put into the contract that there has

4 to be a small brick and mortar component to it so

5 there's point of sales.

6 Continue the negotiations. Why can't you

7 negotiate in this contract some kind of point of sale

8 distribution with whatever goes on, anything that's

9 delivered in Upland, something, but if you just say

10 no, nothing happens.

11 We need to move forward. We already know we

12 don't have to worry about 13th Street because that's

13 been taken off the list. We know that there's going

14 to be road he shall use. All right. So we can plan

15 ahead for that.

16 We've got to find a way that we can get a

17 continued refer knew stream from this. There

18 certainly has to be a way.

19 A lot of the community is asking for an EIR,

20 then let's do it because that will answer some

21 people's concerns.

22 If that's going to be one of the deciding

23 factors, because a lot of people in here are worried

24 about the environment. We also have to worry about

25 the economics and the young families who are trying

I-36 cont.

52

1 UNOFFICIAL UNCERTIFIED REALTIME ROUGH DRAFT TRANSCRIPT

2 to make a living and to move up.

3 I've talked to a few Amazon employees and

4 it's not really as bad as anyone says. Are there

5 companies things that are bad. Yes. And I get it.

6 There's bad health care, there's bad but there's good

7 too. But we have to negotiate. If you keep saying

8 no, no, nothing happens. We've got to move forwards.

9 Let's look at the concerns they have.

10 Bridge has been open and they've been listening to

11 all ever these concerns. I think they will continue

12 to do so.

13 I would also like to add is that no one is

14 talking about the family that owns the property. The

15 Giovannis have a say in this. This is their private

16 property and to a certain extent they can do what

17 they want with I find it very interesting that

18 primarily a Republican audience which is all about my

19 property, I get to do what I want, gets to regulate

20 somebody. I don't think the Giovannis want to have

21 brick-and-mortar stores or maybe they do, maybe they

22 don't.

23 I'm not saying it's right and I'm not saying

24 it's wrong, I'm saying don't encloses the door. Keep

25 the door open and start looking at all of those

I-36 cont.

53

1 UNOFFICIAL UNCERTIFIED REALTIME ROUGH DRAFT TRANSCRIPT

2 concerns and work with Bridge and work with the

3 family and see what can be worked out. Thanks you.

4 THE CLERK: After Ms. Contrares is Bob Cable.

5 CHARLENE CONTRARES: Hi there my name is Charlene

6 Contrares, I'm a resident on 16th and Benson. I am

7 also a -- an environmental specialist with the

8 LA County Department of Public Health; certified and

9 fully to speak on health impacts of this project.

10 What I wanted to bring to your attention was

I-37

11 while Bridge did identify a good buffer around -- for

12 noisy want to speak on the noise, a buffer around the

13 project site, their project does also include the

14 fleet.

15 And so the fleet and the routes that are

16 traveled on, there is not a good buffer between the

17 routes and the residential -- the residential zones

18 that are along those routes.

19 The -- as you heard from other people before

20 you, the traffic study seems to be flawed and it's

21 the basis for which the noise, the air and the

22 greenhouse gas models were developed as well; so if

23 you have the foundation data not correct, then the

24 rest of the other studies are not going to be correct

25 as well. And just so you know, looking at the noise

I-37 cont.





2 study, they did capture -- they did capture actual

3 noise measurements but only four of them. And there

4 are two areas where one was models and one was

5 actual, it was a 10 decibel difference. And so while

6 that may not mean anything, CEQA says if there's a

7 significant impact above 5 decibels then that is a

8 significant impact; so the health -- the noise study

9 did say there was a significant impact.

10 However when we look at the model and we

11 look at the actual, there is a 10 decibel difference;

12 so I just want further evaluation into that.

13 In addition, the nighttime noise was not

14 captured. And so if it's a 24/7 operation, then the

15 nighttime noise at the residential area should be

16 captured.

17 Also inside the homes shall I know that the

18 City of Upland does have strict code enforcement on

19 noise. And so there is -- there is laws in there

20 that say the residential area has to be at 45. And

21 so it's very important that the model be taken at the

22 residential area because noise is a significant

23 health impact, especially when you're trying to

24 sleep. And you hear horns and you hear all of this

25 noise.

I-37 cont.

55

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2 So lastly what I just wanted to say is I

3 want to urge you to go through with a full EIR

4 because if we can't identify the impacts then we will

5 never get the opportunity to litigate them and then

6 you just have to live with them.

7 And so that's why I'm here, to just help --

8 help you in any way because I think we all need to

9 be -- we need to make informed decision.

I-37 cont.

10 Thank you.

11 THE CLERK: After Mr. Cable is Carlos Garcia.

12 BOB CABLE: Well, good evening, Mayor, City

13 Council, Planning Commission members, Airport Land

14 Use Commission and Staff, we've got a full house

15 today don't we.

16 Well, I'm here as you obviously know is to

17 support this project and of course my name is Bob

18 Cable and my family has been on owning the cable

19 airport for just about 75 years now. So when we talk

20 about change, we've seen a lot of change when we

21 first built the airport here there was nothing around

22 here but orange groves so for people to think that

23 life isn't going to change and technology is not

24 going to change the way we live, I can tell you

25 you're wrong.

I-38





2 And I've seen it lap and I've seen it happen

3 over and over again. And I'm excited about Upland

4 going being on the cutting edge of this change once,

5 just once.

6 We -- we broke a developer that tried to get

7 the colonies in the first time. We had a ton of

8 opposition for the second time and it still went in.

9 And it's a great asset to the community and

10 to the citizens of Upland and our surrounding

11 community.

12 So to say that I'm associated or the City is

13 associated with -- with a cutting edge Amazon

14 retail/quick delivery service, I'm excited about

15 that.

16 It's nice to be on the cutting edge now and

17 then and it's nice to be recognized for something

18 that -- that nobody else has.

19 So I would urge you to take a good hard look

20 about what brings people to the City of Upland

21 because I'll ask them, what do you hear? Crickets?

22 And I'll find 20 who say you know what people come to

23 the City of Upland because we've got the cutting edge

24 Amazon center here. I'm cool with that. I'm totally

25 okay with that. I'm good with that.

I-38 cont.

And it's a playing that all the years and the his s I hear behind me is the lack of information that those people do and the lack of research they don't I guess they didn't just see that Amazon made an order for 100,000 electric vehicles, 1 hundred thousand electric vehicles.

So -- so you know what, I hear all this stuff about the environmental and about the smog and about the pollution, but none of these people live next to that area. I live next to that area. That's my business.

I have to put up with the dust, I have to put up the vagrants. I have I have to put up with the fires. I have had tenants attacked by people in that field.

A lot of people think I put a fence up for security, that was part of it, and you know what it's for, to protect my business; so if you really want know what it's like come spend a few days down next to that fence. And you know what, you'd approve this today.

I-38 cont.

Thank you.

THE CLERK: After Mr. Garcia is Terry Deed.

25 CARLOS GARCIA: Good evening council, Planning



1 UNOFFICIAL UNCERTIFIED REALTIME ROUGH DRAFT TRANSCRIPT

2 Commission, Carlos Garcia, almost a 40-year resident

3 here in Upland and also a proud director of the

4 Upland city.

5 As I was coming in I already had notes

6 prepared for this but I was handed an updated flier

7 that looked to be about 10 million dollar on what

8 they're proposing to help out.

9 Specifically, I'd like to know is is who was

10 invited or who allocated is this particular land

11 specifically for schools? We already covered the

12 chamber and other aspects of it too. I come from

13 education. $100,000 for our schools does nothing, it

14 doesn't even pay after of a salary for a teacher for

15 the most part, including the benefits and all of

16 that.

17 Part of what we really need to look at is

18 the environment. It's already been talked about.

19 How is this going to talk about -- 10 million dollars

20 what we're talking about yearly for a 50-year lease,

21 okay.

22 10 million dollars is nothing. They get

I-39

23 50 million dollars, it's nothing. By the time it

24 hits that bank, it's already spent.

25 Are we talking about -- I was -- are we

59

1 UNOFFICIAL UNCERTIFIED REALTIME ROUGH DRAFT TRANSCRIPT

2 talking about our retirement plan and -- it's not

3 going to do anything for it, right?

4 So what Ms. James also said about not

5 keeping the door open I agree with her on that. If

6 we're going to negotiate, let's negotiate for the

7 better of Upland.

8 We keep crying that we don't have money we

9 don't have money we don't have money but the other

10 thing I'm also here is that we're afraid of being

11 sued.

12 Well, we pay our attorney half a million

13 dollars to cover, right, so why not put that to work.

I-39 cont.

14 Thank you.

15 THE CLERK: After Terry D is Alonzo Seldfar.

16 TERRY D.: Hello. Can everybody hear me?

17 Okay. Thank you.

18 I had an opportunity to attend a human

19 trafficking conference this week, last sat; so what

I-40

20 I'm not hearing being said tonight is what's going to

21 come in on the trucks and vans.

22 A speaker asked the question, where does

23 this kind of activity take place? People responded,

24 dizzy knee land, the Rose Parade.

25 If any type of a big event.

I-40 cont.



1 UNOFFICIAL UNCERTIFIED REALTIME ROUGH DRAFT TRANSCRIPT

2 Why? Around Disneyland, the area around it,

3 the traffic. You have people coming from other

4 states and other countries; so --

5 Then she asked let's bring if closer to

6 home. Where else do you think bad things happen?

7 Nobody responded.

8 She said think about this. High density

9 housing and traffic. We have a lot of big vehicles,

10 a lot of vehicles, no matter what size. What that

11 welcomes in is prostitution and human trafficking,

12 drug car tells.

13 On this flier that those there was a young

14 man handing out as we came in there was a dollar

15 amount that was supposed to go directly to the police

16 department. That dollar amount needs to be increased

17 to five times that amount.

18 The prostitution, child trafficking, the

19 fight against the drug car tells, they're going to

20 out number the police department just like that.

21 What's down the street from this location?

22 The nude dancing whatever you want to call it.

23 That's a perfect prime location for such activity.

24 Today in the news there was talk about the

25 City of Pomona dedicating two full-time officers to

I-40 cont.





2 walk the boulevard. Why? To combat prostitution and

3 human trafficking.

4 The age for human trafficking starts at the

5 age of 12. This human is sold to different gangs

6 throughout our region.

7 Drugs are a one-time hit, it comes and goes,

8 but a 12 year old human can be sold and resold and

9 resold. You don't until they can no longer perform,

10 then they're took to the side of the road or they're

11 killed.

12 Is that what each and every one of you want

13 to bring to this community?

14 If so, know that you own this. Okay?

15 THE CLERK: After Mr. Seldfar is Marjorie

16 Michaels.

17 ALUNZO ZALDIVAR: Good evening, City Councilmembers

18 and Mayor Stone. My name is Alonzo Selfar, I'm a

19 28-year resident here in Upland and currently a

20 senior at the University of Southern California

21 Marshal school of business.

22 I'm excited to be here tonight to voice my

23 opinion in strong disagreement on the desired

24 permission Amazon is currently trying to get in an

25 effort to place a 5-acre distribution plant in a city

I-41





2 that I grew up --

3 50. I'm sorry. 50. Makes it even worse.

4 In a city that I grew up never seeing as a

5 commercial hub, I'd like to begin to remind

6 Councilmembers that this decision that lies before

7 them is very important and it should be taken with an

8 in a finite view, not so much a finite one.

9 And I can imagine how easy it is for us to

10 get caught up in the glamor that Amazon has promised

11 regarding jobs, increasing consumer spending and

12 especially the use of unused land that kind much has

13 created a sore as I'm driving down Foothill.

14 But according to Amazon's 2018 income

15 statement they've spent roughly 28 billion in

16 research and development and throughout the years

17 it's grown enormously. Just year over year,

18 27.48 percent and 2016, 79.28 percent.

19 Now, what this means is all they do promise

20 to provide us jobs in this distribution plant that

21 I'm sure will provide many, I think it's very

22 short-term. And as many people here have spoken

23 about the -- the change that we've seen before us and

24 it's -- it's rapid. And before we know it, we're

25 going to have an empty -- completely you autonomous

I-41 cont.



1 UNOFFICIAL UNCERTIFIED REALTIME ROUGH DRAFT TRANSCRIPT

2 distribution plant that provides no benefit to our

3 city.

4 You know, as an avid businessman this is a

5 really good model, I'm not going to lie to you, but

6 as a citizen of a city that I truly love, I really

7 don't see it benefiting us in the future.

8 So unless Amazon is fully committed to

9 increasing the quality of life of our great city,

10 whether that be creating a supporting community fund

11 that improves our roads and schools, will I be

12 against this motion until that is.

13 And so that is, that is all I got. Thank

14 you so much. And -- and yeah, is love Upland, I

15 really do.

I-41 cont.

16 THE CLERK: Next is Marjorie Michaels.

17 MARJORIE MIKELS: Hello. Marjorie Michaels.

18 And my family has been here almost 100

19 years. And so I was here with the airport came in

20 and. It's --

21 You know it's significant, I haven't heard

22 anybody talk about the fact that Amazon always

23 locates near airports. They're trying to locate over

24 at Norton where the largest plutonium pit probably in

25 the world is over there and, you know, they're going

I-42





2 to subject people to it.

3 But what -- it is inconceivable to me that

4 Amazon is touting this as a prototype. There's not

5 going to be any drones and other things to use that

6 airport to bring in goods and so forth.

7 And we haven't talked about how much that's

8 going to increase, you know, the the burden on -- on

9 our city.

10 And then I -- I have to second what

11 Ms. Terry said about the human trafficking.

12 Now, we all remember when Steven Dunn left

13 here as the City manager and got taken in by Bob --

14 by -- sorry, Bob Cable over there and then got his

15 campaign for City Council supported by Welke, the big

16 marijuana guy who was trying to push in all the

17 marijuana and who owns all the T&A outfits that are

18 right next door to this airport.

19 At the time when we know this Sonoma --

20 Sonola, what is that, gang from Mexico is bringing in

21 pot and other stuff to the airport, you know, for

22 distribution through well key's outfits and so forth,

23 while the City is spending a million dollars to fight

24 the only guy who was trying to --

25 I mean you know we have a -- a history here.

I-42 cont.





2 Right? And we're putting this gateway of our city,

3 we're going to put an Amazon distribution center

4 right next door to the T&A. I know it's in the

5 county and you can't control it but -- but we don't

6 all know what is going to be permitted and

7 distributed at our front door. Okay? Front door

8 from Claremont.

9 They're not asking to go to Claremont,

10 they're asking to come to up grand, the gracious city

11 because -- maybe they just don't like you guys to be

12 scared I have a feeling Mr. Zimmerman has been fed a

13 line that this is zoned for this and so you don't

14 have any right to do this and so they might sue us

15 and that would be horrible.

16 Well, we know how Amazon treats people, they

17 know how they spent over a million dollar dollars to

18 get rid of a City Councilwoman in Seattle who was

19 trying to help -- to get the largest corporations in

20 the world, we know Jeff Bezos is the richest guy in

21 the world, okay, to try to get them and Starbucks and

22 Boeing, you know, to kick in some money to get rid of

23 the homeless.

24 They fought that tooth and snail. And

25 Amazon spent a million dollars to get rid of that one

I-42 cont.





2 council woman and they lost. Okay. They lost.

3 Because the people knew better.

4 And you've got a lot of people out here

5 tonight and you need to listen to them and we need to

6 go for an EIR, okay, and -- you say oh, we don't have

7 time, we have to get this in by next August or -- or

8 else it just won't work, and -- and Amazon needs to

9 step up to the plate. Okay? They won't even come

10 and sign the contracts that you're going to true try

11 to impose them.

I-42 cont.

12 MAYOR STONE: Thank you Marjorie, your time is

13 up.

14 Thank you.

15 THE CLERK: I don't have any additional cards.

16 MAYOR STONE: All right. Thank you very much

17 and thank everyone for your time and your comment.

18 Now I will turn it turnover the --

19 Okay. I'm sorry, but I'm being kind of

20 asked up here, we're going to take a five-minute

21 break. We'll be right back.

22 (Off the record.)

23 MAYOR STONE: All right. Keri? Keri? Keri?

24 Turn my microscope on. If I --

25 Keri? Keri? Can you turn me on? Hello?

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Testing?

If I could have the Council come to the dais we're going to get started please.

Mr. Velto, could you come back to the dais wherever you're at.

Other there you are. All right. Thank you very much.

So now we will move on to the presentation and that will be our development services director, Robert Dalquest.

MR. DALQUEST: Thank you, Mayor and City Council, Planning Commission and Airport Land Use Committee.

You my recall at the last workshop which was in October of 2019 on the revised project, it was requested that a joint meeting be provided when a vulnerable document is released for a public review and also to provide a 30 or 35 day public review period.

The environmental consultant who prepared the environmental document, Kimley-Horn is here to provide a detailed presentation to you and answer any

24 questions you may have on the study.

25 The public review period began on December



2 16, 2019 and is due to end on January 21, 20230.

3 This provides for a public review period of

4 about 37 days which exceeds the minimum public review

5 period following the negative mitigated declaration,

6 which is 30 days; however 30 days is required if a

7 document is --

8 Which this document was received, the City

9 has received 22 comments thus far on the

10 environmental document. After the public review

11 period is over staff will work with Kimley-Horn to

12 prepare responses to each of the comments that were

13 received from the public. This will be included in

14 the materials to provided to the Planning Commission

15 and the City Council in the public hearing process.

16 And will also be sent to each of the -- the

17 individuals that provided a letter 10 days before the

18 public hearing.

19 The negative mitigated declaration reflects

20 the independent judgment of the City, who is

21 responsible for every agency of the adequacy of the

22 objectivity of the CEQA quality.

23 With that, I will turn if over to

24 Kimley-Horn who will he provide a presentation.

25 MR. FLOWERS: Good evening, Madam Mayor.



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2 Before the Kimley-Horn representative begins

3 I would just like to remind the Commission and the

4 Council that since this is a special meeting under

5 the Brown Act, your discussion is strictly limited to

6 matters on the agenda and the only item on the agenda

7 for your discussion tonight is the initial study and

8 mitigated neg dec; so this is --

9 I'm just giving you some pointers that this

10 is not about the ultimate merits of the project,

11 about whether or not to approve it, and it's not

12 about the proposed development agreement or those

13 deal terms. Those matters are not on the agenda

14 tonight so they're not open for your discussion.

15 This workshop was called to discussed

16 environmental review and that's what we're -- the

17 discussion should be limited to.

18 MAYOR STONE: Thank you very much, I appreciate

19 the information.

20 All right. Go right ahead.

21 MS. BURNETT: All right. Thank you.

22 Good evening Mayor, members of the City

23 Council, members of the Planning Commission and

24 chair, and members of the Airport Land Use Committee.

25 My name is Candace Burnett and I'm a planner with





2 Kimley-Horn.

3 We are the consulting firm that prepared the

4 environmental document which is the mitigated

5 negative declaration in partnership with other

6 consulting firms that prepared portions of the

7 technical studies.

8 The mitigated negative declaration

9 comprehensive environmental document that is

10 available for review and the workshop tonight is an

11 opportunity for us to provide you as well as the

12 public an opportunity to not only review but

13 understand the process in which we evaluated the

14 project.

15 The mitigated negative declaration is

16 currently on line, it's available at your public

17 counter as well as we have a copy here tonight. I --

18 I see that you all have copies as well. It's quite a

19 large volume and so we will refer to it as well

20 tonight.

21 Tonight we will also cover the preparation

22 of the mitigated negative declaration, the public

23 review period and the next steps.

24 The CEQA process is a methodical evaluation

25 procedure in which each impact section is evaluated





2 for a project. The process includes technical

3 studies as well as professional level environmental

4 studies.

5 The Bridge Point Upland project is a 2

6 hundred thousand square foot building located on an

7 approximately 50-acre site. The site is currently

8 eyed as depression activities as part of Upland lock.

9 The proposed building occupies approximately 10

10 percent of the site and is proposed a s a as

11 last-mile type warehouse storage facility.

12 In the Upland Claremont and Montclair area,

13 the facility also may include a retail will call type

14 pick up location that would serve the retail -- the

15 residents as well as the location -- general location

16 around it.

17 The adjacent uses include industrial, park

18 and warehousing to the west, the Cable Airport to the

19 north, Lowe's and small retail as well as restaurant

20 shops to the east and immediately south restaurant as

21 well as retail and further south an across Foothill

22 Boulevard additional industrial and retail sales.

23 Additionally the site has been designed for

24 clean energy efficient vehicle operations to

25 accommodate a fully electric fleet of delivery vans





2 as the infrastructure would be included in future

3 build out. *

4 Kimley-Horn is a full service environmental

5 and engineering consulting firm providing series

6 advises to the clients nation wide. It was founded

7 in 1967 and has a staff of over 4200 professionals

8 and offices nationwide. We have experienced planners

9 and environmental analysts working with

10 interdisciplinary teams in more than 400

11 professionals and 12 offices in California alone.

In the Riverside office we've been part of over 1,000 projects in the inland empire in the past 20 years. We provide a full range of environmental services including CEQA review.

Our national environmental compliance and have worked on a number of complex projects requiring technical expertise and creative exclusion for design as well as understanding the local state and federal laws and regulations.

We have environmental documents that are supported by in-house professionals that have expertise with civil engineering, land development, air quality, GHG, noise, hydrology as well as other environmental study areas.





In fact, my personal experience has been in over 20 years of planning specifically starting my career here in Upland in the Planning Department.

Some of my own projects included projects around the Cable Airport early on in my career.

Now recently I have spent time in Claremont as well as Rancho Cucamonga. ; therefore, I am very

9 familiar with your city as well as the Cable Airport

10 and appropriate land uses and the types of zoning.

11 Kimley-Horn is also very familiar with

12 airport development as we have a strong aviation team

13 in-house with -- with helping many airports in the

14 Inland Empire.

15 The purpose of tonight's joint workshop is

16 to share with you and the public the process of the

17 environmental review and throughout our technical

18 evaluation of the project and how we evaluated the

19 project.

20 It is also to gather the type of

21 information, the comments we receive tonight and any

22 additional comments from you.

23 All of those formal comments will be

24 received and incorporated into the final document.

25 The other thing that we wanted to point out,





2 that tonight is just a workshop, that no formal

3 decision will be made by any of the policy makers.

4 Also, that this is the third workshop, that

5 the applicant held two additional workshops with not

6 only the City Council and the planning anything but

7 the airport land use committee, and that based on

8 feedback the project has been redesigned to have a

9 smaller footprint but tonight the workshop is

10 primarily to discuss the mitigated negative

11 declaration.

12 The mitigated negative declaration is out

13 for CERCLA ration for public review until

14 January 21st of 2020. It was released by the City on

15 December 16th and is required to be circulated for a

16 minimum of 20 days but because the City decided to

17 circulate it to the state clearing house, it was

18 required to go for 30 days of circulation.

19 It was extended for the 37 days which was

20 longer than required, to accommodate for additional

21 holidays and to allow for adequate time for review.

22 Additionally, we did -- although not required, we

23 will be responding formally to every response

24 received from the public as well as any agencies and

25 also any policy makers.



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2 Again, copies of the mitigated negative

3 declaration are available online on the website as

4 well as at your city hall planning counter and

5 tonight for review if anybody is interested in

6 reviewing it. And it will be available until January

7 21, 2020 for comment.

8 We will be responding to every comment.

9 So CEQA determines thresholds of

10 significance to evaluate a project against. Those

11 significant thresholds are identified threw a

12 quantitative, qualitative or performance level

13 evaluation of environmental effects. The project is

14 evaluated to be determined if it may cause an impact

15 to the environment. The lead agency may determine if

16 those impacts can be mitigated to a level of less

17 than significance. And if so, they may consider

18 processing and adopting a negative declaration or a

19 mitigated negative declaration.

20 If the lead agency prepares the

21 environmental document for the project, they must

22 utilize the regional, state and federal standards for

23 each topic area under CEQA.

24 If it's determined that there is no impact

25 and that there are no thresholds exceeded, then per

2 the guidelines they prepare a mitigated N deck for

3 the project.

4 This is the same process for an EIR but then

5 an EIR generally has significant impacts or sometimes

6 impacts that cannot be Milt gated.

7 When environmental analysis is prepared to

8 analyze all potential impacts. Generally when occurs

9 when the technical studies that are prepared by

10 professionals in those fields to determine if the

11 project has specific recall packets.

12 There are 20 environmental factors that are

13 included study aesthetics, GHG, hydrology, noise and

14 others that you heard tonight. After all of these

15 different impact areas are studied, a determination

16 is made whether that project has an impact on those

17 study areas.

18 Again, these studies are performed by

19 technical experts in these areas and are evaluated by

20 the federal, state and local standards, guidelines

21 rules and regulations.

22 So how are these impacts determined?

23 If there are no adverse impacts determined,

24 then the project can be determined less than

25 significant and a mitigated negative declaration can

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2 be prepared and adopted for the project.

3 If there are clearly no significant effects

4 on an environment, they also can prepare a negative

5 declaration for the project.

6 The same level of comprehensive analysis is

7 performed for both a mitigated negative declaration

8 and an EIR. An EIR is warranted when a significant

9 impact from the project is determined based on the

10 studies and the technical evasion evaluations

11 prepared for that project, or if the significant

12 impacts can not be mitigated.

13 Once the document is prepared for the

14 project, the document is circulated for the public

15 review, and that is the process that we're currently

16 in.

17 So why a mitigated negative declaration and

18 not an EIR?

19 Based on thorough evaluation prepared by the

20 technical experts who performed the studies on all of

21 those 20 environmental factors studied for this

22 project, it was determined that the technical and

23 lead agency found that no significant impact would

24 be -- that would occur from this project based on the

25 proposal. And that all studied areas could either be





2 mitigated to a level of less than signature or those

3 environmental areas had no impact.

4 The Bridge point Upland project is

5 consistent with the General Plan designation and the

6 zoning for the site. Additionally, it is consistent

7 with the Cable Airport Land Use Plan.

8 The zoning allows for the proposed use with

9 a last mile warehouse type service building in the

10 Upland and surrounding community. And it is

11 significantly set back from the street and located on

12 a large parcel of similar scale to industrial

13 development in the general area.

14 The warehouse parcel is -- generally results

15 in fewer employees and visitors to the retail and

16 commercial or residential uses and it is consistent

17 with the airport plan as it reduces potential noise

18 and safety impacts to a larger population consistent

19 with the compatible criteria chapter --

20 MAYOR STONE: Excuse me just a moment, I'm

21 sorry.

22 If you guys are going to leave, if you could

23 please leave quietly to not disrupt the neating

24 meeting.

25 And Mr. Wade and Mr. Patterson we need for





2 you to keep it down you are. You're interrupting.

3 Thank you.

4 For those of you standing in the back, if

5 you'd like to come forward and have a seat you may do

6 so.

7 I'm sorry for the interruption. Please go

8 ahead.

9 MS. BURNETT: Thank you.

10 Additionally, based on the traffic study

11 prepared for the project, the project would generate

12 minimal number of trips from the site that would

13 access the project site, primarily overnight with a

14 maximum of five daytime trips.

15 The project would not create an I'm fact to

16 air quality as identified in the mitigated negative

17 declaration and the technical studies provided in the

18 appendices.

19 And the project would not include

20 transportation or use of -- of hazardous materials.

21 Additionally, the mitigated negative

22 declaration and the technical studies prepared for

23 the Bridge Point Upland project overanalyzed a larger

24 footprint and this was based on comments from the

25 previous workshop.



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2 Originally the studies prepared were for a

3 much larger footprint of 270,000 square-foot building

4 prior to it being reduced in size. The building was

5 reduced in size to 75 -- an additional 75,000 square

6 feet or 35 percent.

7 The 20 environmental areas studied were

8 based on the 20 studied areas per the guidelines of

9 CEQA and more than 1800 pages of environmental

10 analysis including the technical studies are all

11 included in the volume.

12 28 mitigation measures and project design

13 features are included to reduce those impacts.

14 The project was determined to have a less

15 than significant impact for 13 of the 20

16 environmental studied areas. This means that the

17 project as designed would meet thresholds for and of

18 the study areas and would not require any mitigation

19 to reduce the level of impact which would require an

20 EIR.

21 Technical studies were performed for the

22 necessary environmental study areas to determine the

23 level of impact on the environment.

24 The project was determined to have less than

25 a significant impact with mitigation for seven of the





2 20 environmental areas. Again technical studies were

3 prepared for these environmental areas as well to

4 determine their significance as well as appropriate

5 mitigation measures to mitigate the areas for less

6 than significance.

7 The technical appendices that were referred

8 to are identified here for the project were performed

9 by -- for the Bridge Point Upland project. The

10 thorough evaluation by subject matter experts,

11 engineers and professionals were prepared for a

12 comprehensive set of thorough evaluations for each

13 environmental impact area to study all impacts of the

14 project. And it demonstrated that the project met

15 the requirements of CEQA.

16 Additionally, we identified a few of the key

17 areas that we've heard through either public comments

18 or through the workshops that were areas that were

19 key to the public for concerns and we're bringing

20 those up tonight to discuss in further detail

21 including items identified here tonight which are the

22 transportation, air, noise, hydrology, land use and

23 aesthetics.

24 First traffic and transportation was a topic

25 that we heard as a public person concern. Based on





2 the input a traffic impact analysis was prepared for

3 the project in consultation with city staff.

4 The traffic impact analysis was prepared in

5 accordance with the requirements of the SB county

6 management program and the analysis -- and analyzed

7 traffic concerns for the scenarios relating to

8 existing conditions as well as project conditions

9 with the opening year of construction. It also

10 analyzed the 2040 conditions and project conditions

11 of the project year, 2040.

12 The project impact analysis also evaluated

13 potential impacts at 17 intersections including

14 within the City of Claremont and Montclair and all

15 intersections there was potential for impact to occur

16 based on increased traffic levels for additional

17 movement and trips leaving the site. The traffic

18 engineers are here tonight and based on comments

19 received they can respond to those comments.

20 Additionally at previous workshops and

21 project review there was concerns from the public

22 regarding possible sites leaving the site from

23 13th Street. Based on those comments received from

24 the public truck movement was a concern from 13th and

25 based on that, we wanted to recognize through this





2 exhibit that it has been removed as a potential

3 access point and that all truck trips would be

4 relocated through central and Foothill leaving the

5 site; so this is just a -- just to reiterate that we

6 do understand that is a concern of the public.

7 Additionally, the traffic impact analyzed

8 trips from trucks, vans, employees and visitors based

9 on the analysis the project would generate far fewer

10 trucks compared to existing conditions. A total of

11 25 trips -- trucks would leave -- would access the

12 project site primarily overnight with a maximum of

13 five trucks during the daytime hours, resulting in a

14 significant reduction ever daytime trucks.

15 Peak hour trips less than five percent on

16 Foothill, 2 percent on Benson and 1 hers on Baseline

17 Road.

18 As determined from the traffic study and

19 with the collusion of the mitigation measures, less

20 than significant impacts at all intersections would

21 occur. The project will be required to find a fair

22 share contribution to the circulation improvements at

23 Benson and Baseline.

24 It was determined that the circulation

25 improvements of the project would have less than a



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2 significant impact and it was an incorporated into

3 the mitigation measure as shown here.

4 Additional there was a level of comment.

5 One of the things that we did want to know is that

6 the VMT is not a required analysis at this time under

7 CEQA and that the level of service does measure

8 congestion and the delays in traffic and therefore

9 that was the appropriate analysis at this time.

10 The table is provided as a comparison

11 between proposed project for wire houses and retail

12 uses. And what it shows is that the project he

13 proposed project would generate generally less than a

14 third of the trips as the same retail size building

15 on the site. Retail uses would also have to

16 accommodate large trips, bearing deliveries as well

17 as parcels and employees.

18 Air quality was also another concern of the

19 public. Air quality study prepared for the site

20 established health protective thresholds for project

21 emissions. Based on the study prepared project --

22 all emissions were shown below the South Coast Air

23 Quality management district thresholds and the

24 project was determined to be less than significant.

25 Additionally, the air quality study prepared





2 for the project identified appropriate mitigation

3 measures to reduce impacts. Some of those measures
4 were included in the infrastructure improvements that
5 would include items such as installing electric
6 vehicle charging infrastructure are future
7 6 percent of the vehicle parking spaces, limiting
8 truck idling to 5 limits and that service equipment
9 including things like forklifts and yard trucks would
10 be electric or natural gas.
11 Another concern was noise. Noise is
12 evaluated for a project based on short-term and long
13 term construction, as well as operational noise.
14 And noise and vibration study was prepared
15 for the project and based on our comprehensive study
16 it was determined that the project design features
17 would include -- would address those noise impacts.
18 Features would include items such as
19 construction equipment with min Muzing mufflers,
20 noise minimizing mufflers, signage that would go out
21 to the neighbors to let them know of the timing for
22 construction, which would include construction
23 schedules and start times, and all that have would be
24 in compliance with your Upland Municipal Code.
25 Additionally the site is surrounded by only

industrial and commercial uses on all sites and by Foothill Boulevard to the south. The closest residential neighborhood to the east would experience truck and van noise of levels less than 342 decibels which is below the threshold for residential noise standards in the Upland Municipal Code.

Additionally, this would be further attenuated by other structures as well as landscaping, especially as it matures.

The noise impact on Central Avenue with an increase in truck traffics. It would inexperience an increase in of.7 decibels which is still below the acceptable level of 3.0.

Hydrology is also studied as required by California Environmental Quality Act.

Additionally, the hydrology calculations prepared for the project to evaluate the potential impacts, based on the study project design features were included to minimize my impacts to hydrology.

The project includes undergrounding infiltration and trenching systems so that all flow captured onsite would be treated onsite prior to being diverted offsite. And sanitary channel and

25 then diverted to the Chino Basin.



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2 Water flow would ultimately be directed to

3 the groundwater recharge and hydrology methods that

4 were determined by using the San Bernardino County

5 Method Program.

6 Hazards are also a require of the CEQA

7 hazard standards and are required to be evaluated as

8 part the environmental study area. This includes

9 requeuing if a project or site will create or is

10 located on a site that is considered hazardous,

11 therefore a Phase I Environmental Site Assessment was

12 prepared for the proposed project and conclude that

13 there were no onsite or offsite environmental

14 concerns for the project site.

15 The Phase 1 also side identified that no

16 recognized environmental conditions on the site or

17 the site was not included in the department of toxic

18 and sub Department of Toxic Substances Control.

19 Additionally the proposed project is a

20 warehouse facility and would not result in the

21 release or transfer of hazardous materials from the

22 site.

23 Land use was also another area of concern

24 and whether it met the zoning requirement.

25 An aerial of the site shows as you can see





2 that it's made up of primarily and commercial zoning

3 district and use. The site is currently soaped as

4 commercial industrial and mixed use. And and is

5 surrounded by similar zoning uses and designations.

6 The proposed use is consistent with the underlying

7 zoning as well as General Plan and Airport Land Use

8 Compatibility Plan.

9 The proposal is low density in terms of the

10 type of use and -- as well as the number of employees

11 and visitors; therefore, it is appropriate in terms

12 of your airport compatibility plan as well as it

13 would limit of type of intensity of development

14 around the airport and suppose sewer to sensitive

15 receptors to the airport.

16 The project is adjacent to the air -- the

17 Cable Airport and therefore is within the Airport

18 Compatibility and Airport Land Use Plan. The project

19 must comply with the Airport Compatibility Component

20 of the plan which means that it must -- the project

21 must knit within the zoning allowed under those uses

22 and the intensity of the number that of people that

23 would occupy the area and capacity zones.

24 The proposed parcel is within the proposed

25 airport is C1, Y2 and compatible zones and the





2 building is within the C2 and C3 zones only. The

3 project structure is consistent with the allowable

4 uses of the C2 and C3 zones as the structures are

5 proposed in the C1 zone. It will generally result

6 in, and it's therefore most compatible with your

7 airport compatibility.

8 It also is noise and safety impacts -- it's

9 a reduction in noise and safety impacts as it has a

10 lower population.

11 The last impact area that we wanted to cover

12 was aesthetics.

13 The project was designed to meet your city

14 standards for all set backs, lot and original design

15 requirements and in fact will exceed most of those

16 standards.

17 The building will cover less than 10 percent

18 of the total site area and have 11 acres ever

19 landscaping that will serve as screening on all four

20 sides.

21 Building must meet the height limits of

22 airport compatibility requirements and would be set

23 back from Foothill Boulevard a substantial distance.

24 In fact, the building will be set back more

25 than 700 feet from Foothill Boulevard which is about





2 2 and a half football fields for perspective.

3 The building will be substantially screened

4 from Foothill by over 1,000 trees and by the -- the

5 buildings along Foothill Boulevard which are the

6 retail and commercial type comments tenants.

7 The next step in the process is that the

8 mitigated negative declaration will close on

9 January 21, 2020 for public comments and those

10 comments can be provided through comment cards

11 tonight.

12 The comments that we received from the

13 public tonight as well as provided in email or in

14 writing to the contract planning manager, as well as

15 by responding to Kimley-Horn.

16 The other thing is we did collect those

17 comments in right writing and will be respond

18 information formal -- in the formal response to

19 comment process.

20 We also have a consulting team here tonight

21 who can respond to specific questions that were

22 brought up as he will. And so if there's also

23 questions of the City Council, Planning Commission

24 and Airport Land Use Committee that we can respond

25 to, here happy to take those.



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2 Additionally, if there are documents that

3 anyone wants to provide to us, we are willing to

4 review those documents and respond to them as well.

5 I know that quite a few members of the

6 public mentioned that they do have studies or

7 technical documents and so we would like to have them

8 provided to us and we are more than willing to review

9 them and o accept them, to respond to them as well.

10 So thank you.

11 MAYOR STONE: Great. Thank you very much.

12 Appreciate the presentation.

13 So at this time I'm going to ask

14 Councilmembers or Commissioners if anyone has any

15 statements or comments. Okay.

16 Robin, go ahead.

17 COMMISSION CHAIR ASPINALL: First, can you tell

18 me if you --

19 I think you covered this earlier but are you

20 with the --

21 MS. BURNETT: Yes, we are.

22 COMMISSION CHAIR ASPINALL: And do you have any

23 intention prior to making comments based on what you

24 get in writing, the comments you get in writing to

25 respond to any of the accusations of inaccuracy or

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2 inadequacy in your studies.

3 MS. BURNETT: Prior to we would review --

4 COMMISSION CHAIR ASPINALL: You would do that

5 through the comment process?

6 MS. BURNETT: Correct.

7 COMMISSION CHAIR ASPINALL: Okay. So we need to

8 go back to the map of the project.

9 You'll recall in the northwest corners

LA-2

10 that's kind of lobbed off, there's sort of a -- if

11 you -- if you look at your sort of map of the

12 project? Yeah. It looks like it overlaps the

13 runway, I'm not sure.

14 Is that intentionally done because it's in

15 the zone? Do you know --

16 MS. BURNETT: On the land use compatibility

17 plan?

18 COMMISSION CHAIR ASPINALL: Right.

19 Do you know which one?

20 FLOWERS/DALQUEST: Commissioner, that's an

21 existing commission in this project between the

22 airport owner and the property owner, that would be

23 corrected and this property would either -- I believe

24 and Bridge can also answer that, would be deeded over

25 to the airport.

LA-2 cont.

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2 COMMISSION CHAIR ASPINALL: Okay. So it would

3 be cleared up in the sense of the homeless situation

4 because it still looks like there's a pocket there

5 that could be a problem.

6 Okay. Thank you.

7 MAYOR PRO TEM FELIX: I was going to say if you

see in the northwest corner you'll see exactly what she's talking about, it's slides number 2.

COMMISSION CHAIR ASPINALL: Okay.

MAYOR STONE: Any other comments or questions?

FEMALE SPEAKER: I have a question.

MAYOR STONE: Okay. Go ahead.

FEMALE SPEAKER: Thank you. Thank you.

I have a question with regards to the permeable concrete that was -- a comment was -- I think it was one of our initial speakers.

Is there permeable concrete considered for this project, or would it be considered?

LA-3

MS. BURNETT: Can you answer?

Can I defer that to the Applicant?

FEMALE SPEAKER: Yes. Thank you.

MAYOR STONE: Go ahead.

Do you have an answer?

MR. KOTLER: Yes, I was going to jump up and





answer.

I can actually respond to the first question too, Chairperson Aspinall.

5 So on the permeable pavement, we're

6 presently opened to it. It's not currently designed

7 as part of the project.

8 In terms of actually going down to the

9 design of the site and the civil design, the

10 hydrology design to capture all waterfall to filter

11 if and then to re- -- to discharge it back into the

12 standard system.

13 We -- me personally -- I personally and then

14 we have worked with projects that have permeable

15 asphalt, permeable pavement.

16 Sir, I gave my card to gentleman, I'm

17 certainly interested to here what he has to same.

18 I thought he spoke kind of eloquently and

19 seemed to be kind of passionate about the project he

20 was considered from so we're going to look into it.

21 One of the concerns specifically about the

22 last couple of years in terms of the technological

23 ranges with but the original concerns with term

24 limits is it would be kind of like up, flex and

25 wrote -- it would degenerate faster than your





2 standard asphalt or concrete.

That being said we're certainly open to anything that would kind of make this project, again, more environmentally friendly, nor economically you know beneficial to us, the City, what have you. We're happy to be a practice ground in the City is interested in checking it out.

We're more than happy to designate certain areas, even many areas to be kind of a test case, we're certainly open to that, so --

But the not currently but certainly open to having further conversation.

MAYOR STONE: Any other questions?

MR. KOTLER: Chairman Aspinall, the first question out earlier, if you look at --

You're in a parcel map today there is that corner that kind of juts out into the airport. No only is it but and will would go to the site together tiered in you'll go up on 12th and get out of our your car over if you drive up airport road, it's one of the most tough grading situations weaver because of the way the site sits above Foothill; so even make it usable we have to put this massive retaining wall, it won't necessarily look great, it's not fart of our

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plan; so we have he kind of kept it off as not part of our plan.

And so to a certain extent, the extent we can kind of rectify which is kind of a weird condition with the airport and either condition kind of the airport runway continue or just not build on it for the purposes of our project, it's probably best for -- for all involved.

COMMISSION CHAIR ASPINALL: So will that require a lot readjustment?

I think it said it will be deeded to the airport, but you're not owner so --

LA-4

MR. KOTLER: So let me tell you, there will be no deeding of the property. It's just we're not -- we're not building on it.

To the extent that we might be able to find other use or working with the airport to find other uses to look at --

Let's zoom sort of exchange of properties.

It will not be deeded over, it will not be a change to the par sill lap, it won't shall -- it's just that we're aware is that it's out -- and just

24 generally a try to --

25 MAYOR STONE: Perfect. Thank you so much.



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2 Councilmember Elliott.

3 COUNCILMEMBER ELLIOTT: Thank you, Mayor Stone.

4 And so, first of all, there's lot of us that

5 are new sitting up here and, first of all, this is

6 the largest development project that I have ever made

7 any decisions on and I would really like some --

8 probably from some staff -- some -- some

9 clarification of this process.

10 So you're saying that the public hearing is

11 going to be held in February -- I believe it was

12 February 12th, is that correct, that's in front of

13 the Planning Commission?

LA-5

14 MR. DALQUEST: Yes. We're tentatively

15 scheduling it for the February 12th Planning

16 Commission meeting and that's a public hearing.

17 COUNCILMEMBER ELLIOTT: And that public hearing

18 is for the Planning Commission to hear what the

19 public wants and has to say with regard to the

20 decision that they will be making on the mitigated

21 negative declaration; is that correct?

LA-6

22 MR. DALQUEST: No. The Planning Commission will

23 be a recommending body. The entitlements include a

24 development agreement which is approved by the

25 Council. It includes the site plan and design of the





2 project, as well as the CEQA document; so it will go

3 to the Planning Commission and the public hearing,

4 will contain public input, but the Planning

5 Commission will submit a recommendation to the City

6 Council.

7 COUNCILMEMBER ELLIOTT: But as far as accepting

8 the mitigated negative declaration, one of the

9 decisions --

LA-6 cont.

10 MR. DALQUEST: Yes. Correct.

11 COUNCILMEMBER ELLIOTT: Okay. Thank you very

12 much. That was to start off with.

13 Then the other questions I have, and I have

14 a whole -- I have like four pages of them, I'm not

15 going to go through all of them, but some of the ones

16 that have been posed that -- that have been posed to

17 me most frequently from the residents and you started

18 out Commissioner Aspinall about the --

LA-7

19 Some cities require that the City contract

20 with for the studies and the developer pay, some have

21 the developer pay in contract and those studies are

22 peer reviewed and some of them just let the developer

23 contract with the consultants and then there's no

24 peer review.

25 Where do we fall in Upland?

LA-7 cont.

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2 MR. DALQUEST: Well, let's book up and look

3 at -- look at what CEQA says.

4 Under 15063 of the CEQA guidelines the City

5 as lead agency may choose one of -- one of a number

6 of arrangements or a combination in preparing the

7 initial study.

8 The initial study is -- is what will

9 determine whether this project is is processed as a

10 mitigated negative declaration or an EIR. One is

11 preparing a draft a -- the initial study directly

12 with its own staff members.

13 Two, contracting of the availability entity,

14 public or private; so contracting directly with the

15 environmental consult to prepare that.

16 Three, accepting the draft initial study by

17 the applicant and consultant retained by the

18 applicant or any other person. And so that is --

19 that is permitted as well.

20 Once the document is submitted to the City

21 it becomes our document and then we work with the

22 environmental consultant, staff will review that

23 document, we'll suggest changes and then we'll

24 transmit those to the environmental consultant.

25 Also -- and then there's other combinations;



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2 so in this instance I think about 18 months ago the

3 developer had indicated to the City that they would

4 like to use Kimley-Horn and at that time staff was

5 well aware of Kimley-Horn, they're a Premier

6 Environmental consulting firm and that was -- that

7 was acknowledged that it would be okay to allow

8 Kimley-Horn to be the environmental consultant on

9 this project.

10 But it would be like we would give them a

11 list anyway. And so that's how they came on board

12 and became the consultant for the project.

13 COUNCILMEMBER ELLIOTT: Okay. And in this case

14 Kimley-Horn was paid by Bridge Development.

15 MR. DALQUEST: Yes.

16 COUNCILMEMBER ELLIOTT: And the staff will

17 review it and determine whether or not whether or not

18 some of the studies need to be altered or or redone

19 based on some of the feedback that we've heard; is

20 that correct?

LA-8

21 MR. DALQUEST: So staff and myself as the

22 project manager, I have 30 years of experience in

23 CEQA project management, project planning has over

24 30 years experience, we have our city attorney review

25 that. We had engineering review that which is the



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2 City's engineering consultant review that and through

3 that review we suggested certain things to some of

4 the document and now we're satisfied that represents

5 the independent judgment of the City.

6 COUNCILMEMBER ELLIOTT: Okay. So I spoke with

7 many of the people who came here tonight and I met

8 with them at various places and -- about the

9 technical studies and I don't want to take any time

10 up here to go over them, but I'd like to meet with

11 you, Mr. Dalquest, with these questions and see if

LA-9

12 perhaps we can iron them out.

13 One of my big concerns is with regard to the

14 ambiguity of the classic -- the land use

15 classification per the Upland Municipal Code; so so

16 that this project is deemed to be appropriate meets

17 the commercial designation, so that it is allowable

18 to have warehouses. And that was around

19 administrative decision because that's written in our

20 code.

21 But the term "warehouse" is extremely

22 ambiguous nowadays as we heard from knowledgeable

23 members of our audience that since that was adopted

24 it has change

25 And so I'd like to direct staff to consider

LA-9 cont.



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2 and research options to update our Upland Municipal

3 Code for future projects on this so that we can have,

4 say, a -- a different level of administration and

5 decision making based on if a warehouse is under

6 50,000 feet, perhaps that could be just an

7 administrative review for a warehouse is over

8 50,000 feet, maybe it would require a conditional use

9 permit.

10 And then I'd also like staff to look at

11 clarifying the distinction between a warehouse and a

12 distribution center and require a comprehensive

13 report for all facilities over 50,000 feet, square

14 feet.

15 Does that make sense?

LA-9 cont.

16 MR. DALQUEST: Yeah.

17 COUNCILMEMBER ELLIOTT: I have it all written

18 down and I can sent it to you but I'd like to make

19 this really clear future projects because this is

20 extremely ambiguous in our Municipal Code and I want

21 to avoid any future problems with this.

22 MR. DALQUEST: I understand this.

23 But just we'd like to suggest that base on

24 staff's review and the City attorney's review this

25 falls within the definition under warehousing also



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2 land use which are also permitted uses.

3 But we can talk to you about -- I'll suggest

4 it to you.

5 COUNCILMEMBER ELLIOTT: I would love to do that.

6 My -- will the airport be used at all for

LA-10

7 distributing?

8 MS. BURNETT: Yes.

9 COUNCILMEMBER ELLIOTT: Will the airport at all

10 be used for distributing in anyways in the projected

11 future?

LA-10 cont.

12 MR. KOTLER: Not that we have had any

13 discussion, knowledge, the short answer is no, like

14 it's not that type of airport like there are large

15 kind of commercial freight airports offices we've

16 seen --

17 COUNCILMEMBER ELLIOTT: Yes, there is a

18 private -- little planes.

19 MR. KOTLER: Yes. Little planes.

20 Short answer is no. There's no connectivity

21 between the site and the airport.

22 Again, part of that is just me saying

23 there's no connectivity, part that have is the actual

24 project design. There's no connectivity.

25 Again, I certainly suggest that any one who





2 has any cures yacht, either public or up on the dais

3 to go and drive it. The site sits quite a bit lower

4 than the airport itself so there's no --

5 Not only is there no physical design connect

6 difficulty, there's no physical connectivity in

7 general once we grade the project to make it useful

8 for our needs.

9 COUNCILMEMBER ELLIOTT: And what about drone

10 projects, are those protected at all in the future?

LA-11

11 MR. KOTLER: Not at all.

12 Again -- and I'm happy to commit that

13 anything -- I'm not an expert in the City Code, I

14 don't even think they're allowed but we can certainly

15 include in any sort of project condition that any

16 sort of flying apparatus that would ever come to this

17 site would have to go back in front of the

18 administration or governing body to get that use.

19 That's not a problem.

20 COUNCILMEMBER ELLIOTT: I appreciate that now --

21 MR. KOTLER: Just --

22 Sorry, I apologize for interrupting.

23 COUNCILMEMBER ELLIOTT: Please. No.

24 MR. KOTLER: Typically up the don't see drones

25 next to airports.

COUNCILMEMBER ELLIOTT: That's what I've heard to.

MR. KOTLER: There's a combination that of sticks it's finger in things; so I wouldn't necessarily work you too much about the drones next to the airports. But, again, we can certainly add project conditions that would take care of that.

COUNCILMEMBER ELLIOTT: I would went through this whole binder and I did not see a plant pallet in here. Did I miss it or --

Because that's something that --

That's one of the ways of mitigation is to have those trees, some trees are better at mitigating greenhouse gas emissions, I mean greenhouse gases, better than other trees, and we do talk about native trees and these are all big native trees that are bitter than say creek turtles.

LA-12

MR. KOTLER: Yes.

FEMALE SPEAKER: Can you provide us with a plant pallet for this?

Because I know I met with the landscape architect and he showed me and he had the list and everything and I was pretty excited about those particular choices but I'd like to have that in

LA-12 cont.

writings. LA-12 cont.

MR. KOTLER: So two things.

One is landscape design is typically a design feature and wouldn't necessarily be directly studied in environmental document.

That being said we can absolutely provide it to the public, to every up one up on the dais and more to the point about having it writing, we'll do you one better than have it writing, we can have the City condition the project with specific requirements at to the types of species, we're going to be using in this project sheet.

COUNCILMEMBER ELLIOTT: I think a lot of the other concerns would be could be addressed through covenants that we make or agreements that we make with you, such as compliance as far as there's only going to be five trucks during the day and at night. LA-13

MR. KOTLER: Absolutely. No. Absolutely.

COUNCILMEMBER ELLIOTT: And that can all be in writing so that if, in fact, there was a violation we could come back and exact some kind of a financial or LA-13 cont.

23 some kind of a penalty to -- to -- for these kinds

24 ever violations.

LA-13 cont.

25 MR. KOTLER: 100 percent.

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2 And just to add a little bit more to that

3 because I think it's a very fair concern.

4 You know, this is our -- this is our third

5 time in front of you all as group, there will

6 hopefully be a couple more so we'll be seeing all the

7 same --

8 Long story short, on -- on being able to

9 kind of hold us to account to what we've committed to

10 you guys and I think we've made a lot of commitments

11 and a lot of concessions but I still think it comes

12 down to kind of a prove it or who's going to be

13 responsible more importantly to enforce it and I know

14 there's concern about dedicating city staff, even

15 though the City does have a code enforcement I

16 division shall we're more than happy to contribute

17 financially to the City to basically give the City

18 the extra funds that needs to make that you are that

19 it can monitor this site to make sure that we comply

20 with all conditions now in the future.

21 COUNCILMEMBER ELLIOTT: Yeah. And I think there

22 seems to be a lot of paranoia but I think you have to

23 understand you're not revealing the tint and so we

24 can't do our due diligence --

25 MR. KOTLER: Sorry.

LA-14



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2 COUNCILMEMBER ELLIOTT: -- as far as researching

3 what this tenant's employment history is and anything

4 to everybody is kind of wondering here now what's

5 going on.

LA-14 cont.

6 MR. KOTLER: All fair questions.

7 And to the extent that in the past we've

8 been accused of being a little bit kind of coy about

9 it.

10 Let me be explicitly clear. We do not have

11 a signed lease. There is no signed tenant on this

12 project. If and when we have one, it will be made

13 public. But we can't have assigned tenant on a

14 project that doesn't now currently exist.

15 There has been plenty of talk about it but

16 we can't have -- there -- this isn't a signed tenant.

17 That being said, every commitment we have

18 made, every commitment that we will make in the

19 document, in the conditions of approval, in the

20 eventual development agreement, will be equally

21 enforceable against the landowner, the tenant, the

22 developer and anyone else connected to this project.

23 The name of the tenant and how the tenant

24 acts will not be allowed to be any different than the

25 commitments and conditions that are applied to this





2 project. It doesn't matter if it's a tenant that

3 exists today, if it -- are -- it doesn't matter if if

4 it's a new tenant, it doesn't matter 25 years from

5 now.

6 The conditions that are applied to this

7 project and the commitments that we make as part of

8 these conditions of approval, as part of the City's

9 existing code, as part of the development agreement,

10 will be applicable to anyone that occupies and uses

11 the site.

12 So while I certainly appreciate both the

13 Council's and the Commission's and the Committees and

14 the public concerns about all of these different

15 types of use, the reality is anyone who's on this

16 site and any design feature of this site needs to

17 comply with the City Code and any other further --

18 further restrictions be made.

19 A good point --

20 I'm sorry for you kind of going off on this

21 but I think it's kind of important.

22 A good point is the trucks. There are --

23 I can -- I have not heard of any other

24 project before this really and relatively new Council

25 or Planning Commission or in any past that have been





2 willing to restrict the trucks below what is has

3 otherwise been studied or --

4 We are making that commitment based on

5 comments we've heard from the public and the

6 concerns.

7 That commitment has not only been something

8 we've made publicly but it's been something that we

9 are going to actually include in whatever sort of

10 conditions or development agreement that gets made.

11 Any violation of that commitment would be a

12 violation against all of the provision, all the

13 commitments that we've made and there will be --

14 there will be retribution. There will be -- there

15 will be mechanisms to enforce that.

16 But to be clear, that's not just us saying

17 it flippantly, it's not just us, oh, it's not saying

18 there's a secret plan to do different trucks, that

19 are a plan with the commitments placed upon this

20 site.

21 And it's those types of mitigation measures,

22 those types of mitigations that would and that we've

23 still open to making this there are concerns that the

24 Planning Commission, that the Committee, that the

25 Council and that the public have that further need to



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2 restrict this site just to give the piece of mind

3 that the commitments that we've made publicly are

4 enforceability and that the rumors that have been

5 spread about this project can never come to be true.

6 COUNCILMEMBER ELLIOTT: Thank you for that.

7 I've got a question about the greenhouse gas

8 mitigation.

9 One of the features that you have talked

10 about was the EVA chart infrastructure that's going

LA-15

11 to be provided, I believe that all of the truck bays

12 and at six locations for the passenger cars.

13 Is that infrastructure only or is that --

14 are they actually going to have charging stations?

LA-15 cont.

15 MR. KOTLER: So as ever right now I believe it

16 is infrastructure only, for instance, around the

17 parking areas, the design right now calls for conduit

18 to be placed that such as I think that previously

19 mentioned the entire fleet can be electric when the

20 technology has advanced to that stage.

21 Whether or not further commitments need to

22 be made, whether or not further design changes need

23 to be made. It's not uncommon, for instance, for

24 projects to ever a minimum amount of publicly

25 available charging stalls need to be included as part





2 of the project from day one and it's those types of

3 changes and commitments that we're more than happy to

4 make.

5 One of the things that prevents most large

6 scale development projects from just rolling out with

7 EV chargers everywhere using EV chargers as annex

8 many, solar is very similar is that the technology

9 changes very quickly that the concern is once you've

10 put it in it will become obsolete and it won't be

11 used.

12 Nevertheless, if there is a certain amount

13 or location or type or a style that the City feels

14 strongly about that wants to be a part of this

15 project we're certainly open to including that.

16 COUNCILMEMBER ELLIOTT: Well, one of the -- one

17 of the speakers from the public mentioned that Amazon

18 has got all of these electric vehicles and if there

19 there's any charge station charging station it seems

20 like then that's not really not a benefit for having,

21 even if it's not Amazon, but for having the

22 infrastructure if these vehicles, these vans and the

23 trucks can't actually charge up, then there's really

24 no point --

25 MR. KOTLER: I totally agree.

LA-15 cont.

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2 But by the same token, I need -- you know, I

3 respect you and I would not be saying this

4 flippantly, there's also no point in including the

5 infrastructure and the equipment if in the end

6 vehicles don't exist are or not onsite yet. But it's

7 about the time being now ready.

8 So when you design a project -- you design

9 is a project for the future, the term used is future

10 projecting. Typically any sort of infrastructure

11 need to put below grade that's harder to access you

12 put in there so this when all the technology catches

13 up we are ready to do it.

14 A good example would be electric trucks,

15 like the big trucks.

16 COUNCILMEMBER ELLIOTT: Okay.

17 MR. KOTLER: That is coming.

18 There are CARB, AQMD, all sorts of different

19 groups looking specifically at that. Unfortunately,

20 the technology is not there but designing warehouses

21 today to accommodate truck charging at the docks; so

22 good practice that is certainly something that needed

23 if needed to be added as a condition of this project

24 we would be more than open to.

25 COUNCILMEMBER ELLIOTT: Correct. But they do

LA-15 cont.



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2 have vans that are EV, so it would be really good to

3 have the charging station for those vans and reward

4 those drivers if they're contractors for using a zero

5 mission vehicle.

LA-15 cont.

6 MR. KOTLER: Couldn't agree more.

7 Happy to include that as a design feature

8 for both vans -- and again -- and any sort of

9 vehicles as well.

10 COUNCILMEMBER ELLIOTT: I think the rest of my

11 questions are questions that we can work on together

12 off -- off the microphone phone and the cameras.

13 Thank you very much, Brandon.

14 Thank you, Robert.

15 MR. KOTLER: Thank you.

16 MAYOR STONE: Councilmember Zuniga.

17 COUNCILMEMBER ZUNIGA: Yes, I have some

18 questions from some residents, a lot of them I'm not

19 going to be able to ask because they don't pertain to

20 this workshop but has there any been -- has there any

21 studies of the new van hub facilities to take into

22 account what may be happening here?

23 Like Chino and Redlands and all the other

24 locations, has anyone went to those locations to see

25 the potential for Foothill, what we can do -- what

LA-16

we're looking at? LA-16 cont.

MR. KOTLER: So I think --

We have our traffic engineers here -- or traffic engineers that are independent but that have been hired to analyze this project who I think could come up and speak to that a little bit and then should their answers be deemed -- not to have the full color we're happy to volunteer as well.

MR. GIBSON: Good evening. My name is Pat Gibson, I'm with Gibson Transportation, I analyze traffic and civil engineer in the State of California.

You know, trip generation the traffic study is based for a parcel partial hub warehouse which is like a FedEx or UPS. Those typically generate more trips.

We have -- we have looked at other an some-type projects and we haven't looked at them -- at a van hub but we have looked at other Amazon-type facilities and I know the -- and in all Amazon facilities the truck traffic is significantly less than what you would see in also say a -- a Sketchers warehouse or a big box warehouse in terms of accident

25 occurrence, Amazon in terms of more passenger cars



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2 that be than a typical facilities.

3 So we can certainly look at other facilities

4 but I -- I -- our numbers in the traffic study are,

5 in my opinion, whatever, than what you're actually

6 seeing what it opens.

7 COUNCILMEMBER ZUNIGA: Okay. We have.

8 MR. KOTLER: We have some people --

9 COUNCILMEMBER ZUNIGA: We have some people --

10 some residents feeling that the traffic study is

11 flawed.

LA-16 cont.

12 MR. GIBSON: Yes, but I -- I hear that every

13 day.

14 I have worked on city projects, I've worked

15 for the City of Upland where my contract was with the

16 City where it wasn't a development project, it was a

17 specific plan. And, yeah, I heard that. I mean, you

18 know, one of my -- one of my advisors at USC where I

19 also used to teach used to say that everybody with a

20 driver license is a traffic engineer.

21 But again if you want us to look at other

22 facilities we can definitely get some counts there.

23 COUNCILMEMBER ZUNIGA: Yes. That -- that would

24 be good.

25 MR. KOTLER: And actually just --



To over -- to over -- to over kind of share on that, if there are any specific comments other concerns or other information that needs to be provided to the project so that we can review the analysis and provide comments back as -- as previously stated we're open to that. It doesn't need to be hyperbole, it doesn't need to be just kind of orally out there.

If there was something specific provided to us, provide it to us and we will -- we will respond and if there are changes that need to be made or if things are things needs to be studied we're happy to do that.

By if it just needs to have an affirmative response as to what we've done and why we're certainly happy to do that as well.

In terms of like other style or other types of facilities, I mean not to speak out of term but in

20 some of the ear facilities that I think have been

21 necessarily mentioned there is sometimes some Kern as

22 to how older sites have been retrofitted or used in

23 kind of modern day facilities; is so I would suggest

24 that this site being built for this use and the use

25 specifically that it studied is more capable and more





2 ready to handle the exact and specific use that's

3 going studied, that's being mentioned, that is

4 allowable by the zoning code than potentially some

5 older sites in some adjacent cities that are

6 struggling with the progress and changes in the way

7 warehouses are being used.

8 COUNCILMEMBER ZUNIGA: Okay. Thank you.

9 Can you get with Brandon afterwards and

10 exchange our -- what we have and what you brought to

11 us, what your traffic -- your issues?

12 Well, afterwards, please.

13 FEMALE SPEAKER: Just to clarify with the

14 traffic engineer here for the public --

15 MAYOR STONE: Okay. We can't have this

16 conversation; so what we'll do is if you can just get

17 together with him --

18 COUNCILMEMBER ZUNIGA: Thank you.

19 MAYOR STONE: Okay. Any other questions?

20 COUNCILMEMBER ZUNIGA: Yeah, I -- I do, I'm

21 sorry.

22 So at our first workshop we -- when we first

23 got together and presented all of this to us and I

24 remember saying, hey, you know, as long as you supply

25 us with an EIR, I don't see why there would be any

LA-17



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2 problem with this.

3 And you were pretty sure that an EIR was

4 going to pass -- it would pass an EIR, you had no

5 problem giving that back to us. And then the next

6 time we got together it was time was of the essence

7 and we couldn't get a full EIR. Right? Because --

8 MR. KOTLER: Yeah. To be --

9 I mean, I'm happy to go back and look but I

10 think our commitment was -- and I believe to you

11 personally as to several other members up there on

12 the dais is that we believe and still believe that

13 the environmental study that has been done for the

14 this project is comprehensive and covers every single

15 technical and environmental aspect that would

16 otherwise be covered in the EIR.

17 To be explicitly clear about this, there is

18 not a sings many particulars any Cal study that would

19 have been studied any differently in an EIR than what

20 was provided.

21 As Kimley-Horn, as planning staff has laid

22 out, there is a specific process by which a

23 determination is made as to whether a project needs

24 to get an EIR or an MND. In this case, this project

25 being studied using the same standards and technical





2 analyses that would be in an EIR were shown to ever

3 less than significant impact in 13 different areas

4 and less than significant impact with mitigation in

5 seven different areas.

6 As a result, because there is no significant

7 impact that couldn't be mitigated to a less than

8 significant level, an MND is the appropriate document

9 in this case.

10 Once again, there are no technical studies

11 that would be added in addition if this was an EIR.

12 If the public or the Council or the -- or the

13 committee or the commission have any concerns about

14 the veracity, the comprehensive nose, anything that's

15 in the technical studies, please provide them. We --

16 I mean, candidly as the Applicant we'd want

17 to have the most robust and comprehensive document.

18 That's why we do that is to make sure -- not only

19 because it's good practice. It's the law.

20 So if there's comments or concerns, please

21 provide them, we will respond. If things need to be

22 modified because there might have been typos, it's a

23 giant document, we will correct them.

24 But to be explicitly clear, the same

25 environmental studies and reports and analyses and





2 standards that would apply in an EIR apply to this

3 document.

4 When people are requesting an EIR there is

5 no further environmental studies in an EIR than there

6 are in this MND.

7 COUNCILMEMBER ZUNIGA: So if there --

8 So if you're saying what you've done was the

9 same as an EIR or pretty close, why didn't you just

LA-17 cont.

10 do an EIR? LA-17 cont.

11 MR. KOTLER: So I would say two -- there's two

12 reasons. And I think, you know, it's a fair

13 question, it's a question we obviously anticipated.

14 The first -- the first question is because

15 it is not necessary for this project. As we said,

16 there is a state provided process by which a -- by

17 which the lead agency decides whether or not an EIR

18 is required.

19 And to reiterate that process, if there is a

20 significant impact that cannot be mitigated to less

21 than significant levels, then an EIR is provided. In

22 this case there were none and thus a MND is done; so

23 to do an EIR just at basic level would be more than

24 what is required than -- than what is called for by

25 the technical reports.



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2 In addition, the -- the only difference

3 between an EIR and an MND in this case is whether or

4 not alternatives would have been studied to this

5 project. And actually based upon the city's comments

6 and feedback and the public feedback, we are

7 basically proposing an alternative.

8 If everyone I'm sure remember the first

9 project we had up here was a million square feet

10 spread across three buildings. Given the concerns

11 that were raised over that development, we have gone

12 with an alternative development that has been reduced

13 by over 80 percent in terms of coverage area and

14 90 percent in terms of trucks.

15 COUNCILMEMBER ELLIOTT: I have --

16 Mayor, I've asked if I can ask a question

17 that's directly related to this to our attorney,

18 Steven Flowers.

19 I asked this earlier and I want to again ask

20 you, does an environmental impact report provide the

21 City more legal defense in the event that there's a

22 lawsuit against the City in the case of some damages

23 in the future from this project? Does it provide

24 more of a defense for us than the negative

25 declaration?

LA-18



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2 MR. FLOWERS: The EIR is generally considered

3 more -- more easily defended in court because of the

4 stand dashed review that the courts apply, changes

5 between an MND and an EIR.

6 So there is a less deferential standard when

7 a court is reviewing a city's decision of whether or

8 not to adopt an MND. It's considered -- it's called

9 a fair argument standard. As long as there's

10 substantial evidence in the record that's sufficient

11 to support a fair argument that the MND failed to

12 adequately analyze some environmental impact, the

13 court would find that an EIR would be required.

14 The standard for review of an EIR is

15 different. As long as there's any substantial

16 evidence to support the -- the conclusions in the

17 EIR, it will be uphold; so in that sense an EIR is

18 more defensible.

19 But to be fair to the Applicant and so in --

20 for edification of the Council and Commission, an MND

21 is a perfectly legitimate part of CEQA.

22 There are cases where an MND is the most

23 appropriate document. I say that without judging

24 this -- this project in particular but just in

25 general.

So there are these two -- two tracks that CEQA lays out and -- because of the legislature anticipates the some projects where an EIR is necessary and some whereby it's not.

MR. KOTLER: And just to add one point, and I certainly appreciate if I'm wrong or if the City attorney can -- can comment on this, the City faces no liability on this because the Applicant indemnifies the City for all damages and all costs related to any challenge regarding of the document.

COUNCILMEMBER ELLIOTT: Is this correct?

MR. FLOWERS: It is a standard condition of approval here in almost every city I've ever worked where the Applicant will indemnify the City for -- against any challenge -- legal challenge to the decision to approve the project.

And if they fail to indemnify the City, they've not met the conditions of approval and they loose their entitlement.

COUNCILMEMBER ELLIOTT: Thank you.

COUNCILMEMBER ZUNIGA: So, Brandon, what is the difference on your behalf, is it time, is it money, cost?

LA-19

MR. KOTLER: Time.

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COUNCILMEMBER ZUNIGA: Time.

MR. KOTLER: Time.

COUNCILMEMBER ZUNIGA: How much more time would it --

LA-19

MR. KOTLER: 6 months.

COUNCILMEMBER ZUNIGA: Six months. How long have you known about this project?

LA-19

MR. KOTLER: Have I?

COUNCILMEMBER ZUNIGA: Yes.

MR. KOTLER: To be -- to be clear, the project that is currently proposed the 200,000-square-foot building --

COUNCILMEMBER ZUNIGA: Well, you were talking about a different project before.

MR. KOTLER: Correct.

COUNCILMEMBER ZUNIGA: This has been going on for a couple years now, right, what kind of project was going to happen there?

LA-19 cont.

MR. KOTLER: Within the last two years?

COUNCILMEMBER ZUNIGA: So I think you've had plenty of time to do an EIR or to think about doing an EIR but now that you're out of time you're trying

LA-19 cont.

24 to constitute an emergency on Bea my behalf to allow

25 you guys to go without an EIR.

LA-19 cont.

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2 MR. KOTLER: Well, and I -- to be clear, we're

3 not trying to create any sort of emergency. And it's

4 not that it takes us six months to do an EIR.

5 I understood your question to be how much

6 more time would be required if you did an EIR and my

7 answer is roughly six months.

8 What I will say is that if at any point we

9 felt that an EIR, based upon the technical studies,

10 was the -- was the document that would have been

11 required, we would have been provided one and the

12 City would have been forcing us to do so.

13 It is not a decision that is done

14 flippantly, it is not a decision that should be made

15 cavalierly, it is not a decision explicitly that can

16 be made via conjecture or thoughts or rumors or

17 speculation.

18 It is a very serious labor intensive time

19 consuming decision that is not taken lightly. And as

20 a result because all of the experts and all of the

21 technical studies that have been reviewed by the City

22 staff, by the City Attorney, by the outside

23 consultants reflect that this meets the thresholds or

24 an MND that was the decision that was made.

25 As the City Attorney Flowers just mentioned,





2 there are hundreds of projects in a year in the State

3 of California, most projects don't do an EIR because

4 that is not what is required by the technical

5 documents and the studies therein.

6 It is not just a -- it sounds just like, oh,

7 just do it. It's not that easy and it does put a lot

8 more stress and pressure on a project.

9 For this project specifically, and this is

10 something candidly it is not a manufactured emergency

11 that we've just come up with today or this month or

12 last month or the month before or the month before.

13 We have been candid with the City and the public from

14 day one as to the timing restrictions on this

15 project. All the benefits that come with the

16 project.

17 Admittedly, some of the concerns about

18 whether or not this project -- you know the concerns

19 raised about this project, this project has specifics

20 time constraints based upon this smaller design.

21 If we are not able to process this project

22 in the time that we believe has been laid out, and

23 it's not because time should be a factor here, but

24 time is a factor into this project.

25 We would have to go back to a more intensive





2 project that was previously provided that was also

3 appropriate for zoning and land use in terms of its

4 density.

5 We were able to find a specific project that

6 was smaller, that could have all ever these

7 conditions, that could have all ever these financial

8 benefits, that could fit no this community, but we

9 were able to find this project and it had in fact a

10 time restraint on it.

11 If we are not able to deliver this project,

12 this smaller project, this project that's smaller by

13 80 percent, that is 90 percent less trucks, that as

14 all the different financial commitments that we have

15 made publically to this City, we will not be able to

16 deliver this project and as a result we will more

17 likely have to go back to a more larger intensive

18 project.

19 MS. CROSSNER: And I'm sorry, this is Heather

20 Crossner for Bridge Development.

21 I just want to add one thing about the

22 difference between the EIR and the MND when it comes

23 to timing.

24 And it has really nothing to do with the

25 main project that is analyze the. What -- as Brendan





2 said, you know, our MND has all of the technical

3 analyses and technical appendices that we have

4 been -- that have been studied in the EIR.

5 The only -- and the main difference in

6 timing between an EIR and an MND is the alternatives.

7 So just to lay that out a little bit more,

8 for an EIR you have to identify and analyze at least

9 four, it's like four to six project alternatives.

10 For every single one of those alternatives

11 you have to do this. You have to do a -- a study of

12 the 20 environmental areas, hydrology, hazards,

13 traffic, air quality, for every single one of those

14 four, five, six alternatives which means basically

15 multiplying that by four, five or six.

16 And for this project, you know, given all

17 the constraints, given that it's next to the airport,

18 you can't do residential, there has been no retailer

19 who's wanting to come and use this project, there

20 literally is not a project alternative.

21 So what you would get with an EIR is

22 analyses of four, five or six other projects that

23 could not be constructed.

24 That's what all that time is -- is added to

25 the process that it -- it doesn't add anything to



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2 this project. It adds something to you know all of

3 these alternatives.

4 And as we said in effect the process that

5 happened -- was like a project alternative. We

6 understood that was not acceptable, we went to 276,

7 we dropped it again to w72,000.

8 So I just wanted to add that clarity because

9 I think maybe that's not coming through or, you know,

10 people who aren't like super involved in CEQA don't

11 real realize you know that is the biggest time

12 difference.

13 It's not anything additional to our project,

14 it's all the other additional work that has do with

15 those alternatives.

16 COUNCILMEMBER ZUNIGA: I guess I take a little

17 bit offense to it because I was told along with other

18 two others up here that you would do an EIR and you

19 told us that you would do an EIR when we asked for it

20 and this be it changed somehow --

21 MR. KOTLER: Well, I apologize to the extent

22 that either I'm not remembering that or if I have in

23 any way not been forthright.

24 What I believe I've said, and, again, I do

25 apologize if that was the case, is that after



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2 technical -- after we've produced this document, if

3 it was felt -- it was deemed to be inadequate from a

4 technical aspect, that we would then have to consider

5 an EIR. That's --

6 I believe that's what I said.

7 I believe -- I remember the question

8 specifically --

9 COUNCILMEMBER ZUNIGA: I'm sure I can look back

10 at the -- at the recordings but, nevertheless, I

11 certainly --

12 MR. KOTLER: -- that process.

13 COUNCILMEMBER ZUNIGA: You have to understand

14 that property has never been developed, ever. It's

15 next to the airport; so there could be some concerns

16 there, especially on Foothill with -- with the --

17 that's current coming into the City so you've got a

18 traffic flow, people that are avoiding the freeway

19 traffic and Baseline. There's a lot of concerns

20 there.

21 So I would think -- I would think that doing

22 the best or the most you can do to get everyone on

23 board would have been more helpful.

24 But, you know, we'll see what happens

25 with -- you know, maybe you can meet with these other

LA-20





2 folks here and see what they have and answer their

3 questions and hopefully they'll get on board with it.

4 That's all I have.

5 MAYOR STONE: Councilmember Velto.

6 COUNCILMEMBER VELTO: Thank you, Brendan, and

7 your team for the presentation.

8 I'd like to bring back your traffic

9 gentleman and ask a question as to why only

10 17 locations were part of the traffic study when we

11 have streets such as 16th and Mountain, 15th and

12 Mountain, 14th and Mountain, 13th and Mountain,

13 16th -- that's an eastbound, I would think Foothill

14 and Mountain, Foothill and Euclid, 16th and Campus

15 traffic.

16 Without saying who this eCommerce is and

17 without committing to who it is, if it sounds like a

18 duck and walks like a duck, it's probably going to be

19 that duck.

20 And let's just go it with -- let's just say

21 it's UPS.

22 Okay. It's going to be a place that's going

23 to have a lot of vehicles passing through it and if

24 your -- if your intentions at those locations are to

25 do a traffic study at those locations that would

LA-21

anticipate there's going to be testify traffic. I want to call your attention to -- at this want to tell you that's absolutely incorrect.

That's a poor representation of where traffic will flow. That's a fact.

You can argue with me. You're USC, you were a professor there. I will tell you I've been in the City of Upland for over 60 years and I know the streets and we see the City daily and I know the traffic already we have.

So I'm concerned that why only those 17 locations were studied.

LA-21 cont.

MR. GIBSON: So once we go to the primary access to the freeways, once we go to the residential areas, you know, if the -- when the people are ordering whatever, if anybody goes through those areas will be there, regardless of whether it's shipped from this facility or some other facility.

COUNCILMEMBER VELTO: I'm not concerned about the delivery, I'm concerned about traversing through the City.

If there's traffic on the 210 Freeway much which there is a substantial amount ever traffic on

LA-21 cont.

25 the 210 Freeway, I can assure you they are not going

LA-21 cont.





2 to get on at Baseline and the 210. Okay. So you --

3 You -- your traffic pattern is inconsistent

4 with how traffic will flow. Okay. That's a fact.

5 And you can't tell me any differently.

6 Okay?

7 So I'd like to know why those were the only

8 intersections that were studied?

9 MR. GIBSON: So the -- the -- the traffic

10 studies guidelines, that I said that we have to look

11 at intersections where the project is anticipated to

12 add more than 50 trips in any peak hour.

13 Our trip generation is about 200 trips in

14 the peak hour; so for 50 trips you would have to --

15 quell, 25 percent of the project trips would have to

16 go through an intersection which to require analysis

17 of that intersection.

18 Now, a lot of those trips are also passenger

19 cars for people who are coming into work. It is very

20 few trucks in the peak hour, just one that we

21 anticipate, and some vans.

22 So based -- based on the total trips and

23 the -- and the trip distribution was vetted by your

24 City, was vetted by your City's contract traffic

25 engineers, and they made some changes, and based



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2 on -- so the study was determined based on our

3 discussions with the City and the fact that it was

4 appropriate for the City.

5 COUNCILMEMBER VELTO: Okay. And if the VMT, you

6 know, the vehicle miles traffics is not currently

7 required by CEQA; is that correct?

LA-22

8 MR. GIBSON: Yes.

9 COUNCILMEMBER VELTO: Why is it considered a

10 best practice in traffic versus the level of versus,

11 is it better to be used by municipalities?

12 I see you hesitating.

LA-22 cont.

13 MR. GIBSON: Yea.

14 And I'm hesitating because I'm trying to

15 state my response without making the OPR perform like

16 CEQA.

17 So VMT measures how far people are

18 traveling.

19 COUNCILMEMBER VELTO: Uh-huh.

20 MR. GIBSON: So you know, if you have -- if you

21 have a greenfield development like MD -- let's say we

22 are talking a brand-new specific plan and let's

23 say -- I'll use something far out, let's say Banning,

24 there are a lot of them --

25 COUNCILMEMBER VELTO: Stay in Upland, don't go





2 to Banning. I want you to give a comparison --

3 MR. GIBSON: So in Upland --

4 COUNCILMEMBER VELTO: I Want you to

5 Specifically -- I want you to specifically address

6 that issue. Okay?.

7 MR. GIBSON: So in Upland if you look at VMT for

8 employment-generating use, we haven't run the nipples

9 so I cannot guarantee that but I think the VMT would

10 be less than significant.

11 COUNCILMEMBER VELTO: You think?

12 So you can't think. We have to know.

13 MR. GIBSON: Understood but you asked me --

14 The question is --

15 COUNCILMEMBER VELTO: I asked you --

16 MR. GIBSON: The question is if it's the right

17 metric.

18 COUNCILMEMBER VELTO: So is it?

19 MR. GIBSON: So it measures how far people are

20 traveling. It's not measuring whether they are

21 traveling through congested routes. As people will

22 do anything, do they care about how far that guy is

23 going or do they care about how much delay, how much

24 time it takes me to get from home to work?

25 So that is the difference so what we have





2 analyzed evaluates delay, how long it takes -- how

3 much additional time it will take for me -- will it

4 take me you know --

5 COUNCILMEMBER VELTO: That's additional traffic

6 is what you're saying?

7 MR. GIBSON: Uh-huh.

8 COUNCILMEMBER VELTO: So we'll get additional

9 traffic based on that.

10 Okay. All right. So we can agree on that?

11 MR. KOTLER: I just have to interject and I'm

12 sorry but I -- please, stay.

13 Sandy, stay up here. **

14 The specific question I believe you asked is

15 as a City something that's going to impact us day to

16 day going to work, picking up my groceries, picking

17 up my kids, the difference between a VMT and LOS is

18 the LOS standard is localized, it focuses on the

19 actual impacts that will be felt at these very

20 specific intersections. It's the level of service at

21 these intersections. VMT does not; so -- so to give

22 you a hypothetical in Upland, if a project was

23 generating all of its trips from one multifamily

24 development, because it can't fit, you know, a couple

25 hundred people in a house, so in a multifamily



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2 development and was driving just from this

3 multifamily development hypothetically across the

4 street on Foothill and was just driving to this

5 facility, to this project, it's VMT standard would be

6 incredibly low.

7 But the real world impact faced by the

8 citizens of Upland would be significant. They'd have

9 a locality of people in that very small area.

10 So, I believe, and, Sandy, please comment on

11 this, but it is generally presumed for facilities or

12 for projects in localized areas, that's why he

13 brought up Banning which is a little bit further out,

14 but in areas that are more dense and urban, LOS

15 provides a better and more accurate impacts of the

16 impacts that will be felt day to day by the citizens.

17 MR. FLOWERS: If I can also add to that,

18 Councilmember Velto, Sacramento and the government

19 signed SB743, in essence what they were saying is

20 that congestion is no longer a viable impact. And

21 it's -- in the future which will be I think it's June

22 or July of 2020, July, the VMT is the metric. But.

23 In terms of the LOS that is looking at the

24 congestion which is a for more significant impact.

25 But Sacramento, in their infinite wisdom,



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2 decided that that is no longer a viable issue and

3 that another metric needs to be included in the CEQA

4 analysis and that ultimately was a VMT.

5 COUNCILMEMBER VELTO: So that already happened

6 in.

7 MR. KOTLER: And to state it more bluntly,

8 Sacrament wanted loca governments to stop opposing

9 projects based done -- especially housing projects

10 biased on con investigation.

11 COUNCILMEMBER VELTO: So it's once against

12 taking away local control.

13 MR. KOTLER: Well, in my opinion you can still

14 does LOS but you have to do VMT.

15 FLOWERS/DALQUEST: And it impacts the urban

16 areas because to address LOS you generally have to

17 widen your street, widen the lane. In the urban

18 areas you can't do is that because of the build out.

19 And so for the most part that benefits urban areas

20 like San Francisco or Downtown LA but it doesn't

21 benefit an urban area.

22 COUNCILMEMBER VELTO: But it still becomes an

23 issue of congestion. That's the issue I'm

24 discussing.

25 FLOWERS/DALQUEST: Right.



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2 COUNCILMEMBER VELTO: The next issue I'm

3 discussing, this may the nobody the be for you,

4 sandy.

5 Why are they using a particular greenhouse

6 threshold for industrial -- for industrial rather

7 than for commercial and retail, why are you using

LA-23

8 that? Why are we icing that.

9 MR. COLITAS: The greenhouse gas threshold for

10 industry.

11 My name is Ace Colitas, I'm with

12 Kimley-Horn. I'm the technical expert that created

13 the GHG study and the entire 310,000 metric for the

14 threshold for GHG emissions is -- is industry

15 standard for this type of a warehouse project and --

16 and that's --

17 You know, when you get to Tier 4 it's a

18 service population metric. And a service population

19 doesn't apply to projects like we're --

20 COUNCILMEMBER VELTO: But what would go the

21 service -- what would be the service population

22 count? Would tab -- there a count of some kind.

LA-23 cont.

23 MR. COLITAS: Yeah. It's an efficiency metric

24 so it's essentially per population so per user of the

25 project. And that is geared more towards you know





2 mixed eyes projects, residential projects. It's not

3 for industrial type projects where you have -- you

4 have the trips and -- but you have few employees.

LA-23 cont.

5 COUNCILMEMBER VELTO: So you're defining this as

6 be industrial project?

7 MR. COLITAS: Warehouse industrial, I believe

8 it's --

9 COUNCILMEMBER VELTO: Not commercial retail?

10 Would commercial retail be higher, would it

11 be Tier 4? Would commercial retail be Tier 4.

12 MR. COLITAS: It depends. The -- it depends on

13 the project and the density and the --

14 COUNCILMEMBER VELTO: Specifically this project,

15 specifically --

16 MR. COLITAS: If it was commercial, you know,

17 you'd have a different trip generation so you'd have

18 different issues. I don't know if you could --.

19 I guess I don't understand what you're sag.

20 COUNCILMEMBER VELTO: I'm asking if a commercial

21 would have potentially 25, 00, 25300 trips right,

22 what does that count if you look at the industrial

23 amount of trips versus a commercial retail, how do

24 they determine who -- the amount of trips that would

25 bring it from Tier 3 to Tier 4 how do we determine





2 that.

MR. COLITAS: Well, it's not based on trips.

So the way that the -- the thresholds are developed is that the agency has the discretion to choose the most appropriate threshold for a project so -- so that's why there's a different tears and you kind of find your way through the process.

COUNCILMEMBER VELTO: Pardon my ignorance, it's not something I specialize in so I want to make sure.

So the lead agency says it's going -- it's industrial. The zoning for that is -- what's the correct zoning for this Mr. Dalquest?

MR. DALQUEST: Commercial light industrial based.

COUNCILMEMBER VELTO: Commercial light industrial.

MR. DALQUEST: Yes.

COUNCILMEMBER VELTO: So it's got the commercial portion of it; so would it make more sense then to do the high heft threshold for -- because it's commercial also or is it better to use the lower threshold in this case?

LA-23 cont.

MR. DALQUEST: It's more of a question of what's appropriate for the project and it's industry

standard for a warehouse other -- you know, this type project to use the -- the threshold that we used.

COUNCILMEMBER ZUNIGA: Can I ask something real quick?

COUNCILMEMBER VELTO: Yeah go ahead.

COUNCILMEMBER ZUNIGA: I'm sorry.

So you're typically to use that for a warehouse but does a warehouse typically have 250 vans coming and going all day?

MR. COLITAS: They typically have a different fleet mix, that's true, but the overall -- the way the use is it's similar.

COUNCILMEMBER ZUNIGA: So we can say this project ask different than anything else? Right? It's not your typical warehouse, it's not your typical hub; so why we would we use a typical way that industry standards --

MR. COLITAS: Well, it comes down to some of the metrics of the project such as the employment or -- or factors like that.

So, you know, you would never -- you don't have -- it's not a dense project. You know, it don't have a lot of residential or a high number of

25 employees, like an office would. It has, you know,



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2 per the -- the amount of vehicle trips it has a

3 relatively low service population; so that's just --

4 that's the way it works notice --

5 COUNCILMEMBER ZUNIGA: Brendan how, many parking

6 spots does that project have?

7 MR. KOTLER: I don't want to be misquoted it's

8 over a though.

9 But just to be clear to give perspective, so

10 the gentleman that was just here up is like the --

11 the air quality kind of analyst and I don't want

12 him -- I don't want him to be asked questions and

13 have to kind of not necessarily be the right person.

14 So if there are questions as to whether or

15 not the right vehicle we do have our traffic

16 consultant.

17 In terms of whether or not this is an

18 atypical facility, it is -- it is -- it is not

19 necessarily an atypical facility. There are similar

20 style facilities that the ITE manual has studied and

21 that is what is used to create the Baseline traffic

22 condition that was studied in this case.

23 And -- and as we previously said, to the

24 extent that there is a concern as to whether or not

25 that facility would generate an atypical amount of





2 traffic versus what has been studied, project

3 conditions can be applied that would limit that or --

4 or create enforcement mechanisms.

5 COUNCILMEMBER VELTO: So to go back to

6 greenhouse -- the greenhouse gas threshold, the point

7 is that for commercial the threshold is 3,000; is

8 that correct?

9 MR. COLITAS: For residential and commercial.

10 3,000. Yes. Yes.

11 COUNCILMEMBER VELTO: The report shows

12 emissions, what 5,200?

13 MR. COLITAS: Yes.

14 COUNCILMEMBER VELTO: So you prefer using a

15 10,000 threshold?

16 MR. COLITAS: Yes. That's what's appropriate

17 for this type of use.

18 COUNCILMEMBER VELTO: So if it -- if it's

19 commercial properties is shouldn't the threshold be

20 3,000?

21 MR. COLITAS: Well, if it was commercial you'd

22 also have higher trips, a greater number of trips.

23 So all the --

24 COUNCILMEMBER VELTO: What would be the

25 difference if you ran it from commercial to this type





2 of project in -- ingress and egress?

3 MR. KOTLER: So about triple the amount. It

4 would be three times more trips on a retail retail

5 type project.

6 By just -- but just to be -- I know, clear

7 this is not a commercial zone, this is a -- in a

8 commercial/industrial mixed use; so if a lose for

9 both times. And any sort of study presumably that

10 would be done would be project specific based upon

11 the type.

12 You want to study this project based upon a

13 commercial use because it is an industrial use. By

14 the same token, you wouldn't want to study an

15 industrial -- a commercial use in an industrial zone

16 because you would -- again, you would -- you would

17 lose out on what the -- the actual specific metrics

18 that should be applied to this project.

19 COUNCILMEMBER VELTO: Okay. So let's just go

20 and say that this is a -- industrial, in my mind,

21 means they're building something, there's something

22 industry -- of an industry in there. This is a

23 product moving facility; so it's more commercial in

24 my -- in the way I think it's commercial products

25 being moved through a facility.



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2 So I think if you want to use definitions

3 that's -- that can substantiate that, that's why the

4 problem because the City has discretion, has a lot of

5 discretion when it comes to this.

6 This issue with amount ever vehicles leaving

7 that facility, if you looked at Lowe's, Lowe's would

8 probably have -- I'll look at my notes here, I would

9 probably have -- from what my understanding is I

10 would have about 1,500 a day. L. Okay. They're

11 commercial, 1,500 a day.

12 This is a larger footprint in the community;

13 so I want to look at it as commercial. That's the

14 way I want to look at it.

15 So whether or not I'm right, I want to look

16 at it that way because it's commercial products go

17 through that.

18 Those vehicles are coming in with material

19 that -- with -- with product in them. They're

20 willing going to come in with product and they're

21 going to leave with product. That's how it's going

22 to work.

23 MR. KOTLER: I know you to be someone who is, is

24 know, very thoughtful and usually -- and quite -- in

25 this case very specific; so my only response is while



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2 I certainly appreciate the distinction that you're

3 making between the -- in common parlance what is

4 considered commercial or not, technical standards and

5 studies are usually applied based upon the actual

6 zoning code definitions and in this case warehouse is

7 considered an industrial and light industrial using

8 and as a result, those are the metrics to which it is

9 applied.

10 And, again, that makes sense because when

11 you look at the spread of -- of trucks I --

12 Apologize, please correct me so I don't --

13 COUNCILMEMBER VELTO: Go ahead, I know you might

14 need some time but get it right.

15 COUNCILMEMBER ELLIOTT: The zoning code, our

16 Upland Municipal Code has warehouse under commercial,

17 it does not have warehouses under industrial.

18 MR. KOTLER: Then I --

19 COUNCILMEMBER VELTO: That's --

20 COUNCILMEMBER ELLIOTT: If you look Upland

21 Municipal Code and when we go into the zoning part of

22 the Upland Municipal Codes, if you look as industrial

23 you're not going to see warehouses, you're going to

24 see warehouse under the -- the chart for commercial.

25 MR. KOTLER: But I -- and I don't have it in





2 front of me and I do apologize but is short-term

3 storage considered industrial?

4 COUNCILMEMBER VELTO: Short-term storage?

5 COUNCILMEMBER ELLIOTT: I don't have that in

6 front of me.

7 COUNCILMEMBER VELTO: That has a specific zoning

8 I believe. I believe storage has its own specific

9 zoning because I know people that want to billed them

10 all over and it's a difficult.

11 FLOWERS/DALQUEST: If you're thinking like a

12 you-store-it structure that's consider considered a

13 different use than warehouse.

14 MALE SPEAKER: I have the zoning code in front

15 of me if you look at the industrial zones,

16 industrial, warehousing is permitted in both.

17 COUNCILMEMBER VELTO: Under what, commercial?

18 MALE SPEAKER: No, the light industrial and

19 general industrial zone, warehousing is permitted in

20 this both.

21 COUNCILMEMBER VELTO: What does this -- what

22 constitutes industrial?

23 DALQUEST/FLOWERS: There -- there is actually a

24 description of "light industrial" in the zone and it

25 includes a number of different uses and it expressly



1 UNOFFICIAL UNCERTIFIED REALTIME ROUGH DRAFT TRANSCRIPT

2 calls out warehousing and distribution as --

3 COUNCILMEMBER VELTO: But not commercial, it's

4 not considered commercial?

5 DALQUEST/FLOWERS: Well, this is a mixed-use

6 commercial light industrial zone; so it's a little

7 bit of an odd duck so it might be both.

8 COUNCILMEMBER VELTO: If it's mixed-use

9 commercial then commercial could -- we could apply a

10 commercial requirement then for the tier -- to the

11 tier for the -- excuse me, for that.

LA-23 cont.

12 What my concern is is air quality. We could

13 technically do that.

14 FLOWERS/DALQUEST: We could. The question comes

15 from a -- from a technical sense and I'm not an

16 engineer or an analyst but just the legal view of

17 this would be what -- what is the most appropriate

18 analysis or standards for analysis given the type of

19 use that is actually presented as the project.

20 COUNCILMEMBER VELTO: I would think the State of

21 California, as concerned as they are about greenhouse

22 gas effects, would probably lean towards what I'm

23 thinking; so I -- I do --

24 I want to make sure that as we move down

25 this path that we -- we are -- we're coming --

LA-23 cont.



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2 We're holding this to a highest standard

3 possible is what you're trying do because if Upland

4 is going to be known for this type ever a facility,

5 then why not take it to the highest standard of --

6 of -- of care if we're going to -- if it has the

7 potential to be approved?

8 That's one thing I want to look at.

9 Now, I'm not looking for accolades here or

10 applause but I want to make sure is that -- is that

11 we're holding this to the highest standard of care so

12 that we make sure that if the future that we've

13 prevented any potential problems health wise and

14 environmentally today that we don't know about in the

15 future.

16 Is it would be great if they go to all

17 electric, if all this -- all this great stiff happens

18 but I'm still going to go back to the amount of

19 traffic we're going to see increase because of any

20 project, again, walks like a duck, talks like a duck,

21 it's a duck.

22 And, I'm sorry, I just want to make sure

23 that we've covered everything to the extreme I and

24 want -- I would love to see the project work

25 properly.

LA-23 cont.

2 MR. KOTLER: And I --

3 You and I share that view, that everything

4 should be done to the highest standard of care and

5 should be done properly.

6 But I also believe that you and I share the

7 view that this -- that this project or any project

8 should be viewed appropriately. And that if you are

9 looking for inappropriate I would say ways of

10 comparing this project to standards that it does not

11 reside in, just I think as the Attorney -- City

12 Attorney mentioned, cities typically try to find the

13 most appropriate, most like description to follow.

14 And it might not be the most restrictive because the

15 project isn't what would fall into that most

16 restrictive.

17 So I would -- while I certainly second and

18 agree that this should be to the utmost standard of

19 care, all the T's should be crossed, all the I's

20 should be dotted, everything should be done to the

21 highest levels possible and appropriate to match this

22 project.

23 That's why we do project-specific analysis,

24 because you wouldn't just apply residential standards

25 to a commercial standard and project. And you

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wouldn't necessarily apply residential standards to an industrial probably.

When you look at what this project is and how it is qualified, despite it moving commercial goods, it is a warehouse project. And warehouse's in this case is more -- more aligned with what is considered an industrial project; so the appropriate standard of care is the one that was applied.

DALQUEST/FLOWERS: Madam Mayor --

MAYOR STONE: Excuse me, just a second.

DALQUEST/FLOWERS: -- if I might just make a suggestion?

The -- the question, as I understand it, I think is very clearly stated, is would it be more appropriate to use a threshold for the greenhouse gas analysis appropriate for commercial uses.

The question is -- I don't think we're going to be able to answer the question in sufficient detail.

We have a process set up that the Applicant and their consultants will take these comments and actually formulate a written response rather than

24 working it out in public; so I don't want to --

25 COUNCILMEMBER VELTO: No, no --



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2 DALQUEST/FLOWERS: I don't want to dismiss the

3 project --

4 COUNCILMEMBER VELTO: And I want that --

5 I want that on record that I would like to

6 see that.

7 DALQUEST/FLOWERS: Absolutely.

8 It's exactly the kind of thing the process

9 is supposed to work out.

10 COUNCILMEMBER VELTO: Okay. And has this been

11 discussed --

12 Has staff discussed this with AQMD? Have

13 the staff discussed this with --

14 Have you guys discussed this with -- the the

15 Tier 3 levels, the Tier 4 levels with the South Coast

16 Air Quality Management?

17 DALQUEST/FLOWERS: No, we haven't.

18 COUNCILMEMBER VELTO: Would that be something we

19 would -- that you should do?

20 DALQUEST/FLOWERS: Well, we can look into that

21 if that's what your direction is.

22 COUNCILMEMBER VELTO: Anybody else have --

23 COUNCILMEMBER ELLIOTT: Absolutely.

24 COUNCILMEMBER VELTO: Yes. I would like to have

25 that looked into.



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2 COUNCILMEMBER ELLIOTT: We can't make that

3 decision.

4 COUNCILMEMBER VELTO: Well, I think we can

5 recommend staff ask -- look into that.

6 DALQUEST/FLOWERS: But, you know, we did

7 circulate this to the Clearinghouse; so that's going

8 to -- that process is going to end on the 21st and

9 then we'll get comments from the state agencies that

10 reviewed the document.

11 COUNCILMEMBER VELTO: Okay. Fair enough.

12 I gave up my time.

13 MAYOR STONE: All right. I -- I feel bad.

14 All right. Who on the Planning Commission

15 side?

16 Go right ahead.

17 COMMISSIONER NOVIKIV: Yes.

18 I have a question for the representative of

19 the Kimley-Horn.

20 So that's about the noise impact, so that's

21 about the families that have kids along the Central

22 Avenue, we have apartment complexes there. And I

23 drive there quite often taking my kids to a karate

24 studio right at that intersection on Central; so I

25 look at the parkings (sic), they are really situated

LA-24

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2 about less than 10 feet away from Central Avenue.

3 Now, if we're thinking about adding all

4 these trucks, right, at night, 20 trucks? That's

5 about maybe one truck every 20 minutes; so how do you

6 determine, with these numbers that you have, that it

7 has less than significant impact?

8 Because I live in a gated community where we

9 have a truck -- delivery truck coming, UPS, FedEx,

10 all right, I wake up from just the lights and it

11 takes me 20 minutes to go back to sleep; so I want to

12 think about those families and how did you really

13 consider them? Did you think about them --

14 Thank you.

15 MALE SPEAKER: Yes. And I also prepared the

16 noise study. And we -- we did model the traffic

17 noise and we created a -- probably a more

18 conservative fleet mix; so what the project was

19 actually contributing to the -- to the existing

20 roadway noise.

21 The first thing I would like to note,

22 though, is that the project is actually reducing the

23 truck trips because there's currently truck occurring

24 from the site as it exists now with the --

25 However, we did not take credit for that in





2 the noise study.

3 And this project has fewer trips and --

4 truck -- heavy-duty truck trips, it has mostly,

5 excuse me, the lighter vans. And there -- based on

6 the model, we modeled existing conditions, we modeled

7 the project conditions, both in the opening year and

8 horizon year and future years, and there wasn't an

9 audible noticeable change in the noise levels.

10 It generally takes -- oh, you think a truck

11 going by, that's pretty loud. But it takes a

12 doubling of the traffic volume to actually create

13 a -- a noticeable increase in noise. That's --

14 that's just -- that's the way the --

15 You know, you already have a significant

16 or energy or traffic that creates that energy which

17 results in the noise.

18 And in order to --

19 You know, because noise is logarithmic, it's

20 really a case of you have to multiply it by -- you

21 know, on a logarithmic scale; that's why it takes

22 a -- a doubling just to have that perceivable

23 increase in noise.

24 So -- so that's kind of the -- putting it

25 into perspective. But we did the modeling and it



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2 shows that the -- there's not a noticeable increase

3 from the traffic.

4 COMMISSIONER NOVIKIV: Okay. Thank you.

5 Were the people asked their -- you know,

6 maybe by the company, by the Bridge Development who

7 were already living there along -- along the Central

8 Avenue? Did you go and speak inside the departments,

9 you know, to measure some --

10 MALE SPEAKER: It's not really part of the CEQA

11 process to -- to go inside. The standard protocol

LA-24 cont.

12 and methodology is to -- to do the modeling process

13 that we did to determine the project's impact. You

14 know, there is a lot of other variables.

15 But, you know, that's really outside of the

16 scope of -- of CEQA, of the CEQA analysis.

17 COMMISSIONER NOVIKIV: So basically you believe

18 that this number is the best you have that they will

19 not impact people living, right?

20 I mean, I'm just talking about one specific

21 area. There are some other areas -- you know, there

22 are many areas that this --

LA-24 cont.

23 MALE SPEAKER: Right.

24 We modeled all the roadways that were in

25 those traffic studies and the area --

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2 COMMISSIONER NOVIKIV: Thank you.

3 MAYOR STONE: All right. Any other questions?

4 Go ahead, Robin.

5 COMMISSION CHAIR ASPINALL: This is more on

6 process, I think for the staff.

7 Tonight I know we can only talk about what

8 has been presented and the -- the initial study and

LA-25

9 MND. But what --

10 Does -- does the financial aspects of this

11 project go to the Planning Commission or does that go

12 to the City Council?

LA-25 cont.

13 DALQUEST/FLOWERS: Are you talking about in

14 terms of the DA?

15 COMMISSION CHAIR ASPINALL: I must be.

16 DALQUEST/FLOWERS: The development agreement and

17 the ultimate decision whether or not to pursue the

18 development belong to the -- as a legislative act, it

19 belongs to the City Council.

20 COMMISSION CHAIR ASPINALL: So the Planning

21 Commission will not get into -- it's only limited

22 to --

LA-25 cont.

23 DALQUEST/FLOWERS: You will be asked to make a

24 recommendation on it --

25 COMMISSION CHAIR ASPINALL: On the financial





2 aspect to --

3 DALQUEST/FLOWERS: On the development agreement.

4 It's a tricky question, to be honest,because

5 it's -- the financial aspects are typically -- you

6 know, they're -- they're outside the expertise and

7 typical subject matter of the -- of the typical

8 Planning Commission; so generally it's -- you're

9 reviewing it for its impacts in terms of -- for -- as

10 a planning document.

11 And in that regards, it's about how long is

12 the vesting of the project? What sort of -- how do

13 you account for development impact fees and things

14 like that, which have a planning aspect.

15 But in terms of kind of the raw deal points,

16 it's not something that is typically negotiated by a

17 Planning Commission.

18 DALQUEST/FLOWERS: But that's separate and apart

19 from the actual project's entitlements and the --

20 DALQUEST/FLOWERS: Yes.

21 DALQUEST/FLOWERS: -- CEQA determination.

22 they --

23 Both Commission and the Council will have to

24 the decision whether or not to approve the project on

25 its merits with reference to the findings for the



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2 site review. That's different from the findings that

3 are required to approve the development review; so

there are two separate findings decisions and you'll have to -- you'll have to reach -- approve it as to both.

FEMALE SPEAKER: Will they be at the same time and as typically --

LA-25 cont.

DALQUEST/FLOWERS: Yes, I think that's the plan.

FEMALE SPEAKER: Okay, thank you.

MAYOR STONE: Any other questions from the Planning Commission?

All right. Then --

FEMALE SPEAKER: I have a quick question --

I'm sorry.

MAYOR STONE: Oh, I'm sorry.

FEMALE SPEAKER: I'm sorry. I'm hiding back here.

LA-26

So one of my questions was to the Applicant.

Do you think the potential tenant for this project would have an issue with creating the location as a point-of-sale location?

MR. KOTLER: Typically --

I mean the short answer is nothing is being sold out of this location; so as a result, typically

most -- most --

MAYOR STONE: I don't think we should bring that question up; am I correct?

DALQUEST/FLOWERS: It's really not -- it doesn't go to the environmental review.

FEMALE SPEAKER: Okay.

My next question -- thank you.

My next question is I think we have a robust community, very intelligent community and I'm very happy with all the questions that were presented to all of us tonight.

My question to you is when will we have the responses in writing? Where will they be available?

I would really like to see them done as soon as possible, prior to the February 12th meeting, so that there's time to process the responses, you know, and cross-reference as necessary.

LA-27

DALQUEST/FLOWERS: Those will be provided in the staff report packet which goes out the week before the Planning Commission meeting; so it goes out the Thursday before that Wednesday -- before the Wednesday meeting. It will be part of the materials that we'll provide for the administrative record for the project.

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FEMALE SPEAKER: And it will be available online as well?

LA-27 cont.

DALQUEST/FLOWERS: Yes, it will. We'll post that online as well.

FEMALE SPEAKER: Okay. Thank you.

DALQUEST/FLOWERS: And also, as I indicated earlier, it will be sent to each individual that prepared that comment letter ten days before the public hearing meeting as per CEQA.

MAYOR STONE: All right. Any other questions or comments?

All right. Thank you very much. Wonderful information. Appreciate all of you guy's time. Appreciate the public being here. We are adjourned and our next regularly scheduled City Council meeting is Monday, January the 13th. And our next regularly scheduled Planning Commissions meeting is Wednesday, January 22nd.

Drive safely.

23

24

25

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ENTER OPERATIONAL PARAMETERS IN THE HIGHLIGHTED YELLOW CELLS

# TIER 1/TIER 2 SCREENING RISK ASSESSMENT DATA INPUT

*(Procedure Version 8.1 & Package N, September 1, 2017 ) - Risk Tool V1.103*

| | |
|---|---|
| Application Deemed Complete Date | 01/08/20 |
| A/N | Emission based on AP-42 |
| Facility Name | City of Upland |

I-23

| 1. Stack Data | Input | Units |
|---|---|---|
| Hours/Day | 24 | hrs/day |
| Days/Week | 7 | days/wk |
| Weeks/Year | 52 | wks/yr |
| Control Efficiency | 0.000 | |
| Does source have T-BACT? | NO | |
| Source Type (Point or Volume) | V | P or V |
| Stack Height or Building Height | 12 | feet |
| Building Area | 30,000 | $ft^2$ |
| Distance-Residential | 375 | meters |
| Distance-Commercial | 25 | meters |
| Meteorological Station | Upland | |
| Project Duration (Short term options: 2, 5, or 9 years; Else 30 years) | 30 | years |

Station list

**Conversion Units (select units From & To)**

From: 20 feet

To: 6.096 meter

| | |
|---|---|
| Source Type | Other |
| Screening Mode (NO = Tier 1 or Tier 2; YES = Tier 3) | NO |

FOR SOURCE TYPE OTHER THAN BOILER, CREMATORY, ICE, PRESSURE WASHER, OR SPRAY BOOTH, FILL IN THE USER DEFINED TABLE BELOW

Fac Name: City of Upland A/N: ion based on AP-42

Chemical Code table

| TAC Code | Compound | Emission Rate (lbs/hr) | Molecular Weight | R1 = Uncontrolled (lbs/hr) | Efficiency Factor (Fraction range 0-1) | R2-Controlled (lbs/hr) |
|---|---|---|---|---|---|---|
| B1 | Benzene | 9.33E-03 | 78.11 | 9.33E-03 | 0.00000 | 0.00933 |
| T3 | Toluene | 4.09E-03 | 92.13 | 4.09E-03 | 0.00000 | 0.00409 |
| X1 | Xylenes (Mixed Isomers) | 2.85E-03 | 106.2 | 2.85E-03 | 0.00000 | 0.00285 |
| P69 | Propylene (Propene) | 2.58E-02 | 42.08 | 2.58E-02 | 0.00000 | 0.0258 |
| B12 | 1,3-Butadiene | 3.91E-04 | 54.09 | 3.91E-04 | 0.00000 | 0.000391 |
| F2 | Formaldehyde | 1.18E-02 | 30.03 | 1.18E-02 | 0.00000 | 0.0118 |
| A1 | Acetaldehyde | 7.67E-03 | 44.06 | 7.67E-03 | 0.00000 | 0.00767 |
| A3 | Acrolein | 9.25E-04 | 56.06 | 9.25E-04 | 0.00000 | 0.000925 |
| P62 | Naphthalene | 8.48E-04 | 128.1732 | 8.48E-04 | 0.00000 | 0.000848 |
| P42 | Benz(a)Anthracene | 1.68E-05 | 228.2928 | 1.68E-05 | 0.00000 | 0.0000168 |
| P43 | Benzo(a)Pyrene | 1.88E-06 | 252.3 | 1.88E-06 | 0.00000 | 0.00000188 |
| P59 | Indeno(1,2,3-c,d)Pyrene | 3.40E-06 | 276.3368 | 3.40E-06 | 0.00000 | 0.0000034 |
| P49 | Dibenz(a,h)Anthracene | 5.83E-06 | 278.3526 | 5.83E-06 | 0.00000 | 0.00000583 |

## TIER 1 SCREENING RISK ASSESSMENT REPORT

*(Procedure Version 8.1 & Package N, September 1, 2017)*

**Application deemed complete date:** 1/8/20

**A/N Emission based on AP-42, City of Upland**

| | | |
|---|---|---|
| Equipment Type | Other | No T-BACT |
| Nearest Receptor Distance (actual) | 25 | meters |
| Receptor Distance (Table 1 Emission look up) | 25 | meters |

| Tier 1 Results | |
|---|---|
| Cancer/Chronic ASI | Acute ASI |
| 3.53E+02 | 4.29E+00 |
| FAILED | FAILED |

**APPLICATION SCREENING INDEX CALCULATION**

| Compound | Average Annual Emission Rate (lbs/yr) | Max Hourly Emission Rate (lbs/hr) | Cancer/Chronic Pollutant Screening Level (lbs/yr) from Table 1 | Acute Pollutant Screening Level (lbs/hr) from Table 1 | Cancer/Chronic Pollutant Screening Index (PSI) | Acute Pollutant Screening Index (PSI) |
|---|---|---|---|---|---|---|
| Benzene | 8.15E+01 | 9.33E-03 | 5.31E-01 | 5.96E-03 | 1.53E+02 | 1.57E+00 |
| Toluene | 3.57E+01 | 4.09E-03 | 1.08E+04 | 8.17E+00 | 3.31E-03 | 5.01E-04 |
| Xylenes (Mixed Isomers) | 2.49E+01 | 2.85E-03 | 2.52E+04 | 4.86E+00 | 9.88E-04 | 5.86E-04 |
| Propylene (Propene) | 2.25E+02 | 2.58E-02 | 1.08E+05 | | 2.09E-03 | |
| 1,3-Butadiene | 3.42E+00 | 3.91E-04 | 8.86E-02 | 1.46E-01 | 3.86E+01 | 2.68E-03 |
| Formaldehyde | 1.03E+02 | 1.18E-02 | 2.53E+00 | 1.21E-02 | 4.07E+01 | 9.75E-01 |
| Acetaldehyde | 6.70E+01 | 7.67E-03 | 5.31E+00 | 1.04E-01 | 1.26E+01 | 7.38E-02 |
| Acrolein | 8.08E+00 | 9.25E-04 | 6.00E+00 | 5.52E-04 | 1.35E+00 | 1.68E+00 |
| Naphthalene | 7.41E+00 | 8.48E-04 | 4.43E-01 | | 1.67E+01 | |
| Benz(a)Anthracene | 1.47E-01 | 1.68E-05 | 5.89E-03 | | 2.49E+01 | |
| Benzo(a)Pyrene | 1.64E-02 | 1.88E-06 | 5.89E-04 | | 2.79E+01 | |
| Indeno(1,2,3-c,d)Pyrene | 2.97E-02 | 3.40E-06 | 5.89E-03 | | 5.04E+00 | |
| Dibenz(a,h)Anthracene | 5.09E-02 | 5.83E-06 | 1.62E-03 | | 3.14E+01 | |
| **TOTAL APPLICATION SCREENING INDEX** | | | | | **3.53E+02** | **4.29E+00** |

EMISSIONS ARE ENTERED ON THE EMISSIONS WORKSHEET OR ON ONE OF EQUIPMENT WORKSHEETS

INPUT PARAMETERS ENTERED ON THE EMISSIONS SHEET ARE USED FOR TIERS 1 AND TIER 2 ANALYSES

**TIER 2 SCREENING RISK ASSESSMENT REPORT**
***(Procedure Version 8.1 & Package N, September 1, 2017) - Risk Tool V1.103***

**A/N:** ion based on AP-42 **Fac:** City of Upland **Application deemed complete date:** 1/8/20

**1. Stack Data**

| | | |
|---|---|---|
| Equipment Type | Other | |
| Combustion Eff | 0.0 | |
| | No T-BACT | |
| Operation Schedule | 24 | hrs/day |
| | 7 | days/week |
| | 52 | weeks/year |
| Stack Height | 12 | ft |
| Building Area | 30000 | ft² |
| Distance to Residential | 375 | m |
| Distance to Commercial | 25 | m |
| Meteorological Station | Upland | |

**2. Tier 2 Data**

| Dispersion Factors tables | Volume Source |
|---|---|
| For Chronic X/Q | Table 7 |
| For Acute X/Q max | Table 7.7 |

Dilution Factors

| Receptor | X/Q (µg/m³)/(tons/yr) | X/Qmax (µg/m³)/(lbs/hr) |
|---|---|---|
| Residential | 0.28 | 16.04 |
| Commercial - Worker | 10.98 | 488.94 |

Intake and Adjustment Factors

| | Residential | Worker |
|---|---|---|
| Year of Exposure | 30 | |
| Combined Exposure Factor (CEF) - Table 4 | 677.40 | 55.86 |
| Worker Adjustment Factor (WAF) - Table 5 | 1 | 1.00 |

A/N: ssion based on AP-42

Application deemed complete date: 01/08/20

**3. Rule 1401 Compound Data**

| Compound | R1 - Uncontrolled (lbs/hr) | R2 - Controlled (lbs/hr) | CP $(mg/kg\text{-}day)^{-1}$ | MP MICR Resident | MP MICR Worker | MP Chronic Resident | MP Chronic Worker | REL Chronic (µg/m³) | REL 8-hr Chronic (µg/m³) | REL Acute (µg/m³) | MWAF |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Benzene | 9.33E-03 | 9.33E-03 | 1.00E-01 | 1.00 | 1.00 | 1.00 | 1.00 | 3.00E+00 | 3.00E+00 | 2.70E+01 | 1 |
| Toluene | 4.09E-03 | 4.09E-03 | | 1.00 | 1.00 | 1.00 | 1.00 | 3.00E+02 | | 3.70E+04 | 1 |
| Xylenes (Mixed Isomers) | 2.85E-03 | 2.85E-03 | | 1.00 | 1.00 | 1.00 | 1.00 | 7.00E+02 | | 2.20E+04 | 1 |
| Propylene (Propene) | 2.58E-02 | 2.58E-02 | | 1.00 | 1.00 | 1.00 | 1.00 | 3.00E+03 | | | 1 |
| 1,3-Butadiene | 3.91E-04 | 3.91E-04 | 6.00E-01 | 1.00 | 1.00 | 1.00 | 1.00 | 2.00E+00 | 9.00E+00 | 6.60E+02 | 1 |
| Formaldehyde | 1.18E-02 | 1.18E-02 | 2.10E-02 | 1.00 | 1.00 | 1.00 | 1.00 | 9.00E+00 | 9.00E+00 | 5.50E+01 | 1 |
| Acetaldehyde | 7.67E-03 | 7.67E-03 | 1.00E-02 | 1.00 | 1.00 | 1.00 | 1.00 | 1.40E+02 | 3.00E+02 | 4.70E+02 | 1 |
| Acrolein | 9.25E-04 | 9.25E-04 | | 1.00 | 1.00 | 1.00 | 1.00 | 3.50E-01 | 7.00E-01 | 2.50E+00 | 1 |
| Naphthalene | 8.48E-04 | 8.48E-04 | 1.20E-01 | 1.00 | 1.00 | 1.00 | 1.00 | 9.00E+00 | | | 1 |
| Benz(a)Anthracene | 1.68E-05 | 1.68E-05 | 3.90E-01 | 23.12 | 6.62 | 1.00 | 1.00 | | | | 1 |
| Benzo(a)Pyrene | 1.88E-06 | 1.88E-06 | 3.90E+00 | 23.12 | 6.62 | 1.00 | 1.00 | | | | 1 |
| Indeno(1,2,3-c,d)Pyrene | 3.40E-06 | 3.40E-06 | 3.90E-01 | 23.12 | 6.62 | 1.00 | 1.00 | | | | 1 |
| Dibenz(a,h)Anthracene | 5.83E-06 | 5.83E-06 | 4.10E+00 | 7.99 | 2.48 | 1.00 | 1.00 | | | | 1 |

A/N: ssion based on AP-42

Application deemed complete date: 01/08/20

**4. Emission Calculations**

| Compound | R1 (lbs/hr) | R2 (lbs/hr) | R1 (lbs/day) | R2 (lbs/day) | R2 (lbs/yr) | R2 (tons/yr) |
|---|---|---|---|---|---|---|
| Benzene | 9.33E-03 | 9.33E-03 | 2.24E-01 | 2.24E-01 | 8.15E+01 | 4.08E-02 |
| Toluene | 4.09E-03 | 4.09E-03 | 9.82E-02 | 9.82E-02 | 3.57E+01 | 1.79E-02 |
| Xylenes (Mixed Isomers) | 2.85E-03 | 2.85E-03 | 6.84E-02 | 6.84E-02 | 2.49E+01 | 1.24E-02 |
| Propylene (Propene) | 2.58E-02 | 2.58E-02 | 6.19E-01 | 6.19E-01 | 2.25E+02 | 1.13E-01 |
| 1,3-Butadiene | 3.91E-04 | 3.91E-04 | 9.38E-03 | 9.38E-03 | 3.42E+00 | 1.71E-03 |
| Formaldehyde | 1.18E-02 | 1.18E-02 | 2.83E-01 | 2.83E-01 | 1.03E+02 | 5.15E-02 |
| Acetaldehyde | 7.67E-03 | 7.67E-03 | 1.84E-01 | 1.84E-01 | 6.70E+01 | 3.35E-02 |
| Acrolein | 9.25E-04 | 9.25E-04 | 2.22E-02 | 2.22E-02 | 8.08E+00 | 4.04E-03 |
| Naphthalene | 8.48E-04 | 8.48E-04 | 2.04E-02 | 2.04E-02 | 7.41E+00 | 3.70E-03 |
| Benz(a)Anthracene | 1.68E-05 | 1.68E-05 | 4.03E-04 | 4.03E-04 | 1.47E-01 | 7.34E-05 |
| Benzo(a)Pyrene | 1.88E-06 | 1.88E-06 | 4.51E-05 | 4.51E-05 | 1.64E-02 | 8.21E-06 |
| Indeno(1,2,3-c,d)Pyrene | 3.40E-06 | 3.40E-06 | 8.16E-05 | 8.16E-05 | 2.97E-02 | 1.49E-05 |
| Dibenz(a,h)Anthracene | 5.83E-06 | 5.83E-06 | 1.40E-04 | 1.40E-04 | 5.09E-02 | 2.55E-05 |
| | | | | | | |
| **Total** | **6.37E-02** | **6.37E-02** | **1.53E+00** | **1.53E+00** | **5.57E+02** | **2.78E-01** |

**TIER 2 RESULTS**

A/N: ssion based on AP-42

Application deemed complete date: 01/08/20

**5a. MICR**

MICR Resident = CP (mg/(kg-day))^-1 * Q (ton/yr) * (X/Q) Resident * CEF Resident * MP Resident * 1e-6 * MWAF

MICR Worker = CP (mg/(kg-day))^-1 * Q (ton/yr) * (X/Q) Worker * CEF Worker* MP Worker* WAF Worker* 1e-6 * MWAF

| Compound | Residential | Commercial |
|---|---|---|
| Benzene | 7.59E-07 | 2.50E-06 |
| Toluene | | |
| Xylenes (Mixed Isomers) | | |
| Propylene (Propene) | | |
| 1,3-Butadiene | 1.91E-07 | 6.28E-07 |
| Formaldehyde | 2.02E-07 | 6.64E-07 |
| Acetaldehyde | 6.24E-08 | 2.05E-07 |
| Acrolein | | |
| Naphthalene | 8.28E-08 | 2.73E-07 |
| Benz(a)Anthracene | 1.23E-07 | 1.16E-07 |
| Benzo(a)Pyrene | 1.38E-07 | 1.30E-07 |
| Indeno(1,2,3-c,d)Pyrene | 2.49E-08 | 2.35E-08 |
| Dibenz(a,h)Anthracene | 1.55E-07 | 1.59E-07 |
| **Total** | **1.74E-06** | **4.70E-06** |
| | **FAIL** | **FAIL** |

**5b. Is Cancer Burden Calculation Needed (MICR >1E-6)?** **YES**

| | |
|---|---|
| New X/Q at which $MICR_{70yr}$ is one-in-a-million [(µg/m³)/(tons/yr)]: | 2.34E+00 |
| New Distance, interpolated from X/Q table using New X/Q (meter): | 91.33 |
| Zone Impact Area (km²): | 2.62E-02 |
| Zone of Impact Population (7000 person/km²): | 1.83E+02 |
| **Cancer Burden:** | **8.62E-04** |
| **Cancer Burden is less than or equal to 0.5** | **PASS** |

**6. Hazard Index Summary**

A/N: ssion based on AP-42

**Application deemed complete date:** 01/08/20

HIA = [Q(lb/hr) * (X/Q)max * MWAF ]/ Acute REL
HIC = [Q(ton/yr) * (X/Q) * MP * MWAF] / Chronic REL
HIC 8-hr= [Q(ton/yr) * (X/Q) * WAF * MWAF] / 8-hr Chronic REL

| Target Organs | Acute | Chronic | 8-hr Chronic | Acute Pass/Fail | Chronic Pass/Fail | 8-hr Chronic Pass/Fail |
|---|---|---|---|---|---|---|
| Alimentary system (liver) - AL | | | | Pass | Pass | Pass |
| Bones and teeth - BN | | | | Pass | Pass | Pass |
| Cardiovascular system - CV | | | | Pass | Pass | Pass |
| Developmental - DEV | 1.69E-01 | 1.00E-02 | 2.08E-03 | Pass | Pass | Pass |
| Endocrine system - END | | | | Pass | Pass | Pass |
| Eye | 2.94E-01 | 1.95E-04 | | Pass | Pass | Pass |
| Hematopoietic system - HEM | 1.69E-01 | 1.49E-01 | 1.49E-01 | Pass | Pass | Pass |
| Immune system - IMM | 1.69E-01 | | | Pass | Pass | Pass |
| Kidney - KID | | | | Pass | Pass | Pass |
| Nervous system - NS | 1.17E-04 | 8.49E-04 | | Pass | Pass | Pass |
| Reproductive system - REP | 1.69E-01 | 1.00E-02 | | Pass | Pass | Pass |
| Respiratory system - RESP | 1.89E-01 | 1.98E-01 | 1.27E-01 | Pass | Pass | Pass |
| Skin | | | | Pass | Pass | Pass |

A/N: ssion based on AP-42 **Application deemed complete date:** 01/08/20

**6a. Hazard Index Acute - Resident**

HIA = [Q(lb/hr) * (X/Q)max resident * MWAF] / Acute REL

| | HIA - Residential | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| Compound | AL | CV | DEV | EYE | HEM | IMM | NS | REP | RESP | SKIN |
| Benzene | | | 5.54E-03 | | 5.54E-03 | 5.54E-03 | | 5.54E-03 | | |
| Toluene | | | 1.77E-06 | 1.77E-06 | | | 1.77E-06 | 1.77E-06 | 1.77E-06 | |
| Xylenes (Mixed Isomers) | | | | 2.08E-06 | | | 2.08E-06 | | 2.08E-06 | |
| Propylene (Propene) | | | | | | | | | | |
| 1,3-Butadiene | | | 9.50E-06 | | | | | 9.50E-06 | | |
| Formaldehyde | | | | 3.44E-03 | | | | | | |
| Acetaldehyde | | | | 2.62E-04 | | | | | 2.62E-04 | |
| Acrolein | | | | 5.93E-03 | | | | | 5.93E-03 | |
| Naphthalene | | | | | | | | | | |
| Benz(a)Anthracene | | | | | | | | | | |
| Benzo(a)Pyrene | | | | | | | | | | |
| Indeno(1,2,3-c,d)Pyrene | | | | | | | | | | |
| Dibenz(a,h)Anthracene | | | | | | | | | | |
| **Total** | | | 5.55E-03 | 9.64E-03 | 5.54E-03 | 5.54E-03 | 3.85E-06 | 5.55E-03 | 6.20E-03 | |

**6a. Hazard Index Acute - Worker**

HIA = [Q(lb/hr) * (X/Q)max Worker * MWAF] / Acute REL

A/N: ssion based on AP-42

**Application deemed complete date:** 01/08/20

| Compound | HIA - Commercial | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | AL | CV | DEV | EYE | HEM | IMM | NS | REP | RESP | SKIN |
| Benzene | | | 1.69E-01 | | 1.69E-01 | 1.69E-01 | | 1.69E-01 | | |
| Toluene | | | 5.40E-05 | 5.40E-05 | | | 5.40E-05 | 5.40E-05 | 5.40E-05 | |
| Xylenes (Mixed Isomers) | | | | 6.33E-05 | | | 6.33E-05 | | 6.33E-05 | |
| Propylene (Propene) | | | | | | | | | | |
| 1,3-Butadiene | | | 2.90E-04 | | | | | 2.90E-04 | | |
| Formaldehyde | | | | 1.05E-01 | | | | | | |
| Acetaldehyde | | | | 7.98E-03 | | | | | 7.98E-03 | |
| Acrolein | | | | 1.81E-01 | | | | | 1.81E-01 | |
| Naphthalene | | | | | | | | | | |
| Benz(a)Anthracene | | | | | | | | | | |
| Benzo(a)Pyrene | | | | | | | | | | |
| Indeno(1,2,3-c,d)Pyrene | | | | | | | | | | |
| Dibenz(a,h)Anthracene | | | | | | | | | | |
| **Total** | | | 1.69E-01 | 2.94E-01 | 1.69E-01 | 1.69E-01 | 1.17E-04 | 1.69E-01 | 1.89E-01 | |

A/N: ssion based on AP-42

Application deemed complete date: 01/08/20

**6b. Hazard Index Chronic - Resident**

HIC = [Q(ton/yr) * (X/Q) Resident * MP Chronic Resident * MWAF1 / Chronic REL

| | HIC - Residential | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Compound | AL | BN | CV | DEV | END | EYE | HEM | IMM | KID | NS | REP | RESP | SKIN |
| Benzene | | | | | | | 3.74E-03 | | | | | | |
| Toluene | | | | 1.64E-05 | | | | | | 1.64E-05 | 1.64E-05 | 1.64E-05 | |
| Xylenes (Mixed Isomers) | | | | | | 4.89E-06 | | | | 4.89E-06 | | 4.89E-06 | |
| Propylene (Propene) | | | | | | | | | | | | 1.03E-05 | |
| 1,3-Butadiene | | | | 2.35E-04 | | | | | | | 2.35E-04 | | |
| Formaldehyde | | | | | | | | | | | | 1.57E-03 | |
| Acetaldehyde | | | | | | | | | | | | 6.58E-05 | |
| Acrolein | | | | | | | | | | | | 3.17E-03 | |
| Naphthalene | | | | | | | | | | | | 1.13E-04 | |
| Benz(a)Anthracene | | | | | | | | | | | | | |
| Benzo(a)Pyrene | | | | | | | | | | | | | |
| Indeno(1,2,3-c,d)Pyrene | | | | | | | | | | | | | |
| Dibenz(a,h)Anthracene | | | | | | | | | | | | | |
| **Total** | | | | 2.51E-04 | | 4.89E-06 | 3.74E-03 | | | 2.13E-05 | 2.51E-04 | 4.96E-03 | |

A/N: ssion based on AP-42

Application deemed complete date: 01/08/20

**6b. Hazard Index Chronic - Worker**

HIC = [Q(ton/yr) * (X/Q) * MP Chronic Worker * MWAF] / Chronic REL

| | HIC - Commercial | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Compound | AL | BN | CV | DEV | END | EYE | HEM | IMM | KID | NS | REP | RESP | SKIN |
| Benzene | | | | | | | 1.49E-01 | | | | | | |
| Toluene | | | | 6.54E-04 | | | | | | 6.54E-04 | 6.54E-04 | 6.54E-04 | |
| Xylenes (Mixed Isomers) | | | | | | 1.95E-04 | | | | 1.95E-04 | | 1.95E-04 | |
| Propylene (Propene) | | | | | | | | | | | | 4.12E-04 | |
| 1,3-Butadiene | | | | 9.38E-03 | | | | | | | 9.38E-03 | | |
| Formaldehyde | | | | | | | | | | | | 6.29E-02 | |
| Acetaldehyde | | | | | | | | | | | | 2.63E-03 | |
| Acrolein | | | | | | | | | | | | 1.27E-01 | |
| Naphthalene | | | | | | | | | | | | 4.52E-03 | |
| Benz(a)Anthracene | | | | | | | | | | | | | |
| Benzo(a)Pyrene | | | | | | | | | | | | | |
| Indeno(1,2,3-c,d)Pyrene | | | | | | | | | | | | | |
| Dibenz(a,h)Anthracene | | | | | | | | | | | | | |
| **Total** | | | | 1.00E-02 | | 1.95E-04 | 1.49E-01 | | | 8.49E-04 | 1.00E-02 | 1.98E-01 | |

**6c. 8-hour Hazard Index Chronic - Resident**

HIC 8-hr = [Q(ton/yr) * (X/Q) Resident * WAF Resident * MWAF] / 8-hr Chronic REL

A/N: ssion based on AP-42

**Application deemed complete date:** 01/08/20

| | HIC - Residential | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Compound | AL | BN | CV | DEV | END | EYE | HEM | IMM | KID | NS | REP | RESP | SKIN |
| Benzene | | | | | | | 3.74E-03 | | | | | | |
| Toluene | | | | | | | | | | | | | |
| Xylenes (Mixed Isomers) | | | | | | | | | | | | | |
| Propylene (Propene) | | | | | | | | | | | | | |
| 1,3-Butadiene | | | | 5.22E-05 | | | | | | | | | |
| Formaldehyde | | | | | | | | | | | | 1.57E-03 | |
| Acetaldehyde | | | | | | | | | | | | 3.07E-05 | |
| Acrolein | | | | | | | | | | | | 1.59E-03 | |
| Naphthalene | | | | | | | | | | | | | |
| Benz(a)Anthracene | | | | | | | | | | | | | |
| Benzo(a)Pyrene | | | | | | | | | | | | | |
| Indeno(1,2,3-c,d)Pyrene | | | | | | | | | | | | | |
| Dibenz(a,h)Anthracene | | | | | | | | | | | | | |
| **Total** | | | | 5.22E-05 | | | 3.74E-03 | | | | | 3.19E-03 | |

A/N: ssion based on AP-42

Application deemed complete date: 01/08/20

**6c. 8-hour Hazard Index Chronic - Worker**

HIC 8-hr = [Q(ton/yr) * (X/Q) Worker * WAF Worker * MWAF] / 8-hr Chronic REL

| | HIC - Commercial | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Compound | AL | BN | CV | DEV | END | EYE | HEM | IMM | KID | NS | REP | RESP | SKIN |
| Benzene | | | | | | | 1.49E-01 | | | | | | |
| Toluene | | | | | | | | | | | | | |
| Xylenes (Mixed Isomers) | | | | | | | | | | | | | |
| Propylene (Propene) | | | | | | | | | | | | | |
| 1,3-Butadiene | | | | 2.08E-03 | | | | | | | | | |
| Formaldehyde | | | | | | | | | | | | 6.29E-02 | |
| Acetaldehyde | | | | | | | | | | | | 1.23E-03 | |
| Acrolein | | | | | | | | | | | | 6.34E-02 | |
| Naphthalene | | | | | | | | | | | | | |
| Benz(a)Anthracene | | | | | | | | | | | | | |
| Benzo(a)Pyrene | | | | | | | | | | | | | |
| Indeno(1,2,3-c,d)Pyrene | | | | | | | | | | | | | |
| Dibenz(a,h)Anthracene | | | | | | | | | | | | | |
| **Total** | | | | 2.08E-03 | | | 1.49E-01 | | | | | 1.27E-01 | |

**From:** Michael Poland
**To:** Brendan Kotler
**Subject:** FW: Bridge Development Project Opposition & Specific revenues question

---

**From:** Upland Coalition of Concerned Citizens [mailto:uplandccc@gmail.com]
**Sent:** Monday, December 30, 2019 1:24 PM
**To:** Michael Poland <mpoland@ci.upland.ca.us>
**Subject:** Fwd: Bridge Development Project Opposition & Specific revenues question

**WARNING: External email. Please verify sender before opening attachments or clicking on links.**

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Mr. Poland,

Sending individually as the City Server "blocks" group emails it appears.

Sir, I hold no I'll will against you AT ALL. I want you to know that. Your doing your job. My best wishes to you and your family, Happy New Year sir.

Respectfully,

Steve Bierbaum

---------- Forwarded message ---------
From: **Upland Coalition of Concerned Citizens** <uplandccc@gmail.com>
Date: Mon, Dec 30, 2019 at 11:21
Subject: Bridge Development Project Opposition & Specific revenues question
To: mPoland@ci.upland.ca.us <mPoland@ci.upland.ca.us>
CC: Janice Elliott <janiceelliott4upland@gmail.com>, Rosemary Hoerning <rhoerning@ci.upland.ca.us>, robin.aspinall@gmail.com <robin.aspinall@gmail.com>

Mr. Poland and All;

I hope you enjoyed your Christmas Holidays.

The City is allegedly receiving $2M from Bridge for "Future Road Maintenance". I-43

Can Someone confirm:

1. Assuming the Bridge Deal goes through; is that monies actually going into the designated Public Works account for maintenance, or;

2. Are those monies being utilized for 13th st. Widening/revamping from Cable Airport to Benson?

Mr. Poland, you probably can not answer this question, but wanted to include you to ensure

everyone is in the loop.

I-43

That being said, let this serve as my official notice in opposition of the Bridge Project.

I am not opposed to developing the site.

I am opposed due to the manner in which the process has been handled in the past 2-years by the City.

I am opposed due to zero continuous, future revenues to the City of Upland, especially based upon the Multi-Millions of dollars the Developers and Occupants will earn from it.

I am opposed to the current MND which in Conclusion finds no issue with the proposed development. Specifically, the amount of VAN traffic that SHALL be generated 24-7 onto our streets in THAT particular area will destroy the allure of District 1 & District 3 residential living; specifically Sycamore Hills and Baseline/Benson/210 access.

As a resident, I realize that the project meets Zoning Standards, but I implore upon the Planning Commission to look, listen and FEEL the opposition to this particular project, at this location, based upon the lack of financial future revenues to be received by the City of Upland.

Respectfully,

Steve Bierbaum
2052 Windermere Way
Upland, CA 91784

**From:** Joaquin Delgado
**To:** Michael Poland
**Subject:** Bridge Development - In Support Of
**Date:** Sunday, January 12, 2020 11:03:09 PM

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**WARNING: External email. Please verify sender before opening attachments or clicking on links.**

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Hello Mike Poland,

I am a happy resident of Upland, CA. I am voting to support this project, there is many of us in my household who could be potential employees of this new warehouse. I-44

Upland cannot pass up jobs from a Fortune 10 company, more workers will support the local businesses in the area, generating sales tax revenue and increased presence for the city. Jobs create more jobs, and economic opportunity creates more economic opportunity in proximity.

For the people who oppose this project, don't oppose us residents feeding our families and supporting the local businesses with hard earned money.

Respectfully,

Joaquin

**From:** Kathy Dee
**To:** Michael Poland
**Subject:** Fwd: Bridge Development
**Date:** Sunday, January 12, 2020 4:00:07 PM

---

**WARNING: External email. Please verify sender before opening attachments or clicking on links.**

---

Address correction, see below...

---------- Forwarded message ----------
From: "Kathy Dee" <kathy.distefano@gmail.com>
Date: Jan 12, 2020 12:55 PM
Subject: Bridge Development
To: <mpoland@upland.ci.ca.us>
Cc: <citycouncil@ci.upland.ca.us>

I OPPOSE the proposed development of an e-commerce sorting and distribution center on Foothill Blvd. I-45

This is not a warehouse, even by the e-commerce merchant's own definition. They are calling it a Delivery Station with the purpose of sorting packages for outbound routes in a clustered "last mile" defined urban area.

It is clearly a truck and delivery van terminal and along with being a traffic nightmare AND a major detractor of living quality in my District 1 neighborhood AND subsequently a devaluing factor of my property, is NOT permitted in the General Code.

This sorting station address with its accompanying descriptor of a 206,000 square foot building and start up date of Q4 2020 is listed online in a table of Amazon's U.S. Delivery Station Network. This fact leads me to believe the project was preaapproved by the City some time ago and may even have been a factor in denying District 1 the right to vote for representation in the 2018 election.

This alleged preaapproval may also have influenced the Planning Commission to skip what should be a mandatory Environmental Impact Review in order to meet a timeline. If Moreno Valley is any example, skipping this review could lead to future litigation in which even California's own Attorney General takes a position against the city. Upland cannot afford that, especially for a project that as presented, does not offer the city any economic benefit.

Sincerely,
Kathryn Di Stefano
1328 N Erin Avenue
Upland, CA 91786-2660

**From:** Michael Poland
**To:** Schooner, Casey; Heather Crossner (hcrossner@bridgedev.com); Brendan Kotler
**Subject:** FW: Amazon Distribution Center
**Date:** Monday, January 13, 2020 11:12:48 AM

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**From:** Victoria Douglas [mailto:vtdouglas@gmail.com]
**Sent:** Thursday, January 9, 2020 10:30 AM
**To:** Michael Poland <mpoland@ci.upland.ca.us>; Uplandccc@gmail.com; rhoerning@ci.upland.ca.org
**Subject:** Amazon Distribution Center

**WARNING: External email. Please verify sender before opening attachments or clicking on links.**

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Hello Mr. Poland,

I wanted to write to you about my concerns about the potential Amazon Distribution Center in our City.

My concern is this will bring a lot traffic and congestion in and out of Baseline the 210 and beyond. This type of distribution center seems out of place since it will be near residential areas. I moved from Claremont to Upland and have loved living here yet this will effect us all and could potently reduce our property prices. Please reconsider. I-46

Thank you,

Victoria Douglas

Bridge Point Development – New Requirements
Jerry Fenning MA, January 10, 2020, (30 resident of Upland)

The following report is based on reading the documents provided by City of Upland (see URL's below) and listening to public testimony on January 9, 2020 during Planning Commission public session. Please refer to sections of the Bridge Point Upland Project's Initial Study/Mitigated Negative Declaration or IS/MDN completed by Kimley Horn and Associates, Inc. 765 The City Drive, Suite 200 Orange, California 92868 Contact: Mr. Ace Malisos 714.939.1030

Jerry Fenning MA, Upland resident for 30 years.

Proposed Requirement (PR) #1

I-47a

PR #1: Require a downgrade of the physical plant be completed so that the number of loading/unloading docks would be reduced from the proposed 16 high-dock and 8 van loading doors and parking for 1104 vans to approximately 4 high-dock and 2 van loading doors and parking for 25 vans in order to better correspond to the very light transportation activity that is represented in the IS/MDN.

OR Require that a new more expansive and formal Environmental Impact Report or EIR be completed that matches the higher level of transportation activity that the Bridge Point Project would incur.

Why and Rationale? The IS/MDN describes a very small amount of transportation activity for such a large facility. The proposed parking stalls for 1104 vans indicates that this huge number of vehicles will be an integral part of the building's business activity; otherwise, why have such a significant number of such parking spaces. It is self-evident that hundreds of vans will be parked at the facility but their business activity wasn't included in the IS/MDN. It was explained that a more detailed Environmental Impact Report wasn't necessary due to the small amount of transportation activity. The 1104 van parking spaces indicates an entirely different situation where additional hundreds of vehicles traveling thousands of miles DAILY will occur in order for the facility to become profitable.

**Therefore the current report is grossly inadequate and does NOT REFLECT FUTURE REALITY. The required solution is either to drastically reduce the physical size of the Bridge Point Project or develop a new more expansive and formal EIR.**

If one of these two requirements do not occur, then discussions surrounding issues of competence, misrepresentation or even possible fraud given the huge discrepancies between the apparently low amount of transportation activity and the huge supply of van parking stalls which will of will be used for delivery purposes. Will the vans just stay parked permanently without moving? Is this a long term storage space with NO change in status? No one with common sense would agree to the permanent static parking scenario.

(My personal observations during the public testimony on January 9, 2020 saw the public react in defiance of having more than 1100 vans and trucks at the Bridge Point Project and the

IS/MDN report which only related to 25 or so vehicles. The public's fear, in my opinion, is that the Planning Commission and City Council will hide behind the low figures presented in the report and ignore the much larger capacity of the facility as envisioned by the developer. This would create discussions of incompetence, misrepresentation and even possible fraud. My proposed requirements would remedy this discrepancy by creating a more accurate portrayal of the Bridge Point Project. It is much better to explore all possibilities now before construction to achieve a possible consensus or else face much more damaging discussions in the future.) I-47a cont.

Proposed Requirement #2

I-47b

PR #2 Require that a vote on approval or disapproval of the Bridge Point Project occur AFTER the 2020 elections so that residents will be represented by mayor, city council and planning commission who supports the majority positions of the Upland voters because this warehouse issue will be a paramount part of the upcoming political campaigns.

Why and Rationale? Past mayor and city council members have hastily implemented legislation that has been injurious to the city in my opinion and to many of my friends. It is important to continue the candidacy of more unbiased and competent representatives.

Here are a few examples. During the last session after the 2018 elections, the lame duck city council approved of a new city manager despite substantial input from the public to allow the new representatives to complete this responsibility. Nope, they voted to have a permanent city manager and less than two years later this person is not working for Upland any longer. This was an indication of mismanagement and wasted money which created additional controversies.

Recently, the city council was considering an increase in water rates and was going to gradually raise them over a number of years. Nope, the water rates jumped all at once causing additional financial pain on residents who didn't have time to adjust to a series of increases. This was another indication of mismanagement.

There is a current controversy surrounding the sale of segments of Memorial Park to San Antonio Hospital in order to create more parking spaces. City Council and staff attempted to complete this transaction without a vote of Upland residents. Nope, the people of Upland will be able to vote on the park acquisition according to my information.

Given these three examples, it would be prudent to require that a vote on the Bridge Point Project occur after the 2020 elections.

Proposed Requirement #3

I-47c

PR #3 Require a written mandate that must be followed that alternative fueled vehicles will be used because current descriptions only involve recommendations or suggestions or exposure to programs that reduce vehicular emissions or install infrastructure for electric vehicles. A much better approach is to require specific targets or percentage of vehicles that use alternative fuels.

- The best standard is to include written requirements that on Day ONE of First Year 100% of vehicles owned, leased, under contract with third party or enter/leave facility for

conducting deliveries operate on alternative fuels. One exception to this requirement applies to staff who drive to work using their personal vehicles and who are NOT transporting products or services. If staff are asked to deliver products using their personal transportation, then the employer still needs to insure that they're using energy efficient vehicles or must provide a company- owned energy efficient vehicle.

I-47c cont.

- The second best standard is to include requirements that on Day ONE of First Year 50% of vehicles owned, leased, under contract with third party or enter/leave facility for conducting deliveries operate on alternative fuels. A second requirement is that on Day One of Third Year the remaining 50% of vehicles owned, leased, under contract with third party or enter/leave facility for conducting deliveries operate on alternative fuels.

The owner will be responsible for determining the type of alternative fuel and appropriate infrastructure for the vehicles.

As for the public parking spaces, 25% of the stalls should be allocated for plug-in electric or other appropriate alternative fueled vehicles. Half of these plug-in electric charging stalls will be reserved for employees using proprietary company cards or some other system and the other half will be available for general public as well as employees' use. The number of alternative parking stalls will increase in the future based on demand.

Why and Rationale:

It's absolutely imperative to establish a firm number or percentages of vehicles that do NOT use oil rather than stipulate that infrastructure be installed. Too many times a vehicle with an internal combustion engine will deliver products or park at the facility and ignore the alternative fuels guidelines.

Not adhering to these established mandates for alternative fueled vehicles will consist of shutting down the facility until correction is completed. Insignificant fines are NOT enough to enforce this requirement.

Reduction of fossil fuels, especially oi, is essential since it achieves the following worthwhile objectives.

1. Saves lives. Improves health. It is a scientific fact that ICE (internal combustion engines) related vehicular emissions are harmful to people's health and using alternative fueled vehicles will result in a healthier public.
2. Clean the environment. It is an acknowledgement of realty that ICE related vehicular emissions is changing the world's climate and dirtying up the environment and using alternative fueled vehicles will in a cleaner and better world
3. Improve America's domestic economy and become more energy independent. Reducing oil consumption through energy efficient vehicles will allow our country to reduce imported, overseas oil. America won't be sending petrodollars to the Persian Gulf or other volatile areas but will instead circulate the money within our country in order to generate more jobs and improve our economy.

4. Improve national security and help establish a more peaceful world. Alternative fueled or energy efficient vehicles will reduce demand for oil and avoid the necessity for importing oil from overseas. Sending petrodollars to the Persian Gulf and other volatile areas results in some of these funds being siphoned off to pay for terrorism and war. America is funding both sides of the war on terrorism.
5. Improve social justice for women and children and increase religious freedom. Sending money overseas to volatile areas such as the Persian Gulf funds discrimination against women and children and funds religious intolerance since no other religion besides Islam can be publicly practiced in Saudi Arabia, one of America's primary sources of overseas oil.

I-47c cont

Proposed Requirement #4

I-47d

PR #4 Require that a written contract with enforcement be completed that allows Upland to collect legal amount of sales tax for transactions involving merchandise and services emanating from the Bridge Point Project. Whether this requirement is fulfilled with the "point of sale" agreement or some other effective method is up to the City of Upland and the company.

Why and Rationale? It's imperative that Upland receives the appropriate and legal amount of sales tax since the company is selling products within our jurisdiction. The funds will pay for operational budget including street maintenance for the City of Upland.

Proposed Requirement #5

I-47e

PR #5 Require reconsideration of Bridge Point Project to a location adjacent to the 210 Freeway, most likely north of the Campus ramp where you already have two car dealerships. Another location could be north of the Baseline/Padua ramp above the shopping center or south of the Baseline/Padua ramp where the cement factory and/or Cable Airport are located.

Why and Rationale? Traffic from any of these locations can be configured to flow directly from the freeway ramp to the Bridge Point Project; thus, avoiding residential neighborhoods. Acreage was made available to construct a park area north of 210 Freeway and perhaps the warehouse could be set up on this more "out of the way" location.

The current proposed location off of Foothill and Central Ave. is too imbedded within the communities of Upland, Montclair and Claremont. Foothill Blvd., Central Ave. and Monte Vista are already heavily congested streets that border on all three cities.

**Upland promotes Responsible Growth that doesn't harm its citizens,**

Examples of Responsible Growth are two retail shopping centers - one at Campus and another at Baseline/Padua on 210 Freeway ramps; and another project of revitalization of the shopping center on the northeast quadrant or Foothill and Euclid.

There is also the construction of two car dealerships north of Campus ramp on 210 Freeway which are expected to generate sizeable sales tax for these high end products. I-47e cont.

An example of Irresponsible growth that has been justifiably denied includes:

The destruction of much appreciated Cabrillo Park and soccer complex in order to build high density homes. The Cabrillo Park and soccer fields were planned to be moved to more inaccessible rock-filled locations north of the 210 Freeway. This project did NOT occur.

**Upland residents want Responsible Growth that preserves our city and provides progress in the 21st century.**

**The current Bridge Point Project does NOT achieve these standards of excellence and requires substantial changes.**

Please refer to sections of the IS/MDN report that have been copied for documentation purposes in order to write this position paper. These sections of the report provide evidence for the necessity of the requirements.

Jerry Fenning MA,30 year resident of Upland

REFER TO URLS for source of information:

https://www.uplandca.gov/uploads/files/DevelopmentServices/Environmental%20Review%20Documents/Volume%201%20-%20Bridge%20Point%20Upland_MND_2019.12.16.pdf

https://www.uplandca.gov/uploads/files/DevelopmentServices/Environmental%20Review%20Documents/Volume%202%20-%20Bridge%20Point%20Upland_Appendices%20MND%202019.12.16.pdf

https://www.uplandca.gov/uploads/files/DevelopmentServices/Environmental%20Review%20Documents/Volume%201%20-%20Bridge%20Point%20Upland_MND_2019.12.16.pdf

Summary Section IS = Initial Study; MND = Mitigated Negative Declaration This is NOT a formal more expansive Environmental Impact Report, IER due to low number of vehicles involved

The western building frontage would include **16 dock-high doors for trucks, and 8 van loading doors** would be located on each of the northern and southern building frontages. The Project would require a minimum of 220 automobile parking spaces, and approximately 224 automobile parking spaces would be provided. Trailer parking for the warehouse building would include **approximately 12 trailer stalls and an additional 1,104 van parking stalls would be located on-site**. Page 1

Prior to the issuance of a certificate of occupancy, the Project Applicant shall demonstrate to the satisfaction of the City of Upland Planning Division that the following measures would be implemented during Project operations. ▪ The proposed warehouse shall be constructed with the

appropriate infrastructure to facilitate sufficient electric charging for trucks to plug in, in anticipation of future technology that allows trucks to operate partially on electricity. ▪ At least **6 percent of all vehicle parking spaces (including for trucks) shall be designed to accommodate future electric vehicle charging stations. Further, electrical hookups should be provided at the onsite truck stop for truckers to plug in any onboard auxiliary equipment. At a minimum, electrical panels should be appropriately sized to allow for future expanded use.** Page 4

**All service equipment (e.g., forklifts, yard trucks, hostlers, etc.) used within the site shall be electric or powered by compressed natural gas**. ▪ **To promote alternative fuels and help support "clean" truck fleets, the developer/successor-in-interest shall provide building occupants with information related to the SCAQMD's Carl Moyer Program, or other such programs** that promote truck retrofits or "clean" vehicles and information including, but not limited to, the health effect of diesel particulates, benefits of reduced idling time, CARB regulations, and importance of not parking in residential areas. Tenants shall be notified about the availability of (1) alternatively fueled cargo handling equipment; (2) grant programs for diesel- fueled vehicle engine retrofit and/or replacement; (3) designated truck parking locations in the project vicinity; (4) access to alternative fueling stations proximate to the site that supply compressed natural gas; and (5) the US Environmental Protection Agency's Smart Way program. PAGE 4

IS/MND Report

As further discussed in Section VI.17, Transportation, although the site is zoned to accommodate truck traffic associated with a Commercial/Industrial Mixed-Use facility, a **total of 25 trucks would arrive to the facility daily (for a total of 50 truck trips), of which 2% would occur during each of the a.m. and p.m. peak hours. No more than 5 trucks would travel to the site during the daytime.** All trucks would access the site via the driveway at the north leg of Central Avenue/Foothill Boulevard. Page 17; repeated on Page 26

Another difference is that parcel hub facilities have high truck traffic throughout the day, while the proposed warehouse/parcel delivery use would have a majority of truck trips occurring during the off-peak hours. Based on information provided by the client, **a total of 25 trucks will arrive to the facility daily, of which 2% will occur during each of the a.m. and p.m. peak hours**. Page 96

**Please submit written comments to:**

Address: Mike Poland, Contract Planning Manager City of Upland
Development Services Department/Planning Division
460 N. Euclid Avenue. Upland CA 91786; mpoland@ci.upland.ca.us

**From:** Michael Poland
**To:** Schooner, Casey; Heather Crossner (hcrossner@bridgedev.com); Brendan Kotler
**Subject:** FW: Bridges project
**Date:** Monday, January 13, 2020 11:11:42 AM

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-----Original Message-----
From: Russ Griffin [mailto:russgriffin1@verizon.net]
Sent: Wednesday, January 8, 2020 5:08 PM
To: Michael Poland <mpoland@ci.upland.ca.us>; uplandccc@gmail.com; rhoerning@ci.upland.ca.org; City Manager <CityManager@ci.upland.ca.us>
Subject: Bridges project

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Dear Madam or Sir,

My name is Russell Griffin and my family and I have lived in the same house in Upland for over 30 years. We are concerned that the council is actually considering the construction of a building in Upland that will generate an additional 2,583 more PCE trips PER DAY (Passenger Car
Equivalent) in the area around 13th, Benson and Foothill and not $1 benefit to the City of Upland. But you are willing to say "Yes we will repair the roads when they need it". Much sooner than without the building.
Are you aware that there is a building on the Interstate 15 that is an Amazon Distribution Center that is a half mile long? Why do we need another one so close? I-48

Russell Griffin
1585 Wedgewood Way
Upland, Ca 91786-2169
909-982-7585

**From:** Michael Poland
**To:** Schooner, Casey; Heather Crossner (hcrossner@bridgedev.com); Brendan Kotler
**Subject:** FW: Bridge Warehouse
**Date:** Monday, January 13, 2020 11:13:13 AM

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**From:** gonzojhawk [mailto:gonzojhawk@aol.com]
**Sent:** Friday, December 20, 2019 9:56 AM
**To:** Michael Poland <mpoland@ci.upland.ca.us>
**Subject:** Bridge Warehouse

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I am opposed to the Warehouse size and location. There should be something else that is more aesthetically pleasing (with the mountains as a backdrop) in this location. The extra truck traffic will congestion Foothill, Benson, Padua, Baseline and the entrances and exits to the 210. Sincerely yours, James Herron 1235 Adriana Way . Resident of Upland for 35 years. 909-224-9092 I-49

Sent from my Verizon, Samsung Galaxy smartphone

**From:** matt hinson
**To:** Michael Poland
**Cc:** Uplandccc@gmail.com; rhoerning@ci.upland.ca.org
**Subject:** Amazon Bridge point
**Date:** Monday, December 23, 2019 1:33:55 PM

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This cannot happen in Upland!!!! I've seen it in Rosemead Ca. on Temple City Blvd, Amazon Flex... It's terrible, I-50
This project cannot be allowed. I will be there on February 12th to voice my opinion.

James & Kim Hinson
1364 Lakewood Ave
Upland Ca, 91786

**The City Council of the City of Upland**
**460 N. Euclid Avenue**
**Upland, CA 91786**

**January 6, 2020**

My name is Shawn Ariannia and I have been a resident of the City of Upland for the past 12 years. I am a professional civil/geotechnical engineer with pavement engineering as one of my areas of expertise. In the last two decades I have completed numerous projects for different cities and municipalities in Southern California, some in industrial cities such as Commerce, City of Industry, City of Chino, City of Downey, etc.

As I heard, a developer, i.e. Bridge Development Partners, intends to build a single warehouse building with about 276,000 square feet area on the current vacant property north of Foothill Boulevard and west of Benson Avenue, which will perform as a retail and logistics center. Reportedly, the future operation of the retail center at a minimum, will create a traffic of 25 trucks and 200 passenger vehicles per day. In addition, the developer, is placing 1,486 parking spaces for delivery vans and cars, as well as other spaces for semi-trucks.

Due to this development, the City will receive about $2.2M in permitting fee and 200 permanent jobs will be created in the City. This, at the beginning, sounds great. However, there will be some impacts onto the other side of the equation, i.e. the residence of the City.

The followings are my concerns, which I would like to share them with the City Council members and ask you to consider these in the process of your decision making:

1. As far as I know, no environmental impact study has been done for this report. Considering the size and nature of the project and its proximity to the residential areas, conducting an environmental impact study is necessary. I-51
2. The project entails addition of considerable volume of truck traffic and other cars. Neither Benson Avenue nor surrounding streets are designed to carry the resulting traffic load and frequency of such a heavy traffic. All pavements within the truck routes will be deteriorated rapidly.
3. Benson Avenue, Base Line Road and 16th street are main streets being used by Upland residents. The added traffic will cause difficulties for the residences of northern Upland and will result in traffic congestion in the streets located in the vicinity of the retail center.
4. As a resident of the City who lives in the vicinity of the proposed development, I strongly believe that the value of the properties will depreciate. This may cause a future change in the City's culture and demographic.

I appreciate the attention of the Council Members and the City Officials to this important matter.

Respectfully Submitted,

SHAW

Shawn Ariannia, Ph.D., P.E., G.E.
1453 Lookout Court
Upland, CA 91784

**Geo-Advantec Inc.**
G Geotechnical Engineering
A Earthquake Engineering
Inspection and Testing
I Engineering Geology

Office: (909)305-0400
Direct: (909)315-5748
Mobile: (310)365-6091
Fax: (909)907-0704
SAriannia@GeoAdvantec.com

**Shawn Ariannia, Ph.D., P.E., G.E.**
*President/CEO*

**From:** Ruth Kirby
**To:** Michael Poland
**Subject:** Regarding the proposed project on Foothill and Central.
**Date:** Saturday, January 11, 2020 5:40:33 AM

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Mr. Poland,

My name is Ruth and I am a resident of Upland. I heard that a possible Amazon warehouse might be built in Upland. I am writing to ask you not to let this happen. I-52

I am an employee of Amazon. I work at the Rialto warehouse, a new fulfillment center that opened in July 2018. I am currently on leave due to an injury I sustained at Amazon after only a few months of working there.

I believe that bringing Amazon to Upland would be a mistake. The traffic of the trucks would not be the only problem. At my location, there were about 2,000 employees with many beginning their shift at the same time. It would take a long time to get in the building so employees started asking management to help with the traffic. Their answer was to designate one gate for entrance and the other for exit. We could only enter from the north side and only go south when exiting. Then they enlisted the Rialto police to enforce this. The outcome was a long line of cars that went around the building. As far as I know, this caused two car accidents between employees. Part of the traffic was due to a ridiculous amount of speed bumps that are placed in the parking lot.

If you're not already familiar, I ask you to please read some of the articles that discuss the working conditions of these warehouses. There is an article about the times supervisors had to place a 911 call because an employee was expressing suicidal thoughts or attempting to hurt themselves inside the warehouse. There have been many reports on their poor working conditions. As an employee I can attest to them. They're all true. You have to practically run to the restroom because you are timed. If you don't make your rate/quota for the week, you get a write up. Three write-ups in 30 days and you're fired. You are overworked and hurting all over but you can't stop. You have to be fast no matter what. I was given a write-up the week I reported my injury because I could not be fast enough. The whole time I was worried sick of getting fired. Supervisors would yell at us to be faster. My co-workers were unhappy and angry. People would write on the boards how scared they were of losing their job and how depressed they were. This kind of treatment is unacceptable so I ask you not to let this evil corporation into Upland.

Please look into some of the articles. Thank you for your time and have a nice day.

**From:** SUSAN MACH
**To:** Michael Poland
**Cc:** City Council
**Subject:** Bridge Development
**Date:** Sunday, January 12, 2020 4:44:49 PM

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I-53

I am writing in opposition to the proposed development of an e-commerce sorting and distribution center on Foothill Blvd. After attending planning and council meetings, it is very clear to me that the majority of informed Upland residents are also opposed to this development.

The project is clearly a truck and delivery van terminal, which will add to the recently increased traffic nightmare that new residences and the expanded rock quarry near Cable Airport have created. It will also detract from my living quality in District 1. I believe the city's General Code would have to be changed to legally make this project "fit" and I DO NOT want that to happen, as it would devalue my property!

To use the words of a fellow neighbor, "This sorting station address with its accompanying descriptor of a 206,000 square foot building and start up date of Q4 2020 is listed online in a table of Amazon's U.S. Delivery Station Network. This fact leads me to believe the project was pre-approved by the City some time ago and may even have been a factor in denying District 1 the right to vote for representation in the 2018 election.

This alleged pre-approval may also have influenced the Planning Commission to skip what should be a mandatory Environmental Impact Review in order to meet a timeline. If Moreno Valley is any example, skipping this review could lead to future litigation in which even California's own Attorney General takes a position against the city. Upland cannot afford that, especially for a project that as presented, does not offer the city any economic benefit."

Lastly, it's hard to believe in these times of climate concern that our city thinks this project is the way to the future.

Sincerely,

Susan Mach

Upland, CA

**From:** Irmalinda Osuna
**To:** Michael Poland
**Subject:** Re: Bridge Development Project - Request for Copy of the Economic Impact Report
**Date:** Monday, December 30, 2019 2:57:06 PM

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Hello Mr. Poland,

Thank you for your prompt response. However, I am interested in the financial aspect of this project. Can you please elaborate on why an Economic Impact report is not required. Also, is the Development Agreement (DA) separate from an Economic Impact Report or are they two distinct documents? If they are separate documents, what is the status of the DA and is it available for the public to review? I-54

Irmalinda osuna

On Mon, Dec 30, 2019 at 10:52 AM Michael Poland <mpoland@ci.upland.ca.us> wrote:

> An Economic Impact Report is not required nor was one prepared for the Project. However, the California Environmental Quality Act (CEQA) Guidelines required that a Draft Initial Study/Mitigated Negative Declaration be prepared.
>
> In accordance with the CEQA Guidelines the Initial Study/Mitigated negative Declaration reviews all potential effects of a project, which are broken down into twenty-one categories that include aesthetics, agricultural and forestry resources, air quality, biological resources, energy, geology/soils, greenhouse gas emissions, hazards and hazardous materials, hydrology/water quality, land use/planning, mineral resources, noise, population/housing, public services, recreation, transportation, tribal cultural resources, utilities/service systems, wildfires, and mandatory findings of significance.
>
> A copy of this document is available on the City's website. Click on City Departments, then Development Services, Planning Division, and then Environmental Review.
>
> Mike Poland
>
> Contract Planning Manager | Planning Division
>
> City of Upland | Development Services Department
>
> 460 N. Euclid Avenue, Upland, CA 91786

Phone: (909) 931-4135

mpoland@ci.upland.ca.us

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**From:** irmalinda.osuna@gmail.com [mailto:irmalinda.osuna@gmail.com]
**Sent:** Sunday, December 29, 2019 6:40 PM
**To:** Michael Poland <mpoland@ci.upland.ca.us>
**Subject:** Bridge Development Project - Request for Copy of the Economic Impact Report

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Hello Mr. Mike Poland,

In regards to the Bridge Development project, has your office drafted an Economic Impact report? If so, where in the city website is this located? Otherwise, please provide me with an electronic copy via email.

Thank you and look forward to hearing from you.

Irmalinda Osuna

Upland Resident

**From:** Michael Poland
**To:** Schooner, Casey; Heather Crossner (hcrossner@bridgedev.com)
**Subject:** FW: Oppose Development by Bridge Development Partners
**Date:** Monday, January 13, 2020 11:13:56 AM

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**From:** Abraham Shen [mailto:dugu.shen@gmail.com]
**Sent:** Wednesday, January 8, 2020 4:46 PM
**To:** Michael Poland <mpoland@ci.upland.ca.us>
**Subject:** RE: Oppose Development by Bridge Development Partners

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January 8th, 2020

Dear Mike Poland,

My name is Abraham Shen and I am a resident of Upland. As a member of the community, I am writing to you to express my concern about the development for urban distribution center by Bridge Development Partners.

As a resident in this area, I oppose the building of such development for the following reasons:

I-55

**• INCREASED TRAFFIC**
The potential Increase in traffic flow coming from this development can cause a higher risk for safety of drivers and pedestrians as well as delays and backups along the surrounding residential streets. The employees working at the distribution center will not be able to fit dedicated 350 parking spaces in the distribution center as there are 1,000 plus delivery vehicles intended. The parking situation and traffic will in cause negative effects to the surrounding area. In addition, there will be an increase of semi-trucks in the city that will enter to distribution center to deliver and pick-up packages. Also, the estimated traffic is expected to increase tremendously during the holidays. Our streets are not designed to handle traffic in this type of capacity. d

**• Traffic Accidents and Public Safety**
As a new resident in Upland, I have personally saw the negative effects brought by an Amazon distribution center in Rosemead, California. The drivers often drive recklessly as they are competing against time to deliver all the packages. Also, we can't neglect the fact that the drivers are working at nights. We do not know if these drivers are tired. Since these drivers could possibly be contractors, not employees. The distribution center does not have to be responsible or accountable for any of the accidents. For Amazon, Inc., under the agreements of the Last Mile program, contracted delivery companies must assume all liability and legal costs, essentially protecting Amazon from blame.

**• FUTURE DEVELOPMENTS**
Allowing this project would open the doors for similar projects to continue throughout Upland. This city has always been a residential and family-oriented community. This development could set a precedent for more high rises and commercialized buildings in the future.
I have a vested interest in my community and hope that its character and charm will remain intact. This project does not have the best interests of the community in mind and threaten to bring negative side effects to Upland. I hope that as one of our elected council members, you will hear my concerns and take them into consideration as you make decisions on this matter in the future. Thank you for your time.

Sincerely,
Abraham Shen

871 W 13th St
Upland, CA 91786

**From:** Michael Poland
**To:** Schooner, Casey; Heather Crossner (hcrossner@bridgedev.com)
**Subject:** FW: New warehouse
**Date:** Monday, January 13, 2020 11:14:32 AM

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**From:** Scott VanTine [mailto:sverny@gmail.com]
**Sent:** Saturday, January 4, 2020 8:27 AM
**To:** Michael Poland <mpoland@ci.upland.ca.us>
**Subject:** New warehouse

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As a resident of Upland for now over 20 years I find it sad that some of our liberal, elitist residents take issue with the creation of a warehouse business south of the airport. Would they prefer the dust generating, dirt carrying trucks, and quarry noise rather than a clean, economical, tax generating business which would be good for the entire city? I have been trying for years to get my street overhauled only to be put on back burners due to no budget for it. Therefore I wholly support this project and the tax revenue and jobs it will create. Instead of losing our acres to massive quarry holes in the ground let's fill them up and build more industrial businesses for a more balanced city economy. C'mon, Upland residents!!! Get on board and improve our city. If you can't get over upgrading a useless piece of property then move to Claremont. I-56

Scott Van Tine
1361 grove ave

**From:** Brinda Sarathy
**To:** desireerm@gmail.com; Cindi Alvitre; chiefrbwife@aol.com; Julia Bogany (juliabogany@aol.com); Barbara Drake; Kimberly (Morales) Johnson; Kimberly Johnson
**Cc:** Michael Poland
**Subject:** Missing names/parties on NOA for Bridge Development Project in Upland
**Date:** Sunday, January 5, 2020 1:00:06 PM

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Good morning all and happy new year!

I am writing to bring your attention to a project in Upland being proposed by Bridge Development to develop an Amazon warehouse facility on 50 acres of open space designated as light/industrial off of Foothill Boulevard in Upland, CA.

As I was reviewing the project documents, I noticed that Andrew Salas has been listed as the sole representative for the Gabrileno Band of Mission Indians-Kizh Nation (see page 8 of document linked below). I-57

https://www.uplandca.gov/uploads/files/CityClerk/CC%20Packets/2020%20packets/PACKET%20SPECIAL%20JANUARY%209%202020.pdf

I believe that other Tongva tribal representatives may have been left out and wanted to bring this to your attention since this project may be of concern to you.

I am copying Mike Poland, the contract manager on this project as well.

Desiree and Cindi: I spoke to Julia about the omission of other Tongva representatives and she recommended I email you both immediately so that you can provide guidance to the City of Upland about who else from the Tongva nation they should be informing, per law, about this project.

Cheers,
Brinda

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Brinda Sarathy
Professor of Environmental Analysis
Director, Robert Redford Conservancy for Southern CA Sustainability
https://www.pitzer.edu/redfordconservancy/

Pitzer College
1050 N. Mills Ave.
Claremont, CA 91711
brinda_sarathy@pitzer.edu

**From:** Lisa Poe [mailto:gabs2000@verizon.net]
**Sent:** Monday, January 13, 2020 7:59 PM
**To:** Michael Poland <mpoland@ci.upland.ca.us>
**Subject:** Amazon or E-commerce merchant

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Wondering if an EIR or a CMP or a TIA has been done on this project. Curious of the traffic impact and congestion this could possibly have on our community. I-58

I'll be reaching out to SANBAG/SBCTC to enquire more info. I might also reach out to SCAQMD as well.

Thank you in advance for any info. that can be provided.

Lisa Poe

Sent from AOL Mobile Mail
Get the new AOL app: mail.mobile.aol.com

**From:** Bradley Andresen [mailto:bradley_andresen@hotmail.com]
**Sent:** Wednesday, January 15, 2020 11:44 PM
**To:** Michael Poland <mpoland@ci.upland.ca.us>
**Subject:** Upland "warehouse/terminal" project

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Mr. Poland,

Janice Elliott requested that I send an email I sent to Bridge development to you as well. I am copying the email below. I am also very pleased to state that Bridge has emailed me back but I am behind in my emails so I have not read it fully. I-59

Thank you for your time.
Brad

Begin copied message:

Thank you for presenting to Upland the plans for the development in the barren property next to Lowes just south of Cable airport. I found the presentations informative. I have two interlinking concerns I would like to raise. I believe that meeting these concerns will help many residents see the project in a more favorable light.

Concern 1
I believe and agree with your traffic and environmental impact in regards to the trucks and building. What is lacking is any account of the vehicles for the 1000+ parking spots. It is clear that these spots are for short trip deliveries from the terminal as there are only 300 employees total for a 24-hour facility. Thus, ignoring the vans in the traffic and environmental report leaves a foreseeable issue with absolutely no discussion. I realize, as your traffic expert stated that the last mile will be 1) distributed throughout our and other cities, and 2) in our neighborhoods regardless of this project due to our demand for online shopping; however, we know that the source of all the vans will be coming from the facility on Foothill Blvd. Therefore, we need to account for this traffic in the area around the facility as we can then account for this known quantity in any reports. I expect that this too can be mitigated, but it must first be acknowledged. This bleeds into my second concern as the van traffic will also effect the roadways and traffic around the facility, which will become a cost burden on the city.

Concern 2
Although there is a lot of money that Upland would receive upfront, I fear that the facility, which has a 50-year lifespan if I am not mistaken, will not generate enough continued revenue for the city to maintain the services the facility will demand. At the public hearing it was suggested of getting your proposed tenant to agree to make the warehouse the point of sale. I realize that there is not any sales occurring at the facility, but if there was a way to get some of the tax money to Upland that would be great as that provides a sustainable and predictable revenue stream for the city. Specifically, such a revenue stream will allow Upland to pave roads and deal with future traffic problems. I do not want the "over $10 million" figure to be penny wise and pound foolish leaving our future selves not having the money to deal with the anticipated vehicular (van) traffic that would result from the facility.

I want to make sure that all developments in Upland are sustainable. Having a Fortune 20 company in Upland that will utilize city services yet not provide a revenue stream that can cover the anticipated costs is not a good way for Upland to grow. However, if the funding steam is present to cover the services required, then such growth would be good for Upland.

Sincerely
Bradley T. Andresen

Sent from Mail for Windows 10

**From:** Barbara DONE [mailto:monkus525@msn.com]
**Sent:** Thursday, January 16, 2020 11:14 AM
**To:** Michael Poland <mpoland@ci.upland.ca.us>; Robert Dalquest <rdalquest@ci.upland.ca.us>; Keri Johnson <kjohnson@ci.upland.ca.us>; Rosemary Hoerning <rhoerning@ci.upland.ca.us>; janiceelliott4upland@gmail.com; Bill Velto <bvelto@ci.upland.ca.us>; Rudy Gmail. Zuniga <rudy4upland@gmail.com>; Ricky Felix <rfelix@cityofupland.org>; ricky@rickyfelix.com; debbiestone4upland@gmail.com; robin.aspinall@gmail.com; garyschwary@gmail.com; carolyn.6@yahoo.com; anovikov.upland@gmail.com; Yvette@premier-is.com
**Subject:** Bridge Development

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Good morning, Upland City Council and Planning Commission,

I-60

I am writing this email to all of you to record my official notice in opposition of the Bridge Development.

I know that with development of all types, NIMBY (Not In My Backyard) is often a factor. I assure you, that is not the case with me. Having worked in the Architecture and Engineering field for the majority of my career, I am not opposed to development and specifically, developing this site. I realize that when planned with thought and foresight, development of all types is crucial to progress. That being said, when crucial data is not examined thoroughly or objectively, development can be the thing that divides a community, causes significant hazards within that community and erodes a community's infrastructure. With respect, I do not believe that those representing the City of Upland have taken the necessary steps to look at the proposed warehouse development with an objective perspective, looking at thorough and impartial projections. In fact, I do not believe that the projections provided in the MND have been thorough and impartial. I believe that those involved are seeing the benefits of a short term financial gain and not seeing the actual future impacts this development will have. Further, I feel that the compensation from the tenant(s) will not be nearly enough to cover future repairs, improvements, etc. that will become necessary as a result of the development's impact on our roadways and areas; it will also not be enough to cover other infrastructure costs such as additional/future code and law enforcement. Campbellsville, KY. is a prime example of where projected revenue in a similar arrangement as Upland's falls short. I urge you to research it.

Prior to living in Upland, I lived in Rancho Cucamonga for several years. While there, I saw numerous agricultural lots developed into warehouses and entire areas within the city transform from vines to tilt ups centers. And while there, I didn't see many issues arise as a result of the new industrial developments, primarily because they occurred in areas that were void of existing housing, retail, schools, etc. Since they were developed in such areas, they had a blank slate so-to-speak in which they could provide the necessary infrastructure, including wide roads and adequate signals, to support such facilities and do so without endangering those living in existing residential neighborhoods. The area of the proposed development in Upland is already developed with mostly retail and residential, and will house even more people as the high density developments along the Foothill and Baseline corridors are complete. Since this area's composition is already established, it will be impossible to provide streets wide enough and ingress and egress unobtrusive enough to not negatively impact the already traffic taxed areas surrounding the development. Driving down Benson, Baseline and Foothill is already challenging enough with long lines at signals and street congestion, adding the number of vehicles that realistically will be added by this new development will make a bad situation worse. Congestion will only be one factor, as noise and air pollution will also cause trouble for folks in the area. Some things associated with traffic congestion and pollution cannot be controlled, but when a city can proactively prevent adding to such congestion and pollution, it should. On the subject of traffic, with increased traffic comes increased safety concerns. The increase in vehicular traffic along Benson, Foothill and

I-60

Baseline increases the number of speeders, red light runners and others who violate traffic laws. Those folks pose a significant threat to the safety of our residents. And while that will happen with any development, the type of traffic associated with this type of development poses an even greater risk. I believe that the delivery traffic associated with this facility, in living up to its reputation of providing fast service, will pose a traffic hazard to nearby pedestrian and bicycle traffic, especially that to and from Cabrillo Elementary. Just look at what happened to Amazon's first Chief Financial Officer, Joy Covey.

I appreciate your time as you have read my concerns. In the least, I hope that you will consider another analysis of the impacts this development will have on Districts 1 and 3, and Upland as a whole. I really hope, though, that you realize this is not the right development for this property or area, or the future of the City of Upland, and will proceed in a different direction.
Respectfully,

Barbara Done
248 W 16th St
Upland, CA 91784

**From:** Jackie [mailto:jacspampets@yahoo.com]
**Sent:** Wednesday, January 15, 2020 5:15 PM
**To:** Michael Poland <mpoland@ci.upland.ca.us>
**Cc:** janiceelliott4upland@gmail.com; Bill Velto <bvelto@ci.upland.ca.us>; Rudy Gmail. Zuniga <rudy4upland@gmail.com>; Ricky Felix <rfelix@cityofupland.org>; debbiestone4upland@gmail.com; Keri Johnson <kjohnson@ci.upland.ca.us>; robinaspinall@gmail.com; garyschwary@gmail.com; yvette@premier-is.com; carolyn.6@yahoo.com; anovikov.upland@gmail.com; Rosemary Hoerning <rhoerning@ci.upland.ca.us>
**Subject:** "Bridge Development"

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To All Concerned,

We do not want this project to go through. The traffic would be absolutely atrocious! Causing a very real safety hazard and would slow down emergency services. As well as ALL the other reasons that have been brought up against this. I live off of 13th and Benson. All our home values would drop if we had this here. There is no way we want this to go through in our area or anywhere in Upland! I-61

Sincerely,

Richard Gray
Jackie McGrail
1248 Nancy Ct.
Upland, CA 91786

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I-62

My husband and I adamantly oppose the proposed building for Amazon near Lowe's.

1. The first problem is that a company named Bridges is doing the negotiating. It should be out in the open that it is an Amazon building.

2. I've never seen a more benign environmental report. What a joke! When you put that many trucks, vans, etc. on the road in our small town, it is going to cause a lot more traffic on the streets and a lot more streets that will need repaving. We have so many streets in town right now in desperate need of repaving that will probably never be repaired. We live in the suburbs for quality of life. If we wanted our streets to move at a crawl, we could move to L.A. County. We live off of 16th Street which is so crowded now. You want to add more trucks coming off the 210 freeway and getting off on Baseline? Don't tell me that's not the shortest way to the warehouse.

3. Any place that is going to have over a thousand parking spots is trouble. We do not want an operation like that in town.

4. It sounds like a lot of bribing and corruption is going on by Amazon. Originally they were going to pay 2 million. Now they have added money to the schools, the PD, etc. That will still not get our roads paved nor sales tax in the city's coffers. We have deep structural problems in CA cities with our pensions and the way cities get their money from the state. This deal with Amazon might be nice in the short run, but it is terrible in the long run.

5 I am so upset with the condos on Campus and Colonies Parkway. I don't mind building but that area should be single family homes like the adjoining area is. And then I hear there is going to be a mammoth apartment building on the east side of the shopping center. Do you realize the traffic gridlock that will result from all those people in such a small area? The planners of this city have lost their minds. They are definitely not planning anything but our destruction.

It is becoming more and more clear that we the people no longer have any say in government. The elected officials will do anything for short term gain and don't care a whit about what the residents say.

Cathy Cushman 909-985-5820 Upland 91786

# Critique of Air Quality Assessment and Greenhouse Gas Emissions Assessment, Bridge Point Upland Project Along with an Improved Emissions Analysis

January 16, 2020
(This document can be found at https://labor.csusb.edu/Research/research.html.)

Eric Nilsson, Ph.D.
Professor and Chair
Economics Department
California State University, San Bernardino
enilsson@csusb.edu

I-63a

**Summary**

The submitted *Air Quality Assessment* and *Greenhouse Gas Emissions Assessment*:

- Make errors that call into question the quality of their analyses.
- Use questionable, and, in some cases, obviously false assumptions.

The improved air quality and greenhouse gas emissions assessments included in this report:

- Report emission estimates that are often two to three times larger than those reported in the two *Assessments*.
- Reveal that the emissions of Nitrogen Oxides ($NO_x$) and greenhouse gasses associated with the Bridge Point Upland Project will exceed SCAQMD thresholds.

Conclusion:

- Substantial evidence exists that the Bridge Point Upland Project will have significant effects on air quality and greenhouse gas emissions. Future emissions from an expanded Project will likely be even larger.
- An Environmental Impact Report is required (PRC §21080(d)).

I-63a cont.

The *Air Quality Assessment* and the *Greenhouse Gas Emissions Assessment* (hereafter, *Assessments*), submitted as part of the draft *Mitigated Negative Declaration* of the Bridge Point Upland Project, are filled with errors and are based on implausible assumptions.

## I. Errors Pointing to Unacceptable Lack of Care

The *Air Quality Assessment* uses a table, "Long-Term Operational Emissions (Maximum Pounds Per Day),[1] to support the claim that the "Project's net emissions would not exceed SCAQMD operation thresholds."[2] This table appears as Exhibit #1 in Appendix I below.

This table is riddled with errors, both small and big.

Consider, first, a small error. The table miscalculates the value for Total Emissions (for winter) for Carbon Monoxide. The number 100. 38 appears as Total Emissions, but it should be 111.38. This mistake occurred because 85.97 and 25.16 were added together incorrectly. Because the table calculated Total Emissions incorrectly, it presents an incorrect value for Net Increase in Carbon Monoxide, one of the important numbers in the table.[3]

It gets worse.

This same table says that the source for the data in the table is "CalEEMod version 2016.3.2. Refer to Appendix A for model outputs."

But when we look at the model output appearing in Appendix A, we discover that many of the numbers appearing in the table are *different* from those appearing in the Appendix. Such differences should not exist because the tables in the Appendix are supposed to be the source of the data in the table.

In fact, of the 24 numbers appearing for mobile emissions and off-road emissions (summer and winter) *fully 22 are different from what is the alleged source of these numbers.* For instance, the Long-Term Operational Emissions table reports that mobile summer emission for ROG is 8.31, but the model output presented in the Appendix says the number is 7.27.

Exhibit #2, in Appendix I below, identifies some of these errors.

Table 3 in the *Greenhouse Gas Emissions Assessment* also has the same error.[4] This table appears as Exhibit 3 in Appendix I below. Of the 7 numbers that are claimed to be taken or derived from the model output

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[1] The table is found in two places as Table 4 (p. 23) of Volume 1 of the *Mitigated Negative Declaration* and as Table 9 (p. 23) of Appendix A-1, *Air Quality Assessment*, Volume 2 of the *Mitigated Negative Declaration.*

[2] Appendix A-1, *Air Quality Assessment*, p. 23.

[3] In the same table, the value for summer emissions of Nitrogen Oxides (NOx) from the existing gravel processing operation was incorrectly reported to be 46.60. According to a table appearing in the Appendix to the *Air Quality Assessment*, this number should have been 48.60. Because the level of Nitrogen Oxides (NOx) reported in the table is incorrect, the calculated net increase in summer emissions of NOx was likewise incorrect. See "Bridge Point Upland - Existing Rock Crushing - San Bernardino-South Coast County, Summer," found in page 2 of the Appendix to Appendix A-1, Air Quality Assessment, of Volume 2.

[4] Page 22 of the Greenhouse Gas Emissions Assessment found in Volume 2 of the MND.

appearing in the Appendix to the *Assessment*, 5 fail to match their alleged source. For instance, while Table 3 says the greenhouse gas emissions from mobile sources is 5,114, the model output appearing in the Appendix says this number is 4,712.

Exhibit 4, in Appendix I below, identifies these errors.

All these errors reveal a lack of care in the production of the two *Assessments*. For instance, it appears that the two *Assessments* were revised, and alternative model runs were performed, but someone forgot to update all the material in the *Assessments.*

Most importantly, taking these *Assessments* at face value, *we don't know where key numbers in the two tables came from or the assumptions involved in their generation.* We can *imagine* they came from some CalEEMod runs, but we are unable to see what these model runs were or the assumptions on which they were based. Critically, the two *Assessments* fail to provide support for key numbers used to draw their conclusions about air quality and greenhouse gas emissions. On this basis alone, the two *Assessments* should be rejected. I-63a cont.

## II. Interlude

At this point, the reader might be willing to acknowledge that "mistakes were made" in the production of the two *Assessments*. Further, the reader might assume that once these things are cleared up—minor errors corrected, the assumptions clearly explained, and the proper model output provided—that the *Assessments* can be salvaged and we can move forward. I-63b

Such a reader would be wrong.

## III. Implausible Model Inputs

Both the *Air Quality Assessment* and the *Greenhouse Gas Emissions Assessment* generate predictions of various emissions using the California Emissions Estimator Model (CalEEMod). This model is an appropriate tool to use. But the estimates from this model are only as good as the quality of the data input into this model.

Unfortunately, many inputs used by the two *Assessments* are implausible and, so, the estimates generated by CalEEMod, and reported in the two *Assessments*, are likewise implausible.

### A. *Use of inappropriate defaults*

CalEEMod generates estimates of emissions by using mathematical formulas that rely upon hundreds of parameters intended to capture the unique characteristics of the project being analyzed. Among these parameters are the square footage of the project, how long it takes to grade the land on which the project will be built, how far trucks drive to and from the worksite, the proportion of vehicles that are passenger cars, the quantity of emissions of carbon monoxide are generated per hours of use of light trucks working at the site, and many more.

To reduce the work required to generate emissions estimates, CalEEMod initially sets many of these parameters to default values. In many cases, the default values are reasonable guesses. But, sometimes,

I-63b cont.

particular defaults fail to capture the unique characteristics of the project, and so the analyst *must* replace the default values with values that are more appropriate for the project being analyzed.

The two *Assessments* failed to replace obviously incorrect parameter default values with values that more accurately characterized the Bridge Point Upland Project.

Let me give one example that, although not central to the analysis, transparently reveals the failure of the two *Assessments* to replace a wrong default parameter value with an easily available more accurate value.

Consider assumptions about the forklifts used in the proposed warehouse. When forklifts are used, they generate various gasses, and their contribution to undesirable emissions must be considered in air quality and greenhouse gas assessments.

Because the quantity of emissions produced by forklifts is proportional to the number of hours forklifts are used, we need estimates of the number of hours forklifts are to be used. One determinant of the numbers of hours forklifts will be used in a year is, of course, the number of days these forklifts will be used. CalEEMod sets as the default value for the number of days per year forklifts are used to 260 days, which is what would be the case if forklifts were used only five days a week. The two *Assessments* accept this default value.

However, the proposed warehouse will operate up to 365 days per year. The assumption used by the two *Assessments* that forklifts will only be used 260 days a year is obviously wrong.

If the more appropriate estimate of forklift usage of 365 days per year is used, CalEEMod will provide an estimate of forklift greenhouse gas emissions that is 40% larger than what was true in the *Greenhouse Gas Emissions Assessment.* (Note that 365/260 = 1.40.)

My point is not that more plausible estimates of forklift emissions would push emissions over the threshold for greenhouse gas emissions; alone, they would not do that as they are too small.

Instead, my point is that the two *Assessments* failed to take care that the inputs into CalEEMod were reasonable for the project it ostensibly was trying to model. If the *Assessments* failed to change a parameter value (related to forklift usage) that obviously needed to be changed, we have reason to doubt whether they paid sufficient attention to other default parameter values that needed to be changed because these defaults failed to capture essential characteristics of the project being analyzed.

I-63c

### *B. Flawed estimates of traffic generated by Bridge Point Upland Project warehouse*

The largest source of emissions from the Bridge Point Upland Project will be traffic to and from the warehouse. Large trucks delivering items to the warehouse, cars carrying employees, and vans delivering items to customers are just some of the various types of traffic—all producing emissions—that will be associated with the Bridge Point Upland Project.

Air quality and greenhouse emissions assessments often estimate the amount of traffic generated by any project by using the data provided by the Institute of Transportation Engineers (ITE) for the number of

I-63c cont.

"trips" generated by different types of land use. A trip occurs both when a vehicle arrives at a facility and when a vehicle leaves a facility.

ITE carries out empirical studies of the number trips generated by various types of land use, such as golf courses, retail stores, cemeteries, farm stands, schools, residential areas, various industrial uses, and many more. Because the amount of traffic depends on the size of the facility, ITE presents estimates of trips generated per 1,000 square foot of land use (which ITE labels as the "trip rate"), which then permits estimates for trips generated by a particular facility to be produced by multiplying the appropriate trip rate by the number of 1,000 square feet of the facility. (Later, if you multiply the estimate of trips generated by a particular facility by the average length of a trip, you get an estimate of the total miles of driving associated with the project being studied.)

Let me, first, explain how the two *Assessments* use ITE data to generate traffic estimates for the Bridge Point Upland Project. I will then point out two flaws in their methodology that lead them to significantly understate the level of traffic that will be generated by the Bridge Point Upland Project.

The *Assessments* base their estimate of traffic generated by the warehouse by using the analysis found in the *Traffic Impact Analysis,* which was also submitted for the *Mitigated Negative Declaration.* The *Traffic Impact Analysis* uses ITE's data for the trip rate associated with the average "high-cube parcel hub warehouses." The trip rate for such a warehouse is 7.75 trips (per 1,000 square feet of warehouse). However, the *Traffic Impact Analysis* adds to this basic trip rate additional trips associated with 25 truck deliveries a day. This leads to a new trip rate of 7.94 per 1,000 square feet of warehouse. The *Traffic Impact Analysis* claims that by adding this truck traffic (which ordinarily would be included in the 7.75 trip rate), it is presenting a "conservative analysis" (p.5), that is, one that overestimates traffic generated by a last-mile delivery center. The two *Assessments* use this "conservative" value for the trip rate in their emissions analyses.

Next, the *Assessments* estimate the total trips generated by the warehouse by multiplying the trip rate by a larger value for the square footage of the warehouse than what is actually planned for the warehouse. In particular, instead of using the actual square footage of 191,096, the *Assessments* assume a 266,825 square-foot warehouse. By doing so, the *Assessments* will generate a higher estimate for traffic, which will generate a higher estimate for emissions, and this is presented as generating a "conservative" (in this case, intentionally too-high) estimate of emissions produced by the Bridge Point Upland Project.

Given the methodologies used in the *Traffic Impact Analysis* and the two *Assessments*, the reader might believe what appears in the *Assessments* for emissions is the result of a double-dose of conservative methodologies (overestimating the trip rate and then overestimating the size of the warehouse). If the net level of emissions from this conservative analysis still falls short of SCAQMD thresholds with this double-dose of conservatism, this would seem to strongly support the claim that the Bridge Point Upland Project will *not* have adverse air quality and greenhouse gas consequences.

*In fact, both the Air Quality Assessment and the Greenhouse Gas Emissions Assessment present estimates of emissions that significantly* ***understate*** *the level of emissions that would be generated by the Bridge Point Upland Project.* I-63c cont.

One reason the *Assessments* underestimate emissions is that their conservative estimate of the trip rate underestimates the trip rate for the proposed warehouse. The *Assessments* treat the proposed warehouse as a "parcel hub," but the proposed warehouse will actually be an Amazon "last-mile distribution center," which will most likely have a much higher trip rate.

Let us start with the Amazon nature of the facility. Amazon fulfillment centers appear to generate higher trip rates than fulfillment centers operated by other e-commerce operations. One study showed that an Amazon fulfillment center had twice the trip rate of other similarly sized non-Amazon fulfillment centers.[5] This higher trip rate is likely due to the greater flow of orders for Amazon, compared to other e-commerce businesses, combined with the higher pace of work in Amazon facilities. It is reasonable to suppose that any Amazon warehouse, such as a last-mile distribution center, will have a higher trip rate than a similar facility operated by another business because of a greater flow of items and a faster work pace typical of Amazon facilities.

Second, for any given flow of items, an Amazon last-mile distribution center will have a higher trip rate than a typical parcel hub. Amazon will likely use Mercedes-Benz Sprinter vans, which have a cargo volume of 329 cubic feet.[6] But a parcel hub operated by, say, FedEx will use a range of delivery vans, almost all of which are larger than the Sprinter van. For instance, a common FedEx delivery van is the Isuzu Reach, which has a cargo volume of either 540 or 630 cubic feet.[7] That is, this FedEx van has 1.64 or 1.91 times the cargo space as does an Amazon Sprinter delivery van. (Note that 540/329 = 1.64 while 630/329 = 1.91.) This means that for every FedEx Isuzu Reach (of the smaller size), Amazon will need 1.64 Sprinter vans.[8] That is, for every trip FedEx might need, Amazon will need at least 1.64 trips. So, even if the flow of products out of the Amazon last-mile center is the same as the flow of items out of a typical parcel hub, the Amazon center will have a higher trip rate because it will use smaller vehicles.

On top of this, non-Amazon parcel hubs very likely load huge tractor-trailers at these hubs, which swallow a considerable proportion of items passing through these hubs. And each such tractor-trailer

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[5] See, for instance, Billy Park, Technical Memorandum: TUMF High-Cube Warehouse Trip Generation Study, January 29, 2019, p. 3, found in Western Riverside Council of Governments Technical Advisory Committee Agenda Packet, February 21, 2019 downloaded January 9, 2020 from http://www.wrcog.cog.ca.us/AgendaCenter. The trip generation study appeared to have flaws in determining the absolute level of trips, but the data on relative trips by different warehouses seems satisfactory.

[6] https://www.mbvans.com/sprinter/commercial-vans/cargo-van.

[7] https://en.wikipedia.org/wiki/Isuzu_Reach.

[8] This assumes the percentage of the volume used in the two delivery vehicles is the same. But, it very well might be that FedEx, UPS, and other non-Amazon delivery companies fill up their vans more than does Amazon as the former are more concerned with minimizing gasoline costs whereas Amazon is concerned with rapid delivery even if this means send out vans that are not as full as they might be.

would count as only a single trip. Amazon will not, of course, load up these trailers at their last-mile delivery center. I-63c cont.

In conclusion, the *Assessments*, by using the trip rate only a bit higher than a parcel hub, likely understate the trip rate for an Amazon last-mile distribution center. An Amazon last-mile center will likely involve a much higher rate of product flow than seen in a typical parcel hub and will use smaller delivery vehicles, necessitating more vehicles per cubic foot items than a parcel center.

It might be plausible, given what I've said above, that the trip rate for the proposed Upland Amazon last-mile delivery center will be twice what is seen at a typical high-cube parcel center (such as operated by FedEx or UPS). If true, the appropriate trip rate for the warehouse at the Bridge Point Upland Project might be 15.50 (= 7.75 x 2).

Further support for a higher trip rate than used by the *Assessments* is found by considering information about the Project provided by the developer. The warehouse will supposedly employ 300 permanent employees along with an unknown number of temporary employees. Assume, however, that only 200 employees work on a given day. Assume, also, that some of these employees carpool and that the average number of employees per car is 1.25. This generates for employees a total of 160 cars per day (=200/1.25). As each car generates two trips per day (coming and going), this gives us 320 trips per day for delivery center employees.

Now consider delivery trips. The parking lot will have parking spaces for 1,104 vans. Let us suppose that the number of vans operating from the delivery center is only half of that: 552 vans. Suppose that each van makes two deliveries a day. This gives us 2208 trips per day. (This is 552 x 2 x 2).

Now suppose 25 truck deliveries happen each day. This gives up 50 trips as each truck both arrives and departs.

The total trips (employee + delivery + trucks) is 2,578, which gives a trip rate (per 1,000 square feet) of the 191,096 square-foot warehouse of 13.49.

Let me make a third attempt to estimate the trip rate. Let's take at face value the claim that the maximum number of trucks bringing items to the last-mile center will be 25.[9] If these trucks are pulling a 48-foot-long trailer, then the maximum load might be around 3,400 cubic feet. If each truck is 90% loaded, this means 3,060 cubic feet of items in each load. If 25 of these trailers will be unloaded each day, we have 76,500 cubic feet of items to be delivered to customers daily. Now assume that each delivery van typically uses 30% of the maximum load space in a Sprinter van, which is 98.7 cubic feet.[10] If so, this means 775 van

[9] The developer might truly believe that 25 trucks will be the maximum, but such a belief is consistent with Amazon using more trucks after the facility opens. No binding agreement limits trucks to 25. It is also not clear that more deliveries won't be made by smaller vehicles.

[10] Online photos of the inside of Amazon vans support a guestimate of 30% use of maximum cargo volume of a Sprinter van particularly given the need for an aisle for the employee and space not usable because of the large side door and shelves larger that consistent with maximum loading. See, for instance,

deliveries will be needed. (Here, 775 approximately equals 76,500/98.7.) This would lead to 1,550 delivery trips (out and back). Combined with 320 car trips and 50 truck trips, this gives us 1,920 trips or a 10.05 trip rate, which is much smaller than the other two estimates but still larger than what the *Assessments* used. I-63c cont.

All three of my estimates for the trip rate of the Amazon last-mile delivery center significantly exceed the 7.94 trip rate the *Assessments* use. Of course, the reader should be skeptical about my three estimates. But, lacking access to Amazon's own estimate of the traffic to be generated by the Bridge Point Upland Project, we need to do the best we can with the information available to us, which I have attempted to do.

In any case, I propose as an alternative to the *Assessments* that the trip rate for the Bridge Point Upland Project delivery center will have a value of 13.01 (per 1,000 sq feet of warehouse), which is the average of the 15.50, 13.49 and 10.05 estimates I developed above.

One thing is clear: the two *Assessments* use a trip rate for an Amazon last-mile delivery center that is most likely much smaller than what it will actually be. Because of this, the two *Assessments* underestimate trips and, so, underestimate amount of traffic and, thus, underestimate emissions.

But, wait, there's more. I-63d

### *C. Inappropriate use of default trip length*

The number of trips generated by the last-mile delivery center is just one determinant of the emissions to be generated by the Bridge Point Upland Project. A second determinant is the *length* of these trips. Longer trips generate more emissions.

The *Assessments* used 6.9 miles as the average trip length for delivery trips (average of out and back trips) for the last-mile delivery center. [11] This is the CalEEMod default trip length for warehouse deliveries.

I must point out that this 6.9-mile length of a trip is also the default value CalEEMod uses for trips from hospitals, trips from retail stores, and trips by heavy industry factories. It is even the default value for delivery from parking lots, which don't have such trips. This 6.9 miles is the default trip length CalEEMod uses as defaults throughout the model. Obviously, 6.9 miles cannot be taken as a good estimate for any particular land use, and certainly not for a last-mile delivery center. But the two *Assessments* accepted this 6.9-mile length of a delivery trip without discussion or justification.

*A moment's thought leads to the conclusion that 6.9 miles is not a credible estimate for the length of trips associated with delivery vehicles leaving an Amazon last-mile delivery center.*

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https://www.nytimes.com/2018/06/28/technology/amazon-start-up-delivery-services.html and other images of the inside of loaded Amazon delivery vans.

[11] I use the term "delivery" to refer to what the CalEEMod labels as "commercial-nonwork trips," or "C-NW trips." According to the documentation for CalEEMod (*Appendix A: Calculaton Details for CalEEMod*), "The commercial-nonwork trip represents a trip associated with the commercial land use other than by customers or workers. An example of C-NW trips includes trips made by delivery vehicles of goods associated with the land use" (p. 20).

Consider the following hypothetical example. If a van leaves the Upland center to deliver packages to La Verne, the distance to La Verne is, indeed, about 6.9 miles. But once the van reaches La Verne, it might drive around for 3 hours delivering packages in the La Verne area. If the van travels an average of 20 miles per hour (taking into account delivery stops), then during this delivery trip the van will travel 66.9 miles (6.9 + 3 x 20). This is one trip for the delivery van. But, following the definitions of ITE, a second trip will be generated when the van returns, say, 6.9 miles back to the Upland center. The total for the two trips (exiting trip and entering trips) of our hypothetical journey is 73.8 miles (66.9 + 6.9). The average trip length for the two trips will be 73.8/2, or 36.9 miles. I-63d cont.

Even the shortest likely trip, a delivery to Upland lasting only an hour, will likely have an average trip length of 10 miles. This would be 0 distance to Upland then an hour driving 20 miles per hour for two trips (out and back).

A consideration of these two hypothetical trips should lead us to reject 6.9 miles as the average trip length for a delivery trip from an Amazon last-mile delivery center. The default value of 6.9 miles is just not credible.

We do not have information from the developer or Amazon about the expected typical length of a trip, and so we must use some plausible estimate for the average trip length. The empirical evidence supporting any estimate of trip length is slim, but I believe that using a 36.9-mile average trip distance is more plausible than using 6.9 miles.[12]

## IV. Should We Believe the *Air Quality Assessment* or the *Greenhouse Gas Emissions Assessment*? I-63e

No.

Above, I pointed out minor errors in the *Assessments* along with an inconsistency between the data in key tables and the alleged source in the Appendices. Alone, these problems give us reason to doubt the quality of these two *Assessments* and any conclusions they offer.

Worse, the two *Assessments* based their analysis on questionable, and, in some cases, obviously false assumptions. Most notably, the *Assessments*: (1) underestimate the number of trips that will be generated by an Amazon last-mile delivery center and (2) underestimate the length of delivery trips from the center. As a result, the *Assessments* underestimate, perhaps dramatically, the total vehicle mileage associated with the Bridge Point Upland Project.

[12] Online discussions among those who deliver Amazon packages, as flex drivers, support an estimate for trip distances on deliveries of 40 miles or more. However, whether the situation these drivers face will be the same conditions as drivers from an Upland facility can't be known. See https://www.reddit.com/r/AmazonFlexDrivers/comments/b3mm4y/how_many_miles_is_average_did_my_first_delivery/, https://www.reddit.com/r/AmazonFlexDrivers/comments/732z79/average_miles_driven/, https://www.indeed.com/cmp/Amazon-Flex/faq/is-there-a-certain-number-of-stops-you-are-required-to-do-per-block-also-on-average-how-many-miles-are-you-driving?quid=1bobafoi1aqh1bsp, https://www.moneypixels.com/rideshare/how-to-keep-your-costs-low-while-driving-for-amazon-flex

As the *Assessments* underestimate vehicle mileage, they greatly underestimate vehicle emissions. As a result, they underestimate the total emissions (which includes both those from vehicles and other sources) associated with the Bridge Point Upland Project. Most importantly, we can reject the conclusions offered in the *Assessment* that net emissions will *not* exceed SCAQMD thresholds. I-63e cont.

**V. Alternative Analysis of Emissions** I-63f

I now present an alternative analysis of the emissions associated with the operation of the Bridge Point Upland Project. I will use inputs into CalEEMod that more accurately reflect the characteristics of the Amazon last-mile delivery center proposed for Upland.

In this analysis, the vast majority of inputs into CalEEMod are identical to those used by the two *Assessments*. I do not take a stand, however, about whether all of these inputs are appropriate for the project being analyzed. A close investigation of all these many inputs is beyond the scope of this report.

I use values for six CalEEMod parameters that differ from those used by the *Assessments*.[13] The following table indicates the differences.

Table 1
Different Inputs into CalEEMod for Alternative Emissions Estimates

| Variable | *Assessments* | Alternative | Notes |
|---|---|---|---|
| Size of the warehouse (sq ft) | 266,825 | 191,096 | Use the actual size of the warehouse. |
| Days per year forklifts used | 260 | 365 | More plausible estimate as discussed above. |
| Trip rate for delivery center (trips per 1000 sq ft) | 7.94 | 13.01 | This is an average of 15.50, 13.49 and 10.05 as discussed above. |
| Average length delivery trips (miles) | 6.9 | 36.9 | More plausible estimate of the distance of delivery trips as discussed above. |
| Percent Employee Trips (%) | 59 | 12 | To reflect a higher level of delivery trips vs. employee trips. See below. |
| Percent Delivery Trips (%) | 41 | 88 | To reflect a higher level of delivery trips vs. employee trips. See below. |

The only changes appearing in Table 1 not discussed previously are those for Percent Employee Trips and Percent Delivery Trips.[14] Percent Employee Trips is the percent of trips associated with the last-mile delivery center that involve employees driving to and from work. Percent Delivery Trips is the percent of

[13] I was able to reproduce exactly the output for operational activities appearing in the Appendices of the two *Assessments*. I was not able to reproduce many of the results presented in the text of the *Assessments* because, as noted above, many of the results reported in the text tables came from CalEEMod runs that were not presented in the document and, so, I was not able to determine what assumptions on which these estimates were based. Because I could exactly reproduce the operational emissions reported in the *Assessments*, I am confident that the only cause of the difference between what I report here and what is reported in the *Assessments* are the difference noted in the Table 1.

[14] In CalEEMod, Percent Employee Trips appears as "Non Res C-W Trip (%)" while Percent Delivery Trips appears as "Non Res C-NW Trip (%)."

I-63f cont.

trips associated with the delivery center that involve deliveries. The two numbers add up to 100%. My estimates for these two numbers came from my second attempt above to develop an estimate for the trip rate for the delivery center. In this attempt, I used 320 employee trips, 2208 van delivery trips, and 50 truck delivery trips. This works out to 12% employee trips and 88% delivery trips.

Unlike the two *Assessments*, I use the actual size of the planned facility (191,096) in my analysis and, so, I do not artificially inflate my estimates of emissions by using a larger-than-actual size of the warehouse (266,825 sq ft). What I present are the best estimate of actual emissions with no built-in overestimation.

**Air Quality Impact of Upland Project**

My alternative estimates of the impact of the Upland Project appear in the Table 2:[15]

Table 2
Long-Term Operational Emissions (Maximum Pounds Per Day)

| Source | ROG | NOx | CO | SO2 | PM10 | PM2.5 |
|---|---|---|---|---|---|---|
| Existing Gravel Processing Operations | | | | | | |
| Summer Emissions | 4.87 | 48.60 | 32.14 | 0.08 | 2.42 | 2.07 |
| Winter Emissions | 4.87 | 48.61 | 31.92 | 0.08 | 2.42 | 2.07 |
| Proposed Project-Summer Emissions | | | | | | |
| Area Source Emissions | 5.07 | 0.00 | 0.11 | 0.00 | 0.00 | 0.00 |
| Energy Emissions | 0.01 | 0.11 | 0.09 | 0.00 | 0.01 | 0.01 |
| Mobile Emissions | 15.71 | 179.43 | 237.30 | 0.90 | 65.70 | 18.81 |
| Off-Road Emissions | 1.56 | 14.22 | 14.08 | 0.02 | 1.01 | 0.93 |
| Total Emissions | 22.35 | 193.76 | 251.58 | 0.92 | 66.72 | 19.75 |
| **Net Increase** | **17.48** | **145.16** | **219.44** | **0.84** | **64.30** | **17.68** |
| SCAQMD Threshold | 55.00 | 55.00 | 550.00 | 150.00 | 150.00 | 55.00 |
| Exceeds Threshold? | No | **YES** | No | No | No | No |
| | | | | | | |
| Proposed Project-Winter Emissions | | | | | | |
| Area Source Emissions | 5.07 | 0.00 | 0.11 | 0.00 | 0.00 | 0.00 |
| Energy Emissions | 0.01 | 0.11 | 0.09 | 0.00 | 0.01 | 0.01 |
| Mobile Emissions | 14.92 | 187.66 | 210.51 | 0.86 | 65.70 | 18.81 |
| Off-Road Emissions | 1.56 | 14.22 | 14.08 | 0.02 | 1.01 | 0.93 |
| Total Emissions | 21.56 | 201.99 | 224.79 | 0.88 | 66.72 | 19.75 |
| **Net Increase** | **16.69** | **153.38** | **192.87** | **0.80** | **64.30** | **17.68** |
| SCAQMD Threshold | 55.00 | 55.00 | 550.00 | 150.00 | 150.00 | 55.00 |
| Exceeds Threshold? | No | **YES** | No | No | No | No |

Sources: CalEEMod version 2016.3.2. Refer to Appendix IIa and Appendix IIb for model output; *Air Quality Assessment* (for existing gravel processing operations).

[15] I did not generate new results for "Existing Gravel Processing Operations" but used the numbers reported in the *Air Quality Assessment*, although they were corrected where necessary because of a mistake in the *Assessment*.

I-63f cont.

The key numbers in Table 2 are for Net Increase in the various emissions. This row is bolded. Net Increase in emissions is equal to the Total Emissions generated by the "Proposed Project" minus the emissions that are generated by the existing gravel processing operation. And, so, for ROG we get a Net Increase of 17.48 because 22.35 – 4.87 = 17.48. The Net Increase in emissions reported in Table 2 are, except for ROG, about three times larger than what the *Air Quality Assessment* reported. The *Air Quality Assessment* underestimated the emissions to be generated by the Upland Project.

Most importantly, Table 2 shows that the Net Increase in emissions of Nitrogen Oxides ($NO_x$) exceeds SCAQMD thresholds in both the summer and winter. For instance, in the summer, Net Increase in emissions for $NO_x$ is 145.16 whereas the SCAQMD threshold is 55.00. Net Increase in winter emissions of $NO_x$ is 152.38 whereas the SCAQMD threshold is, again, 55.00. In both cases, emissions of $NO_x$ are more than 2.5 times the thresholds.

The Bridge Point Upland Project will have a detrimental impact on air quality.

**Greenhouse Gas Emissions of Upland Project**

Geenhouse gases are the cause of global climate change. As it operates, the Upland Project will lead to the emission of various greenhouse gases.

Table 3 reports the emissions of greenhouse gases associated with the Upland Project. As above, the number to focus on is Net Increase. The Net Increase in greenhouse gases is 14,577 metric tons of carbon dioxide equivalent. This exceeds the SCAQMD industrial project threshold for such gases.

Table 3
Project Greenhouse Gas Emissions
($MTCO_2e$ per Year)

| Emissions Source: | |
|---|---|
| Construction Amortized Over 30 Years | 34 |
| Area Source | 0 |
| Energy | 352 |
| Mobile | 14,553 |
| Off-road | 296 |
| Waste | 39 |
| Water and Wastewater | 202 |
| Total | 15,476 |
| Existing Emissions | 899 |
| **Net Increase** | **14,577** |
| SCAQMD Industrial Project Threshold | **10,000** |
| Exceeds SCAQMD Threshold? | **YES** |

Sources: CalEEMod version 2016.3.2. Refer to Appendix IIc for model output; *Greenhouse Gas Emissions Assessment* (for Construction Amortized over 30 Years).

It is an open question, though, whether the *industrial* project threshold is the proper one to use. Some might argue that a lower threshold—one more appropriate to what is actually a commercial operation—should be applied. The Upland Project is part of a commercial operation and is not part of an industrial operation. I-63f cont.

In any case, the greenhouse gas emissions associated with the Upland Project exceed even the higher industrial threshold, and does so by over 45%. The Total Emissions reported in Table 3 are 2.5 times larger than what the *Greenhouse Gas Emissions Assessment* reported.

In short, the Bridge Point Upland Project will have a significant impact on greenhouse gases.

## VI. The Elephant in the Room…Or Parking Lot: 1,104 Van Parking Spaces

I-63g

A reasonable person would believe that Amazon plans to increase, in the future, deliveries above what we have assumed above. Why else build 1,104 van parking spaces?

With Amazon operating more delivery vans in the future, the warehouse itself will have to receive more deliveries, which will require more trucks driving to the warehouse. The warehouse might also need more employees. The result will be, in the future, more miles driven by vehicles associated with the warehouse and, so, more emissions.

CEQA states, "it is the policy of the state to…develop and maintain a high-quality environment now *and in the future…*" (italics added) (PRC 21001). This implies that environmental assessments should not be limited to what a project will do in, say, the first year of operation *if it can be reasonably inferred that the project will potentially cause greater environmental harm in the future.*

Indeed, CEQA states, "The purpose of an environmental impact report is to identify the significant effects on the environment of a project" (PRC 21002.1). If future effects will be greater than near-term effects, an environmental impact report needs to quantify, as best as possible, these future impacts if it is to "identify the significant effects" of some project. Nothing in CEQA limits the purview of an environmental impact report to what happens when a project first goes into operation.

An environmental assessment of the Bridge Point Upland Project should, then, estimate the emissions that will be produced by the Project after Amazon has expanded the operation to its maximum size. Anything short of that might fail to meet the spirit and perhaps even the letter of CEQA.

The approach taken by the *Assessments* and by the current report is, then, inadequate. They have only considered the impact of the initial stages of the Upland Project, and did not consider the very possible larger future environmental impact of the Upland Project.

## VII. Conclusion

I-63h

The *Air Quality Assessment* and *Greenhouse Gas Emissions Assessment* submitted for inclusion in the *Mitigated Negative Declaration* make mistakes. They also make assumptions that are not credible. As a result, the *Assessments* themselves are not credible.

I-63h cont.

Substantial evidence, presented above, suggests that the Bridge Point Upland Project will have significant effects on the environment. In particular, the release of Nitrogen Oxides ($NO_x$) and greenhouse gases will exceed SCAQMD thresholds. According to CEQA, an Environmental Impact Report is therefore required (PRC §21080(d)).

A good reason exists to believe that the *future* emissions of the Upland Project will be even larger than the current report estimates. A fully adequate Environmental Impact Report should consider the environmental impact of the Upland Project after it reaches its ultimate size.

## Appendix I

This appendix presents the two key tables from the *Assessments* along with material related to the errors appearing in these two tables.

Exhibit 1

This table comes from the *Air Quality Assessment*, which appears in *Volume 2* of the *Mitigated Negative Declaration*. It also appears as Table 4 in the *Mitigated Negative Declaration*.

**Table 9: Long-Term Operational Emissions (Maximum Pounds Per Day)**

| Source | Reactive Organic Gases (ROG) | Nitrogen Oxide ($NO_x$) | Carbon Monoxide (CO) | Sulfur Dioxide ($SO_2$) | Coarse Particulate Matter ($PM_{10}$) | Fine Particulate Matter ($PM_{2.5}$) |
|---|---|---|---|---|---|---|
| **Existing Gravel Processing Operations** | | | | | | |
| Summer Emissions | 4.87 | 46.60 | 32.14 | 0.08 | 2.42 | 2.07 |
| Winter Emissions | 4.87 | 48.61 | 31.92 | 0.08 | 2.43 | 2.07 |
| **Proposed Project – Summer Emissions** | | | | | | |
| Area Source Emissions | 6.76 | 0.0 | 0.12 | 0.0 | 0.0 | 0.0 |
| Energy Emissions | 0.02 | 0.15 | 0.13 | 0.0 | 0.01 | 0.01 |
| Mobile Emissions | 8.31 | 70.32 | 94.69 | 0.32 | 22.16 | 6.37 |
| Off-Road Emissions | 1.73 | 15.57 | 14.16 | 0.02 | 1.16 | 1.07 |
| *Total Emissions* | *16.82* | *86.05* | *109.10* | *0.34* | *23.33* | *7.44* |
| **Net Increase** | **11.94** | **39.45** | **76.96** | **0.26** | **20.91** | **5.37** |
| SCAQMD Threshold | 55 | 55 | 550 | 150 | 150 | 55 |
| **Exceeds Threshold?** | **No** | **No** | **No** | **No** | **No** | **No** |
| **Proposed Project – Winter Emissions** | | | | | | |
| Area Source Emissions | 6.76 | 0.0 | 0.12 | 0.0 | 0.0 | 0.0 |
| Energy Emissions | 0.02 | 0.15 | 0.13 | 0.0 | 0.01 | 0.01 |
| Mobile Emissions | 7.72 | 72.98 | 85.97 | 0.30 | 22.16 | 6.37 |
| Off-Road Emissions | 1.73 | 15.57 | 25.16 | 0.02 | 1.16 | 1.07 |
| *Total Emissions* | *16.22* | *88.70* | *100.38* | *0.32* | *23.33* | *7.45* |
| **Net Increase** | **11.35** | **40.09** | **68.46** | **0.24** | **20.9** | **5.38** |
| SCAQMD Threshold | 55 | 55 | 550 | 150 | 150 | 55 |
| **Exceeds Threshold?** | **No** | **No** | **No** | **No** | **No** | **No** |

Source: CalEEMod version 2016.3.2. Refer to Appendix A for model outputs.

Exhibit 2

Here are some of the inconsistencies between a key text table in the *Air Quality Assessment* and the Appendix material. Sections of Table 9 and Appendix table 2.2 appear below.[16] I added the boxes and arrows.

As pointed out above, the value for ROG in the two tables differs: 8.31 in the top table and 7.2707 in the bottom table. These two numbers should be the same because the bottom table was supposed to be the source for the top table.

All the numbers in the box in the top table are supposed to match the numbers appearing in the boxed section in the bottom table. But none do. The same inconsistencies between Mobile Emissions for Winter and the relevant CalEEMod output appears in the Appendix to the Air Quality Assessment.

**Table 9: Long-Term Operational Emissions (Maximum Pounds Per Day)**

| Source | Reactive Organic Gases (ROG) | Nitrogen Oxide ($NO_x$) | Carbon Monoxide (CO) | Sulfur Dioxide ($SO_2$) | Coarse Particulate Matter ($PM_{10}$) | Fine Particulate Matter ($PM_{2.5}$) |
|---|---|---|---|---|---|---|
| **Existing Gravel Processing Operations** | | | | | | |
| Summer Emissions | 4.87 | 46.60 | 32.14 | 0.08 | 2.42 | 2.07 |
| Winter Emissions | 4.87 | 48.61 | 31.92 | 0.08 | 2.43 | 2.07 |
| **Proposed Project – Summer Emissions** | | | | | | |
| Area Source Emissions | 6.76 | 0.0 | 0.12 | 0.0 | 0.0 | 0.0 |
| Energy Emissions | 0.02 | 0.15 | 0.13 | 0.0 | 0.01 | 0.01 |
| Mobile Emissions | 8.31 | 70.32 | 94.69 | 0.32 | 22.16 | 6.37 |
| Off-Road | [illegible] | [illegible] | [illegible] | [illegible] | [illegible] | [illegible] |

**2.2 Overall Operational**

**Unmitigated Operational**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | | |
| Area | 6.7575 | 1.2700e-003 | 0.1166 | 1.0000e-005 | | 4.2000e-004 | 4.2000e-004 | | 4.2000e-004 | 4.2000e-004 | | 0.2496 |
| Energy | 0.0167 | 0.1516 | 0.1272 | 9.1000e-004 | | 0.0115 | 0.0115 | | 0.0115 | 0.0115 | | 161.742 |
| Mobile | 7.2707 | 62.2075 | 81.9423 | 0.2906 | 20.3490 | 0.4165 | 20.7655 | 5.5506 | 0.3906 | 5.9461 | | 29,647.7[illegible]21 |
| Offroad | 1.5519 | 14.1495 | 14.0142 | 0.0165 | | 1.0044 | 1.0044 | | 0.9240 | 0.9240 | | 1,775.57[illegible]0 |
| Total | 15.6968 | 76.6086 | 96.2004 | 0.3119 | 20.3490 | 1.4328 | 21.7817 | 5.5506 | 1.3315 | 6.8821 | | 31,606.5[illegible]02 |

[16] The Appendix table 2.2 is the same as that which follows for "Mitigated Operational" but I use 2.2 because the table for "Mitigated Operational" was split over two pages. The numbers are the same in the two Appendix tables.

Exhibit 3

This table comes from the *Greenhouse Gas Emissions Assessment*, which appears in *Volume 2* of the *Mitigated Negative Declaration*. It also appears as Table 9 in the *Mitigated Negative Declaration*.

**Table 3: Project Greenhouse Gas Emissions**

| Emissions Source | $MTCO_2e$ per Year |
|---|---|
| Construction Amortized Over 30 Years | 34 |
| Area Source | 0.03 |
| Energy | 418 |
| Mobile | 5,114 |
| Off-road | 211 |
| Waste | 66 |
| Water and Wastewater | 278 |
| Total | 6,121 |
| Existing Emissions | 899 |
| **Net Increase** | **5,222** |
| SCAQMD Industrial Project Threshold | 10,000 |
| **Exceeds SCAQMD Threshold?** | **No** |
| Source: CalEEMod version 2016.3.2. Refer to Appendix A for model outputs. | |

Exhibit 4

Here are some of the inconsistencies between a key text table of the *Greenhouse Gas Emissions Assessment* and the Appendix material (Table 2.2 Overall Operational, Mitigated Operational, Appendix A to the *Greenhouse Gas Emissions Assessment*). I added the box and arrow. The boxed numbers in the lower table are supposed to be the source for the data in the upper table. But only one of the five numbers match.

**Table 3: Project Greenhouse Gas Emissions**

| Emissions Source | $MTCO_2e$ per Year |
|---|---|
| Construction Amortized Over 30 Years | 34 |
| Area Source | 0.03 |
| Energy | 418 |
| Mobile | 5,114 |
| Off-road | 211 |
| Waste | 66 |
| Water and Wastewater | 278 |
| *Total* | *6,121* |
| Existing Emissions | 899 |
| **Net Increase** | **5,222** |
| SCAQMD Industrial Project Threshold | 10,000 |
| **Exceeds SCAQMD Threshold?** | **No** |

Source: CalEEMod version 2016.3.2. Refer to Appendix A for model outputs.

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio-CO2 | NBio-CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | kms/yr | | | | | | | | | | MT/yr | | | | | |
| Area | 1.2326 | 1.3000e-004 | 0.0146 | 0.0000 | | 5.0000e-005 | 5.0000e-005 | | 5.0000e-005 | 5.0000e-005 | 0.0000 | 0.0282 | 0.0282 | 7.0000e-005 | 0.0000 | 0.0301 |
| Energy | 3.0400e-003 | 0.0276 | 0.0232 | 1.7000e-004 | | 2.1000e-003 | 2.1000e-003 | | 2.1000e-003 | 2.1000e-003 | 0.0000 | 416.7005 | 416.7005 | 0.0105 | 3.8500e-003 | 418.2625 |
| Mobile | 1.2115 | 11.9882 | 13.8880 | 0.0512 | 3.6365 | 0.0758 | 3.7123 | 0.9808 | 0.0719 | 1.0627 | 0.0000 | 4,712.1687 | 4,712.1687 | 0.1051 | 0.0000 | 4,716.2960 |
| Offroad | 0.2018 | 1.8394 | 1.8218 | 2.3800e-003 | | 0.1306 | 0.1306 | | 0.1201 | 0.1201 | 0.0000 | 209.4944 | 209.4944 | 0.0678 | 0.0000 | 211.1883 |
| Waste | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 26.5218 | 0.0000 | 26.5218 | 1.9674 | 0.0000 | 65.7966 |
| Water | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 15.8482 | 208.7579 | 224.6060 | 1.6364 | 0.0402 | 277.5005 |
| Total | 2.6490 | 13.8554 | 15.7296 | 0.0538 | 3.6365 | 0.2085 | 3.8450 | 0.9808 | 0.1942 | 1.1880 | 42.3700 | 5,347.1497 | 5,389.3191 | 3.4532 | 0.0441 | 5,488.9846 |

## Appendix II

What follows is the output from the CalEEMod model, which provides the numbers appearing in Table 2 and Table 3 of the text above. Three sets of output are included, one for summer emissions (Appendix IIa), one for winter emissions (Appendix IIb), and one giving annual greenhouse gas emissions (Appendix IIc). Only a single table in each of these Appendices provides the numbers that appear in Table 2 and Table 3: "2.2 Overall Operational."

# Appendix IIa

## CalEEMod Output: Summer Emission

# Bridge Point Upland Project

**San Bernardino-South Coast County, Summer**

## 1.0 Project Characteristics

### 1.1 Land Usage

| Land Uses | Size | Metric | Lot Acreage | Floor Surface Area | Population |
|---|---|---|---|---|---|
| Unrefrigerated Warehouse-No Rail | 191.10 | 1000sqft | 4.39 | 191,096.00 | 0 |
| Parking Lot | 861.05 | 1000sqft | 19.77 | 1,306,800.00 | 0 |
| Regional Shopping Center | 10.00 | 1000sqft | 0.23 | 10,000.00 | 0 |

### 1.2 Other Project Characteristics

| | | | | | |
|---|---|---|---|---|---|
| **Urbanization** | Urban | **Wind Speed (m/s)** | 2.2 | **Precipitation Freq (Days)** | 32 |
| **Climate Zone** | 10 | | | **Operational Year** | 2021 |
| **Utility Company** | Southern California Edison | | | | |
| **CO2 Intensity (lb/MWhr)** | 702.44 | **CH4 Intensity (lb/MWhr)** | 0.029 | **N2O Intensity (lb/MWhr)** | 0.006 |

### 1.3 User Entered Comments & Non-Default Data

Bridge Point Upland Project - San Bernardino-South Coast County, Summer

Project Characteristics -

Land Use - 1,306,800 as per Kimley-Horn

Construction Phase - Total Days as per Kimley-Horn

Off-road Equipment - Equipment amounts as per Kimley-Horn

Off-road Equipment -

Off-road Equipment - Equipment as per Kimley-Horn

Off-road Equipment -

Grading - Total Acres Graded as per Kimley-Horn; Material Exported as per Kimley-Horn

Trips and VMT - Trip Length Hauling as per Kimley-Horn

Vehicle Trips - Regional Shopping Center Trip Rates as per Kimley-Horn
Unrefrigerated Warehouse Trip Rates: new estimates; Non Res C-NW Length: new estimate; Trip %: new estimate

Fleet Mix - Unrefrigerated Warehouse vehicle mix: as per Kimley-Horn

Operational Off-Road Equipment - # equipment and fuel type: as per Kimley-Horn
Days/Year: new estimate

Construction Off-road Equipment Mitigation - Unpaved Road Mitigation and Clean Paved Road Mitigation: as per Kimley-Horn

| Table Name | Column Name | Default Value | New Value |
|---|---|---|---|
| tblConstDustMitigation | CleanPavedRoadPercentReduction | 0 | 6 |
| tblConstDustMitigation | WaterUnpavedRoadMoistureContent | 0 | 12 |
| tblConstDustMitigation | WaterUnpavedRoadVehicleSpeed | 0 | 15 |
| tblConstructionPhase | NumDays | 20.00 | 66.00 |
| tblConstructionPhase | NumDays | 370.00 | 105.00 |
| tblConstructionPhase | NumDays | 20.00 | 0.00 |
| tblConstructionPhase | NumDays | 20.00 | 10.00 |
| tblConstructionPhase | NumDays | 10.00 | 2.00 |
| tblConstructionPhase | PhaseEndDate | 11/26/2021 | 8/31/2020 |
| tblConstructionPhase | PhaseEndDate | 10/1/2021 | 8/18/2020 |
| tblConstructionPhase | PhaseEndDate | 2/28/2020 | 1/31/2020 |

| | | | |
|---|---|---|---|
| tblConstructionPhase | PhaseEndDate | 5/1/2020 | 3/24/2020 |
| tblConstructionPhase | PhaseEndDate | 10/29/2021 | 9/1/2020 |
| tblConstructionPhase | PhaseEndDate | 3/13/2020 | 2/4/2020 |
| tblConstructionPhase | PhaseStartDate | 10/30/2021 | 6/1/2020 |
| tblConstructionPhase | PhaseStartDate | 5/2/2020 | 3/25/2020 |
| tblConstructionPhase | PhaseStartDate | 3/14/2020 | 2/5/2020 |
| tblConstructionPhase | PhaseStartDate | 10/2/2021 | 8/19/2020 |
| tblConstructionPhase | PhaseStartDate | 2/29/2020 | 2/1/2020 |
| tblFleetMix | HHD | 0.06 | 0.02 |
| tblFleetMix | LDA | 0.55 | 0.23 |
| tblFleetMix | LDT1 | 0.04 | 0.04 |
| tblFleetMix | LDT2 | 0.18 | 0.18 |
| tblFleetMix | LHD1 | 0.02 | 0.38 |
| tblFleetMix | LHD2 | 5.2670e-003 | 5.4600e-003 |
| tblFleetMix | MCY | 6.0000e-003 | 6.1170e-003 |
| tblFleetMix | MDV | 0.12 | 0.12 |
| tblFleetMix | MH | 1.0100e-003 | 0.00 |
| tblFleetMix | MHD | 0.02 | 0.02 |
| tblFleetMix | OBUS | 1.3480e-003 | 0.00 |
| tblFleetMix | SBUS | 8.1200e-004 | 0.00 |
| tblFleetMix | UBUS | 1.6070e-003 | 0.00 |
| tblGrading | AcresOfGrading | 175.00 | 225.00 |
| tblGrading | MaterialExported | 0.00 | 431.00 |
| tblLandUse | LandUseSquareFeet | 191,100.00 | 191,096.00 |
| tblLandUse | LandUseSquareFeet | 861,050.00 | 1,306,800.00 |
| tblOffRoadEquipment | OffRoadEquipmentUnitAmount | 1.00 | 2.00 |
| tblOffRoadEquipment | OffRoadEquipmentUnitAmount | 2.00 | 4.00 |

| | | | |
|---|---|---|---|
| tblOffRoadEquipment | OffRoadEquipmentUnitAmount | 1.00 | 2.00 |
| tblOffRoadEquipment | OffRoadEquipmentUnitAmount | 2.00 | 4.00 |
| tblOperationalOffRoadEquipment | OperDaysPerYear | 260.00 | 365.00 |
| tblOperationalOffRoadEquipment | OperFuelType | Diesel | CNG |
| tblOperationalOffRoadEquipment | OperLoadFactor | 0.20 | 0.20 |
| tblOperationalOffRoadEquipment | OperOffRoadEquipmentNumber | 0.00 | 12.00 |
| tblTripsAndVMT | HaulingTripLength | 20.00 | 10.00 |
| tblTripsAndVMT | WorkerTripNumber | 33.00 | 20.00 |
| tblVehicleTrips | CNW_TL | 6.90 | 36.90 |
| tblVehicleTrips | CNW_TTP | 41.00 | 88.00 |
| tblVehicleTrips | CW_TTP | 59.00 | 12.00 |
| tblVehicleTrips | ST_TR | 49.97 | 7.75 |
| tblVehicleTrips | ST_TR | 1.68 | 13.01 |
| tblVehicleTrips | SU_TR | 25.24 | 7.75 |
| tblVehicleTrips | SU_TR | 1.68 | 13.01 |
| tblVehicleTrips | WD_TR | 42.70 | 7.75 |
| tblVehicleTrips | WD_TR | 1.68 | 13.01 |

## 2.0 Emissions Summary

## 2.1 Overall Construction (Maximum Daily Emission)

**Unmitigated Construction**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | lb/day | | | | | | | | | | lb/day | | | | | |
| 2020 | 41.5414 | 85.1995 | 59.6805 | 0.1859 | 18.2675 | 3.5286 | 20.4662 | 9.9840 | 3.2464 | 12.0069 | 0.0000 | 18,748.7010 | 18,748.7010 | 3.4353 | 0.0000 | 18,783.3746 |
| **Maximum** | **41.5414** | **85.1995** | **59.6805** | **0.1859** | **18.2675** | **3.5286** | **20.4662** | **9.9840** | **3.2464** | **12.0069** | **0.0000** | **18,748.7010** | **18,748.7010** | **3.4353** | **0.0000** | **18,783.3746** |

**Mitigated Construction**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | lb/day | | | | | | | | | | lb/day | | | | | |
| 2020 | 41.5414 | 85.1995 | 59.6805 | 0.1859 | 18.2570 | 3.5286 | 20.4557 | 9.9815 | 3.2464 | 12.0043 | 0.0000 | 18,748.7010 | 18,748.7010 | 3.4353 | 0.0000 | 18,783.3746 |
| **Maximum** | **41.5414** | **85.1995** | **59.6805** | **0.1859** | **18.2570** | **3.5286** | **20.4557** | **9.9815** | **3.2464** | **12.0043** | **0.0000** | **18,748.7010** | **18,748.7010** | **3.4353** | **0.0000** | **18,783.3746** |

| | **ROG** | **NOx** | **CO** | **SO2** | **Fugitive PM10** | **Exhaust PM10** | **PM10 Total** | **Fugitive PM2.5** | **Exhaust PM2.5** | **PM2.5 Total** | **Bio- CO2** | **NBio-CO2** | **Total CO2** | **CH4** | **N20** | **CO2e** |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Percent Reduction** | **0.00** | **0.00** | **0.00** | **0.00** | **0.06** | **0.00** | **0.05** | **0.03** | **0.00** | **0.02** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** |

## 2.2 Overall Operational

**Unmitigated Operational**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Area | 5.0650 | 1.0000e-003 | 0.1089 | 1.0000e-005 | | 3.9000e-004 | 3.9000e-004 | | 3.9000e-004 | 3.9000e-004 | | 0.2325 | 0.2325 | 6.2000e-004 | | 0.2479 |
| Energy | 0.0121 | 0.1102 | 0.0925 | 6.6000e-004 | | 8.3700e-003 | 8.3700e-003 | | 8.3700e-003 | 8.3700e-003 | | 132.1917 | 132.1917 | 2.5300e-003 | 2.4200e-003 | 132.9773 |
| Mobile | 15.7092 | 179.4280 | 237.3036 | 0.9036 | 64.4015 | 1.3025 | 65.7039 | 17.5708 | 1.2375 | 18.8084 | | 91,525.3156 | 91,525.3156 | 2.7620 | | 91,594.3665 |
| Offroad | 1.5597 | 14.2203 | 14.0843 | 0.0184 | | 1.0094 | 1.0094 | | 0.9286 | 0.9286 | | 1,785.2518 | 1,785.2518 | 0.5774 | | 1,799.6865 |
| **Total** | **22.3461** | **193.7595** | **251.5892** | **0.9227** | **64.4015** | **2.3206** | **66.7221** | **17.5708** | **2.1749** | **19.7457** | | **93,442.9916** | **93,442.9916** | **3.3426** | **2.4200e-003** | **93,527.2782** |

## 2.2 Overall Operational

**Mitigated Operational**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Area | 5.0650 | 1.0000e-003 | 0.1089 | 1.0000e-005 | | 3.9000e-004 | 3.9000e-004 | | 3.9000e-004 | 3.9000e-004 | | 0.2325 | 0.2325 | 6.2000e-004 | | 0.2479 |
| Energy | 0.0121 | 0.1102 | 0.0925 | 6.6000e-004 | | 8.3700e-003 | 8.3700e-003 | | 8.3700e-003 | 8.3700e-003 | | 132.1917 | 132.1917 | 2.5300e-003 | 2.4200e-003 | 132.9773 |
| Mobile | 15.7092 | 179.4280 | 237.3036 | 0.9036 | 64.4015 | 1.3025 | 65.7039 | 17.5708 | 1.2375 | 18.8084 | | 91,525.3156 | 91,525.3156 | 2.7620 | | 91,594.3665 |
| Offroad | 1.5597 | 14.2203 | 14.0843 | 0.0184 | | 1.0094 | 1.0094 | | 0.9286 | 0.9286 | | 1,785.2518 | 1,785.2518 | 0.5774 | | 1,799.6865 |
| **Total** | **22.3461** | **193.7595** | **251.5892** | **0.9227** | **64.4015** | **2.3206** | **66.7221** | **17.5708** | **2.1749** | **19.7457** | | **93,442.9916** | **93,442.9916** | **3.3426** | **2.4200e-003** | **93,527.2782** |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Percent Reduction** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** |

## 3.0 Construction Detail

**Construction Phase**

Bridge Point Upland Project - San Bernardino-South Coast County, Summer

| Phase Number | Phase Name | Phase Type | Start Date | End Date | Num Days Week | Num Days | Phase Description |
|---|---|---|---|---|---|---|---|
| 1 | Demolition | Demolition | 2/1/2020 | 1/31/2020 | 5 | 0 | |
| 2 | Site Preparation | Site Preparation | 2/1/2020 | 2/4/2020 | 5 | 2 | |
| 3 | Grading | Grading | 2/5/2020 | 3/24/2020 | 5 | 35 | |
| 4 | Building Construction | Building Construction | 3/25/2020 | 8/18/2020 | 5 | 105 | |
| 5 | Architectural Coating | Architectural Coating | 6/1/2020 | 8/31/2020 | 5 | 66 | |
| 6 | Paving | Paving | 8/19/2020 | 9/1/2020 | 5 | 10 | |

**Acres of Grading (Site Preparation Phase): 0**

**Acres of Grading (Grading Phase): 225**

**Acres of Paving: 19.77**

**Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 301,644; Non-Residential Outdoor: 100,548; Striped Parking Area: 78,408 (Architectural Coating – sqft)**

**OffRoad Equipment**

Bridge Point Upland Project - San Bernardino-South Coast County, Summer

| Phase Name | Offroad Equipment Type | Amount | Usage Hours | Horse Power | Load Factor |
|---|---|---|---|---|---|
| Architectural Coating | Air Compressors | 2 | 6.00 | 78 | 0.48 |
| Demolition | Excavators | 3 | 8.00 | 158 | 0.38 |
| Demolition | Concrete/Industrial Saws | 1 | 8.00 | 81 | 0.73 |
| Grading | Excavators | 4 | 8.00 | 158 | 0.38 |
| Building Construction | Cranes | 1 | 7.00 | 231 | 0.29 |
| Building Construction | Forklifts | 3 | 8.00 | 89 | 0.20 |
| Building Construction | Generator Sets | 1 | 8.00 | 84 | 0.74 |
| Paving | Pavers | 2 | 8.00 | 130 | 0.42 |
| Paving | Rollers | 2 | 8.00 | 80 | 0.38 |
| Demolition | Rubber Tired Dozers | 2 | 8.00 | 247 | 0.40 |
| Grading | Rubber Tired Dozers | 1 | 8.00 | 247 | 0.40 |
| Building Construction | Tractors/Loaders/Backhoes | 3 | 7.00 | 97 | 0.37 |
| Grading | Graders | 2 | 8.00 | 187 | 0.41 |
| Grading | Tractors/Loaders/Backhoes | 2 | 8.00 | 97 | 0.37 |
| Paving | Paving Equipment | 2 | 8.00 | 132 | 0.36 |
| Site Preparation | Tractors/Loaders/Backhoes | 4 | 8.00 | 97 | 0.37 |
| Site Preparation | Rubber Tired Dozers | 3 | 8.00 | 247 | 0.40 |
| Grading | Scrapers | 4 | 8.00 | 367 | 0.48 |
| Building Construction | Welders | 1 | 8.00 | 46 | 0.45 |

**Trips and VMT**

| Phase Name | Offroad Equipment Count | Worker Trip Number | Vendor Trip Number | Hauling Trip Number | Worker Trip Length | Vendor Trip Length | Hauling Trip Length | Worker Vehicle Class | Vendor Vehicle Class | Hauling Vehicle Class |
|---|---|---|---|---|---|---|---|---|---|---|
| Architectural Coating | 2 | 126.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Building Construction | 9 | 632.00 | 247.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Demolition | 6 | 15.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Grading | 13 | 20.00 | 0.00 | 54.00 | 14.70 | 6.90 | 10.00 | LD_Mix | HDT_Mix | HHDT |
| Paving | 6 | 15.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Site Preparation | 7 | 18.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |

## 3.1 Mitigation Measures Construction

Water Unpaved Roads

Reduce Vehicle Speed on Unpaved Roads

Clean Paved Roads

## 3.2 Demolition - 2020

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 3.2 Demolition - 2020

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 3.2 Demolition - 2020

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 3.3 Site Preparation - 2020

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 18.0663 | 0.0000 | 18.0663 | 9.9307 | 0.0000 | 9.9307 | | | 0.0000 | | | 0.0000 |
| Off-Road | 4.0765 | 42.4173 | 21.5136 | 0.0380 | | 2.1974 | 2.1974 | | 2.0216 | 2.0216 | | 3,685.1016 | 3,685.1016 | 1.1918 | | 3,714.8975 |
| **Total** | **4.0765** | **42.4173** | **21.5136** | **0.0380** | **18.0663** | **2.1974** | **20.2637** | **9.9307** | **2.0216** | **11.9523** | | **3,685.1016** | **3,685.1016** | **1.1918** | | **3,714.8975** |

## 3.3 Site Preparation - 2020

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0982 | 0.0631 | 0.8095 | 2.0400e-003 | 0.2012 | 1.3200e-003 | 0.2025 | 0.0534 | 1.2100e-003 | 0.0546 | | 203.4151 | 203.4151 | 6.2100e-003 | | 203.5704 |
| **Total** | **0.0982** | **0.0631** | **0.8095** | **2.0400e-003** | **0.2012** | **1.3200e-003** | **0.2025** | **0.0534** | **1.2100e-003** | **0.0546** | | **203.4151** | **203.4151** | **6.2100e-003** | | **203.5704** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 18.0663 | 0.0000 | 18.0663 | 9.9307 | 0.0000 | 9.9307 | | | 0.0000 | | | 0.0000 |
| Off-Road | 4.0765 | 42.4173 | 21.5136 | 0.0380 | | 2.1974 | 2.1974 | | 2.0216 | 2.0216 | 0.0000 | 3,685.1016 | 3,685.1016 | 1.1918 | | 3,714.8975 |
| **Total** | **4.0765** | **42.4173** | **21.5136** | **0.0380** | **18.0663** | **2.1974** | **20.2637** | **9.9307** | **2.0216** | **11.9523** | **0.0000** | **3,685.1016** | **3,685.1016** | **1.1918** | | **3,714.8975** |

## 3.3 Site Preparation - 2020

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0982 | 0.0631 | 0.8095 | 2.0400e-003 | 0.1907 | 1.3200e-003 | 0.1920 | 0.0508 | 1.2100e-003 | 0.0520 | | 203.4151 | 203.4151 | 6.2100e-003 | | 203.5704 |
| **Total** | **0.0982** | **0.0631** | **0.8095** | **2.0400e-003** | **0.1907** | **1.3200e-003** | **0.1920** | **0.0508** | **1.2100e-003** | **0.0520** | | **203.4151** | **203.4151** | **6.2100e-003** | | **203.5704** |

## 3.4 Grading - 2020

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 12.8410 | 0.0000 | 12.8410 | 4.0466 | 0.0000 | 4.0466 | | | 0.0000 | | | 0.0000 |
| Off-Road | 7.4017 | 84.8525 | 55.2256 | 0.1093 | | 3.5266 | 3.5266 | | 3.2445 | 3.2445 | | 10,582.8510 | 10,582.8510 | 3.4227 | | 10,668.4187 |
| **Total** | **7.4017** | **84.8525** | **55.2256** | **0.1093** | **12.8410** | **3.5266** | **16.3676** | **4.0466** | **3.2445** | **7.2910** | | **10,582.8510** | **10,582.8510** | **3.4227** | | **10,668.4187** |

## 3.4 Grading - 2020

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 6.4400e-003 | 0.2769 | 0.0360 | 7.3000e-004 | 0.0135 | 5.9000e-004 | 0.0141 | 3.7100e-003 | 5.7000e-004 | 4.2800e-003 | | 77.1877 | 77.1877 | 5.7000e-003 | | 77.3303 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.1092 | 0.0701 | 0.8995 | 2.2700e-003 | 0.2236 | 1.4600e-003 | 0.2250 | 0.0593 | 1.3500e-003 | 0.0606 | | 226.0168 | 226.0168 | 6.9000e-003 | | 226.1893 |
| **Total** | **0.1156** | **0.3470** | **0.9355** | **3.0000e-003** | **0.2371** | **2.0500e-003** | **0.2391** | **0.0630** | **1.9200e-003** | **0.0649** | | **303.2046** | **303.2046** | **0.0126** | | **303.5196** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 12.8410 | 0.0000 | 12.8410 | 4.0466 | 0.0000 | 4.0466 | | | 0.0000 | | | 0.0000 |
| Off-Road | 7.4017 | 84.8525 | 55.2256 | 0.1093 | | 3.5266 | 3.5266 | | 3.2445 | 3.2445 | 0.0000 | 10,582.8510 | 10,582.8510 | 3.4227 | | 10,668.4187 |
| **Total** | **7.4017** | **84.8525** | **55.2256** | **0.1093** | **12.8410** | **3.5266** | **16.3676** | **4.0466** | **3.2445** | **7.2910** | **0.0000** | **10,582.8510** | **10,582.8510** | **3.4227** | | **10,668.4187** |

## 3.4 Grading - 2020

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 6.4400e-003 | 0.2769 | 0.0360 | 7.3000e-004 | 0.0129 | 5.9000e-004 | 0.0135 | 3.5600e-003 | 5.7000e-004 | 4.1300e-003 | | 77.1877 | 77.1877 | 5.7000e-003 | | 77.3303 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.1092 | 0.0701 | 0.8995 | 2.2700e-003 | 0.2119 | 1.4600e-003 | 0.2134 | 0.0564 | 1.3500e-003 | 0.0578 | | 226.0168 | 226.0168 | 6.9000e-003 | | 226.1893 |
| **Total** | **0.1156** | **0.3470** | **0.9355** | **3.0000e-003** | **0.2248** | **2.0500e-003** | **0.2269** | **0.0600** | **1.9200e-003** | **0.0619** | | **303.2046** | **303.2046** | **0.0126** | | **303.5196** |

## 3.5 Building Construction - 2020

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 2.1198 | 19.1860 | 16.8485 | 0.0269 | | 1.1171 | 1.1171 | | 1.0503 | 1.0503 | | 2,553.0631 | 2,553.0631 | 0.6229 | | 2,568.6345 |
| **Total** | **2.1198** | **19.1860** | **16.8485** | **0.0269** | | **1.1171** | **1.1171** | | **1.0503** | **1.0503** | | **2,553.0631** | **2,553.0631** | **0.6229** | | **2,568.6345** |

## 3.5 Building Construction - 2020

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.7498 | 26.0656 | 5.0799 | 0.0670 | 1.5820 | 0.1200 | 1.7019 | 0.4555 | 0.1147 | 0.5703 | | 7,066.7042 | 7,066.7042 | 0.4590 | | 7,078.1793 |
| Worker | 3.4494 | 2.2138 | 28.4227 | 0.0718 | 7.0643 | 0.0463 | 7.1106 | 1.8735 | 0.0426 | 1.9161 | | 7,142.1317 | 7,142.1317 | 0.2180 | | 7,147.5825 |
| **Total** | **4.1992** | **28.2794** | **33.5026** | **0.1388** | **8.6463** | **0.1662** | **8.8125** | **2.3290** | **0.1574** | **2.4864** | | **14,208.8359** | **14,208.8359** | **0.6770** | | **14,225.7618** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 2.1198 | 19.1860 | 16.8485 | 0.0269 | | 1.1171 | 1.1171 | | 1.0503 | 1.0503 | 0.0000 | 2,553.0631 | 2,553.0631 | 0.6229 | | 2,568.6345 |
| **Total** | **2.1198** | **19.1860** | **16.8485** | **0.0269** | | **1.1171** | **1.1171** | | **1.0503** | **1.0503** | **0.0000** | **2,553.0631** | **2,553.0631** | **0.6229** | | **2,568.6345** |

## 3.5 Building Construction - 2020

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.7498 | 26.0656 | 5.0799 | 0.0670 | 1.5144 | 0.1200 | 1.6343 | 0.4389 | 0.1147 | 0.5537 | | 7,066.7042 | 7,066.7042 | 0.4590 | | 7,078.1793 |
| Worker | 3.4494 | 2.2138 | 28.4227 | 0.0718 | 6.6958 | 0.0463 | 6.7421 | 1.7830 | 0.0426 | 1.8257 | | 7,142.1317 | 7,142.1317 | 0.2180 | | 7,147.5825 |
| **Total** | **4.1992** | **28.2794** | **33.5026** | **0.1388** | **8.2102** | **0.1662** | **8.3764** | **2.2220** | **0.1574** | **2.3793** | | **14,208.8359** | **14,208.8359** | **0.6770** | | **14,225.7618** |

## 3.6 Architectural Coating - 2020

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Archit. Coating | 33.7512 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Off-Road | 0.4844 | 3.3677 | 3.6628 | 5.9400e-003 | | 0.2219 | 0.2219 | | 0.2219 | 0.2219 | | 562.8961 | 562.8961 | 0.0436 | | 563.9856 |
| **Total** | **34.2356** | **3.3677** | **3.6628** | **5.9400e-003** | | **0.2219** | **0.2219** | | **0.2219** | **0.2219** | | **562.8961** | **562.8961** | **0.0436** | | **563.9856** |

## 3.6 Architectural Coating - 2020

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.6877 | 0.4414 | 5.6666 | 0.0143 | 1.4084 | 9.2300e-003 | 1.4176 | 0.3735 | 8.5000e-003 | 0.3820 | | 1,423.9060 | 1,423.9060 | 0.0435 | | 1,424.9927 |
| **Total** | **0.6877** | **0.4414** | **5.6666** | **0.0143** | **1.4084** | **9.2300e-003** | **1.4176** | **0.3735** | **8.5000e-003** | **0.3820** | | **1,423.9060** | **1,423.9060** | **0.0435** | | **1,424.9927** |

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Archit. Coating | 33.7512 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Off-Road | 0.4844 | 3.3677 | 3.6628 | 5.9400e-003 | | 0.2219 | 0.2219 | | 0.2219 | 0.2219 | 0.0000 | 562.8961 | 562.8961 | 0.0436 | | 563.9856 |
| **Total** | **34.2356** | **3.3677** | **3.6628** | **5.9400e-003** | | **0.2219** | **0.2219** | | **0.2219** | **0.2219** | **0.0000** | **562.8961** | **562.8961** | **0.0436** | | **563.9856** |

## 3.6 Architectural Coating - 2020

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.6877 | 0.4414 | 5.6666 | 0.0143 | 1.3349 | 9.2300e-003 | 1.3442 | 0.3555 | 8.5000e-003 | 0.3640 | | 1,423.9060 | 1,423.9060 | 0.0435 | | 1,424.9927 |
| **Total** | **0.6877** | **0.4414** | **5.6666** | **0.0143** | **1.3349** | **9.2300e-003** | **1.3442** | **0.3555** | **8.5000e-003** | **0.3640** | | **1,423.9060** | **1,423.9060** | **0.0435** | | **1,424.9927** |

## 3.7 Paving - 2020

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 1.3566 | 14.0656 | 14.6521 | 0.0228 | | 0.7528 | 0.7528 | | 0.6926 | 0.6926 | | 2,207.7334 | 2,207.7334 | 0.7140 | | 2,225.5841 |
| Paving | 5.1797 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| **Total** | **6.5363** | **14.0656** | **14.6521** | **0.0228** | | **0.7528** | **0.7528** | | **0.6926** | **0.6926** | | **2,207.7334** | **2,207.7334** | **0.7140** | | **2,225.5841** |

## 3.7 Paving - 2020

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0819 | 0.0525 | 0.6746 | 1.7000e-003 | 0.1677 | 1.1000e-003 | 0.1688 | 0.0445 | 1.0100e-003 | 0.0455 | | 169.5126 | 169.5126 | 5.1700e-003 | | 169.6420 |
| **Total** | **0.0819** | **0.0525** | **0.6746** | **1.7000e-003** | **0.1677** | **1.1000e-003** | **0.1688** | **0.0445** | **1.0100e-003** | **0.0455** | | **169.5126** | **169.5126** | **5.1700e-003** | | **169.6420** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 1.3566 | 14.0656 | 14.6521 | 0.0228 | | 0.7528 | 0.7528 | | 0.6926 | 0.6926 | 0.0000 | 2,207.7334 | 2,207.7334 | 0.7140 | | 2,225.5841 |
| Paving | 5.1797 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| **Total** | **6.5363** | **14.0656** | **14.6521** | **0.0228** | | **0.7528** | **0.7528** | | **0.6926** | **0.6926** | **0.0000** | **2,207.7334** | **2,207.7334** | **0.7140** | | **2,225.5841** |

### 3.7 Paving - 2020

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0819 | 0.0525 | 0.6746 | 1.7000e-003 | 0.1589 | 1.1000e-003 | 0.1600 | 0.0423 | 1.0100e-003 | 0.0433 | | 169.5126 | 169.5126 | 5.1700e-003 | | 169.6420 |
| **Total** | **0.0819** | **0.0525** | **0.6746** | **1.7000e-003** | **0.1589** | **1.1000e-003** | **0.1600** | **0.0423** | **1.0100e-003** | **0.0433** | | **169.5126** | **169.5126** | **5.1700e-003** | | **169.6420** |

## 4.0 Operational Detail - Mobile

### 4.1 Mitigation Measures Mobile

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Mitigated | 15.7092 | 179.4280 | 237.3036 | 0.9036 | 64.4015 | 1.3025 | 65.7039 | 17.5708 | 1.2375 | 18.8084 | | 91,525.3156 | 91,525.3156 | 2.7620 | | 91,594.3665 |
| Unmitigated | 15.7092 | 179.4280 | 237.3036 | 0.9036 | 64.4015 | 1.3025 | 65.7039 | 17.5708 | 1.2375 | 18.8084 | | 91,525.3156 | 91,525.3156 | 2.7620 | | 91,594.3665 |

## 4.2 Trip Summary Information

| | Average Daily Trip Rate | | | Unmitigated | Mitigated |
|---|---|---|---|---|---|
| Land Use | Weekday | Saturday | Sunday | Annual VMT | Annual VMT |
| Parking Lot | 0.00 | 0.00 | 0.00 | | |
| Regional Shopping Center | 77.50 | 77.50 | 77.50 | 167,620 | 167,620 |
| Unrefrigerated Warehouse-No Rail | 2,486.21 | 2,486.21 | 2486.21 | 29,086,698 | 29,086,698 |
| Total | 2,563.71 | 2,563.71 | 2,563.71 | 29,254,319 | 29,254,319 |

## 4.3 Trip Type Information

| | Miles | | | Trip % | | | Trip Purpose % | | |
|---|---|---|---|---|---|---|---|---|---|
| Land Use | H-W or C-W | H-S or C-C | H-O or C-NW | H-W or C-W | H-S or C-C | H-O or C-NW | Primary | Diverted | Pass-by |
| Parking Lot | 16.60 | 8.40 | 6.90 | 0.00 | 0.00 | 0.00 | 0 | 0 | 0 |
| Regional Shopping Center | 16.60 | 8.40 | 6.90 | 16.30 | 64.70 | 19.00 | 54 | 35 | 11 |
| Unrefrigerated Warehouse-No | 16.60 | 8.40 | 36.90 | 12.00 | 0.00 | 88.00 | 92 | 5 | 3 |

## 4.4 Fleet Mix

| Land Use | LDA | LDT1 | LDT2 | MDV | LHD1 | LHD2 | MHD | HHD | OBUS | UBUS | MCY | SBUS | MH |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Parking Lot | 0.549952 | 0.037123 | 0.179649 | 0.119457 | 0.017229 | 0.005267 | 0.017877 | 0.062669 | 0.001348 | 0.001607 | 0.006000 | 0.000812 | 0.001010 |
| Regional Shopping Center | 0.549952 | 0.037123 | 0.179649 | 0.119457 | 0.017229 | 0.005267 | 0.017877 | 0.062669 | 0.001348 | 0.001607 | 0.006000 | 0.000812 | 0.001010 |
| Unrefrigerated Warehouse-No Rail | 0.227299 | 0.037976 | 0.179087 | 0.122965 | 0.380000 | 0.005460 | 0.017497 | 0.023600 | 0.000000 | 0.000000 | 0.006117 | 0.000000 | 0.000000 |

## 5.0 Energy Detail

Historical Energy Use: N

### 5.1 Mitigation Measures Energy

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| NaturalGas Mitigated | 0.0121 | 0.1102 | 0.0925 | 6.6000e-004 | | 8.3700e-003 | 8.3700e-003 | | 8.3700e-003 | 8.3700e-003 | | 132.1917 | 132.1917 | 2.5300e-003 | 2.4200e-003 | 132.9773 |
| NaturalGas Unmitigated | 0.0121 | 0.1102 | 0.0925 | 6.6000e-004 | | 8.3700e-003 | 8.3700e-003 | | 8.3700e-003 | 8.3700e-003 | | 132.1917 | 132.1917 | 2.5300e-003 | 2.4200e-003 | 132.9773 |

## 5.2 Energy by Land Use - NaturalGas

**Unmitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | lb/day | | | | | | | | | | lb/day | | | | | |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Regional Shopping Center | 60.8219 | 6.6000e-004 | 5.9600e-003 | 5.0100e-003 | 4.0000e-005 | | 4.5000e-004 | 4.5000e-004 | | 4.5000e-004 | 4.5000e-004 | | 7.1555 | 7.1555 | 1.4000e-004 | 1.3000e-004 | 7.1980 |
| Unrefrigerated Warehouse-No Rail | 1062.81 | 0.0115 | 0.1042 | 0.0875 | 6.3000e-004 | | 7.9200e-003 | 7.9200e-003 | | 7.9200e-003 | 7.9200e-003 | | 125.0362 | 125.0362 | 2.4000e-003 | 2.2900e-003 | 125.7793 |
| **Total** | | **0.0121** | **0.1102** | **0.0925** | **6.7000e-004** | | **8.3700e-003** | **8.3700e-003** | | **8.3700e-003** | **8.3700e-003** | | **132.1917** | **132.1917** | **2.5400e-003** | **2.4200e-003** | **132.9773** |

**Mitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | lb/day | | | | | | | | | | lb/day | | | | | |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Regional Shopping Center | 0.0608219 | 6.6000e-004 | 5.9600e-003 | 5.0100e-003 | 4.0000e-005 | | 4.5000e-004 | 4.5000e-004 | | 4.5000e-004 | 4.5000e-004 | | 7.1555 | 7.1555 | 1.4000e-004 | 1.3000e-004 | 7.1980 |
| Unrefrigerated Warehouse-No Rail | 1.06281 | 0.0115 | 0.1042 | 0.0875 | 6.3000e-004 | | 7.9200e-003 | 7.9200e-003 | | 7.9200e-003 | 7.9200e-003 | | 125.0362 | 125.0362 | 2.4000e-003 | 2.2900e-003 | 125.7793 |
| **Total** | | **0.0121** | **0.1102** | **0.0925** | **6.7000e-004** | | **8.3700e-003** | **8.3700e-003** | | **8.3700e-003** | **8.3700e-003** | | **132.1917** | **132.1917** | **2.5400e-003** | **2.4200e-003** | **132.9773** |

# 6.0 Area Detail

## 6.1 Mitigation Measures Area

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Mitigated | 5.0650 | 1.0000e-003 | 0.1089 | 1.0000e-005 | | 3.9000e-004 | 3.9000e-004 | | 3.9000e-004 | 3.9000e-004 | | 0.2325 | 0.2325 | 6.2000e-004 | | 0.2479 |
| Unmitigated | 5.0650 | 1.0000e-003 | 0.1089 | 1.0000e-005 | | 3.9000e-004 | 3.9000e-004 | | 3.9000e-004 | 3.9000e-004 | | 0.2325 | 0.2325 | 6.2000e-004 | | 0.2479 |

## 6.2 Area by SubCategory

**Unmitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | lb/day | | | | | | | | | | lb/day | | | | | |
| Architectural Coating | 0.6103 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Consumer Products | 4.4446 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Landscaping | 0.0102 | 1.0000e-003 | 0.1089 | 1.0000e-005 | | 3.9000e-004 | 3.9000e-004 | | 3.9000e-004 | 3.9000e-004 | | 0.2325 | 0.2325 | 6.2000e-004 | | 0.2479 |
| **Total** | **5.0650** | **1.0000e-003** | **0.1089** | **1.0000e-005** | | **3.9000e-004** | **3.9000e-004** | | **3.9000e-004** | **3.9000e-004** | | **0.2325** | **0.2325** | **6.2000e-004** | | **0.2479** |

**Mitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | lb/day | | | | | | | | | | lb/day | | | | | |
| Architectural Coating | 0.6103 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Consumer Products | 4.4446 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Landscaping | 0.0102 | 1.0000e-003 | 0.1089 | 1.0000e-005 | | 3.9000e-004 | 3.9000e-004 | | 3.9000e-004 | 3.9000e-004 | | 0.2325 | 0.2325 | 6.2000e-004 | | 0.2479 |
| **Total** | **5.0650** | **1.0000e-003** | **0.1089** | **1.0000e-005** | | **3.9000e-004** | **3.9000e-004** | | **3.9000e-004** | **3.9000e-004** | | **0.2325** | **0.2325** | **6.2000e-004** | | **0.2479** |

## 7.0 Water Detail

### 7.1 Mitigation Measures Water

## 8.0 Waste Detail

### 8.1 Mitigation Measures Waste

## 9.0 Operational Offroad

| Equipment Type | Number | Hours/Day | Days/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|
| Forklifts | 12 | 8.00 | 365 | 89 | 0.20 | CNG |

**UnMitigated/Mitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Equipment Type | lb/day | | | | | | | | | | lb/day | | | | | |
| Forklifts | 1.5597 | 14.2203 | 14.0843 | 0.0184 | | 1.0094 | 1.0094 | | 0.9286 | 0.9286 | | 1,785.2518 | 1,785.2518 | 0.5774 | | 1,799.6865 |
| **Total** | **1.5597** | **14.2203** | **14.0843** | **0.0184** | | **1.0094** | **1.0094** | | **0.9286** | **0.9286** | | **1,785.2518** | **1,785.2518** | **0.5774** | | **1,799.6865** |

## 10.0 Stationary Equipment

**Fire Pumps and Emergency Generators**

| Equipment Type | Number | Hours/Day | Hours/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

**Boilers**

| Equipment Type | Number | Heat Input/Day | Heat Input/Year | Boiler Rating | Fuel Type |
|---|---|---|---|---|---|

**User Defined Equipment**

| Equipment Type | Number |
|---|---|

## 11.0 Vegetation

Appendix IIb

CalEEMod Output: Winter Emission

# Bridge Point Upland Project

**San Bernardino-South Coast County, Winter**

## 1.0 Project Characteristics

### 1.1 Land Usage

| Land Uses | Size | Metric | Lot Acreage | Floor Surface Area | Population |
|---|---|---|---|---|---|
| Unrefrigerated Warehouse-No Rail | 191.10 | 1000sqft | 4.39 | 191,096.00 | 0 |
| Parking Lot | 861.05 | 1000sqft | 19.77 | 1,306,800.00 | 0 |
| Regional Shopping Center | 10.00 | 1000sqft | 0.23 | 10,000.00 | 0 |

### 1.2 Other Project Characteristics

| | | | | | |
|---|---|---|---|---|---|
| **Urbanization** | Urban | **Wind Speed (m/s)** | 2.2 | **Precipitation Freq (Days)** | 32 |
| **Climate Zone** | 10 | | | **Operational Year** | 2021 |
| **Utility Company** | Southern California Edison | | | | |
| **CO2 Intensity (lb/MWhr)** | 702.44 | **CH4 Intensity (lb/MWhr)** | 0.029 | **N2O Intensity (lb/MWhr)** | 0.006 |

### 1.3 User Entered Comments & Non-Default Data

Bridge Point Upland Project - San Bernardino-South Coast County, Winter

Project Characteristics -

Land Use - 1,306,800 as per Kimley-Horn

Construction Phase - Total Days as per Kimley-Horn

Off-road Equipment - Equipment amounts as per Kimley-Horn

Off-road Equipment -

Off-road Equipment - Equipment as per Kimley-Horn

Off-road Equipment -

Grading - Total Acres Graded as per Kimley-Horn; Material Exported as per Kimley-Horn

Trips and VMT - Trip Length Hauling as per Kimley-Horn

Vehicle Trips - Regional Shopping Center Trip Rates as per Kimley-Horn
Unrefrigerated Warehouse Trip Rates: new estimates; Non Res C-NW Length: new estimate; Trip %: new estimate

Fleet Mix - Unrefrigerated Warehouse vehicle mix: as per Kimley-Horn

Operational Off-Road Equipment - # equipment and fuel type: as per Kimley-Horn
Days/Year: new estimate

Construction Off-road Equipment Mitigation - Unpaved Road Mitigation and Clean Paved Road Mitigation: as per Kimley-Horn

| Table Name | Column Name | Default Value | New Value |
|---|---|---|---|
| tblConstDustMitigation | CleanPavedRoadPercentReduction | 0 | 6 |
| tblConstDustMitigation | WaterUnpavedRoadMoistureContent | 0 | 12 |
| tblConstDustMitigation | WaterUnpavedRoadVehicleSpeed | 0 | 15 |
| tblConstructionPhase | NumDays | 20.00 | 66.00 |
| tblConstructionPhase | NumDays | 370.00 | 105.00 |
| tblConstructionPhase | NumDays | 20.00 | 0.00 |
| tblConstructionPhase | NumDays | 20.00 | 10.00 |
| tblConstructionPhase | NumDays | 10.00 | 2.00 |
| tblConstructionPhase | PhaseEndDate | 11/26/2021 | 8/31/2020 |
| tblConstructionPhase | PhaseEndDate | 10/1/2021 | 8/18/2020 |
| tblConstructionPhase | PhaseEndDate | 2/28/2020 | 1/31/2020 |

| | | | |
|---|---|---|---|
| tblConstructionPhase | PhaseEndDate | 5/1/2020 | 3/24/2020 |
| tblConstructionPhase | PhaseEndDate | 10/29/2021 | 9/1/2020 |
| tblConstructionPhase | PhaseEndDate | 3/13/2020 | 2/4/2020 |
| tblConstructionPhase | PhaseStartDate | 10/30/2021 | 6/1/2020 |
| tblConstructionPhase | PhaseStartDate | 5/2/2020 | 3/25/2020 |
| tblConstructionPhase | PhaseStartDate | 3/14/2020 | 2/5/2020 |
| tblConstructionPhase | PhaseStartDate | 10/2/2021 | 8/19/2020 |
| tblConstructionPhase | PhaseStartDate | 2/29/2020 | 2/1/2020 |
| tblFleetMix | HHD | 0.06 | 0.02 |
| tblFleetMix | LDA | 0.55 | 0.23 |
| tblFleetMix | LDT1 | 0.04 | 0.04 |
| tblFleetMix | LDT2 | 0.18 | 0.18 |
| tblFleetMix | LHD1 | 0.02 | 0.38 |
| tblFleetMix | LHD2 | 5.2670e-003 | 5.4600e-003 |
| tblFleetMix | MCY | 6.0000e-003 | 6.1170e-003 |
| tblFleetMix | MDV | 0.12 | 0.12 |
| tblFleetMix | MH | 1.0100e-003 | 0.00 |
| tblFleetMix | MHD | 0.02 | 0.02 |
| tblFleetMix | OBUS | 1.3480e-003 | 0.00 |
| tblFleetMix | SBUS | 8.1200e-004 | 0.00 |
| tblFleetMix | UBUS | 1.6070e-003 | 0.00 |
| tblGrading | AcresOfGrading | 175.00 | 225.00 |
| tblGrading | MaterialExported | 0.00 | 431.00 |
| tblLandUse | LandUseSquareFeet | 191,100.00 | 191,096.00 |
| tblLandUse | LandUseSquareFeet | 861,050.00 | 1,306,800.00 |
| tblOffRoadEquipment | OffRoadEquipmentUnitAmount | 1.00 | 2.00 |
| tblOffRoadEquipment | OffRoadEquipmentUnitAmount | 2.00 | 4.00 |

| | | | |
|---|---|---|---|
| tblOffRoadEquipment | OffRoadEquipmentUnitAmount | 1.00 | 2.00 |
| tblOffRoadEquipment | OffRoadEquipmentUnitAmount | 2.00 | 4.00 |
| tblOperationalOffRoadEquipment | OperDaysPerYear | 260.00 | 365.00 |
| tblOperationalOffRoadEquipment | OperFuelType | Diesel | CNG |
| tblOperationalOffRoadEquipment | OperLoadFactor | 0.20 | 0.20 |
| tblOperationalOffRoadEquipment | OperOffRoadEquipmentNumber | 0.00 | 12.00 |
| tblTripsAndVMT | HaulingTripLength | 20.00 | 10.00 |
| tblTripsAndVMT | WorkerTripNumber | 33.00 | 20.00 |
| tblVehicleTrips | CNW_TL | 6.90 | 36.90 |
| tblVehicleTrips | CNW_TTP | 41.00 | 88.00 |
| tblVehicleTrips | CW_TTP | 59.00 | 12.00 |
| tblVehicleTrips | ST_TR | 49.97 | 7.75 |
| tblVehicleTrips | ST_TR | 1.68 | 13.01 |
| tblVehicleTrips | SU_TR | 25.24 | 7.75 |
| tblVehicleTrips | SU_TR | 1.68 | 13.01 |
| tblVehicleTrips | WD_TR | 42.70 | 7.75 |
| tblVehicleTrips | WD_TR | 1.68 | 13.01 |

## 2.0 Emissions Summary

## 2.1 Overall Construction (Maximum Daily Emission)

**Unmitigated Construction**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | lb/day | | | | | | | | | | lb/day | | | | | |
| 2020 | 41.5418 | 85.2004 | 56.0090 | 0.1744 | 18.2675 | 3.5287 | 20.4662 | 9.9840 | 3.2464 | 12.0069 | 0.0000 | 17,592.6853 | 17,592.6853 | 3.4351 | 0.0000 | 17,627.7683 |
| **Maximum** | **41.5418** | **85.2004** | **56.0090** | **0.1744** | **18.2675** | **3.5287** | **20.4662** | **9.9840** | **3.2464** | **12.0069** | **0.0000** | **17,592.6853** | **17,592.6853** | **3.4351** | **0.0000** | **17,627.7683** |

**Mitigated Construction**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | lb/day | | | | | | | | | | lb/day | | | | | |
| 2020 | 41.5418 | 85.2004 | 56.0090 | 0.1744 | 18.2570 | 3.5287 | 20.4557 | 9.9815 | 3.2464 | 12.0043 | 0.0000 | 17,592.6853 | 17,592.6853 | 3.4351 | 0.0000 | 17,627.7683 |
| **Maximum** | **41.5418** | **85.2004** | **56.0090** | **0.1744** | **18.2570** | **3.5287** | **20.4557** | **9.9815** | **3.2464** | **12.0043** | **0.0000** | **17,592.6853** | **17,592.6853** | **3.4351** | **0.0000** | **17,627.7683** |

| | **ROG** | **NOx** | **CO** | **SO2** | **Fugitive PM10** | **Exhaust PM10** | **PM10 Total** | **Fugitive PM2.5** | **Exhaust PM2.5** | **PM2.5 Total** | **Bio- CO2** | **NBio-CO2** | **Total CO2** | **CH4** | **N20** | **CO2e** |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Percent Reduction** | **0.00** | **0.00** | **0.00** | **0.00** | **0.06** | **0.00** | **0.05** | **0.03** | **0.00** | **0.02** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** |

## 2.2 Overall Operational

**Unmitigated Operational**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Area | 5.0650 | 1.0000e-003 | 0.1089 | 1.0000e-005 | | 3.9000e-004 | 3.9000e-004 | | 3.9000e-004 | 3.9000e-004 | | 0.2325 | 0.2325 | 6.2000e-004 | | 0.2479 |
| Energy | 0.0121 | 0.1102 | 0.0925 | 6.6000e-004 | | 8.3700e-003 | 8.3700e-003 | | 8.3700e-003 | 8.3700e-003 | | 132.1917 | 132.1917 | 2.5300e-003 | 2.4200e-003 | 132.9773 |
| Mobile | 14.9201 | 187.6606 | 210.5139 | 0.8621 | 64.4015 | 1.3030 | 65.7045 | 17.5708 | 1.2381 | 18.8089 | | 87,408.5620 | 87,408.5620 | 2.6404 | | 87,474.5717 |
| Offroad | 1.5597 | 14.2203 | 14.0843 | 0.0184 | | 1.0094 | 1.0094 | | 0.9286 | 0.9286 | | 1,785.2518 | 1,785.2518 | 0.5774 | | 1,799.6865 |
| **Total** | **21.5569** | **201.9920** | **224.7995** | **0.8812** | **64.4015** | **2.3212** | **66.7227** | **17.5708** | **2.1755** | **19.7463** | | **89,326.2380** | **89,326.2380** | **3.2209** | **2.4200e-003** | **89,407.4834** |

## 2.2 Overall Operational

**Mitigated Operational**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Area | 5.0650 | 1.0000e-003 | 0.1089 | 1.0000e-005 | | 3.9000e-004 | 3.9000e-004 | | 3.9000e-004 | 3.9000e-004 | | 0.2325 | 0.2325 | 6.2000e-004 | | 0.2479 |
| Energy | 0.0121 | 0.1102 | 0.0925 | 6.6000e-004 | | 8.3700e-003 | 8.3700e-003 | | 8.3700e-003 | 8.3700e-003 | | 132.1917 | 132.1917 | 2.5300e-003 | 2.4200e-003 | 132.9773 |
| Mobile | 14.9201 | 187.6606 | 210.5139 | 0.8621 | 64.4015 | 1.3030 | 65.7045 | 17.5708 | 1.2381 | 18.8089 | | 87,408.5620 | 87,408.5620 | 2.6404 | | 87,474.5717 |
| Offroad | 1.5597 | 14.2203 | 14.0843 | 0.0184 | | 1.0094 | 1.0094 | | 0.9286 | 0.9286 | | 1,785.2518 | 1,785.2518 | 0.5774 | | 1,799.6865 |
| **Total** | **21.5569** | **201.9920** | **224.7995** | **0.8812** | **64.4015** | **2.3212** | **66.7227** | **17.5708** | **2.1755** | **19.7463** | | **89,326.2380** | **89,326.2380** | **3.2209** | **2.4200e-003** | **89,407.4834** |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Percent Reduction** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** |

## 3.0 Construction Detail

**Construction Phase**

Bridge Point Upland Project - San Bernardino-South Coast County, Winter

| Phase Number | Phase Name | Phase Type | Start Date | End Date | Num Days Week | Num Days | Phase Description |
|---|---|---|---|---|---|---|---|
| 1 | Demolition | Demolition | 2/1/2020 | 1/31/2020 | 5 | 0 | |
| 2 | Site Preparation | Site Preparation | 2/1/2020 | 2/4/2020 | 5 | 2 | |
| 3 | Grading | Grading | 2/5/2020 | 3/24/2020 | 5 | 35 | |
| 4 | Building Construction | Building Construction | 3/25/2020 | 8/18/2020 | 5 | 105 | |
| 5 | Architectural Coating | Architectural Coating | 6/1/2020 | 8/31/2020 | 5 | 66 | |
| 6 | Paving | Paving | 8/19/2020 | 9/1/2020 | 5 | 10 | |

**Acres of Grading (Site Preparation Phase): 0**

**Acres of Grading (Grading Phase): 225**

**Acres of Paving: 19.77**

**Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 301,644; Non-Residential Outdoor: 100,548; Striped Parking Area: 78,408 (Architectural Coating – sqft)**

**OffRoad Equipment**

Bridge Point Upland Project - San Bernardino-South Coast County, Winter

| Phase Name | Offroad Equipment Type | Amount | Usage Hours | Horse Power | Load Factor |
|---|---|---|---|---|---|
| Architectural Coating | Air Compressors | 2 | 6.00 | 78 | 0.48 |
| Demolition | Excavators | 3 | 8.00 | 158 | 0.38 |
| Demolition | Concrete/Industrial Saws | 1 | 8.00 | 81 | 0.73 |
| Grading | Excavators | 4 | 8.00 | 158 | 0.38 |
| Building Construction | Cranes | 1 | 7.00 | 231 | 0.29 |
| Building Construction | Forklifts | 3 | 8.00 | 89 | 0.20 |
| Building Construction | Generator Sets | 1 | 8.00 | 84 | 0.74 |
| Paving | Pavers | 2 | 8.00 | 130 | 0.42 |
| Paving | Rollers | 2 | 8.00 | 80 | 0.38 |
| Demolition | Rubber Tired Dozers | 2 | 8.00 | 247 | 0.40 |
| Grading | Rubber Tired Dozers | 1 | 8.00 | 247 | 0.40 |
| Building Construction | Tractors/Loaders/Backhoes | 3 | 7.00 | 97 | 0.37 |
| Grading | Graders | 2 | 8.00 | 187 | 0.41 |
| Grading | Tractors/Loaders/Backhoes | 2 | 8.00 | 97 | 0.37 |
| Paving | Paving Equipment | 2 | 8.00 | 132 | 0.36 |
| Site Preparation | Tractors/Loaders/Backhoes | 4 | 8.00 | 97 | 0.37 |
| Site Preparation | Rubber Tired Dozers | 3 | 8.00 | 247 | 0.40 |
| Grading | Scrapers | 4 | 8.00 | 367 | 0.48 |
| Building Construction | Welders | 1 | 8.00 | 46 | 0.45 |

**Trips and VMT**

| Phase Name | Offroad Equipment Count | Worker Trip Number | Vendor Trip Number | Hauling Trip Number | Worker Trip Length | Vendor Trip Length | Hauling Trip Length | Worker Vehicle Class | Vendor Vehicle Class | Hauling Vehicle Class |
|---|---|---|---|---|---|---|---|---|---|---|
| Architectural Coating | 2 | 126.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Building Construction | 9 | 632.00 | 247.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Demolition | 6 | 15.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Grading | 13 | 20.00 | 0.00 | 54.00 | 14.70 | 6.90 | 10.00 | LD_Mix | HDT_Mix | HHDT |
| Paving | 6 | 15.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Site Preparation | 7 | 18.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |

## 3.1 Mitigation Measures Construction

Water Unpaved Roads

Reduce Vehicle Speed on Unpaved Roads

Clean Paved Roads

## 3.2 Demolition - 2020

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 3.2 Demolition - 2020

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 3.2 Demolition - 2020

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 3.3 Site Preparation - 2020

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 18.0663 | 0.0000 | 18.0663 | 9.9307 | 0.0000 | 9.9307 | | | 0.0000 | | | 0.0000 |
| Off-Road | 4.0765 | 42.4173 | 21.5136 | 0.0380 | | 2.1974 | 2.1974 | | 2.0216 | 2.0216 | | 3,685.1016 | 3,685.1016 | 1.1918 | | 3,714.8975 |
| **Total** | **4.0765** | **42.4173** | **21.5136** | **0.0380** | **18.0663** | **2.1974** | **20.2637** | **9.9307** | **2.0216** | **11.9523** | | **3,685.1016** | **3,685.1016** | **1.1918** | | **3,714.8975** |

## 3.3 Site Preparation - 2020

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0983 | 0.0663 | 0.6653 | 1.8300e-003 | 0.2012 | 1.3200e-003 | 0.2025 | 0.0534 | 1.2100e-003 | 0.0546 | | 182.4750 | 182.4750 | 5.4500e-003 | | 182.6112 |
| **Total** | **0.0983** | **0.0663** | **0.6653** | **1.8300e-003** | **0.2012** | **1.3200e-003** | **0.2025** | **0.0534** | **1.2100e-003** | **0.0546** | | **182.4750** | **182.4750** | **5.4500e-003** | | **182.6112** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 18.0663 | 0.0000 | 18.0663 | 9.9307 | 0.0000 | 9.9307 | | | 0.0000 | | | 0.0000 |
| Off-Road | 4.0765 | 42.4173 | 21.5136 | 0.0380 | | 2.1974 | 2.1974 | | 2.0216 | 2.0216 | 0.0000 | 3,685.1016 | 3,685.1016 | 1.1918 | | 3,714.8975 |
| **Total** | **4.0765** | **42.4173** | **21.5136** | **0.0380** | **18.0663** | **2.1974** | **20.2637** | **9.9307** | **2.0216** | **11.9523** | **0.0000** | **3,685.1016** | **3,685.1016** | **1.1918** | | **3,714.8975** |

## 3.3 Site Preparation - 2020

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0983 | 0.0663 | 0.6653 | 1.8300e-003 | 0.1907 | 1.3200e-003 | 0.1920 | 0.0508 | 1.2100e-003 | 0.0520 | | 182.4750 | 182.4750 | 5.4500e-003 | | 182.6112 |
| **Total** | **0.0983** | **0.0663** | **0.6653** | **1.8300e-003** | **0.1907** | **1.3200e-003** | **0.1920** | **0.0508** | **1.2100e-003** | **0.0520** | | **182.4750** | **182.4750** | **5.4500e-003** | | **182.6112** |

## 3.4 Grading - 2020

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 12.8410 | 0.0000 | 12.8410 | 4.0466 | 0.0000 | 4.0466 | | | 0.0000 | | | 0.0000 |
| Off-Road | 7.4017 | 84.8525 | 55.2256 | 0.1093 | | 3.5266 | 3.5266 | | 3.2445 | 3.2445 | | 10,582.8510 | 10,582.8510 | 3.4227 | | 10,668.4187 |
| **Total** | **7.4017** | **84.8525** | **55.2256** | **0.1093** | **12.8410** | **3.5266** | **16.3676** | **4.0466** | **3.2445** | **7.2910** | | **10,582.8510** | **10,582.8510** | **3.4227** | | **10,668.4187** |

## 3.4 Grading - 2020

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 6.8800e-003 | 0.2742 | 0.0442 | 7.0000e-004 | 0.0135 | 6.1000e-004 | 0.0141 | 3.7100e-003 | 5.8000e-004 | 4.2900e-003 | | 73.8378 | 73.8378 | 6.2900e-003 | | 73.9952 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.1092 | 0.0737 | 0.7393 | 2.0400e-003 | 0.2236 | 1.4600e-003 | 0.2250 | 0.0593 | 1.3500e-003 | 0.0606 | | 202.7500 | 202.7500 | 6.0500e-003 | | 202.9013 |
| **Total** | **0.1161** | **0.3479** | **0.7835** | **2.7400e-003** | **0.2371** | **2.0700e-003** | **0.2392** | **0.0630** | **1.9300e-003** | **0.0649** | | **276.5878** | **276.5878** | **0.0123** | | **276.8965** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Fugitive Dust | | | | | 12.8410 | 0.0000 | 12.8410 | 4.0466 | 0.0000 | 4.0466 | | | 0.0000 | | | 0.0000 |
| Off-Road | 7.4017 | 84.8525 | 55.2256 | 0.1093 | | 3.5266 | 3.5266 | | 3.2445 | 3.2445 | 0.0000 | 10,582.8510 | 10,582.8510 | 3.4227 | | 10,668.4187 |
| **Total** | **7.4017** | **84.8525** | **55.2256** | **0.1093** | **12.8410** | **3.5266** | **16.3676** | **4.0466** | **3.2445** | **7.2910** | **0.0000** | **10,582.8510** | **10,582.8510** | **3.4227** | | **10,668.4187** |

## 3.4 Grading - 2020

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 6.8800e-003 | 0.2742 | 0.0442 | 7.0000e-004 | 0.0129 | 6.1000e-004 | 0.0135 | 3.5600e-003 | 5.8000e-004 | 4.1400e-003 | | 73.8378 | 73.8378 | 6.2900e-003 | | 73.9952 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.1092 | 0.0737 | 0.7393 | 2.0400e-003 | 0.2119 | 1.4600e-003 | 0.2134 | 0.0564 | 1.3500e-003 | 0.0578 | | 202.7500 | 202.7500 | 6.0500e-003 | | 202.9013 |
| **Total** | **0.1161** | **0.3479** | **0.7835** | **2.7400e-003** | **0.2248** | **2.0700e-003** | **0.2269** | **0.0600** | **1.9300e-003** | **0.0619** | | **276.5878** | **276.5878** | **0.0123** | | **276.8965** |

## 3.5 Building Construction - 2020

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 2.1198 | 19.1860 | 16.8485 | 0.0269 | | 1.1171 | 1.1171 | | 1.0503 | 1.0503 | | 2,553.0631 | 2,553.0631 | 0.6229 | | 2,568.6345 |
| **Total** | **2.1198** | **19.1860** | **16.8485** | **0.0269** | | **1.1171** | **1.1171** | | **1.0503** | **1.0503** | | **2,553.0631** | **2,553.0631** | **0.6229** | | **2,568.6345** |

## 3.5 Building Construction - 2020

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.7908 | 25.8542 | 5.8876 | 0.0644 | 1.5820 | 0.1215 | 1.7035 | 0.4555 | 0.1162 | 0.5717 | | 6,792.5027 | 6,792.5027 | 0.5075 | | 6,805.1900 |
| Worker | 3.4512 | 2.3294 | 23.3602 | 0.0643 | 7.0643 | 0.0463 | 7.1106 | 1.8735 | 0.0426 | 1.9161 | | 6,406.8987 | 6,406.8987 | 0.1913 | | 6,411.6802 |
| **Total** | **4.2420** | **28.1836** | **29.2478** | **0.1288** | **8.6463** | **0.1678** | **8.8140** | **2.3290** | **0.1588** | **2.4878** | | **13,199.4014** | **13,199.4014** | **0.6988** | | **13,216.8702** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 2.1198 | 19.1860 | 16.8485 | 0.0269 | | 1.1171 | 1.1171 | | 1.0503 | 1.0503 | 0.0000 | 2,553.0631 | 2,553.0631 | 0.6229 | | 2,568.6345 |
| **Total** | **2.1198** | **19.1860** | **16.8485** | **0.0269** | | **1.1171** | **1.1171** | | **1.0503** | **1.0503** | **0.0000** | **2,553.0631** | **2,553.0631** | **0.6229** | | **2,568.6345** |

## 3.5 Building Construction - 2020

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.7908 | 25.8542 | 5.8876 | 0.0644 | 1.5144 | 0.1215 | 1.6359 | 0.4389 | 0.1162 | 0.5551 | | 6,792.5027 | 6,792.5027 | 0.5075 | | 6,805.1900 |
| Worker | 3.4512 | 2.3294 | 23.3602 | 0.0643 | 6.6958 | 0.0463 | 6.7421 | 1.7830 | 0.0426 | 1.8257 | | 6,406.8987 | 6,406.8987 | 0.1913 | | 6,411.6802 |
| **Total** | **4.2420** | **28.1836** | **29.2478** | **0.1288** | **8.2102** | **0.1678** | **8.3779** | **2.2220** | **0.1588** | **2.3808** | | **13,199.4014** | **13,199.4014** | **0.6988** | | **13,216.8702** |

## 3.6 Architectural Coating - 2020

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Archit. Coating | 33.7512 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Off-Road | 0.4844 | 3.3677 | 3.6628 | 5.9400e-003 | | 0.2219 | 0.2219 | | 0.2219 | 0.2219 | | 562.8961 | 562.8961 | 0.0436 | | 563.9856 |
| **Total** | **34.2356** | **3.3677** | **3.6628** | **5.9400e-003** | | **0.2219** | **0.2219** | | **0.2219** | **0.2219** | | **562.8961** | **562.8961** | **0.0436** | | **563.9856** |

## 3.6 Architectural Coating - 2020

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.6881 | 0.4644 | 4.6573 | 0.0128 | 1.4084 | 9.2300e-003 | 1.4176 | 0.3735 | 8.5000e-003 | 0.3820 | | 1,277.3247 | 1,277.3247 | 0.0381 | | 1,278.2780 |
| **Total** | **0.6881** | **0.4644** | **4.6573** | **0.0128** | **1.4084** | **9.2300e-003** | **1.4176** | **0.3735** | **8.5000e-003** | **0.3820** | | **1,277.3247** | **1,277.3247** | **0.0381** | | **1,278.2780** |

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Archit. Coating | 33.7512 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Off-Road | 0.4844 | 3.3677 | 3.6628 | 5.9400e-003 | | 0.2219 | 0.2219 | | 0.2219 | 0.2219 | 0.0000 | 562.8961 | 562.8961 | 0.0436 | | 563.9856 |
| **Total** | **34.2356** | **3.3677** | **3.6628** | **5.9400e-003** | | **0.2219** | **0.2219** | | **0.2219** | **0.2219** | **0.0000** | **562.8961** | **562.8961** | **0.0436** | | **563.9856** |

## 3.6 Architectural Coating - 2020

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.6881 | 0.4644 | 4.6573 | 0.0128 | 1.3349 | 9.2300e-003 | 1.3442 | 0.3555 | 8.5000e-003 | 0.3640 | | 1,277.3247 | 1,277.3247 | 0.0381 | | 1,278.2780 |
| **Total** | **0.6881** | **0.4644** | **4.6573** | **0.0128** | **1.3349** | **9.2300e-003** | **1.3442** | **0.3555** | **8.5000e-003** | **0.3640** | | **1,277.3247** | **1,277.3247** | **0.0381** | | **1,278.2780** |

## 3.7 Paving - 2020

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 1.3566 | 14.0656 | 14.6521 | 0.0228 | | 0.7528 | 0.7528 | | 0.6926 | 0.6926 | | 2,207.7334 | 2,207.7334 | 0.7140 | | 2,225.5841 |
| Paving | 5.1797 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| **Total** | **6.5363** | **14.0656** | **14.6521** | **0.0228** | | **0.7528** | **0.7528** | | **0.6926** | **0.6926** | | **2,207.7334** | **2,207.7334** | **0.7140** | | **2,225.5841** |

## 3.7 Paving - 2020

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0819 | 0.0553 | 0.5544 | 1.5300e-003 | 0.1677 | 1.1000e-003 | 0.1688 | 0.0445 | 1.0100e-003 | 0.0455 | | 152.0625 | 152.0625 | 4.5400e-003 | | 152.1760 |
| **Total** | **0.0819** | **0.0553** | **0.5544** | **1.5300e-003** | **0.1677** | **1.1000e-003** | **0.1688** | **0.0445** | **1.0100e-003** | **0.0455** | | **152.0625** | **152.0625** | **4.5400e-003** | | **152.1760** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Off-Road | 1.3566 | 14.0656 | 14.6521 | 0.0228 | | 0.7528 | 0.7528 | | 0.6926 | 0.6926 | 0.0000 | 2,207.7334 | 2,207.7334 | 0.7140 | | 2,225.5841 |
| Paving | 5.1797 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| **Total** | **6.5363** | **14.0656** | **14.6521** | **0.0228** | | **0.7528** | **0.7528** | | **0.6926** | **0.6926** | **0.0000** | **2,207.7334** | **2,207.7334** | **0.7140** | | **2,225.5841** |

### 3.7 Paving - 2020

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | | 0.0000 |
| Worker | 0.0819 | 0.0553 | 0.5544 | 1.5300e-003 | 0.1589 | 1.1000e-003 | 0.1600 | 0.0423 | 1.0100e-003 | 0.0433 | | 152.0625 | 152.0625 | 4.5400e-003 | | 152.1760 |
| **Total** | **0.0819** | **0.0553** | **0.5544** | **1.5300e-003** | **0.1589** | **1.1000e-003** | **0.1600** | **0.0423** | **1.0100e-003** | **0.0433** | | **152.0625** | **152.0625** | **4.5400e-003** | | **152.1760** |

## 4.0 Operational Detail - Mobile

### 4.1 Mitigation Measures Mobile

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Mitigated | 14.9201 | 187.6606 | 210.5139 | 0.8621 | 64.4015 | 1.3030 | 65.7045 | 17.5708 | 1.2381 | 18.8089 | | 87,408.5620 | 87,408.5620 | 2.6404 | | 87,474.5717 |
| Unmitigated | 14.9201 | 187.6606 | 210.5139 | 0.8621 | 64.4015 | 1.3030 | 65.7045 | 17.5708 | 1.2381 | 18.8089 | | 87,408.5620 | 87,408.5620 | 2.6404 | | 87,474.5717 |

## 4.2 Trip Summary Information

| | Average Daily Trip Rate | | | Unmitigated | Mitigated |
|---|---|---|---|---|---|
| Land Use | Weekday | Saturday | Sunday | Annual VMT | Annual VMT |
| Parking Lot | 0.00 | 0.00 | 0.00 | | |
| Regional Shopping Center | 77.50 | 77.50 | 77.50 | 167,620 | 167,620 |
| Unrefrigerated Warehouse-No Rail | 2,486.21 | 2,486.21 | 2486.21 | 29,086,698 | 29,086,698 |
| Total | 2,563.71 | 2,563.71 | 2,563.71 | 29,254,319 | 29,254,319 |

## 4.3 Trip Type Information

| | Miles | | | Trip % | | | Trip Purpose % | | |
|---|---|---|---|---|---|---|---|---|---|
| Land Use | H-W or C-W | H-S or C-C | H-O or C-NW | H-W or C-W | H-S or C-C | H-O or C-NW | Primary | Diverted | Pass-by |
| Parking Lot | 16.60 | 8.40 | 6.90 | 0.00 | 0.00 | 0.00 | 0 | 0 | 0 |
| Regional Shopping Center | 16.60 | 8.40 | 6.90 | 16.30 | 64.70 | 19.00 | 54 | 35 | 11 |
| Unrefrigerated Warehouse-No | 16.60 | 8.40 | 36.90 | 12.00 | 0.00 | 88.00 | 92 | 5 | 3 |

## 4.4 Fleet Mix

| Land Use | LDA | LDT1 | LDT2 | MDV | LHD1 | LHD2 | MHD | HHD | OBUS | UBUS | MCY | SBUS | MH |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Parking Lot | 0.549952 | 0.037123 | 0.179649 | 0.119457 | 0.017229 | 0.005267 | 0.017877 | 0.062669 | 0.001348 | 0.001607 | 0.006000 | 0.000812 | 0.001010 |
| Regional Shopping Center | 0.549952 | 0.037123 | 0.179649 | 0.119457 | 0.017229 | 0.005267 | 0.017877 | 0.062669 | 0.001348 | 0.001607 | 0.006000 | 0.000812 | 0.001010 |
| Unrefrigerated Warehouse-No Rail | 0.227299 | 0.037976 | 0.179087 | 0.122965 | 0.380000 | 0.005460 | 0.017497 | 0.023600 | 0.000000 | 0.000000 | 0.006117 | 0.000000 | 0.000000 |

## 5.0 Energy Detail

Historical Energy Use: N

### 5.1 Mitigation Measures Energy

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| NaturalGas Mitigated | 0.0121 | 0.1102 | 0.0925 | 6.6000e-004 | | 8.3700e-003 | 8.3700e-003 | | 8.3700e-003 | 8.3700e-003 | | 132.1917 | 132.1917 | 2.5300e-003 | 2.4200e-003 | 132.9773 |
| NaturalGas Unmitigated | 0.0121 | 0.1102 | 0.0925 | 6.6000e-004 | | 8.3700e-003 | 8.3700e-003 | | 8.3700e-003 | 8.3700e-003 | | 132.1917 | 132.1917 | 2.5300e-003 | 2.4200e-003 | 132.9773 |

## 5.2 Energy by Land Use - NaturalGas

**Unmitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | lb/day | | | | | | | | | | lb/day | | | | | |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Regional Shopping Center | 60.8219 | 6.6000e-004 | 5.9600e-003 | 5.0100e-003 | 4.0000e-005 | | 4.5000e-004 | 4.5000e-004 | | 4.5000e-004 | 4.5000e-004 | | 7.1555 | 7.1555 | 1.4000e-004 | 1.3000e-004 | 7.1980 |
| Unrefrigerated Warehouse-No Rail | 1062.81 | 0.0115 | 0.1042 | 0.0875 | 6.3000e-004 | | 7.9200e-003 | 7.9200e-003 | | 7.9200e-003 | 7.9200e-003 | | 125.0362 | 125.0362 | 2.4000e-003 | 2.2900e-003 | 125.7793 |
| **Total** | | **0.0121** | **0.1102** | **0.0925** | **6.7000e-004** | | **8.3700e-003** | **8.3700e-003** | | **8.3700e-003** | **8.3700e-003** | | **132.1917** | **132.1917** | **2.5400e-003** | **2.4200e-003** | **132.9773** |

**Mitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | lb/day | | | | | | | | | | lb/day | | | | | |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Regional Shopping Center | 0.0608219 | 6.6000e-004 | 5.9600e-003 | 5.0100e-003 | 4.0000e-005 | | 4.5000e-004 | 4.5000e-004 | | 4.5000e-004 | 4.5000e-004 | | 7.1555 | 7.1555 | 1.4000e-004 | 1.3000e-004 | 7.1980 |
| Unrefrigerated Warehouse-No Rail | 1.06281 | 0.0115 | 0.1042 | 0.0875 | 6.3000e-004 | | 7.9200e-003 | 7.9200e-003 | | 7.9200e-003 | 7.9200e-003 | | 125.0362 | 125.0362 | 2.4000e-003 | 2.2900e-003 | 125.7793 |
| **Total** | | **0.0121** | **0.1102** | **0.0925** | **6.7000e-004** | | **8.3700e-003** | **8.3700e-003** | | **8.3700e-003** | **8.3700e-003** | | **132.1917** | **132.1917** | **2.5400e-003** | **2.4200e-003** | **132.9773** |

# 6.0 Area Detail

## 6.1 Mitigation Measures Area

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | lb/day | | | | | | | | | | lb/day | | | | | |
| Mitigated | 5.0650 | 1.0000e-003 | 0.1089 | 1.0000e-005 | | 3.9000e-004 | 3.9000e-004 | | 3.9000e-004 | 3.9000e-004 | | 0.2325 | 0.2325 | 6.2000e-004 | | 0.2479 |
| Unmitigated | 5.0650 | 1.0000e-003 | 0.1089 | 1.0000e-005 | | 3.9000e-004 | 3.9000e-004 | | 3.9000e-004 | 3.9000e-004 | | 0.2325 | 0.2325 | 6.2000e-004 | | 0.2479 |

## 6.2 Area by SubCategory

**Unmitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | lb/day | | | | | | | | | | lb/day | | | | | |
| Architectural Coating | 0.6103 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Consumer Products | 4.4446 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Landscaping | 0.0102 | 1.0000e-003 | 0.1089 | 1.0000e-005 | | 3.9000e-004 | 3.9000e-004 | | 3.9000e-004 | 3.9000e-004 | | 0.2325 | 0.2325 | 6.2000e-004 | | 0.2479 |
| **Total** | **5.0650** | **1.0000e-003** | **0.1089** | **1.0000e-005** | | **3.9000e-004** | **3.9000e-004** | | **3.9000e-004** | **3.9000e-004** | | **0.2325** | **0.2325** | **6.2000e-004** | | **0.2479** |

**Mitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | lb/day | | | | | | | | | | lb/day | | | | | |
| Architectural Coating | 0.6103 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Consumer Products | 4.4446 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | | 0.0000 | | | 0.0000 |
| Landscaping | 0.0102 | 1.0000e-003 | 0.1089 | 1.0000e-005 | | 3.9000e-004 | 3.9000e-004 | | 3.9000e-004 | 3.9000e-004 | | 0.2325 | 0.2325 | 6.2000e-004 | | 0.2479 |
| **Total** | **5.0650** | **1.0000e-003** | **0.1089** | **1.0000e-005** | | **3.9000e-004** | **3.9000e-004** | | **3.9000e-004** | **3.9000e-004** | | **0.2325** | **0.2325** | **6.2000e-004** | | **0.2479** |

## 7.0 Water Detail

### 7.1 Mitigation Measures Water

## 8.0 Waste Detail

### 8.1 Mitigation Measures Waste

## 9.0 Operational Offroad

| Equipment Type | Number | Hours/Day | Days/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|
| Forklifts | 12 | 8.00 | 365 | 89 | 0.20 | CNG |

**UnMitigated/Mitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Equipment Type | lb/day | | | | | | | | | | lb/day | | | | | |
| Forklifts | 1.5597 | 14.2203 | 14.0843 | 0.0184 | | 1.0094 | 1.0094 | | 0.9286 | 0.9286 | | 1,785.2518 | 1,785.2518 | 0.5774 | | 1,799.6865 |
| **Total** | **1.5597** | **14.2203** | **14.0843** | **0.0184** | | **1.0094** | **1.0094** | | **0.9286** | **0.9286** | | **1,785.2518** | **1,785.2518** | **0.5774** | | **1,799.6865** |

## 10.0 Stationary Equipment

**Fire Pumps and Emergency Generators**

| Equipment Type | Number | Hours/Day | Hours/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

**Boilers**

| Equipment Type | Number | Heat Input/Day | Heat Input/Year | Boiler Rating | Fuel Type |
|---|---|---|---|---|---|

**User Defined Equipment**

| Equipment Type | Number |
|---|---|

## 11.0 Vegetation

Appendix IIc

CalEEMod Output: Annual Emissions (For Greenhouse Gas Emissions Estimates)

# Bridge Point Upland Project

**San Bernardino-South Coast County, Annual**

## 1.0 Project Characteristics

### 1.1 Land Usage

| Land Uses | Size | Metric | Lot Acreage | Floor Surface Area | Population |
|---|---|---|---|---|---|
| Unrefrigerated Warehouse-No Rail | 191.10 | 1000sqft | 4.39 | 191,096.00 | 0 |
| Parking Lot | 861.05 | 1000sqft | 19.77 | 1,306,800.00 | 0 |
| Regional Shopping Center | 10.00 | 1000sqft | 0.23 | 10,000.00 | 0 |

### 1.2 Other Project Characteristics

| | | | | | |
|---|---|---|---|---|---|
| **Urbanization** | Urban | **Wind Speed (m/s)** | 2.2 | **Precipitation Freq (Days)** | 32 |
| **Climate Zone** | 10 | | | **Operational Year** | 2021 |
| **Utility Company** | Southern California Edison | | | | |
| **CO2 Intensity (lb/MWhr)** | 702.44 | **CH4 Intensity (lb/MWhr)** | 0.029 | **N2O Intensity (lb/MWhr)** | 0.006 |

### 1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - 1,306,800 as per Kimley-Horn

Construction Phase - Total Days as per Kimley-Horn

Off-road Equipment - Equipment amounts as per Kimley-Horn

Off-road Equipment -

Off-road Equipment - Equipment as per Kimley-Horn

Off-road Equipment -

Grading - Total Acres Graded as per Kimley-Horn; Material Exported as per Kimley-Horn

Trips and VMT - Trip Length Hauling as per Kimley-Horn

Vehicle Trips - Regional Shopping Center Trip Rates as per Kimley-Horn
Unrefrigerated Warehouse Trip Rates: new estimates; Non Res C-NW Length: new estimate; Trip %: new estimate

Fleet Mix - Unrefrigerated Warehouse vehicle mix: as per Kimley-Horn

Operational Off-Road Equipment - # equipment and fuel type: as per Kimley-Horn
Days/Year: new estimate

Construction Off-road Equipment Mitigation - Unpaved Road Mitigation and Clean Paved Road Mitigation: as per Kimley-Horn

| Table Name | Column Name | Default Value | New Value |
|---|---|---|---|
| tblConstDustMitigation | CleanPavedRoadPercentReduction | 0 | 6 |
| tblConstDustMitigation | WaterUnpavedRoadMoistureContent | 0 | 12 |
| tblConstDustMitigation | WaterUnpavedRoadVehicleSpeed | 0 | 15 |
| tblConstructionPhase | NumDays | 20.00 | 66.00 |
| tblConstructionPhase | NumDays | 370.00 | 105.00 |
| tblConstructionPhase | NumDays | 20.00 | 0.00 |
| tblConstructionPhase | NumDays | 20.00 | 10.00 |
| tblConstructionPhase | NumDays | 10.00 | 2.00 |
| tblConstructionPhase | PhaseEndDate | 11/26/2021 | 8/31/2020 |
| tblConstructionPhase | PhaseEndDate | 10/1/2021 | 8/18/2020 |
| tblConstructionPhase | PhaseEndDate | 2/28/2020 | 1/31/2020 |

| | | | |
|---|---|---|---|
| tblConstructionPhase | PhaseEndDate | 5/1/2020 | 3/24/2020 |
| tblConstructionPhase | PhaseEndDate | 10/29/2021 | 9/1/2020 |
| tblConstructionPhase | PhaseEndDate | 3/13/2020 | 2/4/2020 |
| tblConstructionPhase | PhaseStartDate | 10/30/2021 | 6/1/2020 |
| tblConstructionPhase | PhaseStartDate | 5/2/2020 | 3/25/2020 |
| tblConstructionPhase | PhaseStartDate | 3/14/2020 | 2/5/2020 |
| tblConstructionPhase | PhaseStartDate | 10/2/2021 | 8/19/2020 |
| tblConstructionPhase | PhaseStartDate | 2/29/2020 | 2/1/2020 |
| tblFleetMix | HHD | 0.06 | 0.02 |
| tblFleetMix | LDA | 0.55 | 0.23 |
| tblFleetMix | LDT1 | 0.04 | 0.04 |
| tblFleetMix | LDT2 | 0.18 | 0.18 |
| tblFleetMix | LHD1 | 0.02 | 0.38 |
| tblFleetMix | LHD2 | 5.2670e-003 | 5.4600e-003 |
| tblFleetMix | MCY | 6.0000e-003 | 6.1170e-003 |
| tblFleetMix | MDV | 0.12 | 0.12 |
| tblFleetMix | MH | 1.0100e-003 | 0.00 |
| tblFleetMix | MHD | 0.02 | 0.02 |
| tblFleetMix | OBUS | 1.3480e-003 | 0.00 |
| tblFleetMix | SBUS | 8.1200e-004 | 0.00 |
| tblFleetMix | UBUS | 1.6070e-003 | 0.00 |
| tblGrading | AcresOfGrading | 175.00 | 225.00 |
| tblGrading | MaterialExported | 0.00 | 431.00 |
| tblLandUse | LandUseSquareFeet | 191,100.00 | 191,096.00 |
| tblLandUse | LandUseSquareFeet | 861,050.00 | 1,306,800.00 |
| tblOffRoadEquipment | OffRoadEquipmentUnitAmount | 1.00 | 2.00 |
| tblOffRoadEquipment | OffRoadEquipmentUnitAmount | 2.00 | 4.00 |

| | | | |
|---|---|---|---|
| tblOffRoadEquipment | OffRoadEquipmentUnitAmount | 1.00 | 2.00 |
| tblOffRoadEquipment | OffRoadEquipmentUnitAmount | 2.00 | 4.00 |
| tblOperationalOffRoadEquipment | OperDaysPerYear | 260.00 | 365.00 |
| tblOperationalOffRoadEquipment | OperFuelType | Diesel | CNG |
| tblOperationalOffRoadEquipment | OperLoadFactor | 0.20 | 0.20 |
| tblOperationalOffRoadEquipment | OperOffRoadEquipmentNumber | 0.00 | 12.00 |
| tblTripsAndVMT | HaulingTripLength | 20.00 | 10.00 |
| tblTripsAndVMT | WorkerTripNumber | 33.00 | 20.00 |
| tblVehicleTrips | CNW_TL | 6.90 | 36.90 |
| tblVehicleTrips | CNW_TTP | 41.00 | 88.00 |
| tblVehicleTrips | CW_TTP | 59.00 | 12.00 |
| tblVehicleTrips | ST_TR | 49.97 | 7.75 |
| tblVehicleTrips | ST_TR | 1.68 | 13.01 |
| tblVehicleTrips | SU_TR | 25.24 | 7.75 |
| tblVehicleTrips | SU_TR | 1.68 | 13.01 |
| tblVehicleTrips | WD_TR | 42.70 | 7.75 |
| tblVehicleTrips | WD_TR | 1.68 | 13.01 |

## 2.0 Emissions Summary

## 2.1 Overall Construction

### Unmitigated Construction

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | tons/yr | | | | | | | | | | MT/yr | | | | | |
| 2020 | 1.6343 | 4.2520 | 3.8222 | 0.0111 | 0.7390 | 0.1428 | 0.8818 | 0.2144 | 0.1333 | 0.3478 | 0.0000 | 1,007.1734 | 1,007.1734 | 0.1233 | 0.0000 | 1,010.2557 |
| **Maximum** | **1.6343** | **4.2520** | **3.8222** | **0.0111** | **0.7390** | **0.1428** | **0.8818** | **0.2144** | **0.1333** | **0.3478** | **0.0000** | **1,007.1734** | **1,007.1734** | **0.1233** | **0.0000** | **1,010.2557** |

### Mitigated Construction

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Year | tons/yr | | | | | | | | | | MT/yr | | | | | |
| 2020 | 1.6343 | 4.2520 | 3.8222 | 0.0111 | 0.7140 | 0.1428 | 0.8568 | 0.2083 | 0.1333 | 0.3416 | 0.0000 | 1,007.1730 | 1,007.1730 | 0.1233 | 0.0000 | 1,010.2553 |
| **Maximum** | **1.6343** | **4.2520** | **3.8222** | **0.0111** | **0.7140** | **0.1428** | **0.8568** | **0.2083** | **0.1333** | **0.3416** | **0.0000** | **1,007.1730** | **1,007.1730** | **0.1233** | **0.0000** | **1,010.2553** |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Percent Reduction** | **0.00** | **0.00** | **0.00** | **0.00** | **3.39** | **0.00** | **2.84** | **2.87** | **0.00** | **1.77** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** |

| Quarter | Start Date | End Date | Maximum Unmitigated ROG + NOX (tons/quarter) | Maximum Mitigated ROG + NOX (tons/quarter) |
|---|---|---|---|---|
| **1** | **2-1-2020** | **4-30-2020** | 2.3998 | 2.3998 |
| **2** | **5-1-2020** | **7-31-2020** | 2.6110 | 2.6110 |
| **3** | **8-1-2020** | **9-30-2020** | 0.8783 | 0.8783 |
| | | **Highest** | 2.6110 | 2.6110 |

## 2.2 Overall Operational

**Unmitigated Operational**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Area | 0.9238 | 1.2000e-004 | 0.0136 | 0.0000 | | 5.0000e-005 | 5.0000e-005 | | 5.0000e-005 | 5.0000e-005 | 0.0000 | 0.0264 | 0.0264 | 7.0000e-005 | 0.0000 | 0.0281 |
| Energy | 2.2100e-003 | 0.0201 | 0.0169 | 1.2000e-004 | | 1.5300e-003 | 1.5300e-003 | | 1.5300e-003 | 1.5300e-003 | 0.0000 | 351.5528 | 351.5528 | 0.0140 | 3.2200e-003 | 352.8622 |
| Mobile | 2.6989 | 34.7784 | 39.3736 | 0.1583 | 11.5091 | 0.2368 | 11.7460 | 3.1459 | 0.2250 | 3.3709 | 0.0000 | 14,552.9065 | 14,552.9065 | 0.4378 | 0.0000 | 14,563.8522 |
| Offroad | 0.2847 | 2.5952 | 2.5704 | 3.3600e-003 | | 0.1842 | 0.1842 | | 0.1695 | 0.1695 | 0.0000 | 295.5685 | 295.5685 | 0.0956 | 0.0000 | 297.9583 |
| Waste | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 38.5947 | 0.0000 | 38.5947 | 2.2809 | 0.0000 | 95.6167 |
| Water | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 14.2550 | 188.0221 | 202.2771 | 1.4719 | 0.0362 | 249.8553 |
| **Total** | **3.9096** | **37.3938** | **41.9745** | **0.1617** | **11.5091** | **0.4226** | **11.9317** | **3.1459** | **0.3961** | **3.5419** | **52.8497** | **15,388.0762** | **15,440.9259** | **4.3003** | **0.0394** | **15,560.1728** |

## 2.2 Overall Operational

**Mitigated Operational**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Area | 0.9238 | 1.2000e-004 | 0.0136 | 0.0000 | | 5.0000e-005 | 5.0000e-005 | | 5.0000e-005 | 5.0000e-005 | 0.0000 | 0.0264 | 0.0264 | 7.0000e-005 | 0.0000 | 0.0281 |
| Energy | 2.2100e-003 | 0.0201 | 0.0169 | 1.2000e-004 | | 1.5300e-003 | 1.5300e-003 | | 1.5300e-003 | 1.5300e-003 | 0.0000 | 351.5528 | 351.5528 | 0.0140 | 3.2200e-003 | 352.8622 |
| Mobile | 2.6989 | 34.7784 | 39.3736 | 0.1583 | 11.5091 | 0.2368 | 11.7460 | 3.1459 | 0.2250 | 3.3709 | 0.0000 | 14,552.9065 | 14,552.9065 | 0.4378 | 0.0000 | 14,563.8522 |
| Offroad | 0.2847 | 2.5952 | 2.5704 | 3.3600e-003 | | 0.1842 | 0.1842 | | 0.1695 | 0.1695 | 0.0000 | 295.5685 | 295.5685 | 0.0956 | 0.0000 | 297.9583 |
| Waste | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 38.5947 | 0.0000 | 38.5947 | 2.2809 | 0.0000 | 95.6167 |
| Water | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 14.2550 | 188.0221 | 202.2771 | 1.4719 | 0.0362 | 249.8553 |
| **Total** | **3.9096** | **37.3938** | **41.9745** | **0.1617** | **11.5091** | **0.4226** | **11.9317** | **3.1459** | **0.3961** | **3.5419** | **52.8497** | **15,388.0762** | **15,440.9259** | **4.3003** | **0.0394** | **15,560.1728** |

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio-CO2 | Total CO2 | CH4 | N20 | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Percent Reduction** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** | **0.00** |

## 3.0 Construction Detail

**Construction Phase**

Bridge Point Upland Project - San Bernardino-South Coast County, Annual

| Phase Number | Phase Name | Phase Type | Start Date | End Date | Num Days Week | Num Days | Phase Description |
|---|---|---|---|---|---|---|---|
| 1 | Demolition | Demolition | 2/1/2020 | 1/31/2020 | 5 | 0 | |
| 2 | Site Preparation | Site Preparation | 2/1/2020 | 2/4/2020 | 5 | 2 | |
| 3 | Grading | Grading | 2/5/2020 | 3/24/2020 | 5 | 35 | |
| 4 | Building Construction | Building Construction | 3/25/2020 | 8/18/2020 | 5 | 105 | |
| 5 | Architectural Coating | Architectural Coating | 6/1/2020 | 8/31/2020 | 5 | 66 | |
| 6 | Paving | Paving | 8/19/2020 | 9/1/2020 | 5 | 10 | |

**Acres of Grading (Site Preparation Phase): 0**

**Acres of Grading (Grading Phase): 225**

**Acres of Paving: 19.77**

**Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 301,644; Non-Residential Outdoor: 100,548; Striped Parking Area: 78,408 (Architectural Coating – sqft)**

**OffRoad Equipment**

Bridge Point Upland Project - San Bernardino-South Coast County, Annual

| Phase Name | Offroad Equipment Type | Amount | Usage Hours | Horse Power | Load Factor |
|---|---|---|---|---|---|
| Architectural Coating | Air Compressors | 2 | 6.00 | 78 | 0.48 |
| Demolition | Excavators | 3 | 8.00 | 158 | 0.38 |
| Demolition | Concrete/Industrial Saws | 1 | 8.00 | 81 | 0.73 |
| Grading | Excavators | 4 | 8.00 | 158 | 0.38 |
| Building Construction | Cranes | 1 | 7.00 | 231 | 0.29 |
| Building Construction | Forklifts | 3 | 8.00 | 89 | 0.20 |
| Building Construction | Generator Sets | 1 | 8.00 | 84 | 0.74 |
| Paving | Pavers | 2 | 8.00 | 130 | 0.42 |
| Paving | Rollers | 2 | 8.00 | 80 | 0.38 |
| Demolition | Rubber Tired Dozers | 2 | 8.00 | 247 | 0.40 |
| Grading | Rubber Tired Dozers | 1 | 8.00 | 247 | 0.40 |
| Building Construction | Tractors/Loaders/Backhoes | 3 | 7.00 | 97 | 0.37 |
| Grading | Graders | 2 | 8.00 | 187 | 0.41 |
| Grading | Tractors/Loaders/Backhoes | 2 | 8.00 | 97 | 0.37 |
| Paving | Paving Equipment | 2 | 8.00 | 132 | 0.36 |
| Site Preparation | Tractors/Loaders/Backhoes | 4 | 8.00 | 97 | 0.37 |
| Site Preparation | Rubber Tired Dozers | 3 | 8.00 | 247 | 0.40 |
| Grading | Scrapers | 4 | 8.00 | 367 | 0.48 |
| Building Construction | Welders | 1 | 8.00 | 46 | 0.45 |

**Trips and VMT**

| Phase Name | Offroad Equipment Count | Worker Trip Number | Vendor Trip Number | Hauling Trip Number | Worker Trip Length | Vendor Trip Length | Hauling Trip Length | Worker Vehicle Class | Vendor Vehicle Class | Hauling Vehicle Class |
|---|---|---|---|---|---|---|---|---|---|---|
| Architectural Coating | 2 | 126.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Building Construction | 9 | 632.00 | 247.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Demolition | 6 | 15.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Grading | 13 | 20.00 | 0.00 | 54.00 | 14.70 | 6.90 | 10.00 | LD_Mix | HDT_Mix | HHDT |
| Paving | 6 | 15.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |
| Site Preparation | 7 | 18.00 | 0.00 | 0.00 | 14.70 | 6.90 | 20.00 | LD_Mix | HDT_Mix | HHDT |

## 3.1 Mitigation Measures Construction

Water Unpaved Roads

Reduce Vehicle Speed on Unpaved Roads

Clean Paved Roads

## 3.2 Demolition - 2020

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 3.2 Demolition - 2020

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 3.2 Demolition - 2020

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** | **0.0000** |

## 3.3 Site Preparation - 2020

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | | | | | 0.0181 | 0.0000 | 0.0181 | 9.9300e-003 | 0.0000 | 9.9300e-003 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 4.0800e-003 | 0.0424 | 0.0215 | 4.0000e-005 | | 2.2000e-003 | 2.2000e-003 | | 2.0200e-003 | 2.0200e-003 | 0.0000 | 3.3431 | 3.3431 | 1.0800e-003 | 0.0000 | 3.3701 |
| **Total** | **4.0800e-003** | **0.0424** | **0.0215** | **4.0000e-005** | **0.0181** | **2.2000e-003** | **0.0203** | **9.9300e-003** | **2.0200e-003** | **0.0120** | **0.0000** | **3.3431** | **3.3431** | **1.0800e-003** | **0.0000** | **3.3701** |

## 3.3 Site Preparation - 2020

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 9.0000e-005 | 7.0000e-005 | 7.0000e-004 | 0.0000 | 2.0000e-004 | 0.0000 | 2.0000e-004 | 5.0000e-005 | 0.0000 | 5.0000e-005 | 0.0000 | 0.1692 | 0.1692 | 1.0000e-005 | 0.0000 | 0.1693 |
| **Total** | **9.0000e-005** | **7.0000e-005** | **7.0000e-004** | **0.0000** | **2.0000e-004** | **0.0000** | **2.0000e-004** | **5.0000e-005** | **0.0000** | **5.0000e-005** | **0.0000** | **0.1692** | **0.1692** | **1.0000e-005** | **0.0000** | **0.1693** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | | | | | 0.0181 | 0.0000 | 0.0181 | 9.9300e-003 | 0.0000 | 9.9300e-003 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 4.0800e-003 | 0.0424 | 0.0215 | 4.0000e-005 | | 2.2000e-003 | 2.2000e-003 | | 2.0200e-003 | 2.0200e-003 | 0.0000 | 3.3431 | 3.3431 | 1.0800e-003 | 0.0000 | 3.3701 |
| **Total** | **4.0800e-003** | **0.0424** | **0.0215** | **4.0000e-005** | **0.0181** | **2.2000e-003** | **0.0203** | **9.9300e-003** | **2.0200e-003** | **0.0120** | **0.0000** | **3.3431** | **3.3431** | **1.0800e-003** | **0.0000** | **3.3701** |

## 3.3 Site Preparation - 2020

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 9.0000e-005 | 7.0000e-005 | 7.0000e-004 | 0.0000 | 1.9000e-004 | 0.0000 | 1.9000e-004 | 5.0000e-005 | 0.0000 | 5.0000e-005 | 0.0000 | 0.1692 | 0.1692 | 1.0000e-005 | 0.0000 | 0.1693 |
| **Total** | **9.0000e-005** | **7.0000e-005** | **7.0000e-004** | **0.0000** | **1.9000e-004** | **0.0000** | **1.9000e-004** | **5.0000e-005** | **0.0000** | **5.0000e-005** | **0.0000** | **0.1692** | **0.1692** | **1.0000e-005** | **0.0000** | **0.1693** |

## 3.4 Grading - 2020

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | | | | | 0.2247 | 0.0000 | 0.2247 | 0.0708 | 0.0000 | 0.0708 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.1295 | 1.4849 | 0.9665 | 1.9100e-003 | | 0.0617 | 0.0617 | | 0.0568 | 0.0568 | 0.0000 | 168.0105 | 168.0105 | 0.0543 | 0.0000 | 169.3690 |
| **Total** | **0.1295** | **1.4849** | **0.9665** | **1.9100e-003** | **0.2247** | **0.0617** | **0.2864** | **0.0708** | **0.0568** | **0.1276** | **0.0000** | **168.0105** | **168.0105** | **0.0543** | **0.0000** | **169.3690** |

## 3.4 Grading - 2020

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 1.2000e-004 | 4.9000e-003 | 7.0000e-004 | 1.0000e-005 | 2.3000e-004 | 1.0000e-005 | 2.4000e-004 | 6.0000e-005 | 1.0000e-005 | 7.0000e-005 | 0.0000 | 1.2031 | 1.2031 | 9.0000e-005 | 0.0000 | 1.2054 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 1.7300e-003 | 1.3600e-003 | 0.0136 | 4.0000e-005 | 3.8400e-003 | 3.0000e-005 | 3.8600e-003 | 1.0200e-003 | 2.0000e-005 | 1.0400e-003 | 0.0000 | 3.2894 | 3.2894 | 1.0000e-004 | 0.0000 | 3.2918 |
| **Total** | **1.8500e-003** | **6.2600e-003** | **0.0143** | **5.0000e-005** | **4.0700e-003** | **4.0000e-005** | **4.1000e-003** | **1.0800e-003** | **3.0000e-005** | **1.1100e-003** | **0.0000** | **4.4925** | **4.4925** | **1.9000e-004** | **0.0000** | **4.4973** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Fugitive Dust | | | | | 0.2247 | 0.0000 | 0.2247 | 0.0708 | 0.0000 | 0.0708 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.1295 | 1.4849 | 0.9665 | 1.9100e-003 | | 0.0617 | 0.0617 | | 0.0568 | 0.0568 | 0.0000 | 168.0103 | 168.0103 | 0.0543 | 0.0000 | 169.3688 |
| **Total** | **0.1295** | **1.4849** | **0.9665** | **1.9100e-003** | **0.2247** | **0.0617** | **0.2864** | **0.0708** | **0.0568** | **0.1276** | **0.0000** | **168.0103** | **168.0103** | **0.0543** | **0.0000** | **169.3688** |

## 3.4 Grading - 2020

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 1.2000e-004 | 4.9000e-003 | 7.0000e-004 | 1.0000e-005 | 2.2000e-004 | 1.0000e-005 | 2.3000e-004 | 6.0000e-005 | 1.0000e-005 | 7.0000e-005 | 0.0000 | 1.2031 | 1.2031 | 9.0000e-005 | 0.0000 | 1.2054 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 1.7300e-003 | 1.3600e-003 | 0.0136 | 4.0000e-005 | 3.6400e-003 | 3.0000e-005 | 3.6600e-003 | 9.7000e-004 | 2.0000e-005 | 9.9000e-004 | 0.0000 | 3.2894 | 3.2894 | 1.0000e-004 | 0.0000 | 3.2918 |
| **Total** | **1.8500e-003** | **6.2600e-003** | **0.0143** | **5.0000e-005** | **3.8600e-003** | **4.0000e-005** | **3.8900e-003** | **1.0300e-003** | **3.0000e-005** | **1.0600e-003** | **0.0000** | **4.4925** | **4.4925** | **1.9000e-004** | **0.0000** | **4.4973** |

## 3.5 Building Construction - 2020

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.1113 | 1.0073 | 0.8846 | 1.4100e-003 | | 0.0587 | 0.0587 | | 0.0551 | 0.0551 | 0.0000 | 121.5952 | 121.5952 | 0.0297 | 0.0000 | 122.3369 |
| **Total** | **0.1113** | **1.0073** | **0.8846** | **1.4100e-003** | | **0.0587** | **0.0587** | | **0.0551** | **0.0551** | **0.0000** | **121.5952** | **121.5952** | **0.0297** | **0.0000** | **122.3369** |

## 3.5 Building Construction - 2020

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0402 | 1.3843 | 0.2895 | 3.4600e-003 | 0.0818 | 6.3300e-003 | 0.0881 | 0.0236 | 6.0600e-003 | 0.0297 | 0.0000 | 331.0824 | 331.0824 | 0.0229 | 0.0000 | 331.6551 |
| Worker | 0.1639 | 0.1288 | 1.2869 | 3.4500e-003 | 0.3638 | 2.4300e-003 | 0.3662 | 0.0966 | 2.2400e-003 | 0.0989 | 0.0000 | 311.8323 | 311.8323 | 9.3600e-003 | 0.0000 | 312.0664 |
| **Total** | **0.2042** | **1.5131** | **1.5764** | **6.9100e-003** | **0.4456** | **8.7600e-003** | **0.4543** | **0.1202** | **8.3000e-003** | **0.1285** | **0.0000** | **642.9147** | **642.9147** | **0.0323** | **0.0000** | **643.7216** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 0.1113 | 1.0073 | 0.8846 | 1.4100e-003 | | 0.0586 | 0.0586 | | 0.0551 | 0.0551 | 0.0000 | 121.5951 | 121.5951 | 0.0297 | 0.0000 | 122.3367 |
| **Total** | **0.1113** | **1.0073** | **0.8846** | **1.4100e-003** | | **0.0586** | **0.0586** | | **0.0551** | **0.0551** | **0.0000** | **121.5951** | **121.5951** | **0.0297** | **0.0000** | **122.3367** |

## 3.5 Building Construction - 2020

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0402 | 1.3843 | 0.2895 | 3.4600e-003 | 0.0783 | 6.3300e-003 | 0.0846 | 0.0227 | 6.0600e-003 | 0.0288 | 0.0000 | 331.0824 | 331.0824 | 0.0229 | 0.0000 | 331.6551 |
| Worker | 0.1639 | 0.1288 | 1.2869 | 3.4500e-003 | 0.3449 | 2.4300e-003 | 0.3473 | 0.0920 | 2.2400e-003 | 0.0942 | 0.0000 | 311.8323 | 311.8323 | 9.3600e-003 | 0.0000 | 312.0664 |
| **Total** | **0.2042** | **1.5131** | **1.5764** | **6.9100e-003** | **0.4232** | **8.7600e-003** | **0.4319** | **0.1147** | **8.3000e-003** | **0.1230** | **0.0000** | **642.9147** | **642.9147** | **0.0323** | **0.0000** | **643.7216** |

## 3.6 Architectural Coating - 2020

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Archit. Coating | 1.1138 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0160 | 0.1111 | 0.1209 | 2.0000e-004 | | 7.3200e-003 | 7.3200e-003 | | 7.3200e-003 | 7.3200e-003 | 0.0000 | 16.8515 | 16.8515 | 1.3000e-003 | 0.0000 | 16.8841 |
| **Total** | **1.1298** | **0.1111** | **0.1209** | **2.0000e-004** | | **7.3200e-003** | **7.3200e-003** | | **7.3200e-003** | **7.3200e-003** | **0.0000** | **16.8515** | **16.8515** | **1.3000e-003** | **0.0000** | **16.8841** |

## 3.6 Architectural Coating - 2020

**Unmitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0205 | 0.0161 | 0.1613 | 4.3000e-004 | 0.0456 | 3.0000e-004 | 0.0459 | 0.0121 | 2.8000e-004 | 0.0124 | 0.0000 | 39.0777 | 39.0777 | 1.1700e-003 | 0.0000 | 39.1071 |
| **Total** | **0.0205** | **0.0161** | **0.1613** | **4.3000e-004** | **0.0456** | **3.0000e-004** | **0.0459** | **0.0121** | **2.8000e-004** | **0.0124** | **0.0000** | **39.0777** | **39.0777** | **1.1700e-003** | **0.0000** | **39.1071** |

**Mitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Archit. Coating | 1.1138 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Off-Road | 0.0160 | 0.1111 | 0.1209 | 2.0000e-004 | | 7.3200e-003 | 7.3200e-003 | | 7.3200e-003 | 7.3200e-003 | 0.0000 | 16.8515 | 16.8515 | 1.3000e-003 | 0.0000 | 16.8841 |
| **Total** | **1.1298** | **0.1111** | **0.1209** | **2.0000e-004** | | **7.3200e-003** | **7.3200e-003** | | **7.3200e-003** | **7.3200e-003** | **0.0000** | **16.8515** | **16.8515** | **1.3000e-003** | **0.0000** | **16.8841** |

## 3.6 Architectural Coating - 2020

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 0.0205 | 0.0161 | 0.1613 | 4.3000e-004 | 0.0432 | 3.0000e-004 | 0.0435 | 0.0115 | 2.8000e-004 | 0.0118 | 0.0000 | 39.0777 | 39.0777 | 1.1700e-003 | 0.0000 | 39.1071 |
| **Total** | **0.0205** | **0.0161** | **0.1613** | **4.3000e-004** | **0.0432** | **3.0000e-004** | **0.0435** | **0.0115** | **2.8000e-004** | **0.0118** | **0.0000** | **39.0777** | **39.0777** | **1.1700e-003** | **0.0000** | **39.1071** |

## 3.7 Paving - 2020

**Unmitigated Construction On-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 6.7800e-003 | 0.0703 | 0.0733 | 1.1000e-004 | | 3.7600e-003 | 3.7600e-003 | | 3.4600e-003 | 3.4600e-003 | 0.0000 | 10.0141 | 10.0141 | 3.2400e-003 | 0.0000 | 10.0951 |
| Paving | 0.0259 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0327** | **0.0703** | **0.0733** | **1.1000e-004** | | **3.7600e-003** | **3.7600e-003** | | **3.4600e-003** | **3.4600e-003** | **0.0000** | **10.0141** | **10.0141** | **3.2400e-003** | **0.0000** | **10.0951** |

## 3.7 Paving - 2020

### Unmitigated Construction Off-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 3.7000e-004 | 2.9000e-004 | 2.9100e-003 | 1.0000e-005 | 8.2000e-004 | 1.0000e-005 | 8.3000e-004 | 2.2000e-004 | 1.0000e-005 | 2.2000e-004 | 0.0000 | 0.7049 | 0.7049 | 2.0000e-005 | 0.0000 | 0.7054 |
| **Total** | **3.7000e-004** | **2.9000e-004** | **2.9100e-003** | **1.0000e-005** | **8.2000e-004** | **1.0000e-005** | **8.3000e-004** | **2.2000e-004** | **1.0000e-005** | **2.2000e-004** | **0.0000** | **0.7049** | **0.7049** | **2.0000e-005** | **0.0000** | **0.7054** |

### Mitigated Construction On-Site

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Off-Road | 6.7800e-003 | 0.0703 | 0.0733 | 1.1000e-004 | | 3.7600e-003 | 3.7600e-003 | | 3.4600e-003 | 3.4600e-003 | 0.0000 | 10.0141 | 10.0141 | 3.2400e-003 | 0.0000 | 10.0951 |
| Paving | 0.0259 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| **Total** | **0.0327** | **0.0703** | **0.0733** | **1.1000e-004** | | **3.7600e-003** | **3.7600e-003** | | **3.4600e-003** | **3.4600e-003** | **0.0000** | **10.0141** | **10.0141** | **3.2400e-003** | **0.0000** | **10.0951** |

### 3.7 Paving - 2020

**Mitigated Construction Off-Site**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Hauling | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Vendor | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Worker | 3.7000e-004 | 2.9000e-004 | 2.9100e-003 | 1.0000e-005 | 7.8000e-004 | 1.0000e-005 | 7.9000e-004 | 2.1000e-004 | 1.0000e-005 | 2.1000e-004 | 0.0000 | 0.7049 | 0.7049 | 2.0000e-005 | 0.0000 | 0.7054 |
| **Total** | **3.7000e-004** | **2.9000e-004** | **2.9100e-003** | **1.0000e-005** | **7.8000e-004** | **1.0000e-005** | **7.9000e-004** | **2.1000e-004** | **1.0000e-005** | **2.1000e-004** | **0.0000** | **0.7049** | **0.7049** | **2.0000e-005** | **0.0000** | **0.7054** |

## 4.0 Operational Detail - Mobile

### 4.1 Mitigation Measures Mobile

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Mitigated | 2.6989 | 34.7784 | 39.3736 | 0.1583 | 11.5091 | 0.2368 | 11.7460 | 3.1459 | 0.2250 | 3.3709 | 0.0000 | 14,552.9065 | 14,552.9065 | 0.4378 | 0.0000 | 14,563.8522 |
| Unmitigated | 2.6989 | 34.7784 | 39.3736 | 0.1583 | 11.5091 | 0.2368 | 11.7460 | 3.1459 | 0.2250 | 3.3709 | 0.0000 | 14,552.9065 | 14,552.9065 | 0.4378 | 0.0000 | 14,563.8522 |

## 4.2 Trip Summary Information

| | Average Daily Trip Rate | | | Unmitigated | Mitigated |
|---|---|---|---|---|---|
| Land Use | Weekday | Saturday | Sunday | Annual VMT | Annual VMT |
| Parking Lot | 0.00 | 0.00 | 0.00 | | |
| Regional Shopping Center | 77.50 | 77.50 | 77.50 | 167,620 | 167,620 |
| Unrefrigerated Warehouse-No Rail | 2,486.21 | 2,486.21 | 2486.21 | 29,086,698 | 29,086,698 |
| Total | 2,563.71 | 2,563.71 | 2,563.71 | 29,254,319 | 29,254,319 |

## 4.3 Trip Type Information

| | Miles | | | Trip % | | | Trip Purpose % | | |
|---|---|---|---|---|---|---|---|---|---|
| Land Use | H-W or C-W | H-S or C-C | H-O or C-NW | H-W or C-W | H-S or C-C | H-O or C-NW | Primary | Diverted | Pass-by |
| Parking Lot | 16.60 | 8.40 | 6.90 | 0.00 | 0.00 | 0.00 | 0 | 0 | 0 |
| Regional Shopping Center | 16.60 | 8.40 | 6.90 | 16.30 | 64.70 | 19.00 | 54 | 35 | 11 |
| Unrefrigerated Warehouse-No | 16.60 | 8.40 | 36.90 | 12.00 | 0.00 | 88.00 | 92 | 5 | 3 |

## 4.4 Fleet Mix

| Land Use | LDA | LDT1 | LDT2 | MDV | LHD1 | LHD2 | MHD | HHD | OBUS | UBUS | MCY | SBUS | MH |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Parking Lot | 0.549952 | 0.037123 | 0.179649 | 0.119457 | 0.017229 | 0.005267 | 0.017877 | 0.062669 | 0.001348 | 0.001607 | 0.006000 | 0.000812 | 0.001010 |
| Regional Shopping Center | 0.549952 | 0.037123 | 0.179649 | 0.119457 | 0.017229 | 0.005267 | 0.017877 | 0.062669 | 0.001348 | 0.001607 | 0.006000 | 0.000812 | 0.001010 |
| Unrefrigerated Warehouse-No Rail | 0.227299 | 0.037976 | 0.179087 | 0.122965 | 0.380000 | 0.005460 | 0.017497 | 0.023600 | 0.000000 | 0.000000 | 0.006117 | 0.000000 | 0.000000 |

## 5.0 Energy Detail

Historical Energy Use: N

### 5.1 Mitigation Measures Energy

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Electricity Mitigated | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 329.6669 | 329.6669 | 0.0136 | 2.8200e-003 | 330.8463 |
| Electricity Unmitigated | | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 329.6669 | 329.6669 | 0.0136 | 2.8200e-003 | 330.8463 |
| NaturalGas Mitigated | 2.2100e-003 | 0.0201 | 0.0169 | 1.2000e-004 | | 1.5300e-003 | 1.5300e-003 | | 1.5300e-003 | 1.5300e-003 | 0.0000 | 21.8858 | 21.8858 | 4.2000e-004 | 4.0000e-004 | 22.0159 |
| NaturalGas Unmitigated | 2.2100e-003 | 0.0201 | 0.0169 | 1.2000e-004 | | 1.5300e-003 | 1.5300e-003 | | 1.5300e-003 | 1.5300e-003 | 0.0000 | 21.8858 | 21.8858 | 4.2000e-004 | 4.0000e-004 | 22.0159 |

## 5.2 Energy by Land Use - NaturalGas

**Unmitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Regional Shopping Center | 22200 | 1.2000e-004 | 1.0900e-003 | 9.1000e-004 | 1.0000e-005 | | 8.0000e-005 | 8.0000e-005 | | 8.0000e-005 | 8.0000e-005 | 0.0000 | 1.1847 | 1.1847 | 2.0000e-005 | 2.0000e-005 | 1.1917 |
| Unrefrigerated Warehouse-No Rail | 387925 | 2.0900e-003 | 0.0190 | 0.0160 | 1.1000e-004 | | 1.4500e-003 | 1.4500e-003 | | 1.4500e-003 | 1.4500e-003 | 0.0000 | 20.7012 | 20.7012 | 4.0000e-004 | 3.8000e-004 | 20.8242 |
| **Total** | | **2.2100e-003** | **0.0201** | **0.0169** | **1.2000e-004** | | **1.5300e-003** | **1.5300e-003** | | **1.5300e-003** | **1.5300e-003** | **0.0000** | **21.8858** | **21.8858** | **4.2000e-004** | **4.0000e-004** | **22.0159** |

**Mitigated**

| | NaturalGas Use | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Land Use | kBTU/yr | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Regional Shopping Center | 22200 | 1.2000e-004 | 1.0900e-003 | 9.1000e-004 | 1.0000e-005 | | 8.0000e-005 | 8.0000e-005 | | 8.0000e-005 | 8.0000e-005 | 0.0000 | 1.1847 | 1.1847 | 2.0000e-005 | 2.0000e-005 | 1.1917 |
| Unrefrigerated Warehouse-No Rail | 387925 | 2.0900e-003 | 0.0190 | 0.0160 | 1.1000e-004 | | 1.4500e-003 | 1.4500e-003 | | 1.4500e-003 | 1.4500e-003 | 0.0000 | 20.7012 | 20.7012 | 4.0000e-004 | 3.8000e-004 | 20.8242 |
| **Total** | | **2.2100e-003** | **0.0201** | **0.0169** | **1.2000e-004** | | **1.5300e-003** | **1.5300e-003** | | **1.5300e-003** | **1.5300e-003** | **0.0000** | **21.8858** | **21.8858** | **4.2000e-004** | **4.0000e-004** | **22.0159** |

## 5.3 Energy by Land Use - Electricity

**Unmitigated**

| | Electricity Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | kWh/yr | MT/yr | | | |
| Parking Lot | 457380 | 145.7311 | 6.0200e-003 | 1.2400e-003 | 146.2524 |
| Regional Shopping Center | 126300 | 40.2419 | 1.6600e-003 | 3.4000e-004 | 40.3859 |
| Unrefrigerated Warehouse-No Rail | 450987 | 143.6940 | 5.9300e-003 | 1.2300e-003 | 144.2081 |
| **Total** | | **329.6669** | **0.0136** | **2.8100e-003** | **330.8463** |

**Mitigated**

| | Electricity Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | kWh/yr | MT/yr | | | |
| Parking Lot | 457380 | 145.7311 | 6.0200e-003 | 1.2400e-003 | 146.2524 |
| Regional Shopping Center | 126300 | 40.2419 | 1.6600e-003 | 3.4000e-004 | 40.3859 |
| Unrefrigerated Warehouse-No Rail | 450987 | 143.6940 | 5.9300e-003 | 1.2300e-003 | 144.2081 |
| **Total** | | **329.6669** | **0.0136** | **2.8100e-003** | **330.8463** |

# 6.0 Area Detail

## 6.1 Mitigation Measures Area

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Category | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Mitigated | 0.9238 | 1.2000e-004 | 0.0136 | 0.0000 | | 5.0000e-005 | 5.0000e-005 | | 5.0000e-005 | 5.0000e-005 | 0.0000 | 0.0264 | 0.0264 | 7.0000e-005 | 0.0000 | 0.0281 |
| Unmitigated | 0.9238 | 1.2000e-004 | 0.0136 | 0.0000 | | 5.0000e-005 | 5.0000e-005 | | 5.0000e-005 | 5.0000e-005 | 0.0000 | 0.0264 | 0.0264 | 7.0000e-005 | 0.0000 | 0.0281 |

## 6.2 Area by SubCategory

**Unmitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Architectural Coating | 0.1114 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Consumer Products | 0.8111 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Landscaping | 1.2700e-003 | 1.2000e-004 | 0.0136 | 0.0000 | | 5.0000e-005 | 5.0000e-005 | | 5.0000e-005 | 5.0000e-005 | 0.0000 | 0.0264 | 0.0264 | 7.0000e-005 | 0.0000 | 0.0281 |
| **Total** | **0.9238** | **1.2000e-004** | **0.0136** | **0.0000** | | **5.0000e-005** | **5.0000e-005** | | **5.0000e-005** | **5.0000e-005** | **0.0000** | **0.0264** | **0.0264** | **7.0000e-005** | **0.0000** | **0.0281** |

**Mitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| SubCategory | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Architectural Coating | 0.1114 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Consumer Products | 0.8111 | | | | | 0.0000 | 0.0000 | | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Landscaping | 1.2700e-003 | 1.2000e-004 | 0.0136 | 0.0000 | | 5.0000e-005 | 5.0000e-005 | | 5.0000e-005 | 5.0000e-005 | 0.0000 | 0.0264 | 0.0264 | 7.0000e-005 | 0.0000 | 0.0281 |
| **Total** | **0.9238** | **1.2000e-004** | **0.0136** | **0.0000** | | **5.0000e-005** | **5.0000e-005** | | **5.0000e-005** | **5.0000e-005** | **0.0000** | **0.0264** | **0.0264** | **7.0000e-005** | **0.0000** | **0.0281** |

## 7.0 Water Detail

## 7.1 Mitigation Measures Water

| | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|
| Category | MT/yr | | | |
| Mitigated | 202.2771 | 1.4719 | 0.0362 | 249.8553 |
| Unmitigated | 202.2771 | 1.4719 | 0.0362 | 249.8553 |

## 7.2 Water by Land Use

**Unmitigated**

| | Indoor/Outdoor Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | Mgal | MT/yr | | | |
| Parking Lot | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Regional Shopping Center | 0.740725 / 0.453993 | 4.9152 | 0.0243 | 6.1000e-004 | 5.7052 |
| Unrefrigerated Warehouse-No Rail | 44.1919 / 0 | 197.3620 | 1.4476 | 0.0356 | 244.1501 |
| **Total** | | **202.2771** | **1.4719** | **0.0362** | **249.8553** |

## 7.2 Water by Land Use

**Mitigated**

| | Indoor/Outdoor Use | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | Mgal | MT/yr | | | |
| Parking Lot | 0 / 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Regional Shopping Center | 0.740725 / 0.453993 | 4.9152 | 0.0243 | 6.1000e-004 | 5.7052 |
| Unrefrigerated Warehouse-No Rail | 44.1919 / 0 | 197.3620 | 1.4476 | 0.0356 | 244.1501 |
| **Total** | | **202.2771** | **1.4719** | **0.0362** | **249.8553** |

# 8.0 Waste Detail

## 8.1 Mitigation Measures Waste

**Category/Year**

| | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|
| | MT/yr | | | |
| Mitigated | 38.5947 | 2.2809 | 0.0000 | 95.6167 |
| Unmitigated | 38.5947 | 2.2809 | 0.0000 | 95.6167 |

## 8.2 Waste by Land Use

**Unmitigated**

| | Waste Disposed | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | tons | MT/yr | | | |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Regional Shopping Center | 10.5 | 2.1314 | 0.1260 | 0.0000 | 5.2805 |
| Unrefrigerated Warehouse-No Rail | 179.63 | 36.4633 | 2.1549 | 0.0000 | 90.3362 |
| **Total** | | **38.5947** | **2.2809** | **0.0000** | **95.6167** |

## 8.2 Waste by Land Use

**Mitigated**

| | Waste Disposed | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|
| Land Use | tons | MT/yr | | | |
| Parking Lot | 0 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| Regional Shopping Center | 10.5 | 2.1314 | 0.1260 | 0.0000 | 5.2805 |
| Unrefrigerated Warehouse-No Rail | 179.63 | 36.4633 | 2.1549 | 0.0000 | 90.3362 |
| **Total** | | **38.5947** | **2.2809** | **0.0000** | **95.6167** |

## 9.0 Operational Offroad

| Equipment Type | Number | Hours/Day | Days/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|
| Forklifts | 12 | 8.00 | 365 | 89 | 0.20 | CNG |

**UnMitigated/Mitigated**

| | ROG | NOx | CO | SO2 | Fugitive PM10 | Exhaust PM10 | PM10 Total | Fugitive PM2.5 | Exhaust PM2.5 | PM2.5 Total | Bio- CO2 | NBio- CO2 | Total CO2 | CH4 | N2O | CO2e |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Equipment Type | tons/yr | | | | | | | | | | MT/yr | | | | | |
| Forklifts | 0.2847 | 2.5952 | 2.5704 | 3.3600e-003 | | 0.1842 | 0.1842 | | 0.1695 | 0.1695 | 0.0000 | 295.5685 | 295.5685 | 0.0956 | 0.0000 | 297.9583 |
| **Total** | **0.2847** | **2.5952** | **2.5704** | **3.3600e-003** | | **0.1842** | **0.1842** | | **0.1695** | **0.1695** | **0.0000** | **295.5685** | **295.5685** | **0.0956** | **0.0000** | **297.9583** |

## 10.0 Stationary Equipment

**Fire Pumps and Emergency Generators**

| Equipment Type | Number | Hours/Day | Hours/Year | Horse Power | Load Factor | Fuel Type |
|---|---|---|---|---|---|---|

**Boilers**

| Equipment Type | Number | Heat Input/Day | Heat Input/Year | Boiler Rating | Fuel Type |
|---|---|---|---|---|---|

**User Defined Equipment**

| Equipment Type | Number |
|---|---|

## 11.0 Vegetation

**WARNING: External email. Please verify sender before opening attachments or clicking on links.**

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Dear City of Upland,

My husband and I recently moved to Upland in May of 2019 and in November of 2019 started reading about the possibility of a warehouse being built on Foothill in Upland. I-64

We moved here because of the small community feeling and ideal location to my job and Upland High School and feel that having a large distribution center would change the atmosphere of the community. As a new members of the community we have strong concerns about increased traffic, pollution (both noise and light), and environmental impact.

I hope you do a throughout analysis about the impacts this would have on the Upland community.

Regards,
My and Adam Johnson

**WARNING: External email. Please verify sender before opening attachments or clicking on links.**

I AM OPPOSED TO THE BRIDGE PROJECT

I-65

I am a long-time resident of Upland's District 1. I am opposed to the proposed development of the "warehouse" on Foothill and Benson. From what I can tell, the building is more of a transportation center than a warehouse. The area in which you are planning to allow this structure to be built is in an area of the city very close to residential structures, including my home. I am opposed to allowing development that will allow hundreds or even thousands of delivery vehicles to be added to the streets in my neighborhood. These vehicles will be a threat to the safety of children walking to school, people walking their pets and everyone who already uses the roads in my neighborhood. Noise pollution, air pollution, and the effect on the physical environment in the area are also big concerns of mine. Where is the Environmental Impact Study? It is completely unbelievable that this facility will have zero environmental impact on the immediate area and its surroundings.

Please put the people of your city ahead of whatever you perceive to be the potential gain from this horrible proposal. Our city deserves better than this.

Anita Diaz de Leon
1398 North Erin Ave.
Upland, CA 91786

Robert Redford
CONSERVANCY
for Southern California Sustainability
PITZER COLLEGE

**MEMORANDUM**

TO: Mike Poland, Contract Planning Manager, City of Upland

CC: Rosemary Hoerning, Keri Johnson, Janice Elliott, Bill Velto, Ricky Felix, Rudy Zuniga, Debbie Stone, Robin Aspinall, Gary Schwary, Carolyn Anderson, Yvette Walker, Linden Brouse

FROM: Brinda Sarathy
RE: Bridge Point Upland Project
DATE: January 17, 2020

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I-66

Dear Upland City Planning Staff, Planning Commissioners, and City Councilors:

As a Professor of Environmental Analysis, Director of the Robert Redford Conservancy for Southern California Sustainability at Pitzer College, and Upland resident, I write to provide comments on the draft Mitigated Negative Declaration on the Bridge Point Upland Project (BPUP). Based on my comments below, I request that the Planning Commission and City Council **vote no** on the BPUP due to significant concerns with regard to: zoning requirements, air quality impacts, noise impacts, traffic impacts, GHG emissions, and inadequate mitigation measures to fully address the scope and long-term negative impacts of this project on the residents of Upland, and especially those living in closer proximity to the BPUP's transportation routes.

Upland as the Lead Agency is in its full rights to ask for an Environmental Impact Report (vs. MND). An EIR would provide a greater depth of analysis on the full scope of negative impacts of the Bridge Point Project for Upland residents. It behooves all our elected and appointed City officials to be as informed and prudent as possible prior to making such a consequential decision with regard to Upland's short and long-term well-being.

Respectfully,

Brinda Sarathy, Ph.D.
brinda_sarathy@pitzer.edu
1327 N. Ukiah Way,
Upland, CA 91786

## SUMMARY OF COMMENTS

I-66

MND Finding A: "The proposed project would be compatible with the Upland General Plan and existing surrounding uses."

The City's General Plan land use designation for the Bridge Point Project site is Commercial/Industrial Mixed-Use (C/IN-MU). The City of Upland has claimed that the current zoning for the Project site is Commercial/Industrial Mixed-Use (C/I-MU).

The Project building has been described as: "one level and total approximately 201,096 square feet (sf), of which approximately 191,096 sf would be **warehouse/parcel delivery** uses and 10,000 sf would be office/retail uses."

According to 17.05.010 the Purpose of Mixed-Use Zones are to:

1. Foster developments that provide a mix of related land uses close to one another, either within a single building, on the same parcel, or on adjacent parcels, in order to reduce reliance on the automobile, create pedestrian-oriented environments, and support social interaction by allowing residents to work or shop within walking distance to where they live;

2. Promote infill development, intensification, and reuse of currently underused sites consistent with the General Plan;

3. Establish design standards that improve the visual quality of development and create unified, distinctive, and attractive mixed-use corridors and centers;

4. Provide appropriate buffers and transition standards between commercial, industrial and residential uses to preserve non-residential and mixed-use feasibility and residential quality; and

5. Provide incentives for mixed-use (horizontal and vertical) development along main corridors and nodes to promote varied uses within a pedestrian-oriented environment.

Additional purposes of the Commercial/Industrial Mixed-Use (C/I-MU):

The C/I-MU Zone is intended to accommodate a variety of industrial, regional retail, and support commercial activities to satisfy a range of shopping needs for residents of the community. It is also intended to encourage development of businesses in the City and maximize the potential for job generation. This zone is situated at an important gateway into the City at the west end of Foothill Boulevard and along portions of Central and Benson avenues. *Development in this zone is expected to be of high quality design and address the street front with attractive building facades and pedestrian-friendly sidewalks, trees, and landscaping to facilitate the transformation of this area into an attractive and welcoming gateway into Upland.* Uses supported under this category include commercial and industrial, as well as limited residential in the form of live/work developments, subject to a conditional use permit process. The maximum permitted non-residential FAR is 1.0, exclusive of City and state density bonuses. The C/I-MU zone implements the Commercial/Industrial Mixed-Use (C/I-MU) land use designation in the General Plan.

17.05.020 Land Use Regulations for Mixed-Use Zones

Permitted Land Uses. Table 17.05-1 (Permitted Land Uses in the Mixed-Use Zones) identifies land uses permitted in the mixed-use zones. *Use classifications not listed in the table are prohibited.*

It should be noted that although the classification of "warehouse" exists in the Table, the definition provided for a "warehouse" under 17.51.010 Definitions is as follows:

| | |
|---|---|
| **Warehousing** | "Warehousing" means the provision of facilities used primarily for the storage of commercial goods, including documents. "Warehousing" does not include mini-storage. |

Source: http://www.qcode.us/codes/upland/

Concern: Mischaracterization and/or misrepresentation of the Bridge Point Upland Project as a "warehouse" permitted under the zoning category of Commercial/Industrial Mixed-Use in the Upland General Plan.

At its face, the City of Upland claims that the Bridge Point Upland Project is as a "warehouse" and is thus permissible under the Commercial/Industrial Mixed-Use (C/I-MU) zoning.

Yet, this is a significant misrepresentation of the actual operations of the BPUP which is not a mere warehouse for the "primary storage of commercial goods," but rather a soon-to-be node in the (Amazon) **delivery station distribution network characterized by the *on-going and continuous sorting and distribution* of goods on a 24/7 basis**. A "delivery station distribution center" or "truck terminal" would be a more appropriate land use designation for this Project. However, the City of Upland has heretofore not explicitly identified, defined, or accounted for this type of land use in its General Plan. It is thus not a permitted land use under the existing General Plan.

MWPVL International, a leading global supply chain and logistics consulting services firm (which, incidentally, already cites Amazon as the interested tenant for this Project), helps us better understand the context and operations of the BPUP:

"In late 2013, Amazon launched a build-out of its delivery station distribution network consisting of smaller facilities that are typically in the 60,000 to 100,000 sq. ft. range. These buildings are typically positioned within larger metropolitan cities across the country and quite often they are positioned near airports. *The delivery station's primary role is to sort packages for outbound routes to enable last mile delivery to customers within a tightly defined urban area. Often deliveries are performed by multiple local courier companies that are contracted by Amazon to service specific routes and also by independent Amazon Flex drivers.* These deliveries may consist of multi-temperature fresh food totes being delivered on a same day basis to markets where Amazon Fresh is up and running."

Source:
http://www.mwpvl.com/html/amazon_com.html

I-66

As a delivery station (and/or type of trucking terminal) whose primary purpose is "sorting and delivering packages for outbound routes," the characterization of the Bridge Point Upland Project as a storage "warehouse" is inadequate, misleading, and inaccurate.

Moreover, as a transportation-oriented facility, a delivery station and/or truck terminal facility directly conflicts with some of the stated purpose of Upland's Mixed Use Zones such as to:

> "Foster developments that… reduce reliance on the automobile, create pedestrian-oriented environments, and support social interaction by allowing residents to work or shop within walking distance to where they live."
>
> "Provide incentives for mixed-use (horizontal and vertical) development along main corridors and nodes to promote varied uses within a pedestrian-oriented environment."

Finally, the City of Upland's General Plan notes that development in the C/I-MU Zone "*is expected to be of high quality design and address the street front with attractive building facades and pedestrian-friendly sidewalks, trees, and landscaping to facilitate the transformation of this area into an attractive and welcoming gateway into Upland."*

I contest the assertion that an (Amazon) e-commerce delivery station and/or truck terminal—dependent as it is on the continuous use of semi-trucks and thousands of delivery vans traversing Foothill Boulevard, Central Avenue, Benson Avenue, and Baseline Avenue— comports with "an attractive and welcoming gateway into Upland." On the contrary, the Bridge Point Upland Project will make the gateway into Upland an experience of mounting frustration for drivers already dealing with increased levels of traffic and congestion, and pose a hazard for bicyclists and pedestrians, both of whom will be exposed to higher levels of air pollution and vehicular traffic.

If the Bridge Point Upland Project is to be considered, then it is incumbent on Upland City Staff and the Planning Commission to first define "delivery station" and/or "truck terminal" as a specific, designated land use in the City's General Plan and only then consider what Zoning Areas such a land use would be appropriate. Right now, it appears as if the City of Upland is attempting to shoehorn the singularly unique Bridge Point Upland Project into an existing land use definition of "warehouse," which grossly mischaracterizes the nature of this facility and its 24/7 sorting and delivery station operations.

MND Finding B: "Criteria pollutant emissions from the proposed Project would remain below their respective thresholds. Although impacts would be considered less than significant, the proposed Project would be subject to SCAQMD Rules 402, 403, and 1113, as identified in mitigation below, to further reduce specific construction-related emissions."

Concern: Underestimates Localized Air Quality Impacts

The Mitigated Negative Declaration states that there are no significant air quality impacts from the BPUP. Project-generated vehicle emissions were estimated based on trip generation data within the Project traffic study. I have concerns about the methods of measurement used to assess air quality

I-66

impacts. Specifically, rather than total daily trips (2,583 passenger car equivalent trips), why were total Vehicle Miles Traveled also not considered?

The report further notes that off-site mobile emissions were not included in the analysis of Localized Significance Thresholds for air pollutants. Because the BPUP is a truck terminal/delivery station operation, air quality in the localized area (including CO) will be heavily impacted by vehicles (semi-trucks and delivery vans) entering and leaving the facility on a continuous basis, and driving along major routes to and from the site (primarily Foothill Boulevard, Benson Avenue, Baseline Avenue, and Central Avenue). Measurements and impacts of off-site air pollution, along the full length of these routes, should thus be accounted for on residences and other sensitive receptors. This will give a more comprehensive picture of the localized air quality impacts stemming from the Project and its operations within Upland.

Concern: Insufficient Mitigation Measure under AQ-3

The mitigating measure to promote alternative fuels and "clean" truck fleets by the mere provision of relevant information (i.e. Carl Moyer Program, other retrofit programs, etc.) is insufficient to address air pollution emissions or transition to zero emission vehicles. Because the BPUP is a heavily transportation-oriented operation, with over 1100 vans and 25 semi-trucks traveling to and from the site on a daily basis, a more meaningful mitigation measure to ensure zero emission vehicles is required. The City might, for example, require heavily trafficked delivery station facilities (should such a land use designation eventually be permitted by the General Plan) to run majority zero emissions fleets. Independent contractors will not necessarily have the financial means or incentives to purchase zero emissions vehicles so the mere provision of information is an ineffective mitigation measure to address and reduce localized impacts of air pollution and GHG emissions.

MND Finding G: "Although the proposed project would not result in potentially significant temporary noise impacts as a result of project construction, implementation of project design features listed below would minimize potential temporary impacts. Operational noise (resulting from trucks and loading/unloading activities) levels would be in compliance with City of Upland property line noise limits. Offsite noise caused by proposed project traffic would be less than significant."

Concern: Significant investments have been made by private Upland residents buying or renting residential property along Central Avenue (i.e. Upland Central and Park Central developments), one of the major transportation routes of the BPUP. The noise studies in the IS/MND did not measure sound within these residences and it would be prudent to do so in order to assess impacts on public health. Vegetative buffers have been shown to be effective in absorbing both localized air pollutants and noise and should be considered as minimum mitigation measures along all major transportation routes of the Project.

MND Finding H: "Although Project implementation would not result in a significant impact related to traffic, the San Bernardino County Management Program (CMP) recommends circulation improvements at any intersection which operates at an unsatisfactory level of service. Accordingly, implementation of the mitigation measure identified below would minimize circulation impacts at the Benson Avenue/Baseline Road intersection during the (a.m. peak hour) under year 2020 and 2040 Conditions."

I-66

Concern: The traffic study inadequately captures the negative impact of traffic and levels of congestion associated with the BPUP. Only a limited number of intersections were studied using the Level of Service (LOS) method. It is likely that semi-trucks and delivery vans going to and from the project site will take "paths of least resistance." If, for example, traffic is backed up along Baseline Road from the east (partly due to the Sycamore Hills shopping and residential development), it is reasonable to assume that semi trucks and delivery vans will go up Monte Vista Avenue to access the 201 Freeway from the west. Similarly, if traffic is backed up on Central Avenue, it is reasonable to assume that delivery vehicles and semi trucks will enter and/or exit the 10 Freeway via Monte Vista Avenue. These routes and intersections have not been studied for traffic or congestion impacts.

In addition, using measures of Vehicle Miles Traveled (VMT) and trip length would more accurately capture the true negative impacts of the BPUP with regard to GHG emissions and traffic congestion. The California Land Use & Development Report provides some context for understanding the differences between using "LOS" vs. "VMT" measures:

"Following years of development and public comment, the Office of Planning and Research (OPR) and the Natural Resources Agency have issued new CEQA Guidelines for analyzing transportation impacts. These new regulations represent a significant shift in analyzing transportation impacts under CEQA. By July 1, 2020, all CEQA lead agencies must analyze a project's transportation impacts using vehicle miles traveled (VMT). VMT measures the per capita number of car trips generated by a project and distances cars will travel to and from a project, rather than congestion levels at intersections (level of service or "LOS," graded on a scale of A – F). California's largest cities have already adopted VMT standards and abandoned LOS, but many other jurisdictions will continue to require LOS analysis — not for CEQA purposes, but because their general plans or other policies require LOS analysis."

"Under the existing framework of congestion-based analysis using LOS, infill and transit-oriented development is often discouraged because such projects are in areas of existing traffic congestion. *As policymakers and legislators have recognized, congestion-based analysis does not necessarily improve the time spent commuting and is often at odds with state goals of reducing vehicle usage and promoting public transit. Indeed, a frequent solution to reducing level of service at intersections is to increase roadway capacity, which studies have found can actually lead to an increase in system-wide congestion and an increase in travel time. It is also now better understood that LOS does not accurately reflect vehicle travel as it only focuses on individual local intersections and roadway segments and not on the entire vehicle trip*.

VMT is not a new tool for assessing environmental impacts under CEQA. It is used to assess a project's impact on greenhouse gas emissions, air quality, and energy. Using VMT for analyzing transportation impacts will emphasize reducing the number of trips and distances vehicles are used to travel to, from, or within a development project."

Sources: https://www.californialandusedevelopmentlaw.com/2019/01/07/new-regulations-for-assessing-transportation-impacts-under-ceqa-finalized/

http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf

I-66

Per the Draft EIR conducted in 2019 for the Slover/Cactus Warehouse Project—similar in size and scope of operations to the BPUP, and located in the County of San Bernardino:

"In the last five years, the SCAQMD has provided numerous comments on the trip length for warehouse/distribution and industrial land use projects. The SCAQMD asserts that the model-default trip length in CalEEMod™ and the URBan EMISsions (URBEMIS) 2007 model (version 9.2.4) would underestimate emissions. It should be noted that for warehouse, distribution center, and industrial land use projects, most of the heavy-duty trucks would be hauling consumer goods, often from the POLA and POLB and/or to destinations outside of California. The SCAQMD states that for this reason, the CalEEMod™ and the URBEMIS model default trip length (approximately 12.6 miles) would not be representative of activities at like facilities. The SCAQMD generally recommends the use of a 40-mile one-way trip length."

Source: South Coast Air Quality Management District.Review of the Draft Environmental Impact Report (Draft EIR) for the Oakmount Olive Grove Project. [Online] June 2, 2010. http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2010/june/oakmont-olive-grove-june-2010.pdf.

Source: https://ceqanet.opr.ca.gov/2019039033/2/Attachment/WGc1Aa

Given the heavily transportation-oriented operations of the BPUP as a delivery station, the full scope of Vehicle Miles Traveled have not been accounted for by the IS/MND. It is also unclear whether widening intersections via the LOS analysis is an adequate way to mitigate traffic congestion in the long run (see above). The Traffic Study (using LOS measures) does not fully capture the full negative impacts of this Project on traffic congestion. Nor are the GHG emissions fully captured (see Concern below).

The City of Upland as the Lead Agency has discretionary authority to require additional methods for fully assessing the negative impacts associated with traffic, air quality and GHG emissions.

MND Finding I: "The proposed project would not result in direct or indirect significant impacts to aesthetics, agriculture and forestry resources, energy, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation/traffic, utilities and service systems, and wildfires."

Concern: In addition to the comments already noted, the BPUP underestimates Greenhouse Gas Emissions because it uses an improper Tier III Numerical Screening Threshold

Air pollutant emissions sources are typically grouped into two categories: stationary and mobile sources. Stationary sources are large, fixed sources of air pollution and include, but are not limited to, power plants, refineries, and factories characterized by their manufacturing, production, fabrication, or other industrial processing activities. Mobile sources include "off-road" sources such as construction equipment and "on-road" sources such as passenger cars, trucks, and buses. The South Coast AQMD's interim GHG significance threshold of 10,000 MT/year CO2eq applies to industrial projects, consisting

of primarily stationary sources during operation. The primary source of air pollution for warehouse projects during operation is trucks, which are mobile sources. I-66

However, for commercial and mixed-use projects, the GHG CEQA Significance Threshold Stakeholder Working Group #15 "presented two options that lead agencies could choose: option #1 – separate numerical thresholds for residential projects (3,500 MTCO2e/year), commercial projects (1,400 MTCO2e/year), and mixed use projects (3,000 MTCO2e/year) and; option #2 – a single numerical threshold for all nonindustrial projects of 3,000 MTCO2e/year. If a lead agency chooses one option, it must consistently use that same option for all projects where it is lead agency. The current staff proposal is to recommend the use of option #2, but allow lead agencies to choose option #1 if they prefer that approach."

Source: September 28, 2010 minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #15)

For the MND, the City of Upland as the Lead Agency has discretionary authority to choose which Tier III Numerical Screening Threshold to apply to assess GHG emissions for the BPUP project.

Appendix A-2 (Greenhouse Gas Emissions Assessment) of the MND states:

"As the Project involves the construction of a new warehouse, the 10,000 MTCO2e per year industrial screening threshold has been selected as the significance threshold, as it is most applicable to the proposed Project."

Appendix A-2 goes on to note:

"The Project's construction-related GHG emissions would be generated from off-road construction equipment, on-road hauling and vendor (material delivery) trucks, and worker vehicles. The Project's operations-related GHG emissions would be generated by vehicular traffic, area sources (e.g., landscaping maintenance, consumer products), electrical generation, natural gas consumption, water supply and wastewater treatment, and solid waste."

Finally, it is notable that the Slover/Cactus Warehouse Project Draft EIR in the County of San Bernardino—a warehouse project of similar size and operation as the BPUP—uses the Tier 3 Threshold of 3,000 MTCO2 equivalent/year to assess its GHG emissions. Per that Draft EIR:

"The County of San Bernardino adopted the GHG Plan in September 2011, which provides guidance on how to analyze greenhouse gas (GHG) emissions and determine significance during the CEQA review of proposed development projects within the County of San Bernardino (County) (50). The County includes a GHG Development Review Process (DRP) that specifies a two-step approach in quantifying GHG emissions (51). First, a screening threshold of 3,000 MT CO2e per year is used to determine if additional analysis is required. Projects that exceed the **3,000 MTCO2e** per year will be required to either achieve a minimum100 points per the Screening Tables or a 31% reduction over 2007 emissions levels. Consistent with CEQA guidelines, such projects would be determined to have a less than significant individual and cumulative impact for GHG emissions."

Source: https://ceqanet.opr.ca.gov/2019039033/2/Attachment/WGc1Aa

I-66

In sum, I am concerned that no substantive justification has been provided as to why the industrial screening threshold was considered the most applicable standard to use for the "construction of a new warehouse," especially given alternative thresholds for similar project used in other environmental reports (see above). The BPUP it is not a heavy industrial stationary facility such as a power plant or factory. Yet, the City of Upland has applied the industrial numerical threshold of 10,000 MTCO2e/year to assess the Project's GHG emissions. This resulted in a finding of "no significance" for GHG emissions for the BPUP project. Based on the description of GHG emission sources cited in Appendix A-2, the BPUP more appropriately falls under the *mixed-use/commercial* threshold of 3,000 MTCO2e/year for GHG emissions. If the mixed-use/commercial threshold of 3,000 MTCO2e/year were used, the BPUP's net increase for GHG emissions (5,222 MTCO2e/year) *exceed* the threshold (see table below) and would require further study and mitigation.

The City of Upland as the Lead Agency should choose a threshold most reflective of the actual project (rather than applying a higher industrial threshold to find "no significance" and/or dismiss the need for further study and added mitigation measures).

The fact that the City of Upland as Lead Agency did not use the more stringent numerical threshold to assess GHG emissions is cause for concern. It indicates that the full impacts of this project related to GHG emissions have not been accurately reported. For this reason, a full EIR is warranted, using the more stringent (and more project relevant) screening threshold of 3,000 MTCO2 e/year.

**Table 3: Project Greenhouse Gas Emissions**

| Emissions Source | $MTCO_2e$ per Year |
|---|---|
| Construction Amortized Over 30 Years | 34 |
| Area Source | 0.03 |
| Energy | 418 |
| Mobile | 5,114 |
| Off-road | 211 |
| Waste | 66 |
| Water and Wastewater | 278 |
| *Total* | *6,121* |
| Existing Emissions | 899 |
| **Net Increase** | **5,222** |
| SCAQMD Industrial Project Threshold | 10,000 |
| **Exceeds SCAQMD Threshold?** | **No** |

Source: CalEEMod version 2016.3.2. Refer to Appendix A for model outputs.

I-66

Concern: Insufficient landscaping and negative impacts related to the removal of chaparral and other native plants on site.

According to the IS/MND: "The Project building would include 1,000 new trees and in excess of 10 acres (464,380 sf) of landscaping, which would account for more than 21% landscape coverage, more than four times the City's minimum requirement of 5%. The warehouse/parcel delivery service building would be setback more than 200 feet on the southern building frontage and would exceed minimum setback requirements of 5 feet for front and side setbacks and rear setbacks of 10 feet. Trees and other vegetation would serve to screen the van loading areas on the southern side of the building from Foothill Boulevard."

The fact that the BPUP has more than four times the City's minimum requirement of 5% does not fully account for the unique and transportation heavy nature of the as yet undesignated land use of a station delivery facility. What types of trees are being proposed and what is their carbon dioxide sequestration potential? What are the particular properties of these tree species with regard to absorbing air pollutants? Why are off-site vegetative buffers not also considered as part of mitigation measures for both GHG emissions and localized air pollutants?

What is the current GHG sequestration capacity of existing chaparral and other native flora on this site? Recent studies have shown that "old-growth chaparral shrub ecosystem can be a significant sink of carbon under normal weather conditions and, therefore, be an important component of the global carbon budget."

Sources: http://www.californiachaparral.com/images/Luo_et_al_Chaparral_as_carbon_sink_2007.pdf

https://ww3.arb.ca.gov/cc/natandworkinglands/draft-nwl-ip-1.7.19.pdf

https://selectree.calpoly.edu/search-trees-by-characteristics

How does the removal/loss of existing plant cover and chaparral ecosystems compare with the planting of 1,000 new trees, both in terms of carbon sequestration and in terms of habitat and food sources for wildlife? Such questions are not adequately addressed in the IS/MND.

I OPPOSE the proposed development of an e-commerce sorting and distribution center on Foothill Blvd for the following reasons: I-67

- Added truck traffic
- Health risk due to vehicle emissions
- Decrease in property value

Sal Mosca

1192 W. Molly Ct.

Upland, CA 91786

Michael Poland, Contract Planning Manager
City of Upland
460 N. Euclid Ave
Upland, CA 91786
mpoland@ci.upland.ca.us

January 19, 2020

SUBJECT: **COMMENTS ON INITIAL STUDY AND PROPOSED MITIGATED NEGATIVE DECLARATION – BRIDGE POINT UPLAND**

Dear Mr. Poland:

Thank you for the opportunity to review and comment on the Initial Study to authorize a development project (Project) with a 201,096-square-foot warehouse/office building, expected to accommodate office space, retail pick-up, warehousing, and the distribution of finished goods and materials, including 16 truck loading bays,16 van loading doors, 12 trailer parking stalls, and 1,104 van parking stalls. I-68

These comments reflect my experience and expertise as a subject matter expert registered in the field of environmental public health. The following are my comments concerning Noise, Air Quality, and other public health concerns related to the Project. In general, the City of Upland should request additional information on potential health impacts to nearby populations who live, work and go to school near the Project. To ensure the Project does not impact the health of residents and sensitive populations, an Environmental Impact Review (EIR) should be conducted to quantify potential impacts during both the construction and occupancy phases of the Project, in accordance with the California Environmental Quality Act. A significant purpose of an initial study is to assist in the preparation of an EIR by identifying effects determined to be significant and not significant and by explaining the reasons for those determinations. (CEQA Guidelines, section 1 5063(c)(1), (3)). An initial study that omits material necessary to inform decision-making subverts the purposes of CEQA. (Lighthouse Field Beach Rescue v. City of Santa Cruz (2005) 131 Ca1.App.4tli 1170, 1202).

**NOISE:**

- The Project proposes the use of a fleet as part of its operations which will increase the number of vehicles traveling along the corridors adjacent to residential zoned areas. The Project proposes the fleet of vehicles would make 202 trips in the a.m., 202 trips in the p.m., and 2,583 daily trips. Even though the Project will increase truck and vehicular trips to the facility over a 24-hour operation period, the Initial Study concludes that the Project will create less than significant noise impacts. The Initial Study does not include substantial or sufficient evidence to support this conclusion. The potential noise impact from vehicular traffic and other sources may be significant and should be further evaluated. The City should request that the EIR expand the scope of its analysis to include the fleet noise in addition to the identified operational noise at the site, disclose and analyze significant impacts from the increase on residents living along the proposed corridors, and identify all feasible mitigation measures. At a minimum, the Noise Study must identify the hours that constitute the "operational hours" to determine whether the Project's fleet will create significant impacts.

I-68

- The Noise Study lacks information necessary to support the conclusion that the Project will have less than significant impacts on ambient noise levels in the vicinity of the project. The Initial Study states that the Project would create 202 trips in the a.m., 202 trips in the p.m., and 2,583 daily trips but the Initial Study fails to explain why this increase is not significant. The Noise Study calculated noise levels using the Federal Highway Traffic Noise Prediction Model and the traffic analysis prepared by Translutions. The noise study also included empirical observations gathered between 10:30 a.m. and 12:00 p.m. at four locations near the Project site. The potential noise impact from vehicular traffic and other sources may be significant and should be further evaluated. The City should request an EIR to identify the existing baseline noise in the residential areas along the anticipated corridors and the increased additional noise that would result from the Project's nighttime operations. The EIR should expand the scope of its analysis to include baseline exterior noise measured at the property line of the affected residential properties during sleeping hours, disclose the impacts from the increase, and identify all feasible mitigation measures.

- The Noise Study identified the closest sensitive receptors at approximately 1,040 feet southeast from the site, however, it did not account for the fleet as part of its operations. The potential noise impact from vehicular traffic and other sources may be significant and should be further evaluated. The City should request an EIR to identify the sensitive receptors along the anticipated corridors and the increased additional noise that would result from the Project's daytime and nighttime operations.

**AIR QUALITY**:

- The Project proposes use of a fleet as part of its operations which will increase the number of vehicles traveling along the corridors adjacent to residential zoned areas. The Project proposes the fleet of vehicles would make 202 trips in the a.m., 202 trips in the p.m., and 2,583 daily trips. Use of the fleet for daily operations will result in a significant increase in vehicle emissions exposing sensitive receptors to substantial pollutant concentrations. An EIR must identify the existing baseline emissions along the anticipated corridors and the increased additional emissions that would result from the Project operations. The EIR should expand the scope of its analysis to include fleet emissions in addition to the identified operations emissions, disclose the impacts from the increase, and identify all feasible mitigation measures.

**OTHER**

- The Project proposes use of a fleet that will increase the number of vehicles traveling throughout the City of Upland. The Project proposes 202 trips in the a.m., 202 trips in the p.m., and 2,583 daily trips. The potential impact from traffic-related fatalities and injuries may be significant and should be further evaluated. The City should request an EIR to evaluate the Project's impacts on injury-related death and disability caused by the increase in vehicles near sensitive receptors along the anticipated corridors, disclose the impacts, and identify all feasible mitigation measures to protect pedestrians and prevent traffic-related deaths and injuries.

I-68

- The Project proposes the use of a fleet that will increase the number of vehicles traveling throughout the City of Upland. The Project proposes 202 trips in the a.m., 202 trips in the p.m., and 2,583 daily trips, which does not align with the General Plan's goals and policies:
    - Reduce locally generated pollutant emissions (Goal OSC-4)
    - Encourage alternative modes of transportation that reduce greenhouse gas emissions (Policy LU-4.4)
    - Reduce the number and length of motor vehicle trips (Policy OSC-4.1)
    - Separate sensitive land uses from signification sources of air pollutants, toxic air contaminants, or odor emissions (Policy OSC-4.4)

  The City of Upland should work with the community to determine community-wide improvements necessary to provide Upland residents with the chance to live in well-designed, compact neighborhoods that offer an array of options for traveling throughout the City whether by car, foot, or bike and access to green space, with trails to provide regular opportunities for physical activity.

Thank you for the opportunity to review the Initial Study and recommend areas for further evaluation in the EIR. If you have any questions, please contact me at (213) 509-9305.

Very truly yours,

Charlene Contreras, R.E.H.S.
1646 Redwood Way
Upland, CA 91784

7104

SUBJECT: BRIDGE DEVELOPMENT

I-69

We, OPPOSE the proposed development of an e-commerce sorting and distribution center on Foothill Blvd.

This is not a warehouse, even by the e-commerce merchant's own definition. They are calling it a Delivery Station with the purpose of sorting packages for outbound routes in a clustered “last mile" defined urban area.

It is clearly a truck and delivery van terminal and along with being a traffic nightmare AND a major detractor of living quality in my District 1 neighborhood AND subsequently a devaluing factor of my property, is NOT permitted in the General Code.

This sorting station address with its accompanying descriptor of a 206,000 square foot building and startup date of Q4 2020 is listed online in a table of Amazon's U.S. Delivery Station Network. This fact leads me to believe the project was pre-approved by the City some time ago and may even have been a factor in denying District 1 the right to vote for representation in the 2018 election.

This alleged pre-approval may also have influenced the Planning Commission to skip what should be a mandatory Environmental Impact Review in order to meet a timeline. If Moreno Valley is any example, skipping this review could lead to future litigation in which even California's own Attorney General takes a position against the city. Upland cannot afford that, especially for a project that as presented, does not offer the city any economic benefit.

Sincerely,

Lynn and Drummond Elliott

1416 Erin Avenue

Upland, CA 91786

E-mail: lancslynn44@yahoo.com

Yvonne and Simon Saul

1341 N Quince Avenue

Upland, CA 91786

E-mail: britbabe4vr@yahoo.com

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Mr. Poland,

I-70

I'm writing to let you know I've been an Upland resident for the better part of the last 38 years. I've seen this city change, both good and bad, over the course of my time here. We chose to live here because of the location and also because of the "small town" feel.

I'm writing to express my strong opinion that allowing a large facility by a huge company like Amazon will ruin what's left of the "small town" feel that so many of us enjoy. Not only that but it will increase traffic and create a less inviting community. My family and most of my friends and neighbors are strongly opposed to this idea. I hope you will consider our thoughts and opinions and will pass them on to our elected officials. I truly hope that they will take that into consideration when making this decision.

Sincerely,
Chris Amrhein
(909) 472-5577

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Dear Mr. Mike Poland,

I-71

I urge you to not support the Bridge planned development. There are many things wrong about this proposal. The environmental negative impact is too great. Emissions of Nitrogen Oxides and Carbon Dioxides exceed the SCAQMD threshold. Water usage will be too great.

The excessive amount of traffic on Foothill, Benson, and Mountain Ave. will impact residential neighborhoods detrimentally. Safety of children and adults alike will be hampered. There are 3 elementary schools too close to this development with its tremendous traffic hazards.

Amazon workers are poorly compensated for their work and 62% of Amazon warehouse workers depend upon public assistance. Will all 300 warehouse workers come from our city? Most likely not. Will these future workers have any loyalty to Upland and its citizens? Most likely not. CA and local cities have already subsidized Amazon to the tune of 58 million dollars. Although Upland will receive a one time payout for the Amazon distribution warehouse, Upland will never be able to keep up with the future and forever more financial hardships this Bridge development will place upon this city.

As 42 year residents of Upland, we urge you to not move forward on this 'Bridge' development!

Sincerely,
Michael and Karen Melvin

**WARNING: External email. Please verify sender before opening attachments or clicking on links.**

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Mr. Poland,
Please find attached letter in opposition to the Bridge Development project for distribution center at Foothill/Central/Benson.
Thank you for your timely attention to this matter.

Barbara L. McJoynt

Barbara L. McJoynt
1258 Adriana Way
Upland, CA 91784

January 19, 2020

Mr. Mike Poland, Contract Planning Manager
City of Upland
Development Services Department/Planning Division
460 N. Euclid Avenue
Upland, CA 91786

RE: Bridge Development

Dear Sir,

I-72

I am writing to express my opposition to the proposed development of a ***distribution center*** on 50 acres at Foothill/Benson/Central. I have been following this issue since first presented and even spoke at the City Council meeting of 10/28/19. My remarks from 10/28/19 are attached for reference.

My opposition will not be stated with the inclusion of facts and detail, outlining specific reasons why this project should not be approved, because I understand that that information is being presented by other individuals. I am approaching this from a more "emotional" point of view. I have resided in Upland for over 45 years and have lived through much change. The significant change I see coming if this project is approved will affect our city in many ways, but my primary concerns are in the area of traffic/infrastructure and health/quality of life.

Baseline traffic has become a nightmare with the addition of the housing and commercial center at Sycamore Hills, and the housing is not yet completed, and full impact still to be determined. The small retail center at Benson and Baseline has yet to be completed and ingress/egress patterns will significantly affect that intersection. Even though the MND states that there would be no significant impact on Foothill, Central, Benson and Baseline when "thousands" of vehicles from this project hit our streets, we all know that traffic congestion in the surrounding area would take on a life of its' own and life in District 1/3 will never be the same. <u>It is my belief that a full EIR is required.</u>

Upland cannot keep up with the maintenance of our roads as it is...not only are there issues with potholes and uneven surfaces, but also streets where road striping is almost invisible

I-72

(Benson Avenue as an example.) Road maintenance is very expensive and the burden placed on our streets when over 1000 vehicles make daily deliveries from this project, will be unsustainable...to say nothing about increased number of vehicles "on time schedules" presenting exposure for traffic collisions and increased time needing to be dedicated by our Upland Police Department.

To have a large ***distribution center*** located on our 'Foothill corridor' will have a dramatic effect on the LOOK and FEEL of Upland...are we going to go from the City of Gracious Living to logistical capital of the most western edge of San Bernardino County? The gateway to Upland from the west will lose the aesthetic character that drew most of us to our city in the first place and create what I consider will be numerous "unintended consequences."

Yes, there are still many specific environmental issues also needing attention, as well as problems with Municipal Codes, General Plan and the like (all what I consider housekeeping issues that staff did not properly consider)...and these issues must be addressed. Health issues should be of the utmost concern to all, young and old (our quality of life depends on it.) I am uncomfortable with the "big bully" coming to town any more than it already is. Anyone can be bought when enough "zeroes" are thrown around and I hope that when all is said and done, Upland cannot be bought!

Barbara L. McJoyat

Barbara L. McJoyat

/attachment

10/28/2019

I-72

Good evening Council – my name is Barbara McJoynt and I have lived in Upland for over 45 years so I have seen more than a few changes over the years.

I fully understand that the issue of a proposed distribution warehouse might not be on the Council's radar at the moment, but I believe it is important that you hear citizen's concerns. I will also address my concerns to the Planning Commission.

I congratulate Bridge Development for putting on a superior "dog and pony show" last week at the joint workshop, complete with what I consider a "grandstand play" by bringing in a "cadre" of orange shirts to talk union employment.

My primary take away was the sense of URGENCY communicated…"got to do this yesterday so tenant can be operational before next Christmas season." BIG RED FLAG!!! Bridge likened their involvement and this project to being the SAVIOR for a property that has been vacant for 100 years…riding in on a white horse to SAVE UPLAND!!!

It is interesting to me that the 1st proposal was for approximately 1 million square feet of warehouse and the 2nd, less than 300,000 square feet – how can this still be worthwhile for Bridge?

And then the addition of 1400+ parking spaces on the property – WOW, gotta fill all those spaces with something! Those additional vehicles utilizing our infrastructure that is so sorely compromised, is an issue. Traffic for Foothill, Benson, Baseline and 210 entry will become a bigger nightmare than it is already and we don't yet know the full impact of Sycamore Hills at full build out and occupancy.

I-72

My next large concern is the lack of income this project will generate to our already financially strapped city - how would consideration possibly be given to a project of this magnitude without there being considerable ONGOING financial benefit to our city? A spokesperson for Bridge stated possible cost to build in the tens of millions of dollar range and that the tenant would spend tens of millions of dollars on the facility...and Upland basically gets little or nothing in return ($3\frac{1}{2}$% of 1% from our share of the San Bernardino County pot?) other than upfront one time fees?

I believe this to be a QUALITY OF LIFE issue for Upland - please do not let this become a reality and months down the road have everyone snap to attention and say "how did this happen?! Elected and appointed officials must first and foremost be GOOD STEWARDS for the citizens they represent. Please do not be bullied by this developer. I think with some creative thinking, there might be a more worthwhile project for this 50 acres of Upland land.

Thank you.

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Good Morning Mr. Poland let me introduce myself. My name is Bill Smith and I'm the owner of Upland Automotive and the property 1801 and 1803 w. Foothill, Upland. We are very concerned about the proposed Bridge Project that would directly impact our Business and Property. I would like to meet with you and go over the plan. Please contact me (909) 319-6675 cell. (909) 985-8514. office. You may also email at this address. Thank You. Bill Smith I-73

January 21, 2020

Mike Poland
Contract Planning Manager
City of Upland
Development Services Department/Planning Division
460 N. Euclid Avenue
Upland, CA 91786

Re: Bridge Development – Request for An Economic Impact

Mr. Mike Poland:

I-74

I am a 16-year resident of Upland and I am writing to express my concern with regards to the proposed Bridge Development project. I understand there is a need to develop that land for economic development and to help generate revenue. However, I am asking that we ensure the project of this scale and magnitude be fully vetted, not rushed and that we carefully mitigate all environmental and economic concerns.

First and foremost, I am extremely concerned that this proposed warehouse will create a significant increase in traffic from freight trucks and delivery vans. As a result, it will create a significant health and safety risk to the public who use other modes of transportation (walking, bicycling, riding a scooter, skateboarding, handicap wheelchairs, etc.).

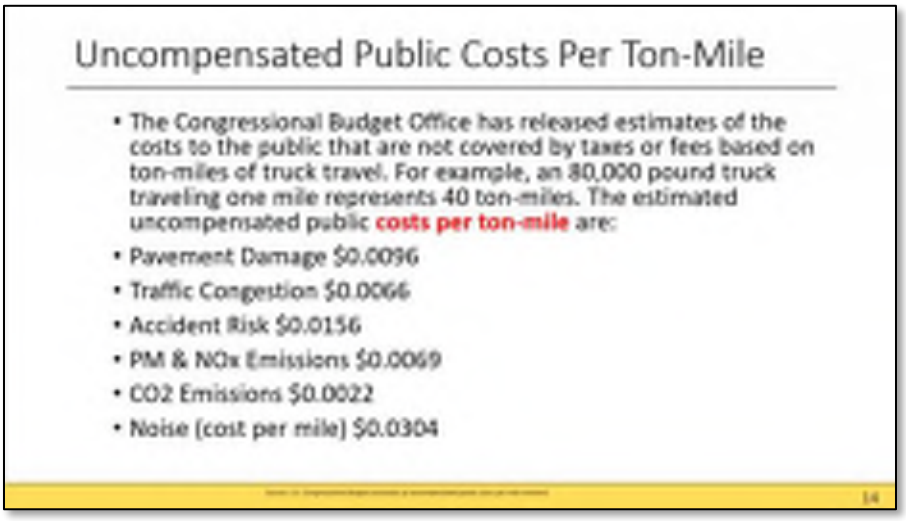
I am also very concerned this will cause significant degradation of our air quality and increase in emissions that will further perpetuate global warming. I am also concerned this will significantly impact our water quality, groundwater renewal, and storm water retention that is necessary to prevent flooding.

It is for these reasons that I request you go above and beyond the Initial Study/Mitigated Negative Declaration process and conduct an extensive and full environmental impact report (EIR).

In addition, as we are asking for an EIR to mitigate environmental impacts, I am asking that the city conduct a transparent and comprehensive cost/benefit analysis to mitigate the **economic impacts**.

We need to carefully analyze and identify the long-term roadway maintenance funding solutions to avoid another costly 50-year street repair backlog we are facing right now due to unsustainable growth that occurred many years ago and that we are sadly paying today. (See Figure 1)

FIGURE 1



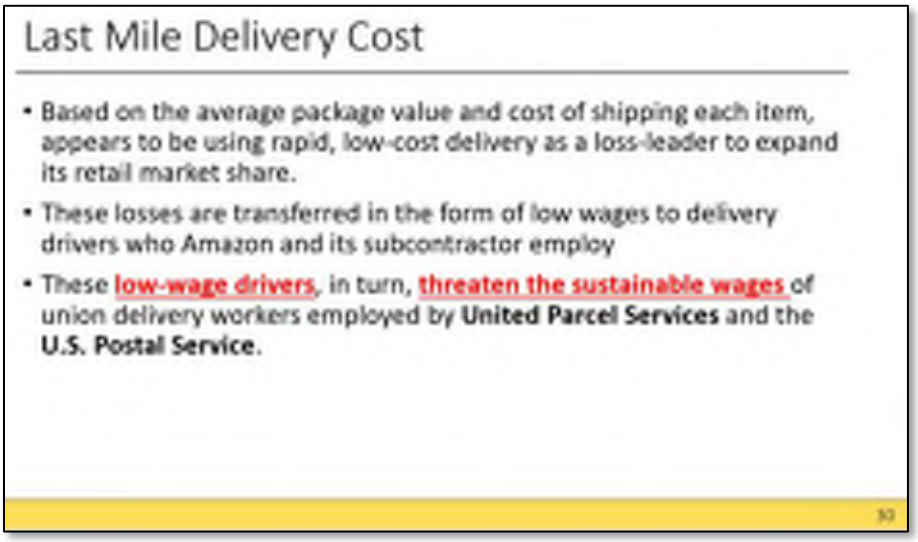

SOURCE: ECONOMIC ROUNDTABLE, "TOO BIG TO GOVERN", PUBLIC BALANCE SHEET FOR THE WORLD'S LARGEST STORE, NOV 2019

We need to identify all the factors that will result in a negative financial impact such as the cost of increased traffic and subsequent cost of lives (see figure 2), the cost of additional police staff to address the spike in traffic/accidents, the cost of local jobs (see figure 3), the cost of Burtec e-commerce excess packaging waste (see Attachment B), the cost of increased water usage, the cost of public subsidies *Amazon* is indirectly receiving (see figure 4) and many other cost that the city may not have factored into the financial analysis.

FIGURE 2

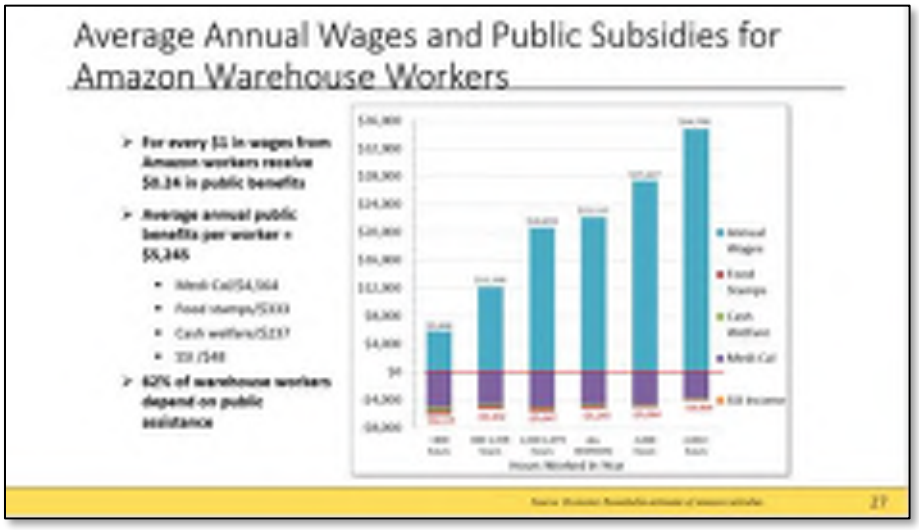
SOURCE: ECONOMIC ROUNDTABLE, "TOO BIG TO GOVERN", PUBLIC BALANCE SHEET FOR THE WORLD'S LARGEST STORE, NOV 2019

FIGURE 3




SOURCE: Economic Roundtable, "Too Big To Govern", Public Balance Sheet for the World's largest store, Nov 2019

FIGURE 4




SOURCE: Economic Roundtable, "Too Big To Govern", Public Balance Sheet for the World's largest store, Nov 2019

Further, with regards to the assumed benefits, we need to carefully evaluate how revenue is being accrued for this e-commerce warehouse business and if the current tax formula will be sufficient for the long-term needs. What is the proposed sales tax revenue and can we consider other means such as a Warehouse tax suggested by Moreno Valley School Board Member, Darrell Peeden (see Attachment C)?

Moreover, how do we ensure the benefits mentioned in this plan will truly come to fruition and how do we hold *Bridge Development* and its client *Amazon* (which they have a pattern of operating anonymously in their business ventures across the Inland Empire), accountable if those benefits are not realized.

For example, if *Bridge Development* proclaims that this new development will create 300 new jobs (which is unlikely as robots/automation are gradually taking over), will they be financially penalized if that expectation is not met (see Attachment D)?

Per John Husing, chief economist for the Inland Empire Economic Partnership and longtime proponent of warehouses in the Inland Empire, "There are a lot of people doing traditional warehouse work, but that will change, …everything is being automated." (see Attachment E)

The bottom line here is that we have more questions than answers on the economics and I would like to request that you and your staff do not "finalize" the Development Agreement (DA) until there is full understanding and engagement with the Upland community and its surrounding Foothill neighbors on this important matter.

To be more specific, I urge your staff to conduct another public workshop centered on the economics and publicly disclose the financial balance sheet of the proposed development prior to any approvals.

Included in this email package is the *Upland Community Questions & Answers (Q&A)* document (Attachment A). It outlines a set of questions that have been raised to me from in-person/online interactions and from our recent Grassroots Workshop that was held on January 11th.

This Q&A document illustrates the economic concerns that are on people's minds and justifies why we need more community dialogue and transparency so that we can assure the Upland taxpayers that we will not foot the bill for uncompensated public costs down the road.

Therefore, before you move forward in submitting the "final" Development Agreement to the Planning Commission for their deliberation, I am requesting that (a) the Q&A document be answered publicly and published on your Bridge Development webpage and (b) hold another public workshop to review the balance sheet. Community leaders and I would be more than happy to arrange this workshop on the city's behalf if necessary.

In closing, I believe it is imperative that a detailed cost/benefit financial analysis is conducted in a transparent manner, reported out via an Economic Impact report such that our Planning Commission and Councilmembers can make an informed decision that is financially sound.

Thank you in advance for your time and consideration and I look forward to hearing from you very soon to discuss this in more detail and especially prior to the February 12th Planning Commission meeting.

Sincerely,

Irmalinda Osuna, PMP®
Contract Administrator, State of California Department of Transportation
City of Upland Resident and Community Organizer
(909) 285-4919

cc:

- Upland Mayor Debbie Stone
- Upland Mayor Pro Tem Ricky Felix
- Upland CM Janice Elliott
- Upland CM Bill Velto
- Upland CM Rudy Zuniga
- Upland PC Robin Aspinall
- Upland PC Gary Schwary
- Upland PC Carolyn Anderson
- Upland PC Yvette Walker
- Upland PC Linden Brouse
- Upland Interim City Manager Rosemary Hoerning
- Upland City Clerk Keri Johnson
- Claremont Mayor Larry Schroeder
- Claremont Mayor Pro Tem Jennifer Stark
- Claremont CM Ed Reece
- Claremont CM Jed Leano
- Claremont CM Cory Calaycay
- Claremont City Manager Tara Schulz
- Claremont Community Development Coordinator Brad Johnson
- Montclair Mayor Javier John Dutrey
- Montclair Mayor Pro Tem Carolyn Raft
- Montclair CM Tenice Johnson
- Montclair CM Corysa Martinez
- Montclair CM Bill Ruh
- Montclair City Manager Edward C. Starr
- Steve Scauzillo, Inland Valley Daily Bulletin
- Mark Gutglueck, San Bernardino County Sentinel
- Sherheryar Kaoosji, Executive Director, Warehouse Workers Resource Center

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## Summary of Attachments

- Attachment A: Upland Community Questions and Answers (Q&A) Document
- Attachment B: "What A Waste: Online Retail's Big Packaging Problem"
- Attachment C: "Warehouse tax NOT a sales tax"
- Attachment D: "MORENO VALLEY: Skechers' warehouse has caused net job loss"
- Attachment E: "Warehouses promised lots of jobs, but robot workforce slows hiring"

From: Carl Bunch <cbcredit@gmail.com>
Sent: Tuesday, January 21, 2020 4:52:54 PM
To: mpoland@ci.upland.ca.us <mpoland@ci.upland.ca.us>; Heather Crossner <hcrossner@bridgedev.com>; Brendan Kotler <bkotler@bridgedev.com>
Subject: Bridge Development

Mike Poland

I-75

The current offer from Bridge is grossly insufficient, with regards for annual compensation for street repaving, and the quality-of-life decrease from 2500 daily truck and van trips.
$370k annually is only a fraction of what Upland will require to repave streets.
The cost to repave 1 mile is over $1 million, and that cost will increase over time. How much more will it cost to repave 5,10, 20 years from now ? And Bridge will still only be paying $370k.

Also, in any agreement, there must be specific, large, enforceable monetary penalties if Bridge violates the 2500 daily truck and van trip limit. It will be easy to count truck and van traffic to determine if the 2500 daily limit is adhered to.

And most importantly, Upland should insist that any Bridge tenant must declare to CDTFA that Upland is the point-of-sale for all product delivered from that warehouse. This will ensure that Upland receives it's full sales tax revenue, and this declaration will cost Bridge and it's tenants literally NOTHING.

Sincerely,
Carl Bunch

253 North Euclid Avenue #A
Upland California 91786
909-985-6104
909-949-6892 fax

**Michael Poland**

**From:** Bill Landecena <bill.landecena@gmail.com>
**Sent:** Tuesday, January 21, 2020 4:46 PM
**To:** Michael Poland
**Subject:** Bridge Development

**WARNING: External email. Please verify sender before opening attachments or clicking on links.**

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Dear Mr. Poland,

I support the Bridge Development. I-76

William (Bill) Landecena

1791 N. 3rd Ave.
Upland, CA 91784

## Michael Poland

**From:** BRIAN RIFE <brianrife@mac.com>
**Sent:** Wednesday, January 22, 2020 6:59 AM
**To:** Michael Poland
**Subject:** Proposed Amazon Watehouse

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Mr. Poland,

I am writing to voice my concern and opposition to the proposed Amazon warehouse project. The negative impact on the environment and traffic congestion cannot be justified by the high stress, low paying jobs and questionable tax revenue promised the city of Upland. I-77

-Brian Rife
Concerned Citizen
626-675-3939

## Michael Poland

**From:** Christopher H. Alanis <christopher.h.alanis@gmail.com>
**Sent:** Tuesday, January 21, 2020 4:07 PM
**To:** Michael Poland
**Subject:** District 1 Resident-Support Bridge Development

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Mr. Poland,
I am a resident at 1393 Lemon Tree Circle, Upland CA 91786. I am incredibly close to the project in proximity. Please consider this an email of support. I am happy that the expansive eye sore of the foothill corridor will finally be developed. I-78

Thank you.

Sincerely,
Christopher H. Alanis

**Law Office of Abigail Smith**
**A Professional Corporation**
1455 Frazee Road, Suite 500, San Diego, CA 92108

**Abigail A. Smith, Esq.**
**Email: abby@socalceqa.com**
**Telephone: (951) 506-9925**
**Facsimile: (951) 506-9725**

***VIA E-MAIL ONLY***

January 21, 2020

Mr. Mike Poland, Contract Planning Manager
City of Upland
Development Services Dept./Planning Division
460 N. Euclid Avenue
Upland, CA 91786
Email: mpoland@ci.upland.ca.us

**RE:** ***Public Comments – Bridge Development Project; Initial Study/Mitigated Negative Declaration***

Dear Mr. Poland:

Please accept this letter on behalf of local residents regarding the Bridge Development/Bridge Point Upland project including the Initial Study/Mitigated Negative Declaration ("MND") ("the Project").

The Project is described as a request to construct a 201,096-square foot warehouse/parcel delivery facility, including a 10,000 square foot retail and office space on a 50.2-acre site on West Foothill Boulevard in the City of Upland. The Project includes 16 dock doors, 8 van loading doors, 337 automobile parking stalls, 12 truck trailer parking stalls, and 1,104 van parking stalls. Access to the Project site for automobiles and vans would be provided via 13th Street, a residential street. The nearest "sensitive receptors" are residences 1,040 feet from the Project site. Sycamore Elementary School is located within 1.5 miles and Cabrillo Elementary School is located within one-half mile of the site. I-79a

Local residents are deeply concerned that the impacts of the proposed Project have not been fully evaluated and mitigated pursuant to the California Environmental Quality Act ("CEQA") as discussed further below.

**General Comments - Mitigated Negative Declaration**

The proposed MND is legally inadequate and an Environmental Impact Report ("EIR") is required for the Project. CEQA requires the preparation of an EIR for any project that *may* have significant adverse effects on the environment. (Public Resources Code § 21151.) "Said

I-79a cont.

another way, if a lead agency is presented with a fair argument that a project may have a significant effect on the environment, the lead agency shall prepare an EIR even though it may also be presented with other substantial evidence that the project will not have a significant effect." (State CEQA Guidelines, §15064 (f)(1).) The Project meets these standards as discussed further below. Additionally, an MND is only appropriate when revisions in the proposed project "would avoid the effects or mitigate the effects to a point where *clearly* no significant effects would occur, and [t]here is *no* substantial evidence, in light of the whole record before the agency, that the project as revised *may* have a significant effect on the environment." (State CEQA Guidelines, § 15070 (b) [emphasis added].) The MND and supporting Initial Study do not demonstrate that significant impacts are mitigated to a point where "clearly no significant effects would occur." Additionally, in many important respects, the MND and Initial Study do not provide sufficient information by which the City of Upland can make an informed decision about the environmental consequences of the Project. An initial study must disclose the factual basis for the City's finding that an EIR is not required. (State CEQA Guidelines, § 15063 (c)(5); *see*, *Lighthouse Field Beach Rescue v. City of Santa Cruz* (2005) 131 Cal.App.4th 1170, 1200.)

**Potentially Significant Environmental Impacts Warranting an EIR**

Air Quality Impacts

I-79b

The Initial Study shows that the Project results in significant air quality impacts during operational phases; as a result, an EIR is legally required. The MND discloses that emissions of NOx during the Project's operational phase well exceeds the applicable threshold of significance of 55 lbs per day. Specifically, Table 4 of the Initial Study discloses that the Project results in NOx emissions of 86.05 lbs per day (summer) and 88.70 lbs per day (winter). Accordingly, the Initial Study's ultimate conclusion of "less than significant" is unfounded and contrary to the record.

The Initial Study asserts there is an existing gravel processing plant on-site, which the Initial Study alleges generates NOx emissions. The Initial Study then subtracts the "plant's" alleged NOx emissions from the Project's NOx emissions to reach a conclusion of "less than significant." This convoluted "net" analysis is improper and misleading. Among other things, a search of Google maps shows on satellite view some stockpiles of dirt and perhaps rocks on-site, but not an "operation" or a "plant." We are not aware of such a permitted use at the site. More importantly, there is no evidence to document the assumptions of the Initial Study with respect to the air quality emissions of this alleged existing use. We do not see any environmental or source documents in the record, or even a reference to any documentation, providing support for the Initial Study's information. Given the lack of disclosure and clarity in the record, the Initial Study's "net" analysis is not appropriate or supported.[1]

[1] A Google satellite image shows a processing plant *off-site*, north of the air strip.

I-79b cont.

Notwithstanding the absence of information in the record, the Initial Study indicates that the Project generates *double* the NOx emissions of the alleged "gravel processing plant." This is a significant Project impact justifying an EIR. The Initial Study, page 28, confirms that the Project generates significant levels of "onsite and mobile source emissions."

As a result of the significant NOx emissions, the Project also results in cumulatively significant air quality impacts per the Initial Study's discussion on page 29.

I-79c

The air quality study (Appendix A-1) is based on the Project being a non-refrigerated use. Yet the Initial Study (p. 47) discloses a potential for refrigeration or cold storage at the site. Therefore, the Project must be conditioned to prohibit cold storage; or the studies must be updated to assume refrigerated uses. Refrigerated uses are known to generate greater air quality and GHG impacts than non-refrigerated uses. Among other things, trucks must operate TRU units to keep products cold; and the Project building will require more energy to power refrigerators or cold storage units.

I-79d

Mitigation Measure A-3 can be feasibly strengthened to include the requirement to provide charging stations/units for electric vehicles (EV). The Project should be conditioned to provide among its hundreds of parking spaces at least 10 Level 2 Quick Charge stations to allow for vehicles to plug-in at the Project site. This is particularly relevant where the site will be open to the public for "retail" uses. Currently the Project is only required – consistent with CalGreen – to designate 6% of parking spaces for EV "infrastructure". At best this requires the Project provide the conduit for future charging stations. However, charging stations must be provided presently to achieve any real environmental benefit in terms of improving access to EV infrastructure and promoting energy efficiency. In addition, the Project should be conditioned so that only electric-powered forklifts are permitted. This type of technology is readily available on the commercial market and is regularly employed by similar projects. To the extent that the Project includes any "yard trucks," these should also be electric powered only.

Energy Impacts

I-79e

The conclusion of less than significant with respect to energy impacts is not supported. First, we do not see that there is an energy analysis in the supporting technical studies, therefore, the Initial Study does not provide a sufficient factual basis for the conclusion of "less than significant."

Nevertheless, the Project presumably creates a large demand for energy resources including fuel. There is no evidence that the Project is taking meaningful steps to reduce fuel consumption, such as requiring that tenant fleets include zero emission or natural gas powered trucks for all or some percentage of the van or truck fleet. Nor is the Project employing renewable energy technologies such as constructing and operating solar panels.

I-79e cont.

In terms of renewables, the Project is not consistent with the CEQA Guidelines, Appendix F, which states:

> The goal of conserving energy implies the wise and efficient use of energy. The means of achieving this goal include:
> (1) decreasing overall per capita energy consumption,
> (2) *decreasing reliance on natural gas and oil,* and
> (3) *increasing reliance on renewable energy resources.*
> In order to assure that energy implications are considered in project decisions, the California Environmental Quality Act requires that EIRs include a discussion of the potential energy impacts of proposed projects, *with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy.* (emphasis added)

The Project will comply with Title 24, as required. The Project is not employing independent technologies or practices to reduce energy consumption either with respect to the building or fuel demand.

I-79f

Greenhouse Gas Emission Impacts

As in the case of its analysis of air quality impacts, the Initial Study utilizes the unsound "net increase" methodology with respect to its analysis of GHG impacts. In so doing, the Initial Study skews and understates the Project's GHG impact.

In addition to the faulty conclusion, the Initial Study's threshold of significance is improper. The Initial Study relies upon unadopted 2010 recommendations by the SCAQMD to establish the threshold of significance for the Project. In 2010, a SCAQMD "working group" considered, but has not adopt in the ten years since that 2010 "working group" meeting, a screening threshold of 10,000 MTCO2e for "industrial" projects where the SCAQMD is not the lead agency. *See,* http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-main-presentation.pdf .[2] The MND here relies upon this numerical screening threshold even though it is (1) unadopted and (2) the Project is not an "industrial" project. The 10,000 MTCO2e screening threshold would apply, if adopted, to "stationary" sources. The Project is a warehouse parcel delivery facility with a retail component proposed on a site zoned and designated as Commercial/Industrial/ Mixed Use with the largest source of GHG emission coming from "mobile" sources *i.e.*, non-stationary sources, such as automobiles, vans and trucks. *See,*

https://en.wikipedia.org/wiki/Major_stationary_source

[2] This hyperlink and all hyperlinks cited in this document are fully incorporated herein by reference.

*See also*, http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-8/ghg-meeting-8-minutes.pdf I-79f cont.

The screening threshold utilized by the Initial Study originates from a 2008 report by SCAQMD which contains an interim GHG significance threshold and draft guidance for projects subject to the SCAQMD's permitting requirements/where SCAQMD is the lead agency for the Project. *See*,

http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds

This document includes a disclaimer that the approaches are "Not Recommended at this Time" for "Residential/Commercial Sector" projects, and the document identifies it clearly as "Interim CEQA Greenhouse Gas (GHG) Significance Threshold for Stationary Sources."

The MND nonetheless asserts that "for all industrial projects, the SCAQMD adopted a screening threshold of 10,000 MTCO2e per year. SCAQMD concluded that projects with emissions less than the screening threshold would not result in a significant cumulative impact." (emphasis added) In light of the above evidence and discussion, and in the absence of any further support, this statement is misleading. *See again*, http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds .

Assuming that the Project intends to rely on consistency with adopted air quality plans as a threshold of significance, the Project has significant GHG impacts because it is not consistent with at least the following Goals of the City's Climate Action Plan (UCAP) (MND Table 10). The discussion below also includes feasible mitigation which should be adopted for this Project to demonstrate consistency with adopted climate action policies and goals.

UCAP Goal 1. The Project should be conditioned to provide secure bicycle lockers; to provide charging stations/units for EV vehicles as discussed above; and to require that some percentage of the tenant fleet be zero-emission, hybrid electric, or natural-gas powered and require the periodic phase-in of additional clean truck technologies.

UCAP Goal 2. The Project should be conditioned to require that all landscape equipment shall be electric powered; no diesel landscape equipment shall be permitted at the site.

UCAP Goal 3. The Project should be conditioned to provide safe transportation from the site to nearest transit stops when five or more employees request it; and to provide incentives to employees who use public transportation or carpool. Also, the

I-79f cont.

Project should be required to provide carpool/vanpool parking stalls for a certain percentage of the site's parking stalls in addition to the 6% of parking stalls required for EV "infrastructure."

UCAP Goal 5. The Project does not employ renewable energy technologies such as solar panels. It is entirely possible and feasible, consistent with other similar "warehouse" projects in southern California, to condition the Project to provide and use solar panels to satisfy at least 50% of the Project's electricity demand.

UCAP Goal 6. The Project shall implement a landscape plan utilizing a mix of at least 24-inch and 36-inch box trees on the Project's perimeter, and all landscaping shall be planted and maintained in manner to provide 50% coverage of parking areas within five years.

UCAP Goal 9. The Project is blatantly inconsistent with this policy insofar as it does not employ any renewable energy technology such as PV solar panels. Solar energy has not been shown to be infeasible for this Project.

I-79g

Noise Impacts

The Initial Study, p. 80, indicates a significant impact with respect to construction noise impacts. Even if construction activities are permitted by the Municipal Code during daytime hours, the level of noise associated with these activities exceeds allowable noise limits and represents a significant increase in noise. As such, the impact is potentially significant pursuant to CEQA as well as the Project's thresholds of significance.

The Initial Study indicates potentially significant operational noise impacts where "short term" noise events in and around the Project's parking areas (car doors slamming, people conversing, truck back up beepers, stopping and starting of truck engines, loading and unloading of trucks at the loading docks, dropping of pallets, operation of trash compactors, and so on) can be expected, per the Initial Study, to be in the range of 60-63 dBA *at best*. These noise levels, even if "temporary", are significant because the Initial Study indicates they exceed the applicable noise limits. Even so, the noise analysis does not appear to have evaluated "short term" noise in terms of the City's noise ordinance relating to the same. *See*,

http://www.qcode.us/codes/upland/?view=desktop&topic=9-9_40-9_40_100

Furthermore, the Project is apparently not conditioned to prohibit nighttime operations. If the hours of operation are not restricted (in that vehicles can enter and exit the site on a 24-hour basis) the Initial Study is incomplete as an informational document. The Initial Study appears to evaluate noise only in terms of the daytime residential noise standard of 55 dBA. The analysis must also consider Project noise relative to the nighttime noise standard of 45 dbA unless nighttime activities are strictly prohibited. As background noise is naturally less during nighttime hours, activities at the Project site

will not be "masked" to the same extent they are during daytime hours. *See*, http://www.qcode.us/codes/upland/?view=desktop&topic=9-9_40-9_40_100 I-79g cont.

Transportation/Traffic

The Initial Study's analysis of the Project's transportation impacts is apparently predicated on several major assumptions "based on information received from the client." These assumptions must be made conditions of the Project to ensure that actual impacts are consistent with the Initial Study's conclusions. These are: I-79h

- The Project will generate only 25 truck trips per day (50 total trips to and from the site).
- Only 2% of truck trips will occur during a.m. and p.m. hours.
- No more than five trucks will arrive during daytime hours (presumably meaning most will arrive during nighttime hours).
- All trucks will use Central Avenue/Foothill Blvd.

Also, the Project must be conditioned so that no trucks are permitted on residential streets. If no such condition is adopted, there is nothing preventing trucks from using residential streets for access to and from the Project site. Additionally, signage shall be installed on these streets stating that trucks are prohibited. The City should also consider weight restricting residential streets to ensure that the prohibition against trucks is enforceable.

It does not appear that 13th Street has been evaluated in any meaningful sense by the traffic study (it is not listed as a roadway that has been studied), although the Initial Study states that 13th Street shall provide access to the Project site for all vehicles and vans.

**Conclusion**

Thank you for including this letter in your record of the Project, and for considering these comments as you move forward with Project review.

Sincerely,

Abigail Smith

Abigail Smith

**Michael Poland**

**From:** Chris Aldworth <ccaldworth@gmail.com>
**Sent:** Tuesday, January 21, 2020 8:26 PM
**To:** Michael Poland
**Subject:** Bridge Development

**WARNING: External email. Please verify sender before opening attachments or clicking on links.**

---

Dear Mr. Poland,

As a 35+ year resident of Upland I want to express my support for the Bridge Development project. Upland is in need of the revenue this project will bring to the city coffers and the added benefit of beautifying a part of Upland that is in desperate need. I-80

Please take this into consideration when weighing your decision.

Sincerely,

Chris Aldworth
2364 Sunfield Way
Upland, CA. 91784.

Sent from my iPad

2238 Coolcrest Way
Upland, CA 91784
909-981-1181

Mike Poland, Planning Commission and City Council
Planning
City of Upland
460 Euclid Ave,
Upland, CA 91786

RECEIVED
JAN 0 2 2020
DEVELOPMENT SERV DEPT

12/30/19

RE: Warehouse Project

Dear City of Upland:

I-81

A 41-year resident, business owner, tax payer, and home owner in the City of Upland, I object to your planned development of the Warehouse Project, at the corner of Foothill Boulevard and Central Avenue, for the following reasons in spite of the Environmental Impact Report:

The project would include 1,104 delivery van stalls, so there will undoubtedly be a substantial increase in road noise. The Bridge Project proposes 1,104 delivery van parking stalls. *That is a monstrous number of vehicles*. The Mercedes-Benz Sprinter 2500 van is 170 inches long. If you took 1,104 of those vans and lined them up bumper-to-bumper, they would form a line 3 miles long stretching from Central Avenue to Campus Avenue. Other street traffic will have to re-route to avoid congestion. This will take a toll on the city's infrastructure that will never be recouped and will create endless headaches for residents.

Everywhere in the City traffic increases, and this project will make it worse. The City of Upland continues to allow the building of more businesses and ugly 3+ story housing units with very limited parking. The City of Upland has definitely lost its suburban appeal and vision: first the Colonies disaster and now the Mello-Roos project buildings off Campus.

People are leaving Upland. More people left California in 2019 than came in legally. Our sons and their families left Upland and California seeking affordable housing, better schools, less congestion, less traffic, and less crime. Housing costs that have skyrocketed along with gas prices and gas taxes, terrible road conditions, inferior state-funded schools (in comparison to other states' schools), [Upland] homeless people pan-handling at freeway off-ramps, restaurants, and stores, [Upland] selling off parks, and increased traffic everywhere is driving people out of Upland and the State of California.

And now you want to make Upland like Ontario, "the warehouse city."

I am so disappointed in Upland's lack of vision of the future. The City has already "outsourced" its Fire Department. There are not even easy ways to email city managers!

Recognizing the City's constant need for INCREASING revenue, I recommend you review other alternatives rather than ruining the area AND trying to force Cable Airport to have to close because of the predictable noise pollution and congestion that will be caused by the Warehouse Project vehicles.

Sincerely,

C. Spencer

C. Spencer

RECEIVED

JAN 21 2020

DEVELOPMENT SERVICES

Mike Poland
Contract Planning Manager
Development Services Department/Planning Division
City of Upland
460 N. Euclid Avenue
Upland, CA 91786

January 21, 2020

Subject: Bridge Point Upland

Dear Mr. Poland

I-82

I am writing to comment on the draft Initial Study (IS) and Mitigated Negative Declaration (MND) for the proposed Bridge Point Upland development that were released for public review on December 16, 2019 by the City of Upland, CA (City) that is the Lead Agency. I have reviewed specific elements of the documents and the following are my comments and conclusions.

**Project Description**

The project description in the MND states that the proposed building is 201,096 square feet but that 276,250 square feet were used for the IS and technical analyses. Figure 3 of the IS presents and overall site plan for the proposed facility and indicates certain features such as parking space types and quantities. The scale for the drawing is not provided. Exterior elevation views of the facility are not provided, nor are descriptions of what is shown and the features to be included. Average finished grade, structure floor, and top of wall elevations are not presented. Average elevation of Foothill should be included. A north to south site cross-section, to-scale with elevations, should be required to assess visual impacts.

Figure 3 of the IS indicates 337 parking spaces for employees and retail operations. Additional parking for 1,104 delivery vans will also be provided. Where will the drivers for the vans park their personal vehicles? That could be another 1,000 or more parking spaces required if the vans represent one trip per day and occur during the same work shift. Is there a remote employee/driver parking arrangement contemplated that should be included in the IS for traffic assessment and related impacts?

My personal observation of a local warehouse that is a small-van-based delivery center (Amazon DLA7, 15940 Euclid Ave, Chino CA) was that significant van loading occurred on the paved areas adjacent to the building. The proposed project site plan (IS, Figure 3) shows permanent awnings or similar at the van loading areas that are estimated to be more than 100,000 square feet in total area. Sixteen van-loading doors (eight each on the north and south sides) are indicated on the site plan. A reasonable person would conclude that active van loading exterior to the structure will occur with only 16 doors for over 1,000 vans.

For the purpose of developing trip generation, number of employees, parking, and other building-area-based estimates, the external active-loading areas should be included in the total area resulting in a facility in excess of 300,000 square feet. The IS and technical studies conducted based on a 276,250 square foot building are therefore not conservative as claimed.

**MND Finding A and Compliance with Zoning**

I-82

MND Finding A addresses zoning. That finding states that the "proposed project would be compatible with the Upland General Plan..." That finding does not specifically state that it meets the zoning requirements of the General Plan.

A review or the current City of Upland Municipal Code Zoning Ordinance (Code) available at http://www.qcode.us/codes/upland/, reveals discrepancies between the Code and the Upland General Plan (General Plan) available at https://www.uplandca.gov/general-plan-map.

The General Plan assigns Commercial/Industrial Mixed-Use (C/I-MU) land use for the area of the proposed project. The description of C/I–MU in the General Plan includes "Typical industrial uses could include limited [emphasis added] general industrial, manufacturing, assembly, warehousing [emphasis added], multi-tenant industrial, research and development, and airport-related uses." In that sentence, "limited" is an adjective that modifies each noun that follows. Therefore "limited warehousing" is the interpretation of the General Plan C/I-MU land use for the proposed project.

Per the Code, article 17.01.030 Relationship to the General Plan, in the event there are inconsistencies between the Zoning Ordinance and the General Plan, the General Plan governs.

The use of the term "general industrial" would include "light industrial" uses per the Code and that in turn would have allowed for warehousing, wholesaling, and distribution. The added "limited" adjective in the General Plan modifies "general industrial" and so "limited general industrial" becomes a new use that that is not in the Code. Similarly, "limited warehousing" becomes another use that is not in the Code and "distribution" is not mentioned with respect to warehousing.

Further, the General Plan description of Industrial (IN), which only applies to the College Heights area south of Foothill Blvd., states "small-scale warehousing and distribution," as one of the possible specific uses listed. This is another instance where the General Plan modifies the Code by limiting the scale of development and specifically stating "warehousing and distribution" with the exclusion of "wholesaling".

The City's governing General Plan has therefore distinguished "limited warehousing" and "small-scale warehousing and distribution" as two, specific, warehouse-based uses. If warehousing were considered to include distribution since that is typical of warehouse operation, limited warehousing would only allow for similarly limited distribution. A reasonable person would conclude that a fleet of more than 1,000 delivery vans is not a limited-distribution operation.

Because C/I-MU as defined in the General Plan indicates limited warehousing and specifically excludes distribution, the proposed project does not meet the General Plan and MND Finding A is misleading. Although the proposed project might be viewed as compatible with the General Plan and surrounding land uses, the 1,000-van-based distribution aspect of the project does not conform to the General Plan and would be a zoning violation if allowed to proceed.

The proposed project as presented in June 2019, in October 2019 with revisions, and now in the IS and MND again with revisions, should have all been rejected based on the General Plan.

**Traffic Impact Analysis**

I-82

The Traffic Impact Analysis (TIA) of the IS assumed the Institution of Transportation Engineers (ITE) trip generation criteria for Land Use (LU) 156 High-Cube Parcel Hub Warehouse was valid.

ITE LU 156 trip criteria are from facilities where employee cars and freight trucks including large step-up vans that are two-axle, six-tire vehicles, with 1.5 personal car equivalents (PCE) are involved, and not small, two-axle, four-tire, 1.0 PCE delivery vans. The following description is from the ITE Trip Generation Manual, 10th Edition:

> **"Land Use: 156**
> **High-Cube Parcel Hub Warehouse**
>
> **Description**
>
> A high-cube warehouse (HCW) is a building that typically has at least 200,000 gross square feet of floor area, has a ceiling height of 24 feet or more, and is used primarily for the storage and/or consolidation of manufactured goods (and to a lesser extent, raw materials) prior to their distribution to retail locations or other warehouses. A typical HCW has a high level of on-site automation and logistics management. The automation and logistics enable highly-efficient processing of goods through the HCW. High-cube parcel hub warehouses typically serve as regional and local freight-forwarder facilities for time sensitive shipments via airfreight and ground carriers. These sites also often include truck maintenance, wash, or fueling facilities. Warehousing (Land Use 150), high-cube transload and short-term storage warehouse (Land Use 154), high-cube fulfillment center warehouse (Land Use 155), and high-cube cold storage warehouse (Land Use 157) are related land uses.
>
> **Additional Data**
>
> The High-Cube Warehouse/Distribution Center-related land uses underwent specialized consideration through a commissioned study titled *High-Cube Warehouse Vehicle Trip Generation Analysis*, published in October 2016. The results of this study have been incorporated into the 10th Edition *Trip Generation Manual* and are published on the ITE website at http://library.ite.org/pub/a3e6679a-e3a8-bf38-7f29-2961becdd498 where the study is posted. Time-of-day distribution data for this land use are presented in Appendix A. For the two general urban/suburban sites with data, the overall highest vehicle volumes during the AM and PM on a weekday were counted between 8:15 and 9:15 a.m. and 5:15 and 6:15 p.m., respectively. The sites were surveyed in the 2010s in California, Connecticut, and Minnesota."

From the above ITE description, LU 156 does not involve small-van, last-mile delivery to customers as alluded to in written or oral comments by the developer. In the IS, nowhere are the proposed vans defined. Trucks with two axles and six tires are the smallest vehicles involved in the transport of goods that ITE LU 156 data are based on.

In the above quoted Additional Data paragraph, the referenced 2016 study by ITE was commissioned, in part, by the South Coast Air Quality Management District. The one LU 156 California facility that was evaluated for that study was a warehouse in Bloomington, CA that is operated by FedEx and is a truck-centric distribution operation with two-axle, six-tire delivery vans.

An assessment for a proposed LU 156 warehouse in Chino, CA, was recently conducted by others for the City of Chino in support of that city's decision to prepare an Environmental Impact Report. For that, an existing Southern California facility was monitored. Trucks were characterized as two-axle, six-tire or larger. I-82

It is important to note that the ITE criteria include both daily total vehicle trip factors based on facility size (square feet of warehouse space, e.g.) and hourly trip distribution data to characterize trips into and exiting the facility on an hourly basis. The latter are key to an assessment of Level of Service (LOS) impacts on the adjacent roadways. The IS doesn't provide enough information to evaluate the reported results.

The ITE LU 156 trip distribution data reflect truck traffic that is relatively stable throughout the day with peak AM and PM Peak Hour Rates that are each approximately 20% of the total daily trips including employee trips that might be related to working hours and shifts. The TIA has assumed peak hourly values that are each approximately 10% of the total daily trips compared to ITE LU 156 data. That is a significant inconsistency.

The proposed facility, with its heavy reliance on small delivery vans, could be expected to vary more throughout the day based on when deliveries are to be made, for example between 8:00 am and 8:00 pm. The number of daily trips per van to and from the facility and timing is unknown. There are no trip generation and hourly distribution data available from ITE for a facility such as the one proposed.

A separate and independent study is warranted to develop valid estimates. Such a study could involve identifying, monitoring, and assessing existing similar facilities, and the incorporation of vehicle trip estimates and distributions from the proposed project's tenant. Because the tenant won't be revealed, a separate and independent study based on monitoring existing similar facilities is the only option.

In addition, the peak delivery season should be the basis of the TIA. Whereas average daily data might be appropriate for relatively stable warehouse and distribution operations, peak parcel delivery periods, such as November through December should be examined. There is precedent for considering peak conditions. For example, ITE LU 820 Shopping Centers information includes total trip generation and hourly trip distribution data for weekends as well as weekdays to allow for average and peak period evaluations.

The TIA does not adequately characterize the total vehicle trips and their hourly distribution for the type of project that is proposed. The ITE trip generation and hourly-distribution data assumed for the IS and MND are not for facilities like the proposed project. Trip generation and distribution criteria for average and peak season need to be developed for the type of facility proposed, the active area for the warehouse should be based on "building" size that includes exterior loading activities, van-driver parking and traffic patterns must be included, and the TIA must be revised accordingly.

**Retail Analysis Memorandum**

An analysis of the traffic from the site if the development were to be ITE LU 820 Shopping Center is included in the IS. The only zoning in the General Plan that would be equivalent to a

I-82

Shopping Center is Regional Commercial-(RC). The only area of the City zoned as such is on Mountain Ave. to the south of 8th Street, and along 7th Street to the west of there.

Delete the results and discussion of the Retail Analysis Memorandum from the Initial Study. That comparison is moot because of General Plan and Code restrictions.

**Project Trip Distributions**

Project trip distributions are routes for exiting and departing vehicles that were assumed as part of the Level of Service (LOS) analysis of the TIA. What guarantee is there that these assumptions are accurate and that there are no adverse impacts to LOS at intersections not specifically identified and evaluated? For example, it was assumed that all traffic to and from the 13th Street entrance to the site will be from Benson. Neither the IS nor MND indicate how traffic would be restricted from the residential and school zone areas of 13th Street east of Benson and on similar streets in other parts of the City.

The truck project trip distribution presented as Figure 5 in the TIA shows that all truck travel will be to and from Interstate 10 on Central Avenue. This route violates the General Plan (Figure 4-CIR Designated Truck Routes) that has a weight limit on a segment of Central Avenue south of Richton Street. This restriction to truck travel on a reach of Central Avenue is stated in the body of the IS and in the appended TIA. This apparent conflict is not addressed in the MND and is an omission of a key potential constraint.

The General Plan also indicates that Central Avenue is not a designated, unrestricted, truck route Between Foothill and Arrow Highway. I recently drove Central Avenue and there are no weight limit signs. Southbound at Arrow Route there is a sign indicating that Arrow Route east and west, and Central Avenue to the south are truck routes. I did not see truck route signs on northbound Central Avenue. Has the General Plan been revised but not updated? Is the current signage not consistent with the General Plan?

**Summary and Conclusion**

My review identified key deficiencies in the draft IS and MND documents:

- The project description is insufficient to characterize what is proposed.
- The van-delivery element is not defined. It does not address van-driver parking or alternative arrangements and resulting traffic flow and timing.
- The project does not conform to the General Plan, both in allowable land use and assumed large-truck routing.
- The TIA is based on faulty assumptions and is not valid.
- Comparison of the assumed traffic for the proposed development to that of a shopping center is moot.
- Because the TIA is not valid, that will be reflected throughout the IS and MND where traffic-based results for other potential project impacts are estimated and assessed, rendering those results and conclusions invalid as well.

I-82

The draft IS and MND do not adequately describe the project, the analysis of transportation impacts is flawed, and the proposed development does not conform to the General Plan. As the Lead Agency, the City should either withdraw the draft IS and MND for the proposed development from further consideration, or the Planning Commission and City Council should deny approval when the documents are submitted for consideration and formal decision.

If the project and supporting documents were revised and resubmitted under separate cover by the developer, a full environmental impact study and report in accordance with the California Environmental Quality Act should be a condition for future consideration by the City. This would allow time for detailed review by all interested parties.

Roger V. Stephenson, PhD, PE
Civil Engineer
4750 Emerald Avenue
La Verne, CA 91750

Email: rvstephenson@verizon.net

**Michael Poland**

**From:** luckyjm12@yahoo.com
**Sent:** Monday, January 20, 2020 8:38 PM
**To:** Michael Poland
**Subject:** upland warehouse project

**WARNING: External email. Please verify sender before opening attachments or clicking on links.**

I have been a resident of Upland for over 40 years. As a resident that lives near foothill , I don't believe this would be a good use of land for Upland. The 210 freeway was built because of overcrowding on foothill blvd.,and this would just put too much traffic back on foothill. As a resident in that area. I know that people tend to just try to get off foothill and use 11th st. or 13th st. to avoid traffic as it is now. I feel this would be even more detrimental with this project. There are elementary schools on both these streets and we really don't need more traffic around these areas. There have been incidents of children hurt and I would not want to see more of these incidents happen. This area is already overcrowded and is quite residential. If Upland needs this warehousing, why can't it be built off the 210 freeway, where trucks can be directed right off the freeway to the warehouse and directed right back on the freeway. I also would like to know about the costs associated with fixing the streets when needed. With all the truck traffic the streets will surely need more maintenance. Please reconsider this project. Sincerely. j. marks I-83

## Michael Poland

**From:** Jaylene Marotte <jayerocket@gmail.com>
**Sent:** Tuesday, January 21, 2020 4:33 PM
**To:** Michael Poland
**Subject:** Bridge Project

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Hi,

My name is Jaylene Marotte. I am a resident of Upland, local business owner and PTA President for Pepper Tree elementary. I have been following the discussions and feedback on the Bridge project as well as doing research myself. I believe that Bridge has made a good faith effort to comply with resident requests and address concerns. The reality is this is a good project for Upland. The opportunity to develop that piece of land may never come again, at least not with the amount of economic stimulus attached to it. Our schools will benefit greatly from the money being offered as well as our parks and roads. That area of the city is one I currently avoid because it is so run down and does not offer any value to me or my family. It would be nice to see that area revitalized. With Bridge taking on the bulk of the curb appeal renovations needed in that area it will be more likely for other retail shops to be enticed to also move to that area. I-84

Thank you for taking the time to read my email.
Jaylene Marotte

Sent from my iPhone

**Michael Poland**

| | |
|---|---|
| **From:** | kris@goodinglabs.com |
| **Sent:** | Tuesday, January 21, 2020 9:15 PM |
| **To:** | Michael Poland |
| **Cc:** | Robert Dalquest; Keri Johnson; Rosemary Hoerning; janiceelliott4upland@gmail.com; Bill Velto; Rudy Gmail. Zuniga; Ricky Felix; ricky@rickyfelix.com; debbiestone4upland@gmail.com; robin.aspinall@gmail.com; garyschwary@gmail.com; carolyn.6@yahoo.com; anovikov.upland@gmail.com; Yvette@premier-is.com |
| **Subject:** | Bridge Point Development Project opposition |

**WARNING: External email. Please verify sender before opening attachments or clicking on links.**

2256 N Campus Ave.
Upland, CA 91784
(909) 920-3447
kris@goodinglabs.com

January 21, 2020

Mike Poland
Contract Planning Manager
City of Upland Development Services Department/ Planning Division
460 N. Euclid Avenue
Upland, CA 91786
mpoland@ci.upland.ca.us

Cc:
Robert Dalquest rdalquest@ci.upland.ca.us Developmental Services Director
Keri Johnson, City Clerk: kjohnson@ci.upland.ca.us
Rosemary Hoerning, Interim City Manager: rhoerning@ci.upland.ca.us
Councilwoman Janice Elliott– janiceelliott4upland@gmail.com
Councilman Bill Velto– bvelto@ci.upland.ca.us
Councilman Rudy Zuniga – rudy4upland@gmail.com
Councilman Ricky Felix – rfelix@cityofupland.org; ricky@rickyfelix.com
Mayor Debbie Stone – debbiestone4upland@gmail.com
Planning Commissioner Robin Aspinall – robin.aspinall@gmail.com
Planning Commissioner Gary Schwary – garyschwary@gmail.com
Planning Commissioner Carolyn Anderson – carolyn.6@yahoo.com
Planning Commissioner Alexander Novikov – anovikov.upland@gmail.com
Planning Commissioner Yvette Walker – Yvette@premier-is.com
Planning Commissioner Linden Brouse

RE: Bridge Point Development Project opposition

Dear Mr. Poland, Upland City Representatives, City Council Members and Planning Commissioners:

As a 25+ year resident of the city of Upland, I am voicing my opposition to the Bridge Point Upland Project. I-85

I urge the you to deny approving the project for the following reasons:

- The project is incompatible with the city's vision and the desires of its residents.
- The distribution center would fundamentally change the character of this area of the city.
- The distribution center could damage the vitality and viability of the nearby businesses and would impact the quality of life in surrounding residential areas.
- The applicants provide no evidence of how a distribution center would benefit the city or its residents, and has failed to demonstrate the quantitative need for a distribution center.
- The economic impact of this development is not beneficial. For example, it does not generate increased tax revenue for the city and, instead, the additional wear and tear on the streets will result in increased roads maintenance costs.
- The development provides only limited job opportunities, mostly low-paying, unskilled delivery driver positions. These are not careers of the future, nor jobs that are equated with the city's economic success.
- The project will cost the city of Upland money.
    - For example, page 1100 of the MND* says "*circulation improvements are proposed at Benson Avenue/Baseline Road and include re-striping the northbound through lane to a through-left turn lane and convert the northbound and southbound left-turn phasing from protected to split-phase[...] The total cost of these improvements is anticipated to be approximately $75,000. The project's fair share has been calculated at 3.413% for these improvements ($2,560).*" That means, Upland will have to pay $72,440 for this development-related project, one of likely many improvements required by the development.
- The developer has no legal or binding obligations to verbal commitments (e.g. using electric vehicles, limiting the number of trucks per hour, hours of operation, etc.). If, despite my opposition and others in the community, this project goes through, the contract needs to include these promises and include significant penalties to discourage violations.
- Throughout the country, there is considerable public debate and concern over distribution centers and their impact on the residents' quality of life. See the study and article entitled "Unfulfilled Promises" published by the Economic Policy Institute -- https://www.epi.org/publication/unfulfilled-promises-amazon-warehouses-do-not-generate-broad-based-employment-growth/.

Furthermore, the Mitigated Negative Declaration (MND) underestimates the project's impact and fails to adequately mitigate the impacts of this project, including, but not limited to, the following reasons (in addition to the points mentioned above):

- The modeling, simulations, assumptions and analysis are based on a "warehouse" rather than a more accurate parcel delivery service or logistics and distribution center (which is what truly is being proposed). This affects the conclusions, mitigations and recommendations outlined in the MND. It also violates Upland city zoning rules.
- It underestimates the scope of the impacts on the city of Upland and its residents, as well as its neighboring cities and residents of Claremont and Montclair.
- The MND is too narrowly focused on the project site and not on the impact on the community of the routes the delivery drivers will utilize.

- The technical studies and assessments do not have sufficient breath or scope and do not fully capture the impact of this project. They need to include more testing days/ observations. I-85
    - For example, the Habitat Assessment was observed on only one day (August 29, 2019). This one-day glimpse at the site cannot fully assess the impact of changing climates, wildlife, vegetation, wildlife corridors or critical habitats that occur or appear throughout the year. Similarly, traffic counts were only one day as well (5/23/18 for Padua/Monte Vista and Baseline, 9/25/18 for Baseline and SR-210, etc.).
- The Traffic Impact Analysis is severely flawed. All flaws, incorrect assumptions and miscalculations affect the conclusions, mitigations and recommendations outlined in the MND.
    - There is no mention of the traffic impact on response times, road access or overall service levels to emergency services, particularly the fire station located on Benson or the police station located on 13th.
    - The NND only assessed the residents and companies located directly surrounding the site, but not along the routes that the trucks, vans and other vehicles would travel. It does not consider the impact on and quality of life among residents living and travelling along the alternate routes the taken by trucks, vans and other vehicles.
    - The traffic and noise analyses do not fully account for *ALL* trips associated with trucks, delivery vans or other vehicles (both the initial loading and further package reloading throughout the day).
        - For example, Table 10 on page 1031 of the MND* states that Baseline Road from Monte Vista Ave. to SR-210 ramp will have NO additional Average Daily Trips (ADT) due to the project (both without project and with project show 28,815 trips. This is completely unrealistic given there will be over 1,100 delivery vehicle stalls, and corresponding numbers of vehicles that will be using these main arteries. Moreover, the other access point to SR-210 (along Baseline Road from Benson Ave) accounts for only 190 ADT (32,620 ADT with project, less 32,430 without the project = 190).
        - As another example, Benson Ave, between 13th street and Foothill was assumed to have no additional increase in ADT (21,650 ADTs with and without the project), which again seems unrealistic in light of the facility's business of providing delivery services and the level of vehicular activity associated with this service. Similar assumptions and undercounts are made regarding the traffic and noise analyses.
    - The Traffic Impact Analysis states that many of the area intersections do not meet the minimum 50-trip threshold. This seems unrealistic and incorrect, given that the delivery center will host over 1,100 delivery vehicles that will continuously be delivering packages and making trips back to the distribution center to pick up additional loads. It also contradicts other figures cited within the document.
        - For example, page 1061 on the MND*, states the SR-210 ramps and Baseline Road does NOT meet the 50-trip threshold. However, this is one of the two proposed freeway entrance/exits for the 1,100 delivery vans and would presumably have more than 50 vehicles or vehicle trips utilize this intersection. Additionally, this directly contradict the noise analysis mentioned above that says there will be 190 ADTs along this stretch of road.
    - The Project Trip Generation chart (Table A on page 1066 of the MND*) accounts for passenger vehicles and trucks, but does not include delivery vehicles. Delivery vehicles need to be included in the calculations in order to present a full and complete traffic impact assessment.
        - The MND may be considering delivery trucks to be passenger vehicles. They are not. According to the Office of Highway Policy Information, passenger cars are defined as "*All sedans, coupes, and station wagons manufactured primarily*

*for the purpose of carrying passengers and including those passenger cars pulling recreational or other light trailers*". The delivery vehicles used by this project are commercial vehicles that are typically heavier, less fuel efficient, etc. than passenger cars. As such, the MND's noise, traffic, and other studies need to reflect this. I-85

  - The Traffic Impact Analysis does not consider alternative traffic routes.
    - Traffic will take the path of least resistance, so drivers will enter the 210 freeway as proposed at Baseline. However, its 360-degree looping onramp to enter the 210 westbound at Baseline and the limited acceleration lane will likely influence drivers to seek alternate routes. So, it is likely that drivers will also the Mountain and Towne ramps. Similarly, drivers will access the 10 freeway Central, as proposed, but they will also likely use the Monte Vista and Mountain ramps.
  - The Traffic Impact Analysis is missing key traffic information and model inputs.
    - For example, the Cumulative Project Trip Generation on page 1074-5 does not consider the traffic associated with the residences entering Benson from 13th street or entering Benson from 11th street (the location of Cabrillo Elementary).
- The MND does not appear to address the impact on nearby parks and schools or their safety-related issues (e.g. crosswalks and school routes).
- The MND does not address the facility operating hours nor its impact of these hours on the quality of life for local residents along the routes and traffic corridors.
- No penalties were proposed for violating mitigation recommendations or Best Management Practices (BMP)
- Alternative uses for the site were not fully explored.

Due to the shortcomings listed above, I believe the study must be re-done to account for the project's effects on, but not limited to, the following:

- Aesthetics, including lighting and glare
- Agricultural and forestry resources
- Air quality, including air pollutants, toxic air contaminants, dust, odors, emissions and ambient air quality
- Biological resources, including climates, wildlife, vegetation, wildlife corridors, critical habitats and conservation plans
- Cultural resources
- Energy, including vehicle fueling, solar and energy infrastructure
- Geology/soils
- Greenhouse gas emissions
- Hazards and hazardous materials, including the emission, storage, transportation and disposal of waste and toxins,
- Hydrology/water quality, including, but not limited to water pollutants, toxic water contaminants, runoff and other discharge, water treatment, retention basins, drainage, irrigation and overall water quality
- Land use/planning, including Upland zoning and general plan compatibility
- Mineral resources
- Noise and vibrations, including assessments around the site as well as along primary and secondary routes
- Population/housing including quality of life for those surrounding the site as well as those along the primary and secondary routes
- Public services, including street improvements, road maintenance, as well as delivery route interference with schools (notably Cabrillo) and emergency response services on Benson and 13th streets

- Recreation I-85
- Transportation, around the site as well as along primary and secondary routes, including traffic patterns, circulation, transit, trip generation, level of service, traffic volume, vehicle access, parking, dangerous roadways (notably westbound SR-210's circular loop and acceleration lane) and traffic, pedestrian and bicycle safety
- Tribal cultural resources
- Utilities/service systems, including water, electric power, natural gas, telecommunications, solar, electric vehicle charging stations, and waste
- Wildfires
- Mandatory findings of significance, including airport operations, general disturbances, hours of operations, nuisances, use of drones and privacy rights
- Identification of sensitive receptors to include those impacted by the facility to include those along primary and secondary traffic arteries used to access the SR-210 at Baseline, Towne and Mountain ramps, and SR-10 at Central, Monte Vista and Mountain ramps.

Ultimately, due to the MND shortcomings, I ask that you require the developer to:

- conduct a full Environmental Impact Report.
    - This report should include alternate uses of the site such as a business park, medical facilities, school, etc.
- provide an assessment of similar parcel delivery distribution centers and logistics centers and their impact on the communities (as the developer stated he would at the community meeting).

This is just a sampling of the errors and omissions in the MND. I sincerely hope that the city, city council and planning commission will join with me in my opposition to this project and will NOT approve the project or its proposed Mitigated Negative Declaration.

Sincerely,
Kris Gooding

**Volume 2 Technical Studies, published on the Upland City website*

## Michael Poland

**From:** Linda Trawnik <sendlinda@icloud.com>
**Sent:** Tuesday, January 21, 2020 4:19 PM
**To:** Michael Poland
**Subject:** Bridge Development

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Dear Mr. Poland
My name is Linda Trawnik, I am a business owner in downtown Upland where we also own a historic home.
I am writing to let you know that I am in favor of moving forward with the warehouse proposed by Bridge Development. I-86
Sincerely,
Linda Trawnik

**Michael Poland**

**From:** Manoj Chitre <chitrem@yahoo.com>
**Sent:** Thursday, January 2, 2020 4:32 PM
**To:** Michael Poland
**Subject:** Opposition to the Amazon Warehouse in Upland

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Mr. Poland,
I am a resident of Upland for the past 35 years and vehemently oppose the development of a Amazon warehouse near Foothill and Benson. Please do everything possible to ensure this Amazon warehouse is not constructed in the city of gracious living. We are already at wits end due to traffic and pollution on Baseline rd near Mountain Shadows. I-87

Manoj Chitre
1784 W Andes Dr
Upland CA 91784

January 15, 2020

Mrs. Mary Hart
1217 W. 13th St.
Upland, CA 91786

RECEIVED
JAN 21 2020
DEVELOPMENT SERV DEPT

Upland City Council:
Mayor Debbie Stone
Bill Velto
Janice Elliot
Ricky Felix
Rudy Zuniga

Mike Poland, Contract Planning Manager

I-88

Living on 13th St., my neighbors, my husband and myself are all very concerned about the proposed warehouse/delivery facility south of Cable Airport.

We have lived on W. 13th St. between Benson and Mountain since the 80's. At that time it was a quiet, peaceful street with very little traffic. We were assured that business traffic would use Benson or Mountain and Foothill or 16th St.

Since that time, a Lowe's has been built, the 210 freeway added with exits at Mountain and Baseline, and the new police station. Cable airport, Upland City Yard and a fire station are located on Benson. There is also a large Smart and Final shopping center at Foothill/Mountain. Workers and commuters now use 13th St. for all of these.

It does not take any explanation to see that the 13th St. traffic has already gotten beyond ridiculous and no one does anything about it. There are days we cannot get out of our driveway. Our neighborhood is not happy with traffic as it is now. To add all the semi's and delivery vans that will be utilized by the new warehouse facility would make life unbearable. How would you monitor that they wouldn't use 13th St.?

While I know that a city needs businesses, we hope you would remember that families live here. Sycamore school is located just east of Mountain/13th St. and many children and teens from the high school walk along this street. We want safety and peace and will have neither of these if this proposal goes through. It is bad enough now.

I am addressing this letter to all the above listed people because Upland City Council and the Contract Planning Manger should be concerned about all of Upland. Please show us you care.

Sincerely,

Mary Hart

Mary Hart

**Michael Poland**

**From:** Micheal Kelly <mkelly55555@gmail.com>
**Sent:** Sunday, January 19, 2020 9:00 PM
**To:** Janice Elliott; Bill Velto; Rudy Gmail. Zuniga; Ricky Felix; debbiestone4upland@gmail.com; robin.aspinall@gmail.com; garyschwary@gmail.com; carolyn.6@yahoo.com; anovikov.upland@gmail.com; Michael Poland
**Subject:** Amazon Warehouse

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Dear Upland Officials,

I'm writing to convey my intense opposition to the proposed gigantic Amazon warehouse distribution facility. Please do not approve this land use. I-89

I vote in every election. I live on a heavy traffic corner, and I will put **large signs** on my property to encourage that any council member who votes to approve this should be **voted off the city council**.

Sincerely,
Micheal Kelly

Phone: (909) 981-2030 m4justice@verizon.net

**Marjorie Musser Mikels**
P. O. Box 1428
Upland, CA 91785-1428

RECEIVED
JAN 21 2020
DEVELOPMENT SERVICES

January 20, 2020

Mr. Mike Poland, Contract Planning Manager
City of Upland
Development Services Department/Planning Division
460 N. Euclid Avenue
Upland, CA 91786

Re: Bridge Development Project/Mitigated Negative Declaration

Dear Mr. Poland, and Honorable Mayor and City Council Members and Planning Commission Members of the City of Upland:

I-90

I object to approval of the proposed "Bridge Development Project" without a full Environmental Impact Report. The impacts of this project on our air quality, water, streets and roads, traffic congestion and health and safety of our citizens are significant and inadequately mitigated by the measures proposed by the developer. No development agreement or project approval should be granted without the actual user-occupier, lessee-beneficiary of the project being identified and stepping forward to commit to the proposed mitigation measures as well as agreeing to bear the **economic costs** to the community over the life of the lease, necessitated by this proposed development and use.

The location of the project is in the wash of the San Antonio Creek, extending from the canyon descending from Mount Baldy, from where Upland derives its treasure of pure spring water. That creek also bears the danger of 100-year floods that in the past destroyed life and property. Thus, I speculated the project was on flood control easements held by the County Flood Control District. However, on reviewing the map with other concerned citizens it appears that flood control easement is just west of the proposed project, next to Dewey Way.

However, the site does lie within the **Dam Inundation Zone**, a hazard area designated per state law in the county's general plan. If that San Antonio Creek dam ever gave way, the floodwaters would come roaring out of that mountain, as it has in the past, bearing huge boulders and damaging everything in its path. No development should be allowed in that hazard zone without the developer/user agreeing to bear

liability for any damages resulting from the decision to build in the dam inundation area as well as flood control improvements necessitated by its development. I-90

**The proposed use fails to comply with the city's general plan and zoning map,** as others have ably shown in their comments. Use as this major distribution hub (not a use specified in either the industrial or commercial textual use description) will damage and destroy our streets and roads, maintenance of which is already financially difficult for Upland and will cause greater traffic congestion in an area already severely impacted. One lady testified in the public hearing that the traffic exiting at Baseline on the 210 Freeway at rush hour is already backed up a mile and a half onto the freeway since the development of Sycamore Hills Shopping Center. Traffic congestion will only become worse when those houses being built north of 16th are owned and occupied. Neither the developer nor the mysterious user of the project has stepped up to the plate to offer an annual fund to establish reserves for repaving the streets those thousands of daily vehicle trips and huge delivery trucks will damage. (We are told by the developer's hired spokespeople that "everyone agrees" it's better to get a few up-front inducements so we don't have to monitor and enforce future obligations). The minor one-time gifts proposed by the developer fail to mitigate the inevitable environmental damage on our community, nor do they reduce the impact to less than significant.

As to **air quality**: While the general plan requires decisions to *reduce* greenhouse gases and dangerous emissions, this project will spew cancer-causing fumes from diesel fuel from large trucks and thousands of van and vehicle emissions in an area already seriously impacted, close to schools, parks and residences exposing particularly vulnerable populations such as children and elders to the health risks of added vehicle emissions.

The **health risk assessment** prepared by a local engineer shows over 30 expected additional deaths from cancer because of the emissions, not counting asthma and chronic obstructive pulmonary disease and other lung illness increases.

STORMWATER AND REPLENISHMENT OF GROUND WATER BASINS: Since Bridge claims there is plenty of capacity in our existing Foothill 72-inch storm drain to accommodate the rain waters which will pour across their huge concrete parking lot, (claiming the waters from their project would only use 178 cfs. of the 288.4 cfs. capacity, leaving 100 cfs. for all remaining Foothill development), they fail to offer any enhancement of our storm drain system's capacity. While promising to send some of the storm water on their acres of concrete into their filtration system before dumping it into our existing storm drain system so it can be delivered to our catch basins to percolate to ground water basins, they admit that acres of their property will "not be routed to a BMP for treatment" and will either be considered as "self-treating" or will "drain offsite without treatment due to technical infeasibility."

So some of the development's storm waters will wash down Benson and into our storm drains there without treatment. Without the project, the soil in that wash area absorbs rain water which percolates into and replenishes our underground aquifers while providing some open space for animal and plant habitat. The MND claims there are no living species of flora and fauna there, but citizens have observed grading taking place already in that area, and who knows what wild life would spring forth if that wash were left unpaved and unexcavated. I-90

WASTE GENERATION: My objections pertain to this LAND USE DECISION—without animosity towards the expected tenant. However, should the anticipated occupant of the project area be that corporation which many in the community surmise, there will enter our waste stream in this community, enormous amount of cardboard and other recyclable and non-recyclable materials of which our waste disposal company is likely aware. Since the last day to object to the proposed waste rate hike is only six days after the last day to object to the distribution center's MND, one surmises that perhaps we Upland citizens are being asked to bear the added cost of disposal of all that extra waste. I hereby voice my objection to the rate hike, given that Burrtec's no-bid, ever-green trash contract was entered with promises that there would be no additional rate increases over the annual cost of living. Perhaps the user of the Bridge project would like to pick up the extra charges this community will bear in disposing of its packing material.

NO TAX BENEFITS: The owner of this property, who acquired it long ago at dirt-cheap cost, and now stands to reap huge profits from turning that pile of dirt into a massive traffic hub and distribution center, adds **no increase in property taxes to our public coffers**, that would help this struggling city pay for street repairs, flood control, water quality, and to deal with the "homeless problem". (The owner of the adjacent airport complains and uses the "homeless" congregating near his property as a reason for supporting the project, never yet disclosing to the public what other plans and coordination the ground distribution center might have in mind for this private air field). The project land owner chooses to lease for decades, <u>not to sell</u> the property—so the new occupant need contribute little by way of property tax increases to this community. Further, the amount of sales tax generated by the project is minimal—3% of the 1% going to the county—since it is not deemed a point of sale. So there are no ongoing financial reparations offered to balance the huge financial burdens and health and safety detriments the community will bear in road repairs, increased traffic, air pollution with accompanying sickness and death. Bridge claims the community will benefit from increased jobs—but that's short-term. Maybe there will be some construction jobs initially, but the prototypes of the expected tenant's operations show rapid movement towards technology (robots and drones), instead of employing human beings who are vulnerable to injury and illness from the kind of stress inflicted in the high-paced work environment that the tenant is known to demand.

I-90

Bridge offers one-time glittering objects, like $50,000 to the Chamber of Commerce. But will that compensate the small businesses no longer be able to compete with the mysterious cloaked Giant knocking on our front door, and demanding admission while refusing to even identify itself (because the lease is not yet signed)?

And who and how will the promises made by Bridge (an LLC that can dissolve with a stroke of a pen tomorrow) be monitored and enforced against the Giant who won't even disclose its name?

And once Giant sticks its nose under our tent, what additional development will shove its way into the sand and gravel operations in that wash, north of the proposed site and the neighboring airport by private agreement, all without a change of ownership that would trigger reassessment and generate some property tax revenue for the residents who must bear the cost of the Giant's operations?

No mitigation posed in the MND is sufficient to offset the substantial detrimental environmental effects of this project being proposed. An EIR is warranted and required to give Upland and the surrounding impacted communities more time and a fairer process for evaluation and comment. The Giant's alleged timeline—to finish project development by next summer so it can be operational by Christmas of 2020—should not be used as an excuse to circumvent public scrutiny.

Thank you for your consideration.

Sincerely,

Marjorie M. Mikels

Marjorie Musser Mikels

**Michael Poland**

**From:** Mary Elizabeth Paster <Mary.Paster@pomona.edu>
**Sent:** Tuesday, January 21, 2020 3:09 PM
**To:** Michael Poland
**Subject:** Public comment on Amazon warehouse

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Dear Mr. Poland,

I'm an Upland resident and I strongly oppose the proposed Amazon warehouse. I work in Claremont, and the proposed warehouse would be right in the middle of my commute. I don't want more traffic in my neighborhood or on my commute. I am also concerned about pollution from the trucks. I understand an initial study was done but I believe it was a rush job and a whitewash. I want to see a full, independent, and robust Environmental Impact Report as well as a full and independent assessment of the potential economic effects on our city. I think that if these assessments are done correctly and independently, it will become clear that this proposal is not good for the city or its residents. But let's do the actual studies and see what they say. Thank you for your consideration. I-91

Respectfully,
Mary Paster
1906 Wilson Ave.

## Michael Poland

**From:** NATASHA WALTON <notlaw_17@msn.com>
**Sent:** Tuesday, January 21, 2020 5:57 PM
**To:** Michael Poland
**Subject:** Bridge Development Comments
**Attachments:** IMG_4598.jpg; ATT00001.txt; IMG_4595.jpg; ATT00002.txt

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Dear Mr. Poland,

I-92

I am a wildlife biologist and 16-year resident of Upland. I ask that you and the City of Upland ensure that Bridge Development complete an environmental impact report (EIR) to be more clear as to what the permanent significant long-term environmental effects of this project would be on our community and whether or not any suggested mitigation would be adequate to help offset these impacts. Various community members at different past project workshops have expressed concerns about inadequate analyses on a variety of subjects such as air quality and traffic.

I am mostly concerned about the limited analysis conducted by ELMT Consulting on the biological resources on the site (Appendix B - Habitat Assessment) for a variety of reasons which include the following:

**References**

Although ELMT Consulting used some standard references to help determine what may be present at the site, they should have referenced more local sources such as Pomona Valley Audubon Society bird lists, San Bernardino County Museum species lists, Bernard Field Station species lists, or Rancho Santa Ana Botanical Garden records.

**Site Visit**

Only one site visit was conducted on August 29, 2019, which by no means would allow enough time to adequately survey such a large area of its flora and fauna. In fact the survey was conducted at a time when many native plants would be found dormant in the heat of the late summer. For example, on a visit to the edge of the northeast corner of the project site on January 7, 2020, I saw a plant *Baccharis sarothoides* (broom baccharis) that was not included in thr biological report (see attached photos). Although not indicative of wetland habitat, this species can be found in wetland habitats (classified as facultative upland [FACU] by the Army Corps of Engineers) and it appeared to be a dominant plant in the northeastern area of the site. However, this species was not found by the biologists and, thus, was not addressed in the report.

I-92

Additionally, no surveys for any special status species, were conducted or suggested. For example no surveys were suggested for burrowing owls (*Athene cunicularia*) even though they are known to currently or have recently inhabited similarly disturbed habitats in the Inland Empire such as the recently burned areas of the North Etiwanda Preserve, Ontario Airport, Chaffey College in Chino, and a vacant lot along Foothill Blvd in Rancho Cucamonga where ground squirrels are also present (personal observation and communication).

**Dismissive Conclusions**

Several special status species were "presumed absent" without a more thorough analysis of local historical species distributions or additional biological surveys. For example, the burrowing owl was "presumed absent" from the site even though ELMT Consulting describes in table B-1 that the owl "persists and even thrives in some landscapes altered by human activity." ELMT describes this habitat as disturbed and inhabited by ground squirrels which provide burrows for burrowing owls, so why is there absolutely no chance for their presence?

**Vague and Incorrect Impact Minimization Measures**

I am encouraged to hear that the project site will be including native plants and trees into its landscaping plans to perhaps help alleviate the loss of native plants from the site, but no details are provided such as a plant and tree palate to ensure species diversity. The sources of these plants are not discussed as well, such as whether or not they will be acquired from local nurseries or propogated from seeds harvested from on-site plants.

The nesting bird season has recently been extended by the California Department of Fish and Wildilfe such that it now runs from February 1st to September 30th. The biological report incorrectly cites these dates several times. As the report mentions, nesting bird surveys will have to be completed if site clearing and other construction work occurs during this time frame, so this is important information.

Although I ask for a more thorough biological assessment via an EIR, this project will still result in the obliteration of a large area that is currently used by a variety of native plant and animal species no longer found in our more urbanized neighborhoods. Loss of native habitat should not be considered significant only if it harbors special status species. I personally consider it significant when this project will cover approximately 40 acres of a historically open area with concrete and forever change the landscape to a much less natural state. Please do not allow this current project to move forward. Upland can do much better!

Please note that I will be forwarding this letter to a variety of city officials, agencies, and local environmental advocates.

Thank you for your time and consideration.

Sincerely,

Natasha Walton, M.S.

Upland Resident

## Michael Poland

**From:** Ruth Ortiz <mathisbeautiful@gmail.com>
**Sent:** Tuesday, January 21, 2020 5:51 PM
**To:** Michael Poland
**Subject:** Bridge Development

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Mr. Mike Poland,
I am a 5-year resident of Upland and I am writing you to express my opposition to the proposed Bridge Development project. I believe that further considerations need to be taken before the Plannig Commition makes a final decision. I-93
Thank you for your consideration,
Ruth Ortiz
1190 5th Ave.

**Michael Poland**

| | |
|---|---|
| **From:** | SS <ssantana217@gmail.com> |
| **Sent:** | Tuesday, January 21, 2020 10:55 AM |
| **To:** | Michael Poland |
| **Cc:** | Keri Johnson; Rosemary Hoerning; janiceelliott4upland@gmail.com; Bill Velto; Rudy Gmail. Zuniga; Ricky Felix; ricky@rickyfelix.com; debbiestone4upland@gmail.com; robin.aspinall@gmail.com; garyschwary@gmail.com; carolyn.6@yahoo.com; anovikov.upland@gmail.com; yvette@premier-is.com |
| **Subject:** | No Amazon in Upland |

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Hi,

As residents of Upland, who live between Mountain and Benson, we are writing to oppose Amazon in Upland. I have written before explaining our reasoning and I hope that you truly listen to the residents of Upland. We are not opposed to the land being used for something but we are opposed to Upland become a logistical nightmare along with having to endure the many health effects that this warehouse will bring. If you truly believe it will have no traffic, health, and environmental impact, then I am not sure you are fit to serve the residents of Upland. We were tuning in to the last broadcast of the meeting and were surprised that specific commentary during a 5 minute break has now been taken off. This shows the residents how corrupt the city is. We thank those of you who are fighting and listening to us. . I-94

Stefanie Santana

## Michael Poland

**From:** Tunisia Fountain <tuf473@mac.com>
**Sent:** Wednesday, January 22, 2020 6:39 AM
**To:** Michael Poland
**Subject:** Bridge Development

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Mr. Poland:

I would like to go on record as being against Amazon or ant other distribution or warehouse facilities in Upland. I-95

Tunisia Fountain
1539 N 2n Avenue

Sent from my iPhone

## Michael Poland

**From:** Brigitte James <bgjames1222@gmail.com>
**Sent:** Tuesday, January 21, 2020 4:52 PM
**To:** Michael Poland
**Subject:** Bridge Development Upland, CA

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Dear Mr. Poland,

I-96

I am writing to indicate I am for developing the property located in the city of Upland on Foothill and Benson near Central Avenue also known as the Bongiovani property project.

As much as I would prefer a hotel or retail, I understand that the location and other factors do not support these types of development. A logistic center is the most logical use for this parcel of land.

As a resident I do want to make sure that a consistent and persistent revenue stream is established as well as working (within the bounds of the law) to make this center a point of sale for the purpose of tax revenue generation. This city would need a consistent, persistent high dollar value revenue stream.

In closing, please continue to work to make this project come to fruition.

Thank you for your time and attention in this matter.

Best regards
Brigitte James
Resident

Sent from my iPhone

**Michael Poland**

---

**From:** chang hee kim <kchang0112@gmail.com>
**Sent:** Monday, January 20, 2020 11:21 PM
**To:** Michael Poland
**Subject:** Opposition to warehouse development project in Upland

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Dear, Mr. Poland

As a resident in Upland, we strongly disagree with the proposal regarding warehouse development in Upland due to possible negative impacts on the City of Upland and its residents' quality of living environment. Please reconsider about the project. I-97

**Michael Poland**

**From:** Mike McGuinness <micks_auto@verizon.net>
**Sent:** Monday, January 20, 2020 11:20 PM
**To:** Michael Poland
**Subject:** Bridge Development - Comment and questions on MND

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Dear Mike Poland,

The Bridge Development project does not appear to be a good fit for the city of Upland. The proposed parcel of land for this project is miles from both freeways that either touch or go through the city. I have only recently been made aware of this project and am trying to get up to speed. From what I understand, the initial proposal was for almost a million square feet of warehousing space and now the warehouse size has been reduced to 201,096 square feet. How does this even work for the developer and their secret tenant? Just applying a little common sense, this would be like going shopping for a family home with the criteria of 2,000 square feet. And then, buying a home with only 400 square feet and saying that the much smaller home met all of their needs. Does this sound reasonable at all? For the ordinary person, it just smells wrong. Or is there a hidden agenda: build one of the warehouses and then build the rest later without public scrutiny? I-98

Please excuse me, as I was unable to find a document with a definitive number of parking spaces for the project. At the January 9 special city council meeting, Brendan Kotler from Bridge Development stated that there were over 1,100 parking spaces. The Daily Bulletin states the proposed project will have 350 parking spaces and 1,486 spaces for delivery vans and automobiles and 25 dock-high loading spaces. With this volume of parking spaces, how can the Draft Mitigated Negative Declaration (MND) state that the project implementation would not result in a significant impact related to traffic? The MND sounds ridiculous. Maybe it is because the traffic study only included the additional 50 daily trips for the semi-trucks? What about all of the trips associated with the employees coming and going to work at the warehouse? What about all of the trips for the delivery vans coming and going from the warehouse each day to make their deliveries? Even with estimating on the low end with the 1,100 parking spaces for delivery vehicles, that is an additional 4,400 trips per day. Any reasonable person will understand that all roads associated with the warehouse will be greatly impacted from the traffic AND the related vehicular air pollution.

Many of the major roads in Upland are currently in a state of disrepair. These are the same roads that will be used for the warehouse. With the additional 18,250 tractor trailer trips and the 1,144,000 delivery vehicle trips per year, it is reasonable to assume that volume of traffic will stress the road structures and stress the other people using

the roads with the additional congestion. How will the roads be maintained? Where will the money for the maintenance come from? How will the city manage? I-98
This project sounds like such a loser for the city of Upland. We hear about all of the financial struggles of the city. I see how the city is trying to make up the budget gap by adding a fee to my property tax bill and by raising up fees and charges on my water / waste bills. If the project is approved and implemented, the financial deficit for the city will be even larger. The quality of life for the residents will be greatly diminished without any foreseeable benefit.

In the 1950's, the city of Pomona was voted the most beautiful city in the United States. Look at the serious decline that occurred in Pomona. I implore you to learn from Pomona's unfortunate mistakes and continue to keep Upland the city of gracious living by declining this project.

Best regards,
Mike McGuinness
1381 Rockdale St
Upland, CA 91784

Chairman of the Upland Planning Commission

I-99

I OPPOSE the proposed development of an e-commerce sorting and distribution center on Foothill Blvd.

This is not a warehouse, even by the e-commerce merchant's own definition. They are calling it a Delivery Station with the purpose of sorting packages for outbound routes in a clustered "last mile" defined urban area.

It is clearly a truck and delivery van terminal and along with being a traffic nightmare AND a major detractor of living quality in my District 1 neighborhood. Subsequently this a devaluing factor of my property. It is also NOT permitted in the General Code.

This sorting station address with its accompanying descriptor of a 206,000 square foot building and startup date of Q4 2020 is listed online in a table of Amazon's U.S. Delivery Station Network. This fact leads me to believe the project was pre-approved by the City some time ago and may even have been a factor in denying District 1 the right to vote for representation in the 2018 election.

This alleged pre-approval may also have influenced the Planning Commission to skip what should be a mandatory Environmental Impact Review in order to meet a timeline. If Moreno Valley is any example, skipping this review could lead to future litigation in which even California's own Attorney General takes a position against the city. Upland cannot afford that, especially for a project that as presented, does not offer the city any economic benefit.

Sincerely,

Marjory Thornburg

Marjory Thornburg
1345 N Erin Avenue
Upland, CA 91786-2660

Cc: Rosemary Hoerning, Interim City Manager
Debbie Stone, Mayor

RECEIVED
JAN 21 2020
DEVELOPMENT SERV.DEPT

From: Christine Canepa <christine.canepa@gmail.com>
Sent: Wednesday, January 22, 2020 11:54 AM
To: Michael Poland
Cc: Debbie Stone; Ricky Felix; janiceelliott4upland@gmail.com; Bill Velto
Subject: Bridge Development

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Hi Mike,

I-100

I received notification that you were looking to receive emails on the Bridge Development project late last evening however was unable to send until now. I sincerely hope you will still accept this email as both my husband I are both in support of the Bridge project as it will bring much needed revenue and jobs to the city. That said, we would also like to see the city allocate funds from the tax revenue specifically for infrastructure repair to ensure that we start improving roads and offset the additional wear from the distribution's vehicles..

I must also note that while we no longer reside in Upland however we have three properties that we pay taxes on that are blocks away from downtown. We make it a point to shop and frequent establishments in downtown to help ensure it's successful revival for our tenants. As of late, we are pleased with the progress being made and feel the HDU board has done a great job of bringing people back to this historic district.

Thank you in advance for your consideration.

Regards,

Christine and Loren Beggs

--
"When once you have tasted flight, you will forever walk the earth with your eyes turned skyward, for there you have been, and there you will always long to return"....:*Leonardo Da Vinci*

## Michael Poland

**From:** Chris Nichols <ChrisN@chinovalleyranchers.com>
**Sent:** Tuesday, January 21, 2020 9:12 PM
**To:** Michael Poland
**Subject:** Amazon warehouse opposition

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Dear Mr. Poland,

As a business owner, and a concerned citizen of Upland, I write to you in opposition of the proposed Amazon warehouse development. Regardless of the fact that the land is not zoned for such an operation, we have enough traffic as is and as much as the numbers may be an estimation, it will have a huge affect on the flow of traffic on Foothill. There is plenty of space in neighboring Ontario and Rancho Cucamonga for another Amazon warehouse. Thank you for your consideration on this project. I-101

Chris Nichols

From: David Moore <david@mooreelectricinc.com>
Sent: Tuesday, January 21, 2020 4:47 PM
To: Michael Poland
Cc: Poland@ci.upland.ca.us; Debbie Stone; Ricky Felix; janiceelliott4upland@gmail.com; Bill Velto
Subject: Bridge Development

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To Whom It May Concern,

I am in favor of this project.

I-102

I am currently serving as President of the Historic Downtown Upland Board and have also been a resident of Upland for over 30 years.

Thank You,
David R. Moore
President
Historic Downtown Upland, Inc.
Long Time Resident Of Upland
Office (909) 941-9983
Fax (909) 941-7114
http://www.MooreElectricInc.com

From: Elaine Carrillo <uplandfarmersmarket@gmail.com>
Sent: Tuesday, January 21, 2020 7:22 PM
To: Michael Poland
Subject: Bridge Development Project

**WARNING: External email. Please verify sender before opening attachments or clicking on links.**

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I-103

Dear Mr. Poland. This email is to express my support of the Bridge Development Project.

Thank you for your time.

Elaine Carrillo
(909) 203-8724
--
Hello:
'Attached is a flyer and application for the 43rd Annual Downtown Upland Christmas Parade & Holiday Faire. We hope you join us!!!

Thank you for your time!

Elaine Carrillo
Rare Affairs/Cooper Museum
(909) 203-8723(cell)
(909) 360-8883(business)

From: Helena van Kooten <helenavankooten@gmail.com>
Sent: Tuesday, January 21, 2020 4:39 PM
To: Michael Poland
Subject: Bridge Development

**WARNING: External email. Please verify sender before opening attachments or clicking on links.**

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Dear Mr. Poland,

I support the Bridge Development. I-104

Helena van Kooten
1791 N. 3rd. Ave
Upland, CA 91784

From: Eric Gavin <eric@gavinarchitect.com>
Sent: Tuesday, January 21, 2020 5:34 PM
To: Michael Poland
Subject: Supporting Bridge

**WARNING: External email. Please verify sender before opening attachments or clicking on links.**

---

I'm definitely in support of the Bridge project.

I prefer a business instead of a pile of dirt ;-)

I-105

Thanks,

Eric Gavin
2115 Sunrise Circle WEST
Upland, CA 91784

Lois Sicking-Dieter
LPSicking@cs.com 909.560.2092
1305 Cloverbrook Lane
Upland, CA 91784

Mr. Mike Poland
Contract Planning Manager
City of Upland
Development Services Department/Planning Division
460 N. Euclid Avenue
Upland, CA 91786

January 21, 2020

Dear Mr. Mike Poland, Honorable Mayor and City Council Members and Planning Commission Members of the City of Upland:

I-106

I am a 31-year resident of Upland in District 1. I am writing to share my comments on the draft Initial Study and Mitigated Negative Declaration (MND) for the proposed Bridge Point Upland (BPU) development published for public comments from December 16, 2019 to January 21, 2020. I have reviewed some sections of the MND and have provided comments, questions, and drawn conclusions as indicated below.

1. The City of Upland, as the Lead Agency, has issued an Initial Study with a draft Mitigated Negative Declaration, not an Environmental Impact Report (EIR) requested in June 2019 by two Upland City Council Members and the Chair of the Planning Commission, based on the significant impacts of the BPU development proposed for a 50-acre warehouse and logistics center. Please comment specifically on the staff's authority and decision-making process for over ruling Council's request to staff for an EIR.

   I find that the Initial Study and MND report uses flawed methodology, outdated software by 20 years, generalized conclusions based on erroneous data, undefined calculations, causing misleading results and analysis. In addition, many inputs to models were not defined or in error (260 days (5 days a week) rather than a 365 days (7 days a week) of operation per year). Most software analysis programs were either not identified and/or the version and revision date was undisclosed. Most raw data output was not included as expected. This environmental report did not include a Health Risk Assessment, a standard practice conducted to determine how many increased deaths from cancer and chronic and acute health hazards are possible due to the proposed BPU development project.

   In my opinion, as an environmental engineer, this MND does not meet standard engineering best practices, was not peer reviewed (a form of self-regulation) by qualified members of the profession. Ensuring that a defensible peer review is conducted is part of due diligence by city planning staff. There are more inconsistencies in the MND that I have not addressed here. For these reasons, I believe the level of detail and inaccuracies represented in the MND data inputs, analysis, and resulting conclusions are misleading

by understating the environmental impacts. Therefore, it is very possible that there are significant environmental impacts with the proposed BPU development. As such, I am against this proposed BPU project going forward without a full EIR.

2. Typically, an EIR follows best engineering practices, to include disclosure of all parameter inputs and input values to each model, define the true operations of 365 days a year, 24 hours a day, winter and summer variations, worse case holiday traffic impacts, includes the title of every software analysis program, version and revision date and include raw data output files, etc. An EIR is expected to undergo a rigorous peer review prior to publication for public comments.

3. The City of Upland needs to confirm that the Initial Study and draft MND for the BPU development project has been reviewed by the South Coast Air Quality Management Control District, California Air Resources Board, and California Department of Transportation. This is critical in determining if the proposed mitigations are sufficient to protect the health and safety of impacted residents.

4. **Hydrology Study and Calculations**
   The purpose of a hydrology study is to determine if the existing storm drain system from the "proposed" site to Foothill Blvd and beyond, can handle the additional storm water of a 100-year peak flow rate rain event.

   The MND report defines the Engineering Hydraulic Software Solutions, developed by Advanced Engineering Software (AES), using a Rational Method Hydrology Computer Program methodology as the hydrology calculation and analysis software utilized in determining the 100-year peak flow rate on the "existing" and "proposed" sites (licensee identification 1435).

   a. As part of the City of Upland and Bongiovanni Construction Company, LLC (BBC) "Settlement Agreement and Release" dated August, 2017, is a clause that at the end of the agreement, BBC must remove any remaining Construction Recycling Materials on the property. The "existing" conditions hydrology map, which the "existing" hydrology calculations and analysis are based upon, is dated May 8, 2018. It is important to note that the "existing" project site has been occupied by BPU after May 8, 2018, as a sand and gravel recycling processing plant. Therefore, a May 8, 2018 "existing" conditions hydrology map and associated "existing" hydrology calculations are not representative of the Project's "existing" site conditions on December 16, 2019, the date the MND was released to the public. In the past months and recently, significant site grading and adjusting the slope and elevation of the soil over the 50-acre site are ongoing, and are activities not representative of a recycling processing plant. It would follow that the recent site grading invalidates the May 2018 "existing" conditions hydrology contour map.

      Upland needs to provide a defensible argument regarding how the site on May, 2018 represents existing conditions as of today, January 2020. It is important to note that since the proposed warehouse project has not been approved yet and a new permit has

not been published for this site, no activity other than the "removal any remaining Construction Recycling Materials on the property" is allowed. Please be specific in addressing these concerns.

b. The AES Rational Method Hydrology Computer Program hydrology calculation and analysis program version 23.0 (revision date of 2016) is the most recent version of this software available and used to generate the "existing" site hydrology calculations and analysis of May, 2018. However, version 8.0 (revision date of 1999) of the Rational Method Hydrology Computer Program hydrology software was used to generate the "proposed" site hydrology calculations and analysis dated November, 2019. Both the "existing" and "proposed" hydrology programs were conducted under the same AES software licensee ID 1435.

   It is obvious that over those 20 years (1999 to 2019) many regulatory updates, refinement of hydrology mathematical relationships, calculations and analysis techniques have taken place. Furthermore, this invalidates the entirety of Appendix E- Hydrology Calculations and, therefore, the December 16, 2019 Bridge Point Upland Initial Study/Mitigated Negative Declaration.

c. The stormwater calculations do not show that the project stormwater drainage plan is able to capture and treat the volume of stormwater in a first rain event, or subsequent rain events, as required. Please be specific in addressing these concerns.

d. The proposed commercial site is approximately 50.0 acres. The hydrology nodes reported for the "existing" site consists of 49.90 acres. However, the hydrology nodes reported for the "proposed" site consists of 48.10 acres, not including 1.8 acres or 3.6 percent of the 50.0 acres. Therefore, the "proposed" hydrology map needs to be updated to include all 50-acres, and hydrology calculations and analysis revised.

e. All input and input parameters and values to the hydrology and stormwater models need to be disclosed and raw data output included.

**5. One-Time Funding Recipients**

a. The City of Upland needs to provide specific details regarding the one-time BPU development payment of $10 million or more, with recipients indicated as new funding for Upland schools, parks, roads, and police. Please include the methodology used in the determination of which groups received money and the ranking system to determine how much money.

b. Were the recipients based on those negatively affected by an Amazon warehouse and logistics center? If not, why not? For example, public safety will be impacted. Was the amount for Upland Police Department provide public safety negotiated with Chief Goodman, to include his projected costs itemized, with inflation over the 50-year lease and worse case 100 years, since this lease is renewable to 100 years. Were there negotiations with San Bernardino Fire Department? Please be specific.

c. Who is dictating/negotiating the terms of this one-time payment? What is their position and title? Under what authority? Will this be presented in detail at a public hearing?

How does the final amount reflect on the real-life costs incurred over the lease of 50 to 100-years?

Is any of this one-time funding to be utilized directly or in-directly to widen and revise 13th St from Cable Airport to Benson? If so, this only benefits the project and does not benefit the City of Upland.

Comment: The City of Upland to a 50-year backlog of road repair and maintenance, which equal a debt of tens of millions of dollars. We need to develop and implement a metric to accurately identify the true road repair and maintenance costs, and UMC language to monitor and collect costs for under estimated costs within a limited time of project approval. Please address these concerns relative to this project.

6. **Native Plants**

a. Regarding the mitigation of the addition of "more than 1,000 trees and 11 acres of landscaping, including entire native plants." A listing of each tree and plant species needs to be provided in the application, to include verification that each tree and plant are native species.

b. Language needs to be included in the lease contract with a guarantee that landscaping will be maintained. Upland needs to take action to avoid what we have currently in landscaping plots in parking lots around Upland with only soil, where a plant has not been in them since the final occupancy was approved.

7. **Artist Rendition**

a. The current artist rendition of the project shows massive parking lots with mature trees, few delivery vans, and no trucks. Project application needs to include a true rendition of the project in the first year, to include 1,104 delivery vans, 330 employee vehicles, tree saplings, and trucks.

8. **Air Traffic**

Residents have voiced concern about possible additional air traffic flying over Upland and Claremont if BPU development builds the warehouse logistics center, possibly Amazon. History tells us that Amazon prefers to locate next to an airport, make use of the airport and further expand. Cable is capable of small cargo planes taking off and landing. A recent quote "Cable Airport is for private aviation. It is not a commercial airport and would not be used by Amazon for air freight". However, could Cable enter into a private lease with Amazon for some use of Cable Airport? If so, does the Federal Aviation Administration (FAA) allow exceptions that could include use of smaller, i.e., less than 55 lb. drones? Can Cable Airport allow drone deliveries to originate from Cable with an FAA exception? Please address these concerns.

I-106

9. **Flood Control**
   a. Is any part of the project site subject to flood control measures under the Flood Control District?

In summary, if this project is to go forward, the Initial Study and MND do not adequately define the project and do not define the significant impacts for the above stated reasons.

I ask the Planning Commission to deny this project until a full EIR is prepared, and available to all interested parties for a comprehensive review.

Thank you for your consideration,

Sincerely,

Lois Sicking - Dieter

Lois Sicking-Dieter

Note: I-107 is one example of 73 identical letters received

From: Sheddy F <sheddyf@gmail.com>
Sent: Tuesday, January 21, 2020 8:00 PM
To: Robert Dalquest; Jamie Davidson; Patricia Miller; Michael Poland; Upland CityClerk; Keri Johnson; janiceelliott4upland@gmail.com; Bill Velto; Rudy Gmail. Zuniga; Ricky Felix; debbiestone4upland@gmail.com; robin.aspinall@gmail.com; garyschwary@gmail.com; carolyn.6@yahoo.com; anovikov.upland@gmail.com; Yvette@premier-is.com
Subject: Bridge Development / Amazon Project – Mitigated Negative Declaration

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Mr. Mike Polard - Contact Planning Manager City of Upland
Development Services Department / Planning Division
496 N Euclid Ave
Upland, Ca. 91786

January 21, 2020

Dear Mr. Poland, Mayor Stone, Upland City Council Members & Planning Commissioners,

I-107

Let this serve as the undersigned residents of Upland's opposition and request to halt the Bridge Point Project, being a 50-acre logistical shipping terminal generally located at the Northeast corner of Foothill and Central, since the project is **NOT** in compliance with Title 17 of the Zoning Ordinance and subsequently, is **NOT** in compliance with Upland's General Plan. We the undersigned Citizens of Upland, also oppose the project because an Environmental Impact Report (EIR) has **NEVER** been completed.

It is our assertion that the developer's Draft Mitigated Negative Declaration(NMD), submitted to the City of Upland's Planning Department, is **NOT** in compliance with the California Environmental Quality Act (CEQA). Yet, it demonstrates **"significant adverse environmental impacts"** which now warrant and require an Environmental Impact Report (EIR), in accordance with the Code. In addition, numerous experts have found the developer's Mitigated Negative Declaration to be sub-par, stating publicly that gross inaccuracies and erroneous calculations exist.

Therefore, we implore the City of Upland to independently validate the findings by KimleyHorn & Assoc, Inc., as well as, Translutions, Inc., by hiring Environmental Consultants who work for the City of Upland, as supposed to working only for the developer. Furthermore, we demand the City of Upland require the developer to complete a full-scale Environmental Impact Report (EIR), to fully determine and document the countless negative impacts from the proposed 50- acre Logistics Terminal, which they plan to operate in the middle of our gracious bedroom community.

With the increased traffic alone on Foothill Boulevard from this proposed massive logistical terminal complex, should be reason enough for the City of Upland to demand the developer complete an Environmental Impact Report (EIR). As the developer's site plan depicts 1,104 delivery van stalls, plus, parking and loading bays for what the developer has said will be 25 tractor trailer trucks, plus, another

337 automobile parking spaces. It is an insult to the intelligence and common sense of the residents of Upland, for the developer to "claim" that there will be "no traffic impacts" from the 24/7/365 operation of this Massive Logistical Terminal, on the Corner Benson & Foothill and Central Ave.

The 50-acre site is zoned Commercial/Industrial Mixed-Use (C/I-MU) and is listed as such in the General Plan. The developer has mis-categorized their Logistics Terminal as merely a "warehouse" in their Traffic Impact Analysis. Under Title 17.51 of the Upland Municipal Code it clearly defines "Warehousing" as, "Warehousing means the provision of facilities used primarily for the storage of commercial goods, including documents." The fact of the matter is that less than 10% of the 50-acre tract, will be used for "warehousing" as depicted by the developer's site plan rending. Whereas the other 90% of the 50-acre tract, is clearly depicted on the developer's land plan use, as a major Logistical Shipping Terminal.

Nowhere in the city's listed permitted and allowable land uses, which can be found in Upland's Municipal Code under Commercial, Industrial and Mix Use Zoned Tracts, allows for the operation of a logistics terminal, nor a cargo terminal, nor a shipping terminal, nor even a trucking terminal. **Therefore, over 90% of the developer's land plan is a non-conforming use**. **Furthermore, Upland's Municipal Code clearly states that any uses not listed on the city's table of permitted and allowable land uses, will be strictly prohibited.** The developer's land plan clearly shows 1,104 delivery van parking stalls and 337 automobile parking stalls. In addition to that, are the developer's public statements that there will also be twenty-five 18-wheelers, which will also access the site on a daily basis.

**Those 1,104 delivery vans + 337 automobiles parking + 25 semi-trucks, are a testament to the fact that this is a Shipping Terminal / Logistical Hub and NOT a "warehousing" zoning application.** Therefore, the proposed project does **NOT** fall under the current zoning definitions within Title 17 of the Upland Municipal Code, nor is it a listed allowable land use and subsequently, the project doesn't meet the definition of the General Plan Focus Area description or its vision for Foothill Boulevard. This proposed 50-acre Logistical Terminal will have 3-entry/egress routes onto Foothill Blvd. It will also have a Foothill Blvd address and subsequently, it does **NOT** meet the standards within Upland's General Plan for this historic location.

We respectfully ask our Upland Planning Commissioners to deny the developer's request for approval on February 12th, 2020, as this is a non-conforming use, as well as, **NOT** an allowable land use and therefore, it is strictly prohibited as stated in Upland's Municipal Code. We, the undersigned residents of Upland, firmly believe this 50-acre Amazon Logistical Terminal should **NEVER** be allowed in the middle of Upland, as it is over 2.5 miles away from all major freeways and **NOT** an allowable nor permitted land use and the developer has **NEVER** completed an Environmental Impact Report (EIR.) We ask our elected officials and our appointed planning commissioners, to please preserve and protect our quality of life, our health and our property values, by rejecting this project using the basis outlined above.

Most Sincerely,

Rashed Faouri
1855 Drew Place
Upland CA 91784
sheddyf@gmail.com

To: Upland City Planning Commission

I-108

I am writing you today to express support for the new Bridge Point Upland project, near Cable Airport.

The proposed project is such a smart use of this space. It's a facility that's become a real nuisance for residents and does not provide much to the city. The new warehouse will be a huge value-add partly because of the jobs and revenue that will come from the site. We also can't forget the physical transformation from a dirt, rock crushing site to one that has acres and acres of landscaping and 1,000 trees.

I think we should welcome these types of projects to Upland. Please approve this without delay so it can create more opportunity for more of us in Upland.

Sincerely, Maria de la Torre

880 Orchid Ct #8
Upland Ca. 91786
(909) 418-7851

Dear Upland City Council and Planning Commission –

I-109

I urge you to vote to approve the Bridge Point Upland project on Foothill Boulevard. The project has been dramatically reduced from its original footprint thanks to community input, and I think this is a development that can work for everyone -- the city, the residents, and Bridge Development, which can be a rarity!

Bridge has pledged more than ten million dollars' worth of investment in the community. In my mind, this is not a decision a company makes lightly. Upland should take advantage of the money for our schools, parks and roads. The impacts of this project will be minimal, especially when you take into account the long list of benefits that come from this type of investment.

Thank you!

Marco Villasa

880 ORCHID CT #2
Upland CA 91786

909789-3992

To the Upland City Council,

Please support the new warehouse facility at the intersection of Foothill Blvd. and Central Ave. That area desperately needs investment and clean up, the effects of which will permeate much further than just that plot of land. I-110

Bridge Development has pledged millions of dollars to improving the project site and to delivering a long list of benefits to our community.

We should absolutely say YES to this plan. Or we risk losing an important opportunity to remake this site.

Best,

Melissa moreno
880 orchid st #20
Upland, CA 91786
909-714-1832

Upland City Planning Dept. and Commission,

I-111

I'm writing today to encourage you to approve the new Bridge warehouse facility on Foothill. The proposed project is an enormous upgrade over current operations and will really transform this area by creating local jobs, adding a new, modern building and 11 acres of landscaping and 1,000 trees.

In addition to the merits of the project, Bridge Development Partners is pledging a remarkable investment in our community, and they have listened to the community's feedback and made changes accordingly. I believe they are dedicated to ensuring this project makes sense for Upland for a long time.

Thank you,

880 orchid St #21
Upland Ca 91786
909) 300-6719

To Upland City Council and Planning Commission,

I-112

Please approve the Bridge Point Upland warehouse project. This project will bring hundreds of quality jobs to our city. In addition to the local jobs, Bridge is pouring 10 million dollars directly to our community's parks, schools and police. This is an investment we should not turn down. It will make a huge difference that many Upland residents will benefit from.

The positives that come from approving this project far outweigh the negatives of few trucks that will travel to the site overnight.

Join me and support this project!

Anthony Alarcon 909-286-0001
880 Orchid Ct #22
Upland Ca. 91786

Dear Upland City Council,

I-113

Please support the Bridge Point Upland project. Bridge Development Partners has listened to the community at every step of the way, and the result is a project I think everyone in Upland – as elected officials, as residents and as local businesses – should be able to agree on.

Personally, I'm most impressed by just how much Bridge has incorporated community feedback in the project. There used to be three buildings in the plan, now there is only one. The number of truck trips are also greatly reduced and will mainly take place at night.

Please vote to approve this project.

Thomas R Denton
880 Orchid Ct. #26
909 493 4180

To Whom It May Concern:

I-114

Please support the proposed Bridge Point Upland project on Foothill Boulevard. The project is going to bring good, quality jobs to the area. I'm not sure who would disagree with the fact that we need more local jobs in Upland! Many families would appreciate these opportunities in our own city so they don't have to commute as far.

I'm also looking forward to the day that huge piece of land being used to crush rocks will finally end.

I do not believe we should let this opportunity pass Upland by.

Sincerely,

880 Orchid Ct #10
Upland, Ca. 91786
909\346-9718

Hello Upland City Council and Planning Department,

I-115

I wish to express my written support for the Bridge Point Upland project. This proposed project will completely transform the area south of Cable Airport. As a local resident, I think this is the best use of that land. Not only will there be a huge aesthetic improvement with the warehouse's modern façade, Bridge Development Partners has pledged to beautify Foothill Blvd, among other investments.

This project has the potential to completely transform Foothill Boulevard, and we need to take advantage of the opportunity we have. Please do not delay this project any further. We are running out of time.

Best,

880 Orchid Ct #14
Upland Ca. 91786
909) 239-7324

Dear Upland City Council:

Please support the proposed warehouse development at Foothill and Central. Bridge Development is a blue-chip, nationally reputable company that we should welcome as a partner in Upland. They have listened to the community's input and changed their designs to better fit our needs. And they are putting their money where their mouth is when it comes to making significant investments in Upland. I-116

We need to make room for businesses that want to make Upland their home and are committed to understanding the community's point of view.

From everything I've seen, Bridge Development Partners have done just that. This is why I believe you should support the project.

Thank you!

880 Orchard St #14
Upland Ca. 91786
909-300-2820

To: Upland Planning Department,

I-117

How often does a national firm like Bridge come to a small city like Upland and listen to the community's feedback to create a project that functions for us all? I would guess it's not that often.

Even less likely is it for a company to make the type of investment in our parks and schools when they're building something completely unrelated. It makes no sense to reject this type of investment and project. Please support this development – think of all it will create and benefit for us!

Thank you,

Francis Nelson 8560 Chelsea Ave 91786 9042882224

To Whom It May Concern,

I-118

I am writing you today to urge you to vote YES on the Bridge Point Upland warehouse development proposed for the corner of Central and Foothill. As someone who drives down Foothill regularly, I am looking forward to seeing this project come to life.

I'm particularly interested in how much it's going to beautify this section of the city. Either driving to or from Claremont (the city of trees and PhDs) it will be a nice change to be welcomed by the THOUSAND new trees that Bridge Development will plant as part of the project. Let's not forget this project will also replace the rock crushing, dirt and debris with plants and trees that will grow and beautify Upland for years to come.

Please support the project.

(909)802-4163
1533 W 11th st
Upland CA 91786

To: Upland City Planning Dept and Commission.

I-119

We need to find a way to welcome Bridge Development Partners' new development. From what I read, it'll create over 300 local jobs, which is a welcome benefit for many residents who have to travel further away for good-paying jobs, sacrificing quality time with their families every day.

With only 25 trucks visiting the site each day, mainly during the overnight hours, I'm not that concerned about the additional traffic.

In addition, over an entire 50-acre site, the building will only take up a small portion. Compared to the pile of dirt and rock crushing we know is there (and has been there…) now, one new building, the rich landscaping and the hundreds and hundreds of trees will be a huge plus.

Please see the great benefits this project will create for Upland residents.

Thank you –

850 N Benson Apt 3

Dear Upland City Council –

Please support the warehouse project on Foothill Blvd! The company is willing to invest over ten million dollars in our community to a number of different worthy recipients – our schools, our parks, our police force and more. Not every company will take this approach when they want to build in our city so we should turn them away. I-120

I also appreciate the fact that Bridge took the time to listen and speak to the community, and incorporate feedback to improve their plan. These are just two reasons why I wholeheartedly believe we should welcome the Bridge development into the community.

Sincerely,

Chafal [signature]

850 N Benson Ave #139
Upland 91786
725 2184406

Dear Upland City Planning Commission and Department,

I-121

Please support the proposed project on the corner of Foothill Blvd. and Central Ave. right in the middle of Upland. With this new project, we've been presented with a great opportunity to beautify this large area of Upland (which will finally clean up the land) and to enhance our public services, like our schools, parks and road. It's not just an investment in this project site, but in our community as a whole.

I've also read about Bridge's plan to beautify the entire site with acres and acres of landscaping and new trees and native plants. This is a sustainable welcome. I don't see many other companies that want to make this type of investment along with a traditional development.

Sincerely,

Dora L Martinez Casillas
1205 E 9th St unit J44
Upland CA 91786
909 993 4889

Hello Upland City Councilmembers,

I-122

I hope that you see the great potential for the Bridge Point Upland project. This looks like an amazing project and is one that I'm excited to see ultimately come to fruition. I think this is really the beginning of a trend of companies bringing good, quality jobs and investing in our community! Bridge Development Partners is setting a good precedent for future companies that want to invest in Upland, on how to work with the community the right way.

The money for our schools, parks and roads are going where we truly need it most – our children, our families, our residents.

Thank you for taking the time to read my letter.

Sincerely,

Teresa Mesia
1205 E 9th Apt. C5
(909) 552 1407

Dear Upland City Planning Commission & Upland City Council,

I-123

I urge you to support the proposed warehouse development on Foothill. Not only will the project build a brand-new, state-of-the-art building, it will create good, quality jobs for those of us who live here. Many of my friends and neighbors commute very far for their work and having the opportunity to work at a good-paying job in our own city is something that would be a game-changer for Upland's families.

We, as residents, cannot afford to turn down this offer – literally. I hope that you too see the great opportunity that this project will create for ALL of Upland. The positives far outweigh any concerns of this plan, which has been improved multiple times to cater to our thoughts and feedback on their original design.

Please vote to approve this project!!

Marcelo Mendes 2205 9th Apt. E11

To: Upland City Council and Planning Dept.

We should all encourage more companies like Bridge Development Partners to invest in our communities when they want to construct a new building here. They have demonstrated the *right* way to come into our community and show that they care about more than just that plot of land. Their $10 million package in community benefits really demonstrates their long term commitment to our community, not just plop down a building and walk away without listening to what their neighbors have to say. This entire process has been very enlightening to me, I never thought a company would legitimately change their plans in order to make the community happy, but here we are. I-124

At this point, they've made the changes we asked for and then some, which is why I believe you should support this project.

Sincerely,

Liliana Saldaña
850 N Benson Ave
Upland CA 91786

Dear Upland City Council,

Why is the Bridge Development Project still not approved?! After reading the details of the plan myself, I cannot help but ask you this question. The company has said it will give over $10MM to the community, build a relatively small facility AND concentrate their truck traffic in the evening, I'm not sure what more we would want. We are running out of time to get this plan approved. I-125

As of now, the land at Foothill and Central is an eyesore. You know it, I know it, everyone driving down Foothill knows it. We've been presented with a great plan for improvement and I think it would be silly to do nothing with that.

Thank you.

850 N. Benson Ave Upland CA 91786
Apt. 14A
323 214-4628
Sylvana Ortiz

Dear Upland City Planning Department,

I-126

I believe we should approve the proposed development on Foothill Boulevard. This is going to be a great thing for the citizens of Upland. For as long as I've lived here, that area at Foothill and Central has been filled with dirt, and the business itself is not adding anything positive to the community.

With 11 acres of new trees, shrubs and other native plants, the greening of this site alone is a reason to make it happen, in my opinion. Add on top of that there will only be 25 truck trips per day, which is much less than I anticipated. Please make a positive impact on our city and welcome this project! Thank you.

Thomas M. Catt

850 Benson Ave
Upland, Ca. 91786

Dear Upland City Council and Planning Commission,

I-127

I am writing you to support the improved plan for the warehouse near Cable Airport on Foothill Boulevard. As someone who's seen Upland transform over the years, I'm incredibly excited about the thoughtful plan. Bridge Development Partners really listened to our community, and in response, drastically changed their plan.

We can't turn down the great community benefits they're offering **and** the fact that they've modified their plans so the project can work better in our area. Please support the development.

Sincerely,

Vincentin Lin
1772 W. Arrow Rte. Apt. 202
Upland, CA 91786
562-240-7362

**To whom it may concern at Upland Planning Commission –**

I-128

**Please join me in supporting the project proposed on Foothill Boulevard near Cable Airport. First off, I didn't think any company would want to buy this area and have to deal with the existing piles of rock. Removing that alone will improve the overall look of Upland, especially along Foothill Boulevard.**

**The company actually listened to the community, shrunk the size of the buildings and changed where the trucks would drive. These changes have resulted in a project I'm happy to have in my community.**

**Sincerely,**

Ana Hernandez
1754 207 Arrowhe
Upland
91786
909 5367238

Dear Upland Councilmembers and Planning Commission,

I-129

I hope you support the proposed warehouse project on Foothill and Central. Having a modern facility on this lot instead of piles of crushed rock is a vast improvement.

Please seize this opportunity to create a modern facility that will make productive use of that space, and to benefit our community in so many other ways through important funding of our schools and parks.

Thank you,

1754 W. ARROW RTE APT. 205
UPLAND CA. 91786

Adi Zgaeln
(323) 362-0765

Dear Members of the Upland City Council and the Planning Commission,

You should vote to approve the project on Foothill Boulevard and Central Ave. The project itself has been modified to incorporate the community's feedback, and the multi-million-dollar investment by the company in Upland is too good to pass up. I-130

Homelessness is a huge issue facing our entire region, and the fact that Bridge Development is donating tens of thousands of dollars to our City to tackle the issue head on – among other investments – is really encouraging as a community member. Bridge Development seems like they really want long-term partnership with our community, and they've shown that with the way their investment is being allocated to range of public services, such as our schools, parks and roads.

Join me in supporting this project and seeing a great opportunity for the City of Upland!!

Roxanne Saunders
1754 W. Arrow Rte #208
Upland, CA 91786
Roxanne Saunders
626-422-0457

To the Upland Planning Commission,

I-131

Please support the project on Foothill Blvd. near Central Ave. I understand that the project has changed entirely due to feedback from the community, a great sign for a development to work for both the company and the people who live nearby. The majority of truck traffic will take place during the evening, and pre-determined truck routes will not impact residential streets.

We need to welcome smart investment, and this is an incredible opportunity to ensure the project is one that both the community and company can be satisfied with.

Signed,

Claudia Gallizzi
1758 W Arrow Rte
Upland CA 91786
909 565 7419

Dear Upland Planning Commission,

I sincerely hope you support the proposed warehouse development on Foothill Boulevard. I-132

I'm impressed with the proposed significant benefits for the community, and how they've actually listened to our feedback on the project. We are the ones who live here and would have had to deal with the day in and day out impacts of the current site, including the rock crushing.

I'm excited for the potential of the project. If anything, I believe my daily life will be impacted positively thanks to the aesthetic improvements and the funding for our schools, parks, and police.

Please support this project!

1754 W. Arrow Rte Apt 205
Upland CA 91786

To the Upland Planning Commissioners and Department:

I-133

I would love to see the new warehouse by Bridge Development get built soon! The promise of new jobs, the significant investment on the property itself and most importantly, the millions in benefits for our community is something we shouldn't pass up.

The people building this project have taken our concerns into consideration and have completely re-designed the project to meet our needs.

Let's get this project approved.

Sincerely,

Ashley Naples 11/23/19

Give People Jobs
1772 W. Arrow Rte
Apt #104
Upland CA 91786
760) 905-6024

Dear Upland City Council Members and Planning Commissioners,

I-134

As a member of this community, I don't see why we are debating the merits of the Bridge Development project.

The proposal as it stands has a lot more upsides, and no downsides. What are the upsides? Hundreds of new jobs, redeveloping the site to make it more attractive for future investors, improving parts of Foothill Blvd, adding 11 acres of landscaping and 1,000 new trees that wasn't there before.

Let's not forget that Bridge wants to commit millions of dollars to help fund our schools, parks as well as local businesses. We all know that our schools and parks, in particular, never have enough funding, and their contribution will go a long way to improving them.

All of this demonstrates their commitment to our community. Please support this project.

Regards,

Breanda Venegas
1784 W arrow Rte Upland CA
91786 #105
909 228 9439

To: Members of the Upland Planning Commission

I-135

The benefits that have been proposed by Bridge Development for the project at Foothill and Central are too impactful to turn down. It's more than transforming the site and beautifying Foothill. They're offering to contribute millions of dollars to ALL of the public schools in Upland! This kind of investment in our schools as well as our other public services demonstrates their commitment to our community.

It's seems to me that Bridge Development Partners has been a responsible corporate citizen. So far, they've put their money where their mouth is, and the responsible thing for us to do is to get this project approved.

Thank you,

Debra
Cavenaso
1772 W. Arrow #205
Upland Ca.
91786

Dear Upland City Council and Planning Commission,

I-136

Please approve the proposal by Bridge Development Partners to build a state-of-the-art warehouse and to beautify the 50-acre site at Foothill and Central.

I have lived here for many years and like the idea of a new development that will generate jobs, boost the economy, and create a nicer environment

I also appreciate the fact that the Bridge team has taken the right steps to consider our needs. It's important to note that they actually listened to us, and went back to the drawing board to come up with a plan that work best for our community. They greatly reduced the project size and overall traffic. At the same time, their investment has only grown with millions earmarked just for our public schools, public parks and public safety.

All of this demonstrates how serious they are about this investment.

Best,

Victor Guinor 1754 Warrow Route Upland Ca 91786
#106 1909-294 4960

Upland City Planning Commission and the Planning Department,

I-137

I am in full support of the new Bridge Development project to revitalize this important site at the corner of Central and Foothill in Upland. This is an entry way to our city, and for 100 years, no one has stepped in to do something useful with it, until now.

We should seize this opportunity and allow Bridge to move forward with their multi-million-dollar investment. Their proposal not only will positively impact the immediate site, but it will lay the foundation for future investment.

It would be smart of us to say YES to this proposal by Bridge. If we don't, we run out of time and we may not see another investment like this for another 100 years.

Best,

Lisa Telles
1754 N. Arrow Rte. #104
Upland, CA. 91786
909) 670-8041

Dear Upland City Council and Planning Commission Members,

As a long-time resident of Upland, I would like to see this new proposed development by Bridge Development moved forward. It will greatly benefit the surrounding community. There are many people here who would welcome the prospect of hundreds of new jobs in the area, which I'm sure would boost the local economy. I-138

The Bridge team is constructing just one building on a 50-acre plot and have taken major steps to address concerns about noise, pollution, and traffic.

The benefits here far outweigh the risks and I would really hope you all would support this new project.

Thanks, Yolanda G. Cabrera.

1754 Arrow Rte #103
Upland Ca. 91786
(909) 407-5730

To the City Council and Planning Commission Members of Upland,

I-139

I am in support of the new Bridge warehouse development at the corner of Foothill and Central, just south of Cable Airport. The project will finally turn this site into something much more productive than a vacant lot with rock crushing activities. Instead, we can have a nice, high-end warehouse that will produce jobs and contribute to our local economy.

This entire area is in great need of beautification, and the Bridge plan also delivers on that need by adding 11 acres of landscaping, including more than 1,000 new trees and shrubs.

Please join me in getting behind the new Bridge plan.

Sincerely, Sandra Covarrubias

1754 W. Arrow Rte #101
Upland, CA 91786
(909) 738-9047

For the Upland Planning Commission,

I-140

Sometimes there are projects that are worthy of support in the community, and warehouse proposal by Bridge Development Partners is one of them.

Aside from Bridge completely transforming this major site with a new building, new jobs, new landscaping and new trees, the plan has carefully considered the community. The size of the project and traffic impact has shrunk, and as I understand it, a majority of the 25 trucks will travel at night.

They're also directing $100,000 to each of the 14 public schools, and four of the local parks. With members of my family going to schools here in Upland, I know that they will benefit from this incredible contribution.

I see only positives when I consider the Bridge plan, and I ask that you move the project forward without delay.

Thanks for your consideration,

Melanie Gomez
1758 W. Arrow Rte Apt. 110
Upland CA 91786
9094387816

To members of the Upland City Council and Planning Commission,

I-141

I think that Upland city officials should definitely approve the Bridge Development Partners Project as it will bring many jobs and greatly improve the area around Foothill Boulevard and Central Avenue.

I'm also excited about the benefits the Bridge project will bring to the larger community. Please support this endeavor, as I would like to see this community grow and prosper.

Regards,

MOOSTAFA
1754 ARROW
UPLAND 91786
313-264-9576

Dear Upland Planning Commissioners,

I-142

I like the idea that a nationally reputable and experienced company like Bridge Development Partners is proposing such a bold, new project on this vacant site at the corner of Foothill and Central. For far too long, this property has been an eyesore and doesn't leave a great first impression when you enter our city.

The prospect of new jobs and a revitalization of the project site as well as a lot more funding for community services such as schools, parks, and public safety is an opportunity we should not pass up.

Bridge also has taken important steps to consider the potential impacts on the community by completely re-designing the plan to accommodate our needs. This says something about the company and the kind of long-term investment they want to make.

Bridge is investing in Upland so we should invest in them by supporting the project all the way through.

Thanks,

Manuel Balderas
1754 W. Arrow Rte Apt# 110
Upland Ca. 91786
909) 242-9497

Dear Upland Planning Commission,

I-143

I am in full support of the proposed warehouse development in Upland. Their plan to bring more jobs to this area and improve the current site is exactly what this community needs.

What's more, the fact that the company is proposing significant funding for critical public services is something we should all applaud and support.

Thank you for your consideration.

STEPHANIE L. JOY
1754 W. ARROW RTE APT #209
UPLAND, CA 91786
909. 837-5219

Upland City Planning Commission,

Please support the project proposed for Foothill and Central. The plan considers community feedback, and I am eager to see what can be built here. Foothill Blvd should be a welcoming gateway to our city, and a modern warehouse facility with retail space is exactly what should be there. When you then look at the financial investment proposed for our site **and** in our community, it seems like a no brainer to vote in favor of this development. I-144

Thank you,

Javier Jauregui
1849 W Arrow Route 4
Upland Ca 91706
(626) 782-2476

For the Upland Planning Commission,

Support the project proposed at Foothill and Central. The project that's proposed is so much more than the standard warehouse: there's only one building, truck traffic will be concentrated at night and they're making a serious, long-term investment in the community with tens of thousands being directed to our schools, parks, local businesses and police. I-145

This is a smart development that I believe can work for both residents and businesses, and we should welcome it in Upland.

Sincerely,

David Livingston
1859 W Arrow Rte
Upland, CA 91786
626 252 0520

Dear Upland City Council and Planning Commission,

I-146

The Bridge Development warehouse project on Foothill should be approved. The plan makes positive use of a lot that currently has rock piles and dirt covering it, and will beautify the entire block by planting new trees and shrubs along BRAND NEW SIDEWALK.

This section of Foothill is inaccessible to pedestrians now, and I'm really looking forward to the day where cars and walkers can coexist there. The drawings I've seen of the project make me so excited for it to be built!

Please support the project and think of all the positives this will create for Upland!

Thank you,

Laura E. Morales 770 E Willo St ontario CA 91764 Fon 909 5451784

Dear Upland Planning Commission,

I-147

I am excited to learn about and support the new warehouse development in Upland. I have lived here for many years and am optimistic about all the wonderful benefits a project like Bridge's would bring.

They have committed to operating most of the trucks at night and restricting their access to Central Avenue, which alleviates my concerns about traffic.

Their promise to invest in our community's schools, parks and public safety is also something we should applaud.

I ask that you not delay this project any further.

Thanks so much,

1788 W. Arrow Rte. #203,
Upland, CA 91768
(626) 848-4123

To the City Council and Planning Commission Members of Upland,

I-148

I am voicing my support for Bridge Point Upland. Bridge's efforts to proactively engage with the community and address concerns demonstrates a strong commitment to our city. I appreciate their serious response when they completely re-designed their project to accommodate our needs. While the project size and traffic will be significantly smaller, it will still create hundreds of new jobs and beautify that large property. It will certainly convert a current eyesore into a state-of-the-art facility that will look much nicer.

Please join me in supporting this project!

Thank you,

Kyle Wright

1850 W. Arrow Rte. Apt 121,
Upland, CA 91786

(678) 575-2031

Dear Upland Planning Commission,

I-149

I live in the city of Upland, not far from the site of the proposed Bridge Development Partners project. The plan would infuse revenue and jobs and provide a boost to the surrounding area. I am very much in favor of this, and I think you all should be as well.

My family and I stand to benefit from the newly created jobs, and I'm sure many other Upland families would as well. I also appreciate Bridge's ongoing efforts to actively communicate with the community. I fully support Bridge's new plan and believe it should be approved.

I appreciate your consideration.

Monica Mayer
1840 W. Arrow Rte. #107,
Upland, CA 91786
(626) 209-3377

To the Upland Planning Commission,

I-150

The vacant area at Foothill and Central is in dire need of revitalization, and I believe Bridge Development Partners has a good plan to do so. I live here, as does my family, and we would love the prospect of a reputable company, like Bridge, investing in and committed to making our community better.

Companies that listen and are responsive to resident concerns are what towns like ours and many others welcome. Please support the proposed Bridge plan, as I believe that they'd contribute to the promise of Upland.

Thanks,

1000 W. Arrow Rte (323) 458-2883
Upland, CA 91786

To members of Upland Planning:

I-151

I am writing to support the warehouse project that Bridge Development Partners is proposing. As a long-time resident of Upland, the new plan to drastically improve the site, and the surrounding community, is what Upland needs.

Bridge's commitment to landscaping 11 acres of the site with more than 1,000 new trees and shrubs will certainly improve that major property. The current site is blighted, and the transformation of it into something useful with minimal impact is something we would like to see.

Thanks for your consideration,

Anusa Frias 1686 W Arrow Rd
(661)585-7200 Upland CA, 91786

Dear Upland City Council and Planning Commission,

I-152

I welcome the idea of a new development in this town. Bridge Development Partners has gone to great lengths to engage and address community concerns.

In particular, Bridge has significantly reduced the project size to just one building that will occupy only 10 percent of the site, while most of the 25 trucks will operate at night. On top of that, they are proposing additional investments in Upland by funding millions of dollars to public services.

This is the kind of company, and kind of new investment, we should all support. Please move this project along.

Regards,

1728 W. Arrow RTE Apt. 31
Upland 91786 (909) 784-9066

Dear Upland City Planning,

I-153

As a longtime resident of this community, I was pleased to hear of a proposal that would allow for new development at Foothill and Central. From what I understand about the Bridge plan, it will bring in new jobs and modernize the entire site along with countless other benefits like investments in our local schools, public parks, the police department and local businesses.

I believe the benefits outweigh the risks, and we should take this opportunity and move forward with the proposed project.

Thank you,

Margarita Canam (909) 560-6672
1690 Arrow Rte Upland CA 91786

RECEIVED
JAN 21 2020
DEVELOPMENT SERVICES

January 16, 2020

TO: Mike Poland, Contract Planning Manager
City of Upland Interim City Manager
City of Upland City Council
City of Upland Planning Commission/Airport Commission
City of Upland City Clerk

*Note: I-154 is one example of a petition signed by 137 individuals.*

**SUBJECT: Bridge Point Project Opposition; Request for Municipal Code Title 17 Update and Request for Environmental Impact Report**

Mr. Poland and Ms. City Manager;

I-154

Let this serve as the undersigned residents of Upland's opposition and request to halt the Bridge Point Project, generally located at the Northeast corner of Foothill and Central, in the City of Upland, until such time that the City Municipal Code has been updated / amended so that the project is in compliance with Title 17 of the Zoning Ordinance and subsequently, the City of Upland General Plan.

We the undersigned Citizens of Upland are also opposed to the project until an Environmental Impact Report is completed. Based upon the sub-par reporting/calculations/findings by Kimley-Horn and Associates Inc. and especially translutions, inc., we feel the Draft Mitigated Negative Declaration proposed by the City of Upland Planning Department, is not in compliance with CEQA and does in fact have a "significant adverse environmental impact" requiring an EIR, in accordance with the Code.

Gross inaccuracy and conclusion within the Foothill Boulevard Warehouse Traffic analysis is reason enough to have an EIR. The addition of 1,104 Van Stalls and associated traffic within the target area reveal "No Project Impact". In its simplest form, that conclusion is an insult to the intelligence and common sense of the residents of this City. Other sub-par data reporting and collection process results were also identified during Public meetings.

The proposed site, is in fact, zoned Commercial/Industrial Mixed-Use (C/I-MU) and is listed as such in the General Plan.

Bridge Point Development has been described as a "warehouse" (Traffic Impact Analysis, November 2019) or, a "warehouse/parcel delivery service building" (Draft Mitigated Negative Declaration)

Title 17.51 (Definitions) of the Upland Municipal Code defines "Warehousing" as follows:

*"Warehousing means the provision of facilities used primarily for the storage of commercial goods, including documents. "Warehousing" does not include mini-storage"*

However, the proposed facility is not, nor has it ever been presented by Bridge Development or the City of Upland as a "Warehouse" It is in fact a "Distribution" or "Logistics" Facility. The intended 1,104 proposed and van parking stalls and 337 automobile parking stalls is testament alone to this fact. I-154 cont.

Even if ultimately identified as a ***"parcel delivery service building"***, the proposed Bridge Point Upland Project does not fall under the current definitions within Title 17 of the Municipal Code, or the current Zoning definition of the property under C/I-MU, and subsequently doesn't meet the definition of the **General Plan Focus Areas** description or vision of Foothill Boulevard. It reads in part:

*"Foothill Boulevard, part of Historic Route 66, has always been the most important east-west corridor in Upland. It plays a key role in establishing the identity and economic vitality of Upland. It features a vibrant mix of uses, providing amenities for the citizens of Upland, as well example of the automobile, pedestrian and bicycle-friendly environment that Upland is fostering through the General Plan..."* (City of Upland General Plan Page FA-1)

This proposed project has 3-entry/egress routes onto Foothill Blvd, will have a Foothill Blvd address and subsequently, should meet the standards within the General Plan for this historic location.

Please, do the right thing, update our Municipal Code to 2020 Standards and applicable issue related to our City. Please, if you wish to move forward with this project regardless of Citizen input, do the right thing and mandate an Environmental Impact Report.

Sincerely,

(1)

Name Greg R Bradley

Signature Greg R Bradley

Address [redacted]

Email [redacted]

(2)

Name Steven C. Leyerly

Signature Steven C. Leyerly

Address [redacted]

Email [redacted]

Note: I-155 is one page of a petition signed by 748 individuals.

## ...ail BRIDGE

**Bridge Development Partners is proposing to transform the vacant 50-acre site at the corner of Foothill Boulevard and Central Avenue, adjacent to Cable Airport. Replacing the crushing operations currently on-site, Bridge Point Upland will construct a state-of-the-art warehouse and beautify the property with more than 1,000 new trees and 11 acres of landscaping.**

We, the undersigned, support the Bridge Development plan to develop a state-of-the-art warehouse at Foothill Blvd and Central Avenue. The proposed project will modernize a century-old site with a state-of-the-art facility, beautify the property with 11 acres of lush landscaping and more than 1,000 new trees, and create hundreds of jobs. Beyond the multi-million-dollar investment in the project site, Bridge Point Upland will provide $6.3 million in community benefits and fees to the City of Upland for use at local schools, parks, road maintenance, to suppprt our police department and local businesses. We urge the City Council to approve the project.

I-155

| | Name | Address | City & Zip Code | Telephone | Email |
|---|---|---|---|---|---|
| 1 | Rodrigo Gutierrez | [redacted] | | | |
| 2 | [illegible] | [redacted] | | | |
| 3 | [illegible] | [redacted] | | | |
| 4 | Cody Moore | [redacted] | | | |
| 5 | Jose Lopez | [redacted] | | | |